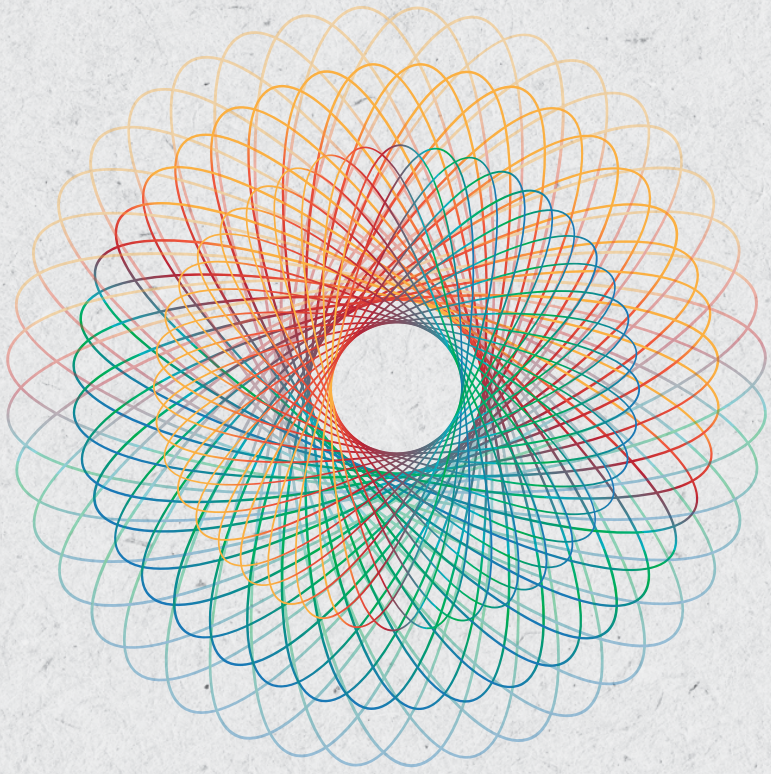
OCS
to be your best™

Modern Slavery Statement.

2025/26



DOING BUSINESS IN THE RIGHT WAY
OCS ESG Est. 1900

TRUE.Values.

Introduction.

This statement is made on behalf of OCS Group Topco Limited and its relevant subsidiary undertakings carrying on business in the United Kingdom in accordance with section 54(1) of the UK Modern Slavery Act 2015.

This statement also reflects actions taken across OCS Group operations globally, including jurisdictions where equivalent modern slavery, labour standards or human rights reporting requirements apply.

It sets out the steps taken by OCS Group ("OCS") to identify, assess, prevent, mitigate and respond to risks of modern slavery and human trafficking within our operations and supply chains.

OCS is an international facilities management business employing more than 135,000 colleagues across multiple countries and service lines. We recognise that labour-intensive sectors and complex supply chains can create heightened exposure to labour exploitation risks. We are committed to conducting business responsibly, respecting applicable laws and labour standards in the countries where we operate, and continuously strengthening our approach to managing modern slavery and human trafficking risk.

Our approach is guided by our TRUE Values of Trust, Respect, Unity and Empowerment and supported through governance, due diligence, workforce engagement and continuous improvement.

Our Business, Operations and Supply Chains.

OCS provides facilities management services across a broad range of sectors and operating environments. Core service lines include cleaning, security, catering, technical services, and integrated facilities support services.

To support service delivery OCS procures goods and services from a diverse supplier base including labour providers, subcontractors, cleaning consumables, uniforms and PPE, food ingredients, outsourced services and technical equipment providers.

OCS operates across the United Kingdom and Ireland and in Asia Pacific and the Middle East (with operations in Malaysia, Indonesia, India, Thailand, Singapore, Philippines, Cambodia, Australia, New Zealand, the United Arab Emirates and the Kingdom of Saudi Arabia).

Information supporting this statement has been gathered through a combination of operational reporting, governance oversight, audit activity and independent review processes, including:

- Group and regional management reporting relating to workforce composition, labour practices and operational controls
- Local and Group Risk Registers, which include modern slavery and labour exploitation risks
- Internal audits conducted by the OCS Internal Audit and Risk team
- Independent audits, gap analyses and advisory reviews undertaken in partnership with the Slave Free Alliance

- Supplier onboarding and due diligence activities, including mandatory acceptance of the OCS Supplier Code of Conduct
- UK & Ireland supplier modern slavery assessment processes for higher-risk suppliers
- Procurement and category management activities, including supplier monitoring and contract controls
- Workforce onboarding and right-to-work verification processes
- Data and insights from the independent Safecall whistleblowing and grievance reporting service, available to colleagues in multiple languages
- Worker interviews, site visits and corrective action monitoring activities where applicable
- Regional compliance reporting and management assurance activities

While OCS maintains established visibility over direct operations and Tier 1 suppliers, approaches to supplier segmentation and supply chain monitoring vary across regions depending on operational structure, maturity and risk profile.

In the UK & Ireland, supplier oversight includes more mature tiered segmentation, supplier assessment processes and enhanced monitoring controls for higher-risk suppliers. In parts of APAC, supplier oversight is currently more heavily risk-based and focused on priority suppliers and labour-related risks.

Across all countries, as a minimum requirement suppliers are required to acknowledge and adhere to the OCS Supplier Code of Conduct, with monitoring and due diligence activities continuing to evolve as OCS strengthens global consistency and supply chain visibility.

OCS recognises that visibility beyond Tier 1 suppliers and indirect labour arrangements can vary by category and geography, and further enhancement of transparency, reporting and supplier due diligence remains a priority area for development.

Governance and Accountability.

Ultimate accountability for modern slavery and human trafficking risk rests with the Group Board.

Oversight is supported through executive leadership sponsorship, ESG governance arrangements, the Group Modern Slavery Committee, regional leadership structures and local operational implementation.

Oversight of modern slavery risk is coordinated through a cross-functional governance group comprising the Group Head of ESG, Group Head of Internal Audit & Risk, and Group General Counsel. The group reviews modern slavery risk exposure, discusses findings and outputs from internal and external audits, supports the development and implementation of corrective actions and recommendations, and oversees ongoing improvement activities across the business. Specifically, the group is responsible for:

- monitoring risk exposure
- reviewing performance indicators

- assessing audit findings
- reviewing significant incidents
- overseeing corrective actions
- supporting continuous improvement activities

The group receives support and challenge from independent expertise through OCS's partnership with the Slave Free Alliance. During the reporting period OCS continued to work closely with the Slave Free Alliance to support programme development, governance maturity and continuous improvement activities. Where appropriate, OCS also obtains advice from independent legal counsel and specialist advisers in relation to applicable legal and regulatory requirements.

To support consistent implementation across a decentralised operating model, OCS applies Group standards, minimum control requirements and regional reporting processes.

Policies and Standards.

OCS maintains policies and procedures intended to support responsible business conduct and labour protections, including the Group Code of Conduct, Group Modern Slavery Policy, Supplier Code of Conduct, Responsible Procurement Policy, Whistleblowing Policy and Recruitment and Vetting Procedures.

Workforce assurance, onboarding and recruitment-related controls are established across OCS operations, including right-to-work verification, vetting processes, onboarding requirements and labour governance controls. The maturity and structure of these processes varies across countries, reflecting local regulatory environments and operational models.

During the reporting period, internal audit assessments undertaken within selected APAC operations provided assurance over the design effectiveness of relevant workforce governance and control processes. Ongoing improvement activities continue to support consistency of implementation, oversight and monitoring across the Group.

In all countries, recruitment and labour controls are applied in accordance with applicable local legal and regulatory requirements, with ongoing work to strengthen consistency of oversight and risk management across the Group.

These documents address areas including:

- prohibition of forced labour
- recruitment and labour controls in accordance with applicable local laws
- ethical recruitment practices
- worker rights and fair treatment
- right-to-work verification
- grievance mechanisms
- responsible procurement expectations
- whistleblowing and non-retaliation

Policies are reviewed periodically and updated where required to reflect changes in legislation, operational requirements and evolving good practice.

During the reporting period OCS strengthened governance arrangements, enhanced whistleblowing processes, expanded workforce visibility initiatives and continued development of modern slavery and human trafficking awareness activities. OCS also continued development of its labour governance framework, including guidance relating to recruitment agency due diligence, migrant worker considerations and responsible recruitment practices across relevant markets.

Risk Assessment and Management.

Modern slavery and human trafficking risk is integrated into OCS enterprise risk management processes and monitored through Group and Local Risk Registers.

Risk assessments are reviewed periodically and supported through governance oversight involving the Group Head of ESG, Group Head of Internal Audit & Risk and Group General Counsel.

Risk considerations include:

- geography
- labour intensity
- sector exposure
- temporary and agency labour usage
- migrant worker vulnerability
- supply chain complexity
- supplier criticality
- audit findings
- workforce feedback
- grievance trends

During Q1 2026, OCS completed an enterprise-level human rights and modern slavery risk assessment exercise with shareholder and external stakeholder engagement. The assessment reviewed inherent and operational risks across the Group's activities, workforce profile and supply chain structure, with particular focus on labour-intensive operations, indirect labour arrangements and higher-risk supply chain categories.

The assessment identified opportunities to further strengthen consistency of due diligence, workforce visibility, supplier oversight and supply chain transparency across countries. As a result, OCS is working on an improvement plan focused on:

- enhancing supplier due diligence and segmentation processes
- strengthening visibility of indirect and agency labour
- improving consistency of governance and reporting
- expanding risk-based supplier assessment activity

- further developing training and awareness programmes
- enhancing supply chain transparency beyond Tier 1 suppliers

Risk assessment outputs are used to inform audit planning, governance discussions, supplier engagement activities and continuous improvement priorities.

Workforce and Recruitment Controls.

The majority of OCS's workforce consists of directly employed colleagues, with controlled use of temporary labour, subcontractors and recruitment agencies where operationally required.

Workers operating on OCS sites are expected to comply with OCS policies and relevant onboarding processes including:

- right-to-work verification
- induction activities
- Code of Conduct requirements
- health and safety processes

OCS practice is to require agency providers and labour partners to acknowledge and comply with OCS standards and applicable contractual requirements before engagement, including the OCS Supplier Code of Conduct.

Enhanced due diligence and supplier assurance processes are established across a number of OCS operations, including onboarding controls, supplier assessments and monitoring activities for higher-risk engagements.

Across other parts of the Group, labour provider oversight is applied through a combination of contractual controls, Supplier Code of Conduct requirements and risk-based due diligence processes. Ongoing work continues to strengthen consistency of labour governance and supplier assurance practices across OCS operations.

OCS recognises that recruitment and labour provider practices represent important controls in preventing labour exploitation risks.

During the reporting period, OCS continued to strengthen oversight of temporary labour arrangements and labour provider controls through a combination of internal review activity and independent assessment. This included audits and worker interview activities undertaken with the support of the Slave Free Alliance in relation to UK temporary labour supply arrangements, with resulting findings and recommendations informing ongoing improvement activities.

Internal audit activity was also undertaken within the Malaysia business to review workforce governance and labour-related controls. In addition, OCS has committed to further independent review activity during 2026 focused on recruitment corridors and labour supply arrangements across selected APAC operations.

OCS continues to strengthen visibility over indirect labour arrangements, supplier assurance processes and central oversight mechanisms across the Group.

Supply Chain Due Diligence.

OCS applies a risk-based approach to supplier due diligence and supplier management.

We recognise that we have several higher-risk categories which can include:

- contingent labour
- outsourced services
- security services
- temporary labour
- labour-intensive supply chains

Suppliers are expected to acknowledge and adhere to the OCS Supplier Code of Conduct as part of supplier onboarding and engagement processes across the majority of OCS operations. In certain countries, including the UK & Ireland, supplier requirements are further supported through contractual obligations, supplier assessment processes and risk-based audit activities.

Supplier monitoring activities in higher-risk categories may include health and safety reviews, labour-related controls, modern slavery considerations and corrective action tracking. OCS continues to strengthen consistency of supplier due diligence and assurance processes across its international operations.

During the reporting period OCS continued supplier audit activity, ongoing development of supplier risk assessment processes and enhancement of risk-based due diligence.

OCS maintains the strongest visibility over direct suppliers and Tier 1 supply chain relationships through supplier onboarding controls, Supplier Code of Conduct requirements, contractual provisions in certain operations, supplier assessments and audit activity.

Approaches to supplier due diligence and monitoring vary across the Group depending on operational structure, risk profile and local operating requirements. Some operations have more mature supplier oversight, audit and assurance processes established than others, reflecting differences in regulatory environments, business structure and programme maturity.

OCS recognises that visibility beyond Tier 1 suppliers and indirect labour arrangements continues to vary across parts of the Group, and ongoing work is underway to strengthen consistency of supply chain transparency, supplier assurance and labour governance processes globally.

Training and Awareness.

OCS recognises that awareness and understanding are essential components of effective modern slavery and human trafficking risk management.

During the reporting period OCS delivered coordinated awareness initiatives combining global messaging with locally adapted materials and frontline engagement activities designed to increase awareness of modern slavery and human trafficking risks and reporting mechanisms.

Activities included global and regional colleague communications, awareness campaigns linked to Anti-Slavery Day, updated policy communications, refreshed eLearning content, frontline toolbox talks and locally delivered engagement materials intended to help colleagues recognise indicators of exploitation and understand escalation pathways.

Future development activity includes further role-specific and targeted training for procurement professionals, recruitment teams, operational leaders and frontline colleagues operating in higher-risk environments.

Speaking Up, Remediation and Worker Voice.

OCS maintains reporting mechanisms intended to support confidential reporting of concerns.

The Safecall whistleblowing service is available in multiple languages and allows anonymous reporting where permitted by law.

Modern slavery and human trafficking concerns raised through whistleblowing channels are subject to defined escalation and investigation processes. Where concerns indicate an elevated risk to worker welfare, matters may be prioritised for expedited review and response.

Where concerns are identified OCS seeks to work with relevant parties to understand root causes and implement appropriate actions.

Remediation responses may include worker support measures, corrective action plans, enhanced controls or supplier intervention activity where appropriate.

Monitoring Effectiveness.

OCS monitors indicators intended to support assessment of programme effectiveness, including training completion, supplier due diligence activity, audit outcomes, corrective action tracking, workforce compliance, worker voice activity and remediation actions.

These indicators are reviewed through governance processes and used to identify trends and support continuous improvement.

OCS will continue to develop its effectiveness measures as programme maturity increases and additional management information becomes available.

Future Focus.

Over the next 12–24 months OCS will continue strengthening its approach to managing modern slavery and labour exploitation risks through a phased programme of governance, due diligence and operational improvements.

Next 12 months

Priority activities include:

- enhancing visibility over agency and indirect labour arrangements
- improving workforce reporting and central oversight processes
- expanding supplier engagement and awareness activities
- continuing development of awareness, communication and training programmes
- further enhancement of risk-based supplier due diligence processes
- continued implementation of recruitment guidance and labour governance controls in relevant countries

Next 18 months

OCS also intends to further strengthen:

- risk assessment methodologies and management reporting
- worker voice and workforce engagement mechanisms
- effectiveness measures and governance reporting
- supply chain transparency and oversight in higher-risk categories

Next 24 months

Longer-term improvement activities include:

- increasing the use of technology and data insights to support risk identification and monitoring
- further strengthening supply chain transparency and traceability beyond Tier 1 suppliers
- continued alignment and consistency of supplier assurance and labour governance processes across countries

Approval.

This statement has been approved by the Board of Directors of OCS Group Topco Limited and relevant subsidiaries.

Signed:

Chief Executive Officer

OCS Group

Date: June 2026