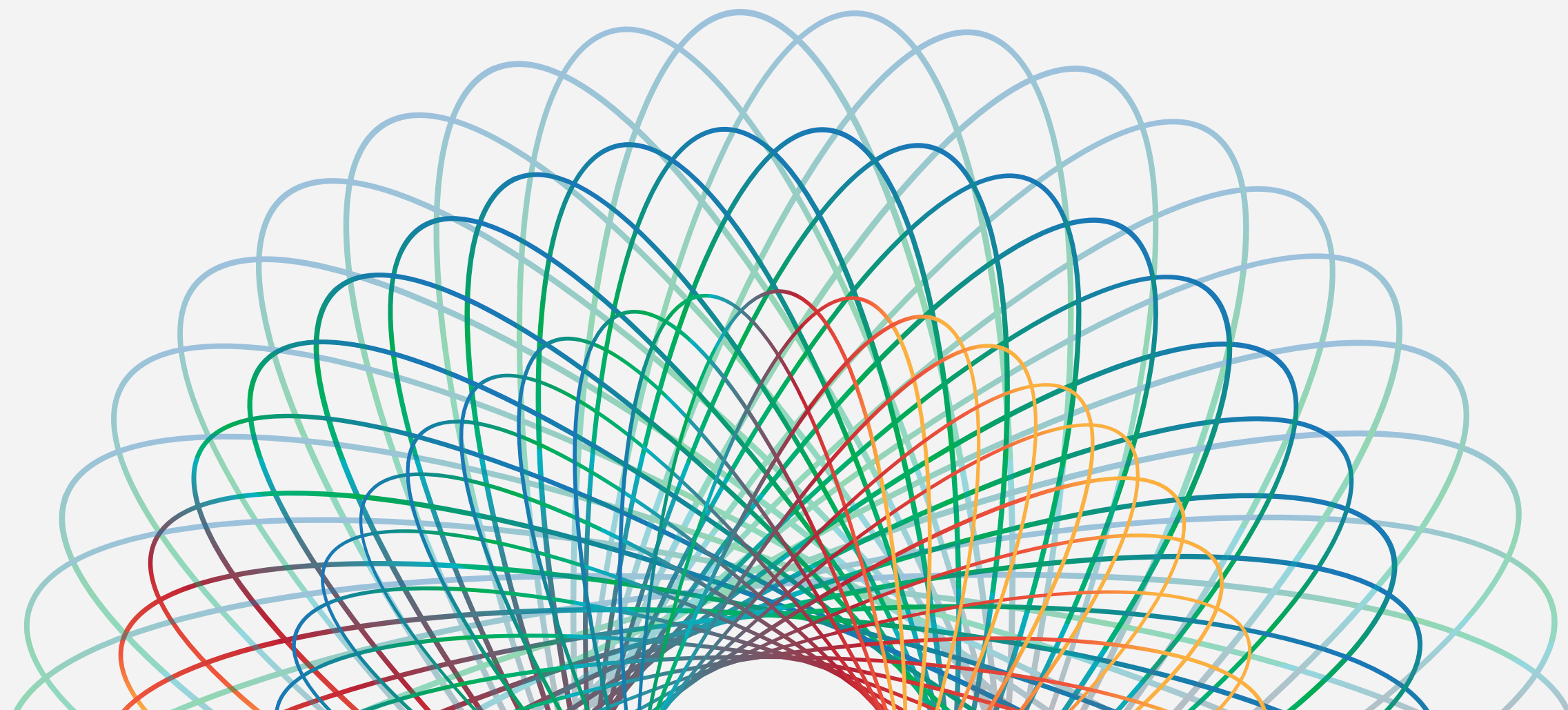




OCS Group Australia Pty Ltd

ABN 24 100 515 106

Modern Slavery Statement 2025



Doing business in the right way →

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Principal Governing Body Approval of this Statement

In accordance with the requirements of the Modern Slavery Act 2018 ("the Act"), this Modern Slavery Statement: was approved by the Board of OCS Group Australia Pty Ltd in its capacity as the principal governing body on 30 June 2026.

This Statement was reviewed, confirmed as accurate and signed by Gareth Marriott, Managing Director of OCS Group Australia Pty Ltd, and a duly authorised person under the Act on 30 June 2026.

Section 16(1) Reporting Criteria

- a) Identify the reporting entity
- b) describe the structure, operations and supply chains of the reporting entity
- c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls
- d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes
- e) describe how the reporting entity assesses the effectiveness of such actions
- f) describe the process of consultation with:
 - i) any entities that the reporting entity owns or controls; and
- b) include any other information that the reporting entity, or the entity giving the statement, considers relevant

Primary description in Statement Part

The Reporting Entity – Structure, Operations & Supply Chains

The Reporting Entity – Structure, Operations & Supply Chains

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How OCS Australia addresses potential risks

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Message from Gareth Marriott, Managing Director

During 2025, OCS Australia continued to strengthen its approach to identifying and managing modern slavery risk across its operations and supply chain.

Key actions during the reporting period included enhanced supplier due diligence, implementation of contractor risk profiling, audits of labour providers, targeted supplier engagement, and the integration of additional modern slavery controls into onboarding and procurement processes.

We also continued to work closely with Fair Supply and our internal Modern Slavery Working Group to improve risk assessment, governance, training and supplier engagement activities. These actions build on the foundations established in previous reporting periods and support a more targeted, risk-based approach to managing modern slavery risk.

This Statement outlines the actions undertaken during 2025, the outcomes achieved, and our priorities for continued improvement.



Gareth Marriott
OCS Managing Director, Australia and New Zealand



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This is the third Modern Slavery Statement that OCS Group Australia Pty Ltd (ABN 24 100 515 106, "OCS Australia", "we" and "our") has submitted under the Modern Slavery Act 2018 (Cth). It covers the 2025 calendar year reporting period.

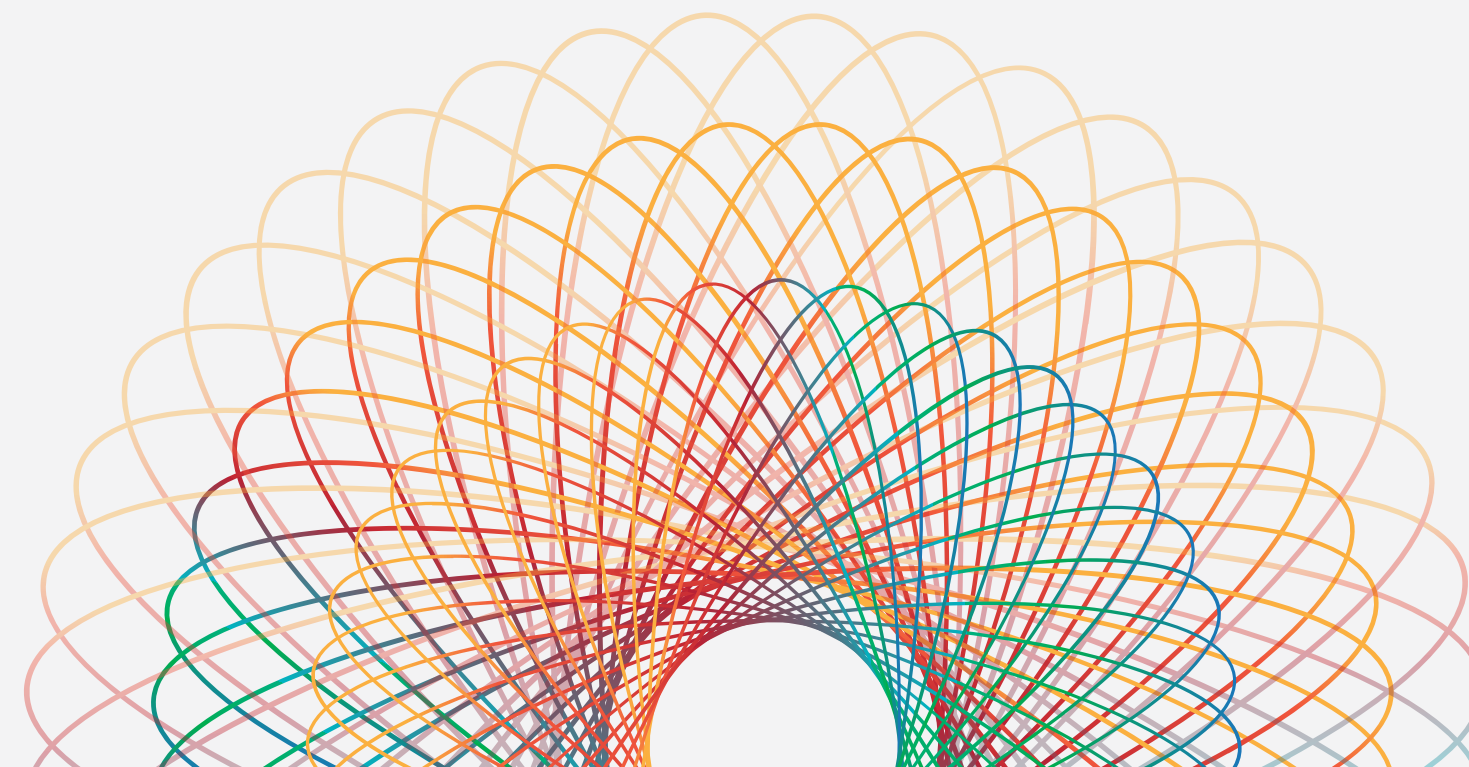
OCS Australia is a wholly owned subsidiary within the global OCS Group structure. Details of the global Group of companies are set out in Appendix 1. OCS Australia's modern slavery response aligns with the broader framework of the global group of companies. The OCS Australia team contributes to the development and application of OCS Group-wide standards.

OCS Australia is the parent company of a consolidated group of Australian businesses that are leading providers of facilities management and property services across Australia.

OCS Building Maintenance Pty Ltd, a 100% subsidiary, trades under the Midcity Group (Midcity) brand, which specialises in insurance building repairs and commercial construction across multiple Australian states. OCS Services Pty Ltd is the facilities management operation and is also a 100% subsidiary. There are two dormant 100% subsidiaries, Integrated Premises Services Pty Ltd and IPS Cleaning Australia Pty Ltd, which in the reporting period entered members voluntary liquidation and was completed in April 2026.

This Statement describes the operations and supply chain of OCS Australia and the entities it owns or controls. All relevant subsidiaries and business divisions were consulted during the preparation of this Statement. This included participation in the OCS Australia Modern Slavery Working Group and formal consultation with legal, risk, procurement and HR functions across both OCS and Midcity. All entities included in this Statement are subject to the described risk management processes, modern slavery policies and supplier engagement measures.

Our principal governing body is the OCS Australia Board of Directors. The Board is supported by our executive leadership team, which oversees key functions including operations, procurement, risk, finance and human resources.



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OCS Services - what we do

OCS Services continues to deliver essential facilities services tailored to the needs of public and private sector customers, as described in our previous Statements. Our core service offerings continue to include:



Commercial and specialist cleaning



Facilities management



Hygiene services



Grounds maintenance



Pest control



Waste management



We are certified under multiple ISO standards, including ISO 9001 (Quality), ISO 14001 (Environmental Management), ISO 45001 (Occupational Health & Safety), and ISO 27001 (Information Security), and hold Toitū Net Carbon Zero certification. A regulated management system with a strong focus on safety, quality, and environmental impact underpins our service delivery. Risk management is embedded in our management system, and our approach to Modern Slavery risks follows these principles. Our certifications help to guide us in adopting sustainable and ethical practices underpinned by our global governance structure.



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Midcity – what we do

OCS Building Maintenance, trading as Midcity Group, specialises in insurance-related and commercial building works. With over 35 years of operational history, Midcity provides services across:

- Residential, commercial and industrial building repair
- Insurance repairs and reinstatement works
- Project management for major building events
- Emergency make-safe services.

Midcity operates across Western Australia, New South Wales, Victoria, and Queensland, with a trusted contractor network of qualified tradespeople. The business serves major insurers, loss adjusters and commercial property customers, and is subject to the same governance, risk and compliance processes as OCS Australia and holds the same certifications.

Operating Locations

OCS Australia operates nationally with a network covering:



These locations support the delivery of services to over 200 customer sites across the country, with teams embedded in customer operations across urban, regional and remote areas

Our Team

OCS Australia’s total workforce across the reporting period was approximately 600 colleagues. This directly employed team comprises 242 full-time (40%), 242 part-time (40%), and 116 casual (20%) roles.

The bulk of our team (550) works in the Facilities Services division (OCS Services). As our operational delivery team, this group comprises frontline cleaners, supervisors, contract managers, and customer service managers, including two waste coordinators, with our senior management team totalling five.

During 2025, our Midcity team grew by 17%. This is primarily due to growth in our Queensland-based business, which was established in the second quarter of 2024. At the end of the reporting period, this division comprised 10 Senior Managers, 41 operational staff members and 26 customer and operational support staff.

Our support teams, including payroll, human resources, health and safety, IT, and business development (14 combined), provide functional support across our operations.

We operate a shared Australia and New Zealand finance function, which is based in Auckland, New Zealand.

We service our broad customer base (comprising private and government clients) through a combination of directly employed staff and subcontractor arrangements in partnership with our trusted trade base.

Key Supply Chain Characteristics

Our support, back office, and operating offices are shared across both the Midcity and OCS Services business units. This means that service providers such as legal advisors, telecommunications providers, landlords, and recruitment services are common to both business units.

Other aspects of the individual supply chains of Midcity and OCS Services are more distinct, reflecting differences in the core service offerings of each business.

A defining feature of Midcity’s operations is the provision of repair and commercial building services by a specialised contracted trades base, overseen and supervised by our qualified supervisors and construction managers in each state. In contrast, the work completed for our customers in relation to domestic insurance claims is high-volume, low-value, which requires the business to employ a large number of tradespeople (contractors) to ensure we can deliver services within our customers’ KPIs.

Larger rectification and commercial building services work often requires a different set of trades with the expertise to deliver on these larger jobs, although some trades do work across both types of work. While Midcity purchases some building supplies directly, the trades base also provides supplies and labour to complete jobs. This business model means that Midcity requires a large trade base to deliver services to our clients.

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The total number of suppliers engaged through the Midcity business increased in the previous reporting period to 750 (676 in 2024). This is attributable to business growth in Queensland and increased job numbers across the operations. Most of our suppliers are from our trade base supporting us to deliver services to our customers and clients, including building works, rectifications, asbestos removal, arborists, HVAC, electrical, plumbing, and the supply of related building products (approx. 98% of the total supplier spend). The spend for our trade base accounts for the largest expense to the business (70%).

OCS Services operates in a labour-intensive service sector. Customer services are provided predominantly via a direct labour model. As is almost universal industry practice, we also provide services using sub-contracted labour for some general cleaning services, or when specialist services are required, such as high-level window cleaning. People costs (wages, on-costs and contractors) accounted for the majority (approximately 85%) of our business costs. Payment of employee wages and related on costs represented approximately 68% of our total annual expenditure for the reporting period.

In 2025, the OCS Services business engaged with 70 suppliers, including our partnership with nine (9) Australian labour providers for cleaning services, which represented the majority (65%) of our total supplier spend.

The following is a further total spend proportion breakdown for the reporting period:

- specialist services such as periodical services, hygiene, pest, window cleaning, waste, gardening services and HVAC - 7.5%
- cleaning consumables and supplies - 14%
- general expenses for day-to-day operation, ranging from legal services, uniforms, travel and accommodation, utilities, and vehicle leasing – 13.5%

Shared supplier engagement between Midcity and OCS Services involved 11 significant suppliers, covering a range of common business needs, including office supplies, computer and software services, recruitment, accreditation bodies, insurance and telecommunications, builders' cleans and waste removal, and motor vehicle leasing.

Apart from one US supplier (software provider), our direct supplier engagement in the reporting period was with Australian companies.



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How OCS Australia identifies and assesses potential modern slavery risks

Leading sources such as the Walk Free Foundation's Global Slavery Index (GSI) continue to rank Australia as low-risk (relative both to the rest of the world and the Asia-Pacific region) for overall incidences of modern slavery¹. However, it remains of pressing relevance for businesses such as ours that Australian sectors utilising migrant or low-skilled workers have been identified as industries with a higher risk of modern slavery.

In September 2025, the Australian Anti-Slavery Commissioner's speech to the Australian Industry Group identified migrant workers on temporary visas, such as international students and backpackers, as one of the groups most at risk of exploitation. Sub-contracting arrangements, including the incorrect engagement of workers on ABNs, were also identified as a risk driver across high-risk sectors.

Sub-contracting arrangements are virtually universal within the Australian commercial cleaning sector, which poses a higher risk to the principal contractor who may be utilising a sub-contracting model to deliver services. In particular, opaque arrangements of second and third-tier contracting may force workers to enter into contracts as independent contractors, rather than securing the appropriate protections and rights afforded to employees (sham contracting).

In relation to identifying general supply chain risk, products imported into Australia from countries with higher modern slavery incidence means that forced labour may be occurring lower down in the supply chain. The GSI publishes the five highest-value at-risk imports in Australia. In reviewing our total supplier spend for the reporting period against the imported risk items noted for Australia, our procurement in these identified categories comprised 4% of total supplier spend, which relates to garments for team uniforms and textiles for flooring.

Supply chain risk assessment processes

One of OCS Australia's key focus areas for continuous improvement is using comprehensive and regularly updated risk assessment to inform our approach with supplier-specific due diligence and engagement (described below in the section on How OCS Australia Addresses Potential Risk). Our first review during the reporting period utilising supplier spend information for the period January to July 2025. The results of this allowed us to develop a shortlist of companies for direct engagement and supplier-specific due diligence. We followed up with a second assessment utilising supplier spend information for the full year, January to December 2025. The materiality level for the assessment was \$5,000.

¹ The Global Slavery Index (Walk Free Global Slavery Index) includes three main markers reflecting severity of slavery within that country. The first being, prevalence of slavery per 100,000 people (estimated number of people in modern slavery) and the second a vulnerability rating which rates how modern slavery could become more prevalent. Countries with better systems in place to prevent slavery will have a lower score. The third looks at how the government is working to end modern slavery, with a higher score meaning more government action. Australia rated 7 (out of 100) on vulnerability, 1.6 on prevalence and 67 (out of 100) on government response.

² Other business services include services which support businesses to operate on a day-to-day basis such as accounting, legal advice, provision of outsourced labour, market research, cleaning, waste management, advertising and consulting services.

We continue to assess the risk of forced labour in our supply chain via our longstanding partnership with external consultants (Fair Supply), including utilising proprietary software to trace the economic inputs required to produce products and services, down to the tenth tier of our supply chain.

624 of our direct suppliers were assessed, with 534 receiving a low-risk rating, 38 a moderate-low rating, and 2 a moderate rating. The moderate risk is associated with two tarpaulin suppliers whose spend made up less than 0.5% of total spend in 2025.

Overall, notable sectors within our full supply chain that are consistently flagged in the risk assessment results on a year-on-year basis include Australian construction work, textiles, and other business services².

All but two of our 38 moderate-low risk suppliers, are within our Midcity operations, carrying risks classified across the following sectors: products of forestry, logging & related services (arborists and tree services), textiles (flooring, shade material), furniture and other manufactured goods (cabinet makers), fabricated metal products (window coverings such as shutters and fabricated metal building products) and glass and glass products (windows and glazing). The remaining two related to OCS Services and classified as paper and paper products, office machinery (stationery and computer provider) and machinery & equipment (cleaning equipment supplier).

New contractor risk profiling and direct engagement on risk mitigation measures

A new assessment measure we implemented this reporting period was a profiling process for new contractors during onboarding. This involves the contractor being subject to our external consultant's comprehensive risk assessment process.

Where the analysis determines the risk rating is low, no further action is required. Where the analysis determines the risk rating is moderate-low, we directly engage with the contractor seeking disclosure of targeted information to inform us of the nature and extent of its inherent modern slavery risks and implement mitigation measures. Where the returned risk rating is moderate or higher, the contractor engagement is escalated to the Managing Director or the Company Secretary for further review.

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All of the labour hire contractors that OCS Australia works with receive a labour-specific Self-Assessment Questionnaire regardless of risk rating.

During the reporting period, OCS Services implemented a new contractor onboarding and prequalification software. The pre-qualification checks include 10 questions pertaining to modern slavery, relating to policies and processes, identifying risk, training, grievance and remediation and the employment of employees from overseas. This captures our new contractors and current contractors who are due for reassessment (annually).

Midcity also utilises contractor onboarding and prequalification software, Rapid Global, and has added modern slavery questions to its process.

Our aim for this reporting period was to include our general suppliers in the profiling process above for new suppliers. This was not achieved during the reporting period but will be implemented in the next reporting period. The delay is due to the requirement to add this to our new automated onboarding system for suppliers, Esker, which we have been rolling out.

Continuous monitoring of potential operational risk areas

As we have done since we began reporting under the Act, OCS Australia frankly recognises that, particularly in our OCS Services business operations, there is a heightened risk to our directly employed colleagues; hence, appropriate controls need to be implemented, monitored, and improved to mitigate this risk.

Key risk drivers include a high proportion of employees with potential vulnerabilities due to visa-related work restrictions, many of whom are student visa holders. Our general workforce is relatively low-skilled, with many having English as a second language. Other recognised factors that may also increase potential vulnerability include the dispersed nature of the workforce across customer sites, with frontline employees rarely visiting an OCS office, and operating in an inherently low margin industry, which can create pressure to meet budgets.



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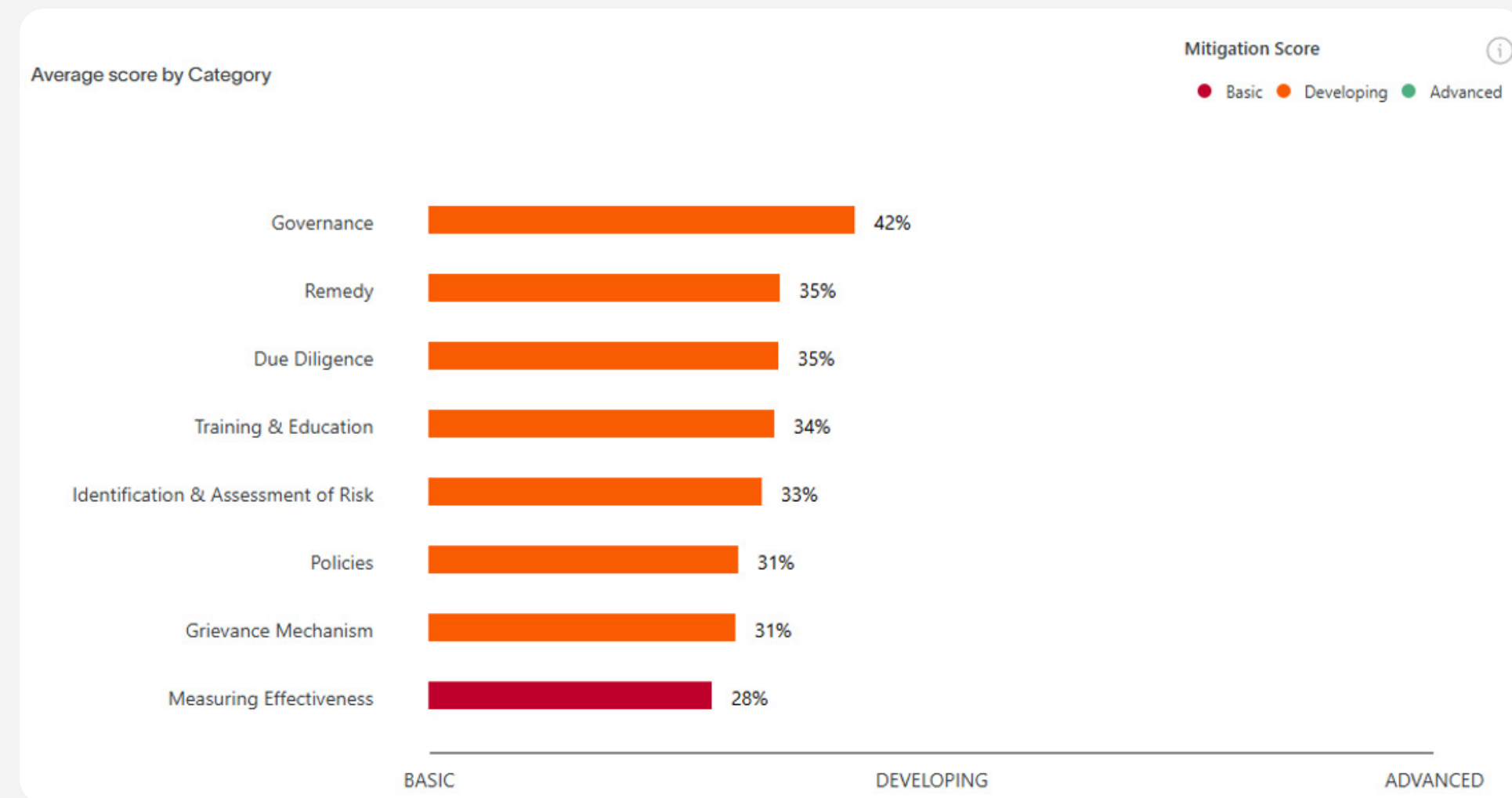
OCS Australia did not receive any reports, complaints, or otherwise become aware of any actual or suspected incidences of modern slavery in its supply chains or operations during the reporting period.

Direct and targeted supplier engagement and due diligence

Applying the results of our comprehensive risk assessment, we focused on the top 50 suppliers, which accounted for 45.9% of the risk, utilising the measure, share of estimated people in forced labour. Based on the previous year's low return rates, we focused on maintaining ongoing communication with identified suppliers and following up on returns. As a result, we achieved a return rate of 75% for full completion of our direct supplier engagement process, which concluded in November 2025.

The majority of participant suppliers in this direct engagement initiative were Midcity trade providers, who tend to be small businesses and, as such, may be relatively constrained in resources to implement extensive measures. Many of these companies are also not reporting entities under the Act.

The average score from the direct supplier engagement process was 34%, with a range of 93% to 4%. The table below shows the average score by category from this assessment. The mitigation score is rated as follows: Basic 0% - 30%, Developing 31% - 70% and Advanced 71% - 100%.



The following is a snapshot of some key insights from our risk-led approach to targeted direct supplier engagement:

- Suppliers are increasingly affirming an overall awareness of modern slavery risk through various staffing roles, from executive leadership down to entry-level positions.
- There is significant scope for suppliers to:
 - Develop specific policy and governance frameworks to respond to modern slavery issues, with 47% of respondents having no formal policies that expressly address modern slavery
 - Undertake formal modern slavery risk assessments on supply chains and overall operations, with the prevailing approach for those companies performing risk assessments being not to go beyond first-tier (direct) suppliers
 - Implement employee training to specifically address modern slavery, with only one-third of respondents currently doing so
 - Define approaches for how the effectiveness of anti-slavery actions are measured, with annual key performance indicators used by 13% of respondents and 16% describing a general reliance on internal governance framework.
- The capacity for stakeholders to report modern slavery-related concerns via implemented grievance mechanisms is reported for just under half (41%) of respondents, with less than one-third (28%) confirming the presence of formal remediation mechanisms.

Audit of Key OCS Australia Labour Contractors

Given that the use of external contractors for labour is a significant potential risk area for our overall business, we undertook an audit of our six key contractors providing cleaning services labour to OCS Services. Key disclosures obtained from the audit process include:

- Calculation of wages paid against award entitlement
- Verification of wages actually paid
- Verification of superannuation payments
- Proof of rights to work in Australia.

The audit identified some discrepancies in the interpretation of award penalty rates, although we did not consider this, in context, to be a red flag for modern slavery practices. We also believe there is clear scope to partner with these companies to improve the quality of information provided in future audits.

All labour-related contractors are also subject to a Fair Supply's Analyst tool, which is another potential source of detailed supplier-specific insights about the proposed labour contractor that we receive prior to engagement.

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Our Valued External Partnerships

As described in detail in previous Statements, we work in close partnership with external consultants (Fair Supply) to assist with various aspects of developing, implementing and continuously improving our overall anti-slavery response. At the beginning of each reporting period, we develop an action plan in consultation with Fair Supply and our Modern Slavery Working Group. Monthly meetings with Fair Supply's project manager and OCS Modern Slavery Lead ensure the plans are on target and any issues flagged.

Fair Supply's CEO also sits on our internal Modern Slavery Working Group, as a subject matter expert guiding our actions and helping us embed the UN Guiding Principles on Business and Human Rights across the business.

Our UK-based parent entity has a close partnership and works in collaboration with Slave Free Alliance who provides advice and guidance in ensuring their compliance with the UK Modern Slavery Act. Part of this is the OCS Global Modern Slavery Committee, which has representatives from each region. This means the sharing of information and good practice across all global OCS entities.

The OCS ANZ Managing Director continues to contribute to broader industry efforts to strengthen responses to modern slavery. During the reporting period, he continued his role as New Zealand's Business Leader to the Bali Process Government and Business Forum through the Walk Free Foundation. In this capacity, he has contributed to discussions supporting the development of proposed modern slavery legislation in Aotearoa New Zealand, including initiatives to strengthen supplier due diligence, improve business engagement in high-risk sectors, and promote practical approaches to identifying and addressing modern slavery risks.

Governance and Policy Framework

Our Modern Slavery Working Group

OCS Australia's Modern Slavery Working Group is responsible for monitoring and reviewing the performance of our modern slavery framework, as well as driving governance practices and ensuring risks are identified and appropriately mitigated. In the event of any reported incident, the Group has primary responsibility for effective grievance handling and is responsible for ensuring that there is tracking of the forward-looking actions outlined in our Modern Slavery Statement.

The Working Group's membership has remained stable across reporting periods and includes our Managing Director, Finance Director, Company Secretary, General Manager of Midcity Group, Country Manager of OCS Services and external consultant representative (CEO of Fair Supply).

Comprehensive Policy Framework

OCS Group has a Group Code of Conduct that outlines the guidelines and standards for how colleagues should conduct themselves in their daily business activities, across all countries and in all aspects of their work. This Code includes a commitment to providing the necessary safeguards, ensuring that no colleague's human rights are compromised.

Through the Code and our policies, OCS aims to:

- Prohibit child labour, forced labour and human trafficking
- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws
- Provide humane and safe working conditions, including safe, clean, and sanitary housing conditions
- Require our customers, suppliers, and other business partners to adopt similar standards regarding human rights

In addition to this global policy framework, OCS Australia has also implemented a comprehensive policy suite that includes:

- OCS ANZ Modern Slavery Policy
- OCS AU Australia Human Rights Policy
- OCS ANZ Grievance Policy and Procedure
- OCS ANZ Human Rights Grievance Procedure (new for 2025 – see below)
- OCS ANZ Employee Relations Policy
- OCS ANZ Whistle Blowing Policy and Procedure
- OCS ANZ Supplier Sustainability Code of Conduct
- OCS AU Young Workers and Students Policy
- OCS AU Recruitment Procedure for Operatives
- OCS AU Recruitment Procedure for Salaried Staff.

As part of our standard onboarding process, all contractors and suppliers receive, and are required to agree to the terms of, the OCS ANZ Supplier Code of Conduct. This includes a clear commitment to preventing modern slavery and human trafficking. In last year's Statement, we described our updated Code of Conduct, which includes improved transparency and information sharing, and a commitment to collaboration and joint efforts to identify and close compliance gaps relating to modern slavery. During the reporting period, we reviewed all current contractors and suppliers, assessing if they had committed to our new Code of Conduct. We followed up all active contractors and suppliers who had not returned an updated Code of Conduct and at the end of the reporting period 86% of our active suppliers and contractors are signed on to the updated Code of Conduct.



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All new contractors onboarded in the reporting period have committed to the updated Code of Conduct. In 2025, we also set up an automated onboarding process for suppliers through Esker and the signing of the updated Code of Conduct has been added to the workflow of this process.

Contractors cannot be on boarded unless they sign an agreement to the Code. Any suppliers indicating they cannot sign the code of conduct are referred to the Company Secretary. This is rare but may occur with larger companies who have their own codes in place. These are checked to ensure their commitments substantially align with OCS.

Operational Risk Mitigation

Clear recruitment practices and worker protections

We recognise that strong employment practices are central to reducing the risk of modern slavery in our operations.

Our directly employed colleagues are recruited through a structured and transparent process led and controlled by our Human Resources team. All candidates must provide documentation confirming their legal right to work in Australia.

At recruitment, Visa conditions are checked through the Australian Government system (VEVO) to verify right to work in Australia and any conditions placed on the visa. This information is then entered into the payroll system and expiry dates noted.



Once employed, expiry is monitored by the payroll team through specific payroll reports as well as via our business intelligence reporting system Microsoft Power Bi which flags approaching visa expiration. The payroll team works actively with our colleagues who are visa holders to ensure ongoing currency.

OCS Australia does not recruit foreign workers through labour hire companies. All employees must be living in Australia with right to work in Australia.

Onboarding includes confirmation of individual bank account details, with all wages paid via electronic transfer.

Employment Terms and Wage Integrity

As a further improvement for wage integrity during the reporting period, we introduced automated site clocking for our frontline team in OCS Services. Our time and attendance system calculates wages automatically, and site managers review and approve payroll before it is processed.

All employees receive a written employment contract in line with the Fair Work Act and National Employment Standards. Employees are paid according to the relevant award or a common-law agreement where they are Award-Free.

Grievance and Reporting Mechanisms

An update for the reporting period was the introduction of our OCS ANZ Human Rights Grievance Procedure. Although our existing omnibus Grievance Policy and Procedure has always covered complaints relating to human rights or modern slavery concerns, we have implemented this additional framework to ensure our approach to specific modern slavery issues remains specifically tailored and fit-for-purpose.

- We provide multiple, accessible channels for employees to raise concerns, including about modern slavery
- A dedicated third-party Whistleblowing service, SafeCall, which enables anonymous reporting
- A confidential email address (MyVoice) that goes directly to our Head of HR in Australia
- Clearly displayed posters and guidance materials throughout worksites and in worker handbooks.

Our Whistleblower Policy explicitly lists modern slavery as reportable misconduct. These frameworks are regularly reviewed and form part of our broader risk and governance system.

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Internal and External Anti-Slavery Training and Awareness Initiatives

OCS Australia remains committed to increasing awareness and building capability, both within our workforce and externally through key supplier partnerships.

External Supplier Engagement and Capacity Building

In recognition of the importance of productive collaboration and capacity building with our key supply chain partners, during 2025 we engaged Fair Supply to deliver a specific labour hire modern slavery training session to our labour specific contractors in the OCS Services business. Following completion, a digital recording of the session and the session slide deck was distributed to these contractors so it could be shared more widely with their employees.

Again, in conjunction with Fair Supply, we also developed a specific construction-sector focused anti-slavery training deck, which was shared with all Midcity Contractors.

Both of these training decks included information regarding how to report through the OCS independent service Safecall (see grievance procedure description, above).

Internal actions

We continued to deliver anti-slavery training to key employee groups as well as some standard training via our annual toolbox talks and induction process. The following is a snapshot of key actions:

- Procurement team members and those responsible for supplier and contractor onboarding were trained in use of the Fair Supply profiling software for new contractors and suppliers.
- Code of Conduct training during induction for new employees.
- Whistleblower Policy and Procedure covered during induction and through an annual toolbox talk.
- Modern Slavery Training was added to the induction for all new employees.
- A Modern Slavery Toolbox talk was rolled out to front line staff, but completion rates were poor. This will be a focus in the next reporting period.
- Safetrac e-learning module on whistleblowing was completed by managers, supervisors, support, and administrative employees.
- A new online modern slavery module, developed by the OCS Group Modern Slavery Working Group and the Slave Free Alliance, was rolled out via the OCS Academy for all managers, supervisors, support and administration staff. Some technical issues with the platform resulted in a completion rate of 65%.
- Posters developed in partnership with the Slave Free Alliance rolled out to sites and offices.

Looking forward, the software supporting the OCS Academy is being retired and replaced with regional solutions and as such in the next reporting period we will be undertaking modern slavery training for our managers, supervisors, support and administration via the Safetrac e-learning platform.

Enforceable and Updated Supplier Contract Provisions

Our standard contractor agreements include a clause that expressly addresses issues relating to modern slavery risks and mitigation. Our standard clause was updated in the last reporting period following a process of external consultation.

All new contractors are required to sign this updated agreement, and it forms part of our onboarding process.

For OCS Services contractors are assessed annually and are required to re-register through the onboarding platform. With the roll out of our new platform, all current contractors will be captured and signed up to the updated agreement. By the end of the next reporting period, we expect all contractors to have signed the updated agreement.



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How OCS Australia Measures the Effectiveness of Our Modern Slavery Response

We continue to develop and improve our processes and procedures to identify and address the modern slavery risk in our business operations, understanding that this is a long-term journey which we are committed to continue to build upon. Our partnership with Fair Supply provides us with specialised support and guidance through our journey as well as equipping us with some of the tools to undertake our risk assessment and monitoring and to also inform our effectiveness.

We set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward. On the next page is the table that shows the relevant actions we have accomplished as described in our previous statement and demonstrates how we are continually improving our response. Where relevant we measure via numerical means, such as employees trained, and number of questionnaires completed.



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Focus Area	How we assess our effectiveness	Key outcomes 2025
Governance & policy	<ul style="list-style-type: none"> Regular review of policies and procedures Implement new or amended policies and undertake training Modern Slavery Working Group in place and meets according to schedule Global initiatives from OCS Group Modern Slavery Committee rolled out Work with external advisors 	<ul style="list-style-type: none"> Implemented clocking for all employees at OCS Services sites Developed new process for supplier onboarding to enhance risk assessment at engagement Modern Slavery Working Group meetings took place in line with schedule No new global initiatives from OCS Group External advisors – undertook monthly meetings and action plan tracking
Supplier engagement	<ul style="list-style-type: none"> Supplier Code of Conduct Contractor Agreements with Modern Slavery clause Contractor onboarding compliance Supplier on-boarding compliance 	<ul style="list-style-type: none"> Updated Supplier Code of Conduct signed by 86% of current contractors and suppliers. New contractors signed Contractor Agreement Updated contractor on-boarding process including modern slavery question New process in place and implemented to profile contractors at engagement through Fair Supply software New process in place to profile suppliers at engagement through Fair Supply software (implementation 2026) Target to reduce labour related supplier spend and number by 30% was achieved
Risk assessment	<ul style="list-style-type: none"> Annual assessment of suppliers through Fair Supply software 	<ul style="list-style-type: none"> Two separate assessments completed for all suppliers with spend in 2025 (Jan- Jul and Jan – Dec)
Due diligence	<ul style="list-style-type: none"> Targeted self-assessment questionnaire (SAQ's) to higher risk suppliers Audit of labour-related contractors (OCS Services) Labour hire specific self-assessment questionnaires to labour-related contractors (OCS Services) 	<ul style="list-style-type: none"> Issued SAQ's to top 50 suppliers by share of estimated people in forced labour which accounted for 49.5% of risk – Completion rate 75% Audit of labour related contractors completed, and report provided to senior management SAQ's completed for labour related contractors (one incomplete)
Training & awareness	<ul style="list-style-type: none"> Effectiveness is measured through engagement and completion of training 	<ul style="list-style-type: none"> Modern slavery toolbox talk rolled out to frontline staff – 23% completion rate OCS Academy online Modern Slavery training rolled out to managers, supervisors, support and administration staff – 65% completion rate Modern Slavery awareness posters rolled out to all sites and offices Modern Slavery training added to new employee induction Safetrac Whistleblower training completed by managers, administration and support staff Whistleblower toolbox talk delivered to frontline colleagues Labour hire specific training delivered via Teams to labour specific contractors by Fair Supply Labour specific contractors provided with recording of training session and slide deck Construction specific modern slavery training deck supplied to all Midcity contractors
Grievance & remediation	<ul style="list-style-type: none"> Grievance mechanism in place Mechanisms communicated Monitor reporting and trends 	<ul style="list-style-type: none"> Grievance Policy and procedure in place Whistleblower programme in place Communication through posters, induction, toolbox talks, handbook Human right grievance procedure developed and rolled out, including publishing on our website.

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OCS Australia plans to continue to consolidate and improve our developing anti-slavery framework throughout 2026 and beyond. The following table provides a snapshot of planned ongoing focus areas as at the time of finalising this Statement:

Focus Area	How we assess our effectiveness
Governance & policy	<ul style="list-style-type: none"> • Continue partnership with Fair Supply • Modern Slavery Working Group monitoring progress • Implement clocking for all labour contractors (OCS Services) • Review and update policies and procedures as required • Implement global initiatives from the OCS Group Modern Slavery Steering Committee • Incorporate modern slavery risk into the Company risk register to be reported to the executive and board
Supplier engagement	<ul style="list-style-type: none"> • Continue to track the percentage of new contractors signing the contractor agreement (includes modern slavery provisions) • Monitor return of the Supplier Sustainability Code of Conduct for contractors and suppliers • Profile new suppliers at engagement stage through Fair Supply proprietary software and track progress • Reduce labour related supplier spend and number in OCS Services by 5% • Develop automated tracking mechanism for Fair Supply assessment and Code of Conduct in Esker for all suppliers • Maintain a record of any contract/supplier that are not subject to a modern slavery provision or has not returned the updated Supplier Sustainability Code of Conduct and develop a position on how to manage those suppliers for modern slavery risk
Risk assessment	<ul style="list-style-type: none"> • Suppliers utilised in 2026, assessed to tier 10, through Fair Supply proprietary software • Labour hire specific self-assessment questionnaires to labour related contractors (cleaning)
Due diligence	<ul style="list-style-type: none"> • Issue SAQ's to highest risk suppliers, identified through Fair Supply proprietary risk assessment • Undertake supplier specific due diligence on identified suppliers from risk assessment (risk based) • Annual audit programme for labour-related contractors (OCS Services) • Engage with labour related contractor employees on site to assess labour practices (OCS Services) • Review supplier SAQ scores to gain an understanding on how we could support to improve scores where relevant
Training & awareness	<ul style="list-style-type: none"> • Safetrac Modern Slavery online training module rolled out to managers, support and administration colleagues • Improve completion rate of Modern Slavery toolbox talk delivered to frontline staff • Include Modern Slavery training at Midcity contractors' forums • Publish training completion
Grievance & remediation	<ul style="list-style-type: none"> • Roll out awareness programme to contractors of OCS modern slavery policies and procedures, including reporting mechanisms



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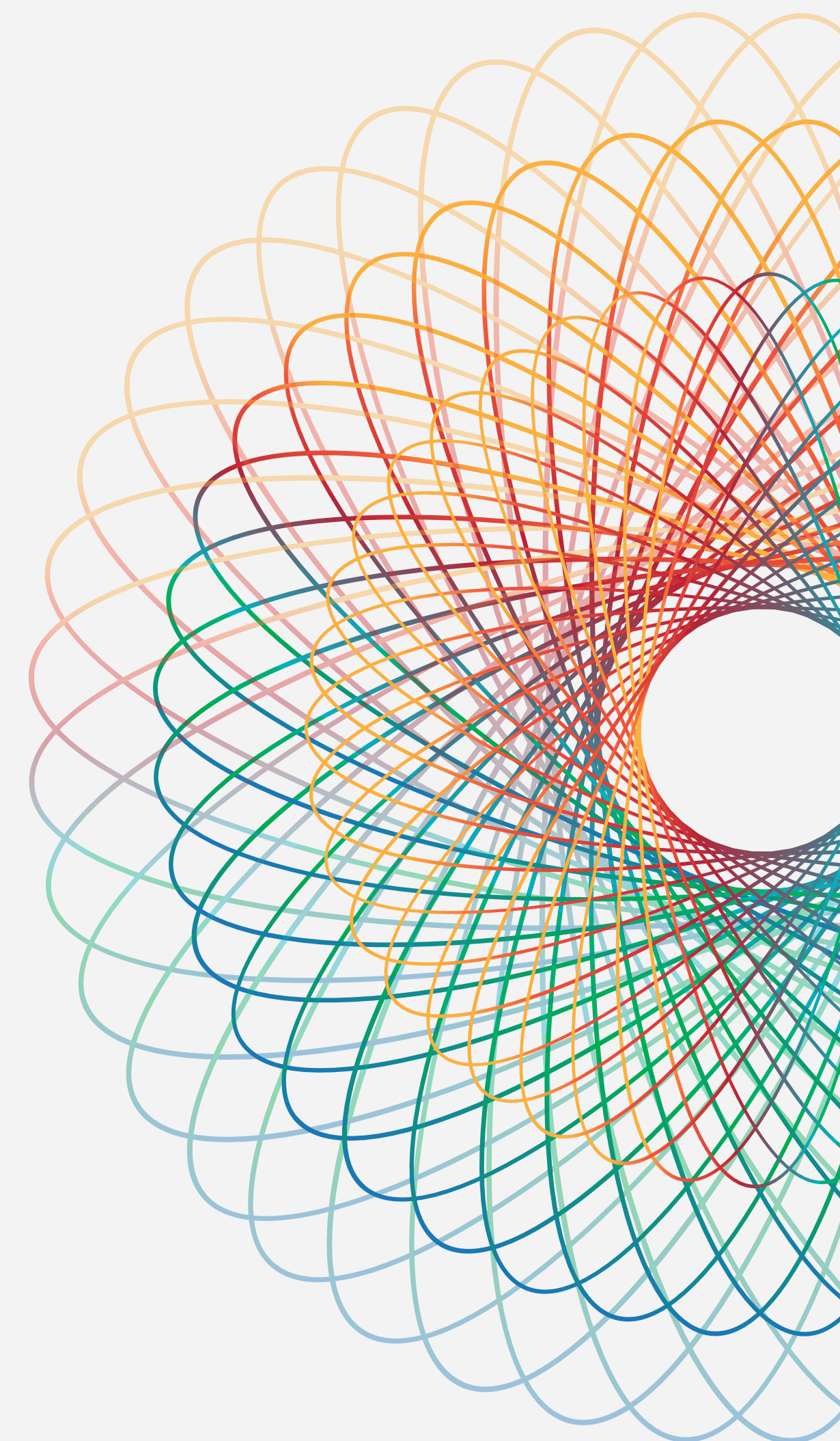
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Appendix One - OCS Group UK and OCS globally

OCS Australia is part of the broader OCS Group, which has its global headquarters in the United Kingdom. The UK parent company is a reporting entity under the United Kingdom's Modern Slavery Act 2015 and has implemented a Group-wide commitment to combat modern slavery. This includes setting minimum expectations for due diligence, policy implementation, and awareness training across all international operations.

The OCS Group of global companies is a leading international facilities management company with over 130,000 colleagues and 8,000 customers across the UK, Ireland, the Middle East, and the Asia Pacific. Founded in 1900 and family-owned for much of its history, OCS has built a reputation for delivering essential services across cleaning, security, catering, hard services, and integrated facilities management solutions.

OCS's global leadership is committed to international human rights frameworks and the UN Guiding Principles on Business and Human Rights, with a continued emphasis on transparency and ongoing improvement.





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