

ANZ Modern Slavery Policy.

Introduction

Modern Slavery is an unacceptable human rights violation. OCS is committed to operating its business ethically, with integrity, and to effectively mitigate risks of modern slavery from occurring within our business and supply chain. We expect the same from our contractors, suppliers and other business partners and stakeholders.

This Policy sets out OCS' overarching approach to addressing modern slavery and to meeting obligations under applicable modern slavery legislation. We are committed to taking meaningful action to prevent, mitigate and remedy modern slavery risks in our operations.

We are guided by key internationally recognised human rights, including:

- The *United Nations Universal Declaration of Human Rights*;
- The *International Labour Organisation's Declarations on the Fundamental Principles and Rights at Work*; and
- the *UN Guiding Principles on Business and Human Rights*.

Scope and Purpose

Modern slavery involves serious exploitation of vulnerable individuals, including forced labour, the worst forms of child labour, human trafficking, bonded labour, slavery, servitude, forced marriage, debt bondage and deceptive recruiting for labour or services.

This Policy applies to all staff, contractors, suppliers and other business partners and stakeholders engaged by OCS Group Australia Pty Ltd and subsidiaries, including OCS Services Pty Ltd and OCS Building Maintenance Pty Ltd (t/a Midcity Group) and OCS Group NZ and subsidiaries, including OCS Limited, FWG Limited, Distribution and Wholesalers Limited, 1st Mechanical Limited and 1st Maintenance Limited (OCS). All employees, business partners and contractors are expected to be familiar with, and adhere to, this Policy.

Supplier Obligations

Suppliers must be familiar with, and agree to, our ANZ Supplier Sustainability Code of Conduct including the expectation to conduct business ethically and with integrity with the intent to prevent acts of modern slavery. Supplier contracts are, where practicable, to include binding clauses requiring contractors to abide by our Code of Conduct.

Our commitments

OCS is committed to ensuring that our workplaces are free from any kind of modern slavery practice (or circumstances that unacceptably elevate the risk of such practice occurring).

The following minimum standards apply to employment in all of our direct operations:

Labour rights

OCS will only engage workers with a legal right to work. All work must be undertaken voluntarily and includes the right to cease employment pursuant to a lawful employment contract. OCS will provide all employees with a written employment agreement that covers key employment terms. We will never require workers to:

- lodge money deposits or original versions of identity papers (e.g. passports) unless specifically required by law; or
- pay any recruitment fees (either directly or through any agent retained, directly or indirectly, on OCS' behalf).

Working hours, wages and benefits

OCS will comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers receive clear written explanations of key information about their pay structure and pay periods. OCS does not allow workers' hours to exceed applicable laws or endanger the health and safety of the worker or anyone else.

Freedom of association

OCS supports workers' freedom of association and collective bargaining by:

- allowing workers to join (or not) or form trade unions and to bargain collectively in accordance with local laws; and
- not discriminating against workers' representatives who carry out their lawful representative functions in the workplace.

Child labour

OCS will not employ children below the applicable minimum legal working age or compulsory schooling, whichever is higher. No workers aged under 18 will be required to perform work that may jeopardise their health or safety having regard to their age, maturity, and ordinary life experience.

Harsh or inhumane treatment

OCS will not use or threaten to use harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

Staff Training

OCS recognises the importance of actively engaging with our staff on our modern slavery policies. Our on-line academy offers a suite of e-learning modules including how to identify and address modern slavery risks. Our administration, support, supervisory and managerial staff are to undertake an annual modern slavery training module. We also provide specialised training for key business areas (such as those team members involved in day-to-day procurement of products or services with potentially elevated risk).

Complaints and resolution mechanisms

OCS staff are encouraged to report and where appropriate, escalate, concerns about potential modern slavery to their manager as soon as possible.

Disclosures about potential modern slavery can also be made under OCS' Whistleblowing Policy and Procedure. That includes OCS' external whistleblower service provider - **SAFE Call** - through which all colleagues, contractors, and customers can report any concerns, including potential instances or risks of modern slavery.

OCS will investigate all reports and promptly address any adverse impacts on human rights that are caused by our operations or our suppliers' operations. We are committed to providing appropriate remedial action.

OCS will work collaboratively with our suppliers to address any issues and to improve our responses to modern slavery risk.

Reporting under the Modern Slavery Act 2018 (Cth)

OCS Group Australia Pty Ltd and subsidiaries will fully meet (including through timely lodgement) our annual reporting obligations under the *Modern Slavery Act 2018* (Cth). Our NZ entities, OCS Group NZ Limited and subsidiaries are not required to report under NZ legislation but will follow this policy as a measure of "best practice".

Each modern slavery statement will be reviewed and approved by OCS's Board of Directors.

OCS will pursue a response to identifying, assessing and addressing potential modern slavery risks in our operations and supply chains that goes beyond mere compliance with the Act's reporting requirements.

Identifying, assessing and addressing modern slavery risk

OCS will manage our operations and supply chain to comply with this Policy and with all applicable laws, rules and regulations. As part of this commitment, OCS will monitor supplier and other third-party stakeholder compliance through appropriate and ongoing due diligence activities.

Key features of our due diligence approach include:

- Risk assessment should be comprehensive and up to date.
- As much as is reasonably practical, risk assessment should go beyond first tier (direct) suppliers.

- Risk mitigation activities are to be proportionate to the overall level of risk and operating context.
- A wide range of due diligence activities may be appropriate, such as supplier questionnaires, audits, and encouraging third party certification.

OCS's directors, officers and employees are expected to promptly report any actual or suspected incidences of modern slavery that they witness, or otherwise become aware of, and to fully comply with any duty of disclosure to law enforcement authorities under applicable legislation.

External collaboration and partnerships

OCS is committed to engaging with external stakeholders as a key part of our overall modern slavery response framework, including pursuing appropriate collaboration with relevant industry groups.

Monitoring and evaluation

OCS recognises that policy documents should evolve and adapt to meet changing circumstances and incorporate any gained learnings as our modern slavery framework matures.

OCS will measure the effectiveness of this Policy and our broader modern slavery framework through mechanisms such as clear and specific Key Performance Indicators (KPIs).

OCS' Modern Slavery Committee is responsible for the day-to-day handling and oversight of our modern slavery response, including driving the implementation of, and compliance with, all key aspects of this Policy.

The OCS Modern Slavery Committee will provide a report to the Board of Directors at least every two (2) years on the performance of this Policy, with any recommendations for improvements and updates. The Board will substantively review this Policy at least every two (2) years.