

Modern Slavery Statement – 2019 Financial Year

What is modern slavery

Modern slavery is an unacceptable, abhorrent and often hidden crime, including forced labour and domestic servitude. The most recent UK Government statistics, produced by the Home Office in 2014, estimate that there were 13,000 victims of modern slavery in the UK in 2013.

In 2015, in an effort to mitigate modern slavery within businesses, the UK Government introduced new legislation in the form of Section 54 of the Modern Slavery Act, requiring businesses with a global turnover of at least £36 million to produce an annual statement, documenting any steps that their business has taken to mitigate the occurrence of modern slavery within their business and supply chain.

Our aim

OCS Group Limited is committed to operating its business ethically and with integrity throughout the organisation. By virtue, it is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain, within the UK and overseas.

Our structure, business and supply chains

We are an international supplier of essential services to facilities and premises owned by our clients. From humble beginnings as a small family business 120 years ago, we've scaled our specialisms and expertise to offer a range of high-quality, sustainable and internationally accredited services. We work at the heart of our clients' businesses, and our sector expertise means that we can design sustainable service solutions that align with their business strategies. OCS operates across a range of sectors, including healthcare, education, government, manufacturing, entertainment venues, aviation, retail, and hospitality to name a few. OCS enter into both long- and short-term contracts with its customers.

OCS employs over 80,000 colleagues globally, and operates in Australia, New Zealand, Thailand, Malaysia, Cambodia, India, Middle East, Republic of Ireland and the United Kingdom.

In order to perform its customer contracts, OCS procures goods, services and temporary labour from suppliers. Most purchases are sourced from a core group of long-term, preferred suppliers. OCS takes steps to ensure that all suppliers agree to comply with its policies, which aim to eliminate modern slavery and human trafficking from the supply chain.

Our policies on slavery, human trafficking and supplier due diligence

As part of our commitment to operating ethically, OCS has a Global Code of Conduct recognising the success of our business will not be valued or sustained unless we are doing business "in the right way". In business, as in life, we are measured not just on what we achieve, but also on how we achieve it. This Global Code of Conduct puts together our many policies into a simple document to help guide in "how" to go about our business day-to-day. It provides the guidelines for our ethical conduct as we go about our everyday business and sets out acceptable standards of behaviour. All colleagues within OCS are required to follow this Code.

The Global Code of Conduct incorporates our established policies, including in relation to the following: Anti-Bribery, Casual Workers, Equal Opportunities, Ethical Trading, Recruitment, Eligibility to Work, Vetting, Whistleblowing, Working Time Regulations, and Procurement. In particular, our Supplier Code of Conduct requires suppliers not to use any form

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of forced, bonded or involuntary labour, and to ensure that workers are not treated in a harsh or inhumane way. We also take steps to ensure that our suppliers are aware of our policies and we expect them to adhere to the same high standards.

Our Procurement Director works closely with our global supply chain to ensure that appropriate steps are taken to prevent acts of modern slavery and human trafficking.

We continue to work with our global teams to ensure that our recruitment practices and agency agreements are fully compliant. We continue to undertake worker accommodation audits as part of our Health and Safety management system in areas where the company provides such facilities and other compliance audits.

Areas of potential slavery and human trafficking risk

OCS is aware that heightened modern slavery and human trafficking risk exists in relation to certain territories, and in relation to the production of certain goods and supplies. The standards outlined by OCS are being implemented across all of its purchasing activity.

In order to provide outsource services to its customers, OCS engages with providers of temporary staff on an agency basis. OCS is continually enhancing its policies and procedures to ensure that it only works with agencies who operate to the ethical standards that OCS expects.

Staff training

We recognise the importance of actively engaging with our staff on many important matters, including our policies that relate to modern slavery and human trafficking. Our intranet offers a fast and secure communications platform, allowing for increased awareness, identification and reporting of any potential breaches of our policies. This same platform allows colleagues throughout our business to access our various policies on Modern Slavery, Whistleblowing, Ethical Trading, and so on. Additionally, our online Academy offers a suite of e-learning modules, including how to spot, tackle and prevent modern slavery. During 2020, our e-learning suite is being reviewed further to incorporate additional methods of prevention, to provide our colleagues with the skills required to mitigate modern slavery and human trafficking.

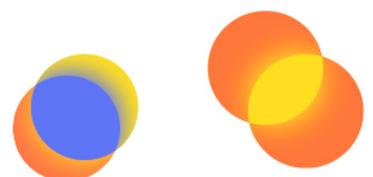
Whistleblowing service

OCS operates a global whistleblowing process via our "Safecall" service, through which any of our colleagues, can report concerns. Reports can be made in several languages and can be made anonymously, alleviating any potential fear of reprisal. Reports can be made on a wide range of concerns that lie within the public interest, including suspicions of modern slavery.

Slave-Free Alliance membership

In an effort to further mitigate the risk of modern slavery and human trafficking within our business and supply chain, OCS has become a member of the Slave-Free Alliance (SFA). OCS is the only Facilities Management member of the Slave-Free Alliance and intends to pioneer this collaboration for the betterment of our colleagues, customers and suppliers.

The SFA was founded in 2018 to deliver services to the commercial sector and support the development of activities and initiatives for businesses working towards a slave-free organisation. SFA works in collaboration with business to enhance



and support their wider framework around ethical trade, sustainability, compliance, corporate social responsibility and human rights. SFA's specialist teams develop business and supply chain solutions that mitigate risk of modern slavery and improve customer confidence and compliance.

SFA membership is unique due to its association with Hope for Justice, a global anti-human trafficking organisation that exists to bring an end to modern slavery, whose combined experience in tackling human trafficking and modern slavery provides OCS with confidence in mitigating the modern slavery risks to its supply chain and business.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 covering the financial year ending 31 December 2019 as approved by the Board of Directors.



John Hunter
Group CEO
July 2020

