

Modern Slavery Policy

As a large international diverse business with 130,000 employees, we recognise the gravity of modern-day slavery and the devastating impact it has on individuals, communities, and society.

Modern Slavery is the exploitation of an individual by others, for personal or commercial gain, and includes but not limited to human trafficking, forced labour, and debt bondage.

As a supplier of services across several continents, we are at particular risk to modern slavery, through our supply chains, including the recruitment and employment of workers, especially in cleaning, security, and maintenance, and we need to be vigilant.

Our TRUE values of Trust, Respect, Unity, and Empowerment, underpin the decisions we take and guide us to do business the right way, to prevent and eliminate all forms of modern slavery within our operations and supply chains.

This policy outlines our commitment and approach to tackling modern slavery, to remove this abhorrent crime in any way that we can.

Control objectives

To guide our efforts in preventing modern slavery, we have established a set of control objectives that define the strategic outcomes we aim to achieve across our operations and supply chain.

The primary objectives of our modern slavery controls are to protect all workers, regardless of origin or employment type, and ensure ethical conduct throughout our business. Specifically, our controls are designed to:

- Prevent unethical recruitment practices, including the charging of recruitment fees to any worker
- Ensure full compliance with OCS's Modern Slavery Policy, applicable regulations, best practice, and customer expectations
- Promote fair treatment, legal protection, and informed consent for all workers, including those recruited through third parties or across borders
- Establish clear accountability across all levels of OCS and our third-party partners
- Embed transparency and ethical standards into recruitment, onboarding, and employment practices

Leadership and responsibility

The OCS Group Executive Committee have overall responsibility to oversee the implementation of this policy, ensuring that it is fully integrated into our operations and supply chain management.

A representative of the Group Executive Committee sits on our Global Anti-Slavery Committee, which meets on a quarterly basis, and provides a forum for representatives across the business to input on the Group's policies and procedures relating to modern slavery.

Chaired by the ESG Director for the UK&IE, the committee engages in discussions on potential risks and formulates plans for improvements to prevent instances of modern slavery.

We also recognise that this is a shared responsibility, and we call on our colleagues, suppliers, and partners to support us in this important mission to create a world free from slavery and exploitation. Together we can make a significant difference in the fight against this abhorrent crime.

Accountability for preventing modern slavery extends beyond leadership to every employee, supplier, and partner. All parties are expected to uphold the principles of this policy and report any concerns without delay.

Legal compliance

OCS Group acknowledges its responsibility to address modern slavery in all its forms, including but not limited to forced labour, child labour, human trafficking, and bonded labour, within our own operations and throughout our supply chain. We will comply with all relevant laws and regulations aimed at preventing and addressing modern slavery and human trafficking, including the Modern Slavery Act 2015 in the UK and equivalent laws in other jurisdictions where we operate, such as the Australian Modern Slavery Act 2018 (Cth).

Protection of Foreign Workers

As a business that stretches across multiple diverse regions, employing 130,000 colleagues, We recognise the vital contribution of colleagues from all backgrounds, including those recruited across borders. We are committed to ensuring that every individual is treated with fairness, dignity, and respect, regardless of nationality or origin.

OCS is committed to ensuring that all foreign workers are recruited and employed under conditions that respect their legal rights, dignity, and informed consent. We prohibit the charging of recruitment fees, and any practices that may lead to debt bondage or coercion.

Risk mitigation and supply chain transparency

Eradicating modern slavery is a serious ethical global challenge, that demands a comprehensive approach, especially for employers with transient workforces, Such as hospitality, security, and cleaning, which are common in facilities management.

We proactively work to identify, assess, and mitigate the risk of modern slavery within our operations and supply chain.



Our onboarding and vetting process includes right-to-work checks and uses technology to support recruitment managers in verifying identity.

We require all suppliers to formally agree to our Supply Chain Code of Conduct and our Responsible, Ethical, and Sustainable Procurement Policy that sets out our expectation of any supplier wishing to work with OCS. Both incorporate a range of topics including bribery, human rights, and modern slavery and they reflect the conventions of the United Nations International Labour Organisation and the Ethical Trading Initiative (ETI) Base Code.

Our Risk mitigation strategy includes:

- Establishing and reviewing internal controls to ensure ethical recruitment, transparency, and compliance with modern slavery legislation and labour standards
- Partnering with the Slave Free Alliance to challenge existing practices and identify opportunities for improvement
- Reviewing our supply chain to identify areas of potential risk, such as recruitment, and working collaboratively to address and mitigate identified risk
- Monitoring our suppliers' compliance with our anti-slavery policies
- Conducting due diligence in high-risk sectors, such as hospitality, and temporary labour, through robust onboarding processes
- Encouraging our suppliers to develop their own anti-slavery policies and procedures where absent

Training and reporting

Modern slavery training is provided to our employees, contractors, and shared with our suppliers, to raise awareness, highlight the risks to our business and the impact on people's lives. This training includes information on the different types of modern slavery, how to recognise the signs, the steps to take in response to suspicions, and stresses our internal reporting procedure.

To support consistent understanding and application of this policy, we have developed internal guidance that outlines expected behaviours, procedures, and controls. This guidance draws on recognised best practices and international standards to ensure our approach remains effective, transparent, and aligned with our ethical commitments.

We have established clear and confidential reporting procedures for employees, suppliers, and other stakeholders to report any concerns or suspicions related to modern slavery.

We will continue to provide a Whistleblowing process via our "Safecall" service, through which all colleagues, contractors, and customers, can report any number of concerns, including modern slavery. We will investigate all reports thoroughly and take appropriate actions in response to any identified issues.

Continuous improvement

We are committed to ongoing improvement in our efforts to combat modern-day slavery and will regularly review and update this policy to reflect changing circumstances, best practices, and legal requirements. We will work with external experts to ensure our processes and procedures are fit for purpose and set measurable targets to assess our progress and report on our efforts.

Eradicating modern-day slavery from society is difficult and challenging, and cannot be achieved by individual companies, this is a shared responsibility. We call on our employees, supplier, and partners to support us in this important mission to create a world free from slavery and exploitation. Together we can make a significant difference in the fight against this abhorrent crime.

We will set measurable targets to assess the effectiveness of our ant-slavery controls, including supplier audits, training completion rates, and incident reporting metrics. These will be reviewed annually and published in our ESG disclosures.

This policy reflects our unwavering commitment to ethical conduct, human rights, and the eradication of modern slavery in all its forms. We will continue to lead by example and collaborate across industries to drive meaningful change.



Rob Legge
Group Chief Executive Officer



Peter Seeley
Group Head of ESG