

Child Labour Remediation

1. Purpose

OCS does not tolerate child labour. This policy explains the action OCS UK&I will take if child labour is suspected or identified in its operations or supply chain. Our priority will be the safety, wellbeing and best interests of the child.

2. Scope

This policy applies to OCS Group UK&I Limited, its colleagues, agency workers and relevant suppliers, subcontractors, recruitment agencies and labour providers. It applies to goods, services or labour supplied to the UK&I business, including where part of the associated supply chain is outside the UK or Ireland.

Applicable local law will always be followed. Where an agreed customer requirement provides greater protection, OCS will apply that higher standard.

3. What we mean by child labour

Child labour: Work undertaken below the applicable minimum legal working age, or work by a young person under 18 that is hazardous, exploitative, harmful to their health or development, or interferes with compulsory education.

Lawful apprenticeships, work experience and permitted light work are not child labour where they comply with applicable law and are properly supervised.

4. Our commitments

OCS will:

- not use or knowingly benefit from child labour;
- require relevant suppliers and labour providers not to use child labour;
- use appropriate age, identity and recruitment checks;
- protect young workers from unlawful, hazardous or unsuitable work;
- investigate credible concerns promptly and sensitively; and
- support appropriate remediation and action to prevent recurrence.

5. Reporting a concern

Anyone who discovers or suspects child labour connected with OCS, should not investigate, but must report it immediately to their line manager, the company designated safeguarding lead (DSL), the OCS ESG team or through Safecall. Suppliers must notify their OCS commercial contact without delay.

If a child appears to be in immediate danger, emergency services or the appropriate local authority should be contacted first. No person raising a genuine concern in good faith will be subjected to retaliation.

6. Remediation procedure

OCS will respond using the following five steps:

1. Protect the child: Stop any unsafe or unlawful work and address immediate safety or welfare needs. The child must not simply be dismissed, threatened, blamed, hidden or moved to avoid detection.
2. Escalate and assess: Notify the OCS ESG team, which will coordinate with Legal, HR, Procurement, Operations, the DSL and the customer where appropriate. Establish the facts sensitively and consider whether other children or young workers may be affected.
3. Obtain appropriate advice: Seek advice from a competent safeguarding, child-protection, ethical-trade or statutory body where required. Contact with parents or guardians must only take place when it is considered safe and in the child's interests.
4. Agree and implement a plan: Agree a proportionate, child-centred remediation plan with appropriate specialist input. Depending on the circumstances, this may include support for education, welfare, healthcare, safe accommodation, lost earnings or family livelihood needs.
5. Monitor and prevent recurrence: Record and monitor the agreed actions to closure. Require the supplier or OCS operation to address the cause through measures such as improved age checks, recruitment controls, training, supervision or audit.

7. Supplier responsibilities

Relevant suppliers and labour providers must prevent and report child labour, preserve records, cooperate with investigations and implement agreed remediation and corrective actions. They must not intimidate the child or witnesses, conceal the concern, or alter or falsify records.

OCS may require a corrective-action plan, enhanced monitoring or an independent audit, and may suspend or terminate a relationship where a supplier does not cooperate or improve. Decisions will consider the potential impact on the child and other workers.

8. Responsibilities and records

- The Group Head of ESG, UK & Ireland owns this policy and coordinates any remediation response.
- Legal, HR, Procurement, Operations and Health and Safety will provide support as required.
- The relevant commercial team will coordinate supplier action and customer notification where necessary.
- OCS will keep a confidential record of the concern, decisions, actions, outcomes and steps taken to prevent recurrence.
- Designated company safeguarding lead

9. Related documents and review

This policy should be read with the OCS Code of Conduct, Supplier Code of Conduct, Modern Slavery Policy and Statement, Responsible, Ethical and Sustainable Procurement Policy, Safeguarding Policy, Whistleblowing Policy, recruitment and vetting procedures, and health and safety arrangements.

The policy will be reviewed annually and after any substantiated case or material change in legal or customer requirements.



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