



Policy Document

Modern Slavery Policy Statement

OCS Group Limited (OCS) is committed to operating its business ethically and with integrity throughout the organisation. Likewise, it is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its 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 over 100 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 we can design sustainable service solutions that align with their business strategies. OCS operate across a full range of sectors, from aviation to healthcare, manufacturing to professional services, education to retail. OCS enter into both long and short-term contracts with its customers. OCS UK offer total facility management solutions delivering the full range of services. OCS employs over 85,000 people and operates in several countries, including Australia, Cambodia, India, Malaysia, Middle East, New Zealand, Republic of Ireland, United Kingdom, Singapore and Thailand.

In order to perform its customer contracts, OCS procures goods, services and temporary labour from its 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 and human trafficking & supplier due diligence processes

As part of our commitment to operating ethically we launched in 2018 a Global Code of Conduct as the success of our business will not be valued or sustained unless it is achieved by doing business in the 'right way'. In business, as in life, we are measured not just on what we achieve but also how we achieve it. This Global Code of Conduct puts together our many policies into a simpler 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, Right to Work, Vetting, Whistle blowing, Working Time Regulations, and procurement. In particular, our Supplier Code of Conduct requires suppliers not to use any form 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.

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 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.

Effectiveness of measures taken

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.



Staff training and Whistleblowing

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. We have also introduced an “e-learning” platform which provides training to our employees on a wide variety of subjects including modern slavery.

In addition, In December 2018 we supplemented our Whistle Blowing process with a new Speak Up Scheme where any of our colleagues can report any concerns by contacting our independent “Speak Up” service provider “SafeCall”. Reports can be made in several languages and allows reports to be made without fear of reprisal. Reports can be made on a wide range of issues, for example: unethical conduct; discrimination; any instances or suspicions of modern slavery; environmental breaches; health & safety; harassment; fraud; bribery & corruption; conflict of interest; security; anti-competitive behaviour; money laundering; and other serious concerns.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 covering the financial year ending 31 December 2018 as approved by the Board of Directors.

A handwritten signature in blue ink, appearing to read 'P. Slator'.

Signature: Peter Slator, CEO, OCS Group Limited

Date: January 2019