

# OCS Group Policy.

## Code of Conduct



## Contents

Page 3	A note from our Group CEO, Rob Legge
Page 4	Introduction
Page 5	Our vision, mission and values
Page 6	Respect, dignity and fair treatment
Page 7	Health and safety
Page 8	Environment and sustainability
Page 9	Compliance with laws
Page 10	Information security and protecting personal data
Page 11	Bribery and corruption
Page 12	Fraud prevention
Page 13	Whistleblowing (speaking up)
Page 14	Speaking on behalf of our company
Page 15	Protecting yourself
Page 16	Appendix 1 - How to contact Safecall

# Introduction

## A note from our Group CEO



As we follow our Vision and Mission **to become the best facilities services business in the world, making people and places the best they can be**, we want to achieve it by doing business in the right way. Our colleagues, customers, suppliers, and other stakeholders will also look to us to do business the “right way”.

Guided by our **TRUE Values (Trust, Respect, Unity and Empowerment)**, we are creating a workplace that inspires, motivates, and supports each of us. We also foster a culture built on solid principles that guide our actions and shape success for our customers and colleagues. We’re proud to be measured on what we do and how we do it.

We have developed this Code of Conduct (“Code”) to help guide us in “how” we should go about our business in the right way every day and in every part of the world. The Code refers to conduct which is required (ethical conduct) and also to prohibited actions and behaviours, and how we should behave towards one another, our customers, suppliers, and all stakeholders.

**By continuing to uphold our TRUE values and doing business the right way, our business will prosper, as we positively impact the lives of our colleagues, customers, and the communities we serve.**

Rob Legge, Group CEO

A handwritten signature in black ink, appearing to read 'Rob Legge'.

## Introduction

### Why do we have a Code?

Our Code sets out the guidelines and standards for how we should behave as we do our business – every day, wherever we are, and whatever we do.

### What about different country laws?

Our Code establishes our principles and guidance on common legal or ethical issues across our business. It's not meant to cover every law and policy that might apply to you. As a global group, our Code is the highest standard and will always apply even if it goes further than local country laws.

### Does our Code include all the policies I need to know?

Our Code and Group policies tell you what you need to know to do your job ethically. Our Code doesn't replace our detailed policies but clearly states our principles and the policy framework. As an OCS colleague, you're responsible for knowing and complying with the policies that apply specifically to your work and the individual decisions you make.

### How to use our Code

Our Code applies to us every day, wherever we are, whatever we do – including our Board of Directors and the Executive Committee. It guides every business decision we make.

*Each one of us is expected to embrace our Code's principles and:*

- Show respect
- Act with integrity
- Work ethically and responsibly
- Fulfil our commitments to our customers

### Breaches of our Code

We must all comply with our Code, policies, and the law.

Any violations of our Code, policies, laws, and regulations could lead to disciplinary action, including termination of employment and legal action.

## Our vision, mission and values

Our vision and mission is to become the best facilities services business globally, making people and places the best they can be. Our **TRUE Values, Trust, Respect, Unity** and **Empowerment** guide everything we do and everything that we don't do. Our OCS Values are us at our best and are the foundation for success.

The OCS culture is built on solid principles that guide our actions and shape success for our customers and colleagues, resulting in us being a trustworthy global business which respects the communities and environment in which we operate.

We celebrate those who place our Values at the heart of their everyday roles through our internal recognition schemes and on our external communication channels, recognising and inspiring our colleagues, customers and all those connected to the OCS world.

### Trust.

*Honesty, consistency and excellence.*

Built and maintained through transparency and communication.

*Trust involves honesty and reliability, creating a secure environment for open communication and teamwork, which is crucial for long-term success.*

### Respect.

*People, planet and purpose.*

The starting point and ongoing position for every interaction.

*Respect is treating everyone fairly, valuing contributions, and fostering an atmosphere where everyone can thrive personally and professionally.*

### Unity.

*Inclusive, diverse and together.*

One team working towards the betterment of each other.

*Unity means teamwork with a shared purpose, harnessing individual strengths for collective achievement, essential for reaching common goals.*

### Empowerment.

*Dynamic, driven and agile.*

Providing the tools and skills to do more, achieving great things together.

*Empowerment gives people the tools and confidence to succeed, encouraging initiative and greater investment in work and community.*

## Respect, dignity and fair treatment

Diversity and inclusion matter to us, so we insist on a fair work environment free from discrimination and harassment. This is our commitment to ensure that we have a work environment free from harassment and other offensive or disrespectful conduct.

**Harassment is unwelcome verbal, visual or physical behaviour that creates an intimidating, offensive or hostile work environment. Harassment may include:**

- Offensive language, gestures, nicknames, jokes, or banter
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behaviour
- Hostility towards others because of individual characteristics
- Excluding others from conversations or social events
- Displaying offensive emails, pictures, or clothing
- Sexual harassment

**Sexual harassment could include:**

- Unwelcome advances, propositions or flirting
- Unwanted physical contact or staring
- Inappropriate comments about someone's appearance, including their clothing or body
- Lewd or suggestive remarks, questions, gestures, language, stories, or jokes
- Sharing inappropriate images or videos

**At OCS, we won't tolerate verbal or physical behaviour considered intimidating, hostile, or offensive. We'll take appropriate disciplinary action in cases of unacceptable conduct.**

**We're also committed to providing appropriate safeguards so no colleague's human rights are compromised. Through our policies, we aim 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

## Health and safety

### Everyone in OCS deserves to go home safe every day!

Our colleagues, families and customers rely on us to ensure this happens. That's why health and safety is our top priority, and we're committed to continuously monitoring, developing, and strengthening our safety programme and culture.

At OCS, we care for one another. We must all play our part in putting safety first and building a zero-harm incident culture.

**Our health and safety ethics and policies are the same in every country we work in.**

#### We're committed to the following:

- Visible leadership on health and safety and environment
- Instilling safe behaviours and creating a strong safety culture
- Giving you the correct training and tools to enable you to do your job safely
- Adopting best practices in our work procedures
- Empowering you to make the right decisions about your safety
- Reporting health and safety incidents promptly, including near misses
- Monitoring, reviewing, and reporting our health and safety performance accurately
- Continually improving our health and safety procedures
- Carrying out our work in a way that minimises any harmful impact on the environment and supports sustainable business

### Our health and safety golden rules

#### Stop and say no if:

- You believe it's not safe to do the job
- You believe the site isn't safe
- You believe the equipment is faulty or you don't have the correct equipment
- You're not trained to do the job or don't feel competent
- You don't have the appropriate personal protective equipment
- You see something that could cause injury or damage the environment



## Environment and sustainability

### **We are committed to conducting our business activities responsibly.**

We acknowledge the critical role we play in providing a safe and sustainable environment for our customers, colleagues, and the communities in which we operate, assuring their health, safety, and wellbeing, preservation of the environment, and compliance with all applicable health, safety, environmental, legal, quality, and regulatory requirements.

At OCS, we all have a responsibility and an opportunity, through our behaviours, to protect the environment and preserve the planet for future generations.

### **We all need to play our part in making OCS environmentally sustainable by doing the right thing.**

#### **How we all can play our part:**

- **Reduce energy consumption:** Conserve energy by turning off lights, computers, and other equipment when not in use.
- **Use natural resources considerately:** Use natural resources efficiently, including water and paper.
- **Work environmentally safe:** Carry out our work in a way that minimises any harmful impact on the environment.
- **Minimise waste:** Practice personal waste management by recycling and reducing waste generation. Use electronic documents instead of printing where feasible.
- **Foster a culture of sustainability:** Encourage colleagues to adopt sustainable behaviours and participate in environmentally sustainable initiatives.

We are committed to continuous improvement and constantly monitor and update our practices to ensure we deliver the best services in the right way for the benefit of our customers, colleagues, communities, and the planet.



## Compliance with laws

**OCS is a global business with one common standard.**

We are headquartered in the United Kingdom. Many principles and guidance on common legal or ethical issues in our business are derived from UK laws and regulations.

**OCS is committed to upholding the highest standard of ethics and integrity when carrying out its business.**

Our Code applies to all parts of the business anywhere in the world. In some cases, our Code may impose higher requirements than the local laws in the country where you operate. In such cases, you are still required to adhere to the requirements of our Code.

### **Laws and regulations**

OCS respects and abides by all applicable supra-national and international laws, regulations, and standards.

## Information security and protecting personal data

**We must take care of personal data and protect information.**

### Personal data

At OCS, we respect the privacy of all our colleagues and other individuals and the confidentiality of personal data.

We routinely hold and deal with information about individuals, such as employees (past and present), job applicants, customers, suppliers, and other business partners, including names, telephone numbers, email addresses, employment contracts, and employment records.

We're an international business, and most countries have laws covering the collection, use, retention, and transfer of personal data. **Although these vary, our policies require that we:**

- Obtain consent from the individual concerned, as required by local laws
- Only collect data that is adequate, relevant, and used solely for the purpose for which it is collected
- Keep personal data up to date
- Keep personal data confidential and secure
- Don't keep personal data for longer than necessary
- Don't share personal data, internally or externally, unless this is relevant to the purpose for which it is collected
- Don't transfer any personal data between territories without advice from the UK Data Protection Officer
- **Report data breaches immediately**

We must always keep personal information secure. Failure to comply with data protection laws can lead to criminal and financial sanctions for both OCS as a business and for us as colleagues.

### Information security

As colleagues, we must protect our company's assets, including company data and information such as customer lists, operating manuals, and other business and marketing material, ideas, designs, databases, and records. You mustn't use our company's confidential information for personal gain or to provide an unfair advantage to a third party. All company information is confidential and should be kept secure.

**Be vigilant for misuse or theft of company resources – and report any concerns if you have them.**

## Bribery and corruption

### **At OCS, we won't tolerate bribery and corruption.**

Bribery is a form of corruption that's harmful and illegal. It can severely damage our reputation and have serious legal and financial repercussions.

Bribery means giving, offering, receiving, or requesting a corrupt or improper payment or advantage in exchange for something in return.

### **Situations where there might be pressure to pay a bribe include:**

- To win or keep a contract
- To obtain a licence or permit
- An attempt to influence someone or to gain an improper advantage (for example, donating to a charity sponsored by a customer or potential customer)
- To secure payment of a debt
- To avoid a fine or penalty

### **Situations where you may be offered a bribe, which should be refused and reported could include:**

- A supplier or third party offers you a payment, a loan, or some other financial benefit with the expectation that it would give them a business advantage.
- A supplier or third party offers you, or your family, a gift or hospitality with an expectation that a business advantage will be given to them by OCS.

A bribe could include money, gifts, hospitality, entertainment, services, employment, charitable donations, preferable treatment, or some other advantage. Small, unofficial 'facilitation' payments to ensure or speed up necessary actions are also bribery – so they're prohibited too.

However, meals, hospitality and small gifts can be legitimate activities when done in the right way. So reasonable and appropriate hospitality or entertainment is allowed to build or maintain our good business relationships. But they could be a form of bribery if they're excessive in value, inappropriate in nature, regular or intended to influence a business decision.

What about a third party acting for OCS, such as a supplier, partner, agent, or consultant? If they pay or offer a bribe, we could be held liable. We must ensure that any third parties we work with don't use bribery.

At OCS, we'll take consistent and swift disciplinary action against any colleague who commits bribery. Action can include dismissal and reporting to the relevant authorities, where you may be subject to criminal proceedings.

## Fraud prevention

### **We must record and report all information accurately and honestly.**

Our financial records and the information we provide to our customers and other stakeholders must be accurate and complete. Our records are valuable business information and evidence of our actions, decisions, and obligations. Our management teams, directors, and tax authorities rely on our financial information to make informed decisions about our business.

Failing to record transactions accurately, falsifying or creating misleading information, or influencing others to do so could constitute fraud and result in fines or penalties for a colleague or OCS.

#### **That's why we must all ensure that:**

- Any company information is recorded accurately, honestly and completely
- All business expenses are accurately recorded and supported by documentation

#### **What about 'money laundering'?**

Money laundering is a form of fraud whereby someone tries to hide illegal funds or tries to make the sources of their illicit funds appear legitimate.

Legislation prohibits money laundering or financing for illegal or illegitimate purposes.

#### **Potential indicators of money laundering include:**

- Requests from a potential customer or supplier for cash payments or other unusual payment terms
- Paying large sums in cash
- Using multiple accounts or payment methods
- Using an account based in an unexpected location

**Be vigilant of fraud or misreporting and immediately report any concerns.**

## Whistleblowing (speaking up)

### **At OCS, you should feel secure and supported in speaking up.**

At OCS we take malpractice and misconduct seriously, whether it's committed by a colleague, supplier, customer or other third party. That's why we want all colleagues to feel confident reporting any serious concerns so that we can deal with them fairly and adequately.

### **You must speak if you believe that one or more of the following has happened – or could happen.**

- Any criminal activity
- Bribery
- Corruption
- Financial fraud or mismanagement
- Failure to comply with any legal or professional obligation or regulatory requirements
- Danger to health and safety
- Damage to the environment
- Conduct which is likely to damage our reputation
- Actions which are intended to hide any of the above

**We treat all matters raised in the strictest of confidence and make every effort not to reveal the identity of the colleague who raises a concern, unless you give your express consent.**

### **Reporting**

We have set up a formal whistleblowing service (Safecall) to enable you to report any serious concerns. Safecall allows you to make whistleblowing reports by phone (local country freephone) or by visiting OCS's dedicated Safecall website ([www.safecall.co.uk/clients/ocs](http://www.safecall.co.uk/clients/ocs)). Please see appendix 1 for the Safecall contact details.

### **Personal grievances**

The above whistleblowing procedure should not be used for grievances relating to your own personal circumstances or complaints, such as the way you have been treated at work, bullying, harassment, breach of employment legislation, hours, pay, issues with your managers etc.

For personal grievances/issues you should use your local country's HR grievance procedure.

## Speaking on behalf of our company

### **You must have the authorisation to speak or write on behalf of OCS.**

How we communicate with the media and other interested third parties demands specialist skills and experience because it can have important legal requirements – that’s why we manage it carefully.

Only colleagues with specific authorisation and training/briefing may communicate about OCS with the media or respond to any enquiries or questions we receive.

Similarly, when using your personal social media channels, you should be clear that you don’t speak on behalf of OCS. Please see our Social Media Playbook for more detailed guidance.

### **You must also:**

- Ensure any personal community, charitable or political activity is not interpreted as being on behalf of or connected with OCS (unless it is authorised)
- Obtain authorisation from your country/sector managing director before speaking at an event, giving an interview, or writing material for publication in your capacity as an OCS employee.

## Protecting yourself

### **We mustn't allow conflicts between our personal interests and those of OCS.**

As colleagues, we must always act in the best interests of OCS. We should be loyal in all matters affecting our company, including those that relate to our customers and other parties with whom our company has a commercial relationship.

What is a conflict of interest? It's when your own personal interests or external relationships interfere or compete with the interests of our business – or influence our ability to make the right decisions.

#### **Conflicts of interest could include:**

- Working for, or owning an interest in, a competitor, customer, or supplier
- Hiring or supervising a family member or friend without the knowledge and approval of your line manager
- Having outside employment that negatively affects your job performance or interferes with your OCS responsibilities
- Using company property, information or resources for your benefit or the benefit of others
- Choosing a supplier because of the hospitality at sporting events they provide

If you think that you have a potential or actual conflict of interest, you must disclose it promptly. Conflicts can often be resolved with an open and honest discussion.

**Bring an actual or potential conflict of interest to the attention of your line manager immediately or contact Safecall (details in Appendix 1).**



## Appendix 1

### How to contact Safecall:

1. Visit OCS's dedicated Safecall website to report a concern ([www.safecall.co.uk/clients/ocs](http://www.safecall.co.uk/clients/ocs)).
2. Safecall local country freephone telephone numbers:

Country	Safecall telephone number
Australia	1 800 312 928
Bangladesh	+44 191 516 7756
Cambodia	1 800 209 761
India	000 800 4401 256
Indonesia	001 803 440 884
Ireland	1 800 812 740
Malaysia	1800 220 054
New Zealand	00 800 7233 2255
Philippines	1800 1441 0499
Qatar	8000 250
Saudi Arabia	800 844 2067
Singapore	800 448 1773
Thailand	001 800 7233 2255
UAE	8000 441 3376
UK	0800 915 1571