



# Modern Slavery Statement

Modern slavery is a growing concern globally. The data tells us that the numbers of people suffering from this terrible crime are increasing by 20% every 4 years which has seen published figures of 50 million people that are now held in modern slavery conditions worldwide.

2022 saw the fallout of the Covid pandemic and political unrest meaning mass human migration which allows criminals to manipulate peoples needs and fears and the result is that this crime only becomes more prevalent but further underground.

OCS are an ethical business with integrity and this runs through our entire organisation to our front line workers. Our approach to business is informed by our Values: Care, Safety, Trustworthy and Expert. These Values underpin the decisions we take, guide us to do the right thing, and they inform the approach OCS is taking to modern slavery. Our commitment is both clear and achievable – to eradicate modern slavery and human trafficking within both our business and our supply chains, within the UK and overseas.



This Statement sets out our progress in the last year and the structures built to enable OCS to achieve our goals. We commit to continue to evolve our processes to ensure we are doing everything we can to remove modern slavery from our world and to raise the exposure to this subject at every point because it is the right thing to do.

**Bob Taylor**  
CEO, OCS Group – UK, Ireland & Middle East  
June 2023

We remain committed to ensuring modern slavery becomes a thing of the past.



**About this Statement** - This Statement has been published in accordance with the Modern Slavery Act 2015. The Statement sets out the approach being taken by OCS Group Ltd (OCS) to prevent the risk of modern slavery and human trafficking in its businesses and across the supply chain.

# OCS Structure, Business and Supply Chains

**OCS is an international leader in facilities management, providing a full range of crucial services to more than 20,000 clients in the UK, Ireland, the Middle East, and Asia Pacific.**

OCS has supported businesses for over a century, from a small family-owned window cleaning service to a highly respected international business, providing multiple services in partnership with our clients across a range of sectors, from offices and hospitals to stadiums and shopping malls to manufacturing facilities, airports, data centres, and courtrooms.

Our 68,000-strong international team of cleaners, security guards, technicians, and service experts provide specialist and sustainable solutions that enhance the businesses of our clients every day.



To fulfill our obligations to our clients, we procure goods and services from a wide range of suppliers both in the complex mega space and SME's. We complete all necessary due diligence with our suppliers and ensure we continue to review processes in place to ensure that Modern Slavery is not occurring in any tier of our supply chain. In 2022, this including completing a deep dive into high risk areas such as Recruitment Agencies and Manned Guarding companies.

# Leadership and Governance

OCS continues its work in Anti Slavery headed by the Global Anti-Slavery Committee which is Board lead and includes business leaders from across OCS international territories, reporting into the Group Executive Leadership Team. The Committee works to the OCS Modern Slavery Action Plan, which was informed by the global gap analysis completed on OCS by the Slave Free Alliance and includes elements ranging from training to recruitment fees. The committee looks at current risks to the business and trends in the modern slavery landscape and works with the operational business to implement processes to remove the risk to our business and our stakeholders.



## Our partnership with the industry experts

The **Slave Free Alliance**, of which OCS are members, are an essential element in our Anti Slavery workstreams. The SFA sit on the Global Anti – Slavery Committee and they provide guidance and consultancy to direct our efforts. We also work together to design programmes which will increase the exposure and understanding of modern slavery across our business. The SFA supported the build of our Modern Slavery training which is mandatory for all employees.

OCS has also completed training with another industry expert organisation, Stronger Together and has completed the Fast Forward audit as an entire organisation.

OCS have been members of the Slave Free Alliance for more than three years and have set out our intention to continue this for the next three years. OCS works in partnership with the Slave Free Alliance on all elements of modern slavery risk, and the SFA sit on the Global Anti Slavery Committee and the Service and Infrastructure Project Providers Modern Slavery Council.

OCS has already shown great commitment to playing its part in creating Slave-Free supply chains and operations. The business is committed to improving protection for workers and reducing exploitation. We look forward to working together into 2022 and beyond.

**Gary Booth**

Slave Free Alliance

 **SLAVE-FREE ALLIANCE**  
Working Towards a Slave-free Supply Chain

## OCS policies on slavery, human trafficking and due diligence

OCS has worked to and abides with our Global Code of Conduct which is shared with all colleagues to ensure that our corporate standards are met at every level in our organisation. We expect our people to behave in the spirit of this code.

OCS Global Code of Conduct incorporates established policies, including:

- Anti-Bribery
- Casual Workers
- Equal Opportunities
- Ethical Trading
- Recruitment and Vetting
- Eligibility to Work
- Whistleblowing
- Working Time Regulations
- Procurement

# Procurement

Our supply chain is managed in a robust fashion, with industry leading processes to protect our organisation, our supply partners, our colleagues and our stakeholders from the impacts associated with Modern Slavery.

On an annual basis, the OCS Procurement team complete a risk assessment across a key set of parameters on every supplier in our portfolio, which in 2022 totalled 3772. In Modern Slavery, we do not do this at broad category level, but down to supplier level. The risk of Modern Slavery is not the same across categories which could be IT or food, so we review the exact service or product being procured and assess a supplier against this, this could mean a fruit supplier who is sourcing from European growers or IT hardware which has risk associated with the origin of its componentry.

When the risk assessment is complete, any supplier with a high or medium risk identified is then required to complete the Modern Slavery Assessment Tool, built in house with the expert guidance from the Slave Free Alliance.

This assessment creates a development plan for all suppliers which is then monitored on a regular basis in monthly and quarterly reviews with our Category Management team. Where specialist expertise is required, OCS have in house specialist Madeline Fitton, Senior Manager ESG, to support and also our partnership with the Slave Free Alliance, amongst the other organisations and NGO's with which we work, including Stronger Together.

We require our suppliers not to use any form of forced, bonded or involuntary labour, and to ensure that workers are not treated in a harsh or inhumane way – this is critical in ensuring we meet our commitments to reduce the risks and harms of modern slavery.



## The OCS approach to procurement

OCS requires that all suppliers agree to our Supply Chain Code of Conduct and Procurement Policy that state the expectation we have of any supplier wishing to work with OCS. Both incorporate a range of topics including bribery and modern slavery and they reflect the conventions of the United Nations International Labour Organisation and the Ethical Trading Initiative Base Code.

These include that our supply chain:

- a. Does not contain child labour, or labour which is forced.
- b. Provides safe working conditions for all workers employed.
- c. Ensures working environments are free from physical abuse (actual or threatened), verbal abuse, all forms of harassment including bullying and any other form of intimidation.
- d. Seeks to eliminate all forms of discrimination in access to employment, training and working conditions.
- e. Acknowledges workers have the right to form and join organisations of their own choosing.
- f. Operates without excessive hours, complies with relevant national laws and ensures overtime is only voluntary.
- g. Ensures pay and benefits meet all national standards.
- h. Provides written contracts to workers, detailing the terms and conditions of their employment in an understandable way.
- i. Our Global Anti - Slavery Committee continues to test and review all policies across the group relating to Procurement but also HR and Operations.

# Leadership in Facilities Management

OCS specialist, Madeline Fitton, Senior Manager ESG, both founded and co-chairs the only group which crosses the entire Facilities Management industry and also construction, infrastructure and IT, the **Service and Infrastructure Project Providers Modern Slavery Council**. This council now includes 20 member organisations and is supported by the Cabinet Office, Home Office, the Business Services Association and the Slave Free Alliance. Alcumus and Unseen have also recently joined the Council. This group is charged with one key objective, **to eradicate modern slavery from our markets and our supply chains**.



The first project to complete is a toolkit which provides guidance to any supplier in these industries, on what modern slavery looks like, where it will appear in your organisation, how to train on modern slavery risk down to the frontline and what to do when you find occurrences to ensure the safest route to safety for victims and those around them. This toolkit will be launched in 2023 and is a true collaboration between competing organisations to make a positive contribution to the anti slavery movement in the UK and globally.



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## Staff Training



In 2022, OCS introduced comprehensive mandatory modern slavery training for all colleagues. This provides tangible and real world scenarios to assist our operational teams to see the crime that is known as hidden in plain sight. We plan to share this training with our suppliers in 2023 to ensure they are supported to manage this risk in the same way that we do with our internal teams.

## Whistleblowing



We continue to provide a Whistleblowing process via our “Safecall” service, through which any of our colleagues, contractors, customers and members of the general public internationally can report concerns. Reports can be made in several languages and anonymously, alleviating any potential fear of reprisal. Reports can be made on a wide range of concerns that lie within the public interest, including suspicions of modern slavery. The mandatory Modern Slavery training completed in 2022, which will be refreshed on an annual basis, reinforces these processes and procedures.

## Into 2023

Looking forward to 2023, the OCS Modern Slavery strategy includes “fire drills” on sites. This would run a case study theoretical incident of a victim being found on site and how staff would deal with this situation. This allows OCS to review the processes which are in place and to continuously improve our frameworks.

In addition in 2023, we are looking to share MS training with our supply chains as mentioned, and also to begin ad hoc independent audits on our sites and in our supply chain, with an industry leading expert organisation.

OCS continue to challenge and lead in anti slavery and have robust structures in place to ensure that Modern Slavery is understood by our employees and our market. We will do everything we can to support our clients, our supply chains and our industry to remove this abhorrent crime in any way that we can.

**OCS Group Limited**

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