

OCS Group Australia Pty Ltd.

ABN 24 100 515 106

Inaugural Modern Slavery Statement

1 July 2023 – 30 June 2024



The Board of OCS Group Australia Pty Ltd as the principal governing body, approved this Modern Slavery Statement on 23rd December 2024.

Pursuant to the requirements of the *Modern Slavery Act 2018 (Cth)*, the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by Gareth Marriott in his role as the Managing Director of OCS Group Australia Pty Ltd on 23rd December 2024.



Gareth Marriott
Managing Director, OCS Australia and New Zealand
20th December 2024

Table of Contents

A message from the Managing Director	3
OCS's structure, operations and supply chains <i>(Reporting requirements 1, 2 and 6)</i>	4
Identifying, Assessing and Addressing Potential Modern Slavery Risk Areas <i>(Reporting requirements 3 and 4)</i>	8
Measuring Effectiveness <i>(Reporting requirement 5)</i>	14

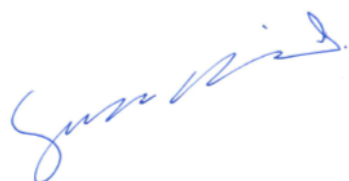
A message from the Managing Director

Our vision at OCS is to become the world's best facilities services company and we're on a mission to make people and places the best they can be because we believe everyone should have the best conditions and opportunities to thrive. Our TRUE values, trust, respect, unity and empowerment are our guiding principles, providing a clear framework for all colleagues, ensuring consistency and alignment with our company's goals across our diverse teams and geographies.

OCS is committed to doing the right things in the right way and that is why we are committed to the intent of the Modern Slavery Act and to identifying and addressing the risks and impacts of modern slavery in our operations and supply chain. Our global parent entity OCS Group, headquartered in the UK, has a commitment which flows to all global entities – to actively assess and address modern slavery and human trafficking within our operations and supply chains, within the UK and overseas, and play our part to help reduce the occurrence of this abhorrent crime.

We understand that modern slavery is a growing concern globally and our industry is one with increased risk, meaning we need to be extra vigilant. OCS Group enlists the assistance of external expert partners, such as Slave Free Alliance and in Australia, we work with Fair Supply to help us assess our risk, assess and review our practises, and provide expert advise.

We are committed to continually improving our approach to modern slavery risk and assisting our suppliers to so the same.



Gareth Marriott
Managing Director, OCS Australia and New Zealand

OCS Australia's structure, operations and supply chains

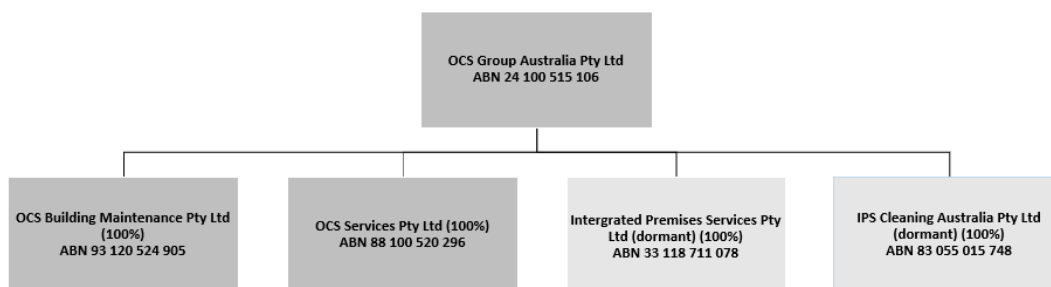
(Reporting requirements 1, 2 and 6)

The reporting entity is **OCS Group Australia Pty Ltd** (ABN 24 100 515 106) (referred to throughout this Statement as "OCS Australia", "we" and "our").

This is our first modern slavery statement under the *Modern Slavery Act 2018* ("the Act"). The 2023-2024 Financial Year was the first reporting period where OCS Australia reached the annual revenue threshold under the Act to become a reporting entity.

The principal governing body of OCS Australia is our Board of Directors.

OCS Australia, as the parent entity of a consolidated group of companies, has cumulatively reached the statutory annual revenue threshold. The following chart depicts the owned/controlled entities that fall under the ownership of OCS Australia but are not individual reporting entities:



Pursuant to the Act's requirements, all the above entities have been consulted in relation to the preparation and content of this statement, and are subject to the described measures for identifying, assessing and addressing potential modern slavery risks.

OCS Australia is also part of global group of companies (referred to collectively in this Statement as "**OCS Group**"). The OCS Group parent entity is a reporting entity under the United Kingdom's Modern Slavery Act 2015.

A copy of the UK Act Modern Slavery Statement for the 2023 Calendar Year is available at:

<https://ucarecdn.com/0ddba48b-0a46-4cda-8ec7-6f6cb6774041/>

Our Operations

OCS Australia

Since 1998, OCS Australia has been offering sustainable and essential facilities services including, commercial cleaning, waste management and recycling, grounds maintenance, pest control and building maintenance.

Our branch network across Perth, Sydney, Brisbane, Melbourne, Kalgoorlie and Albany service more than 200 customer sites.

We have a strict, integrated and regulated management system that fully incorporates work health and safety (WHS) processes, meets the requirements of ISO 45001, and has been independently certified by International Certification bodies. This means the elevated risk environment normally associated with our industry is comprehensively managed and reduced. We also uphold our governance standards through the following additional ISO certifications:

- **ISO 9001:** Our accreditation under this standard is a recognition of our high quality operational and management systems.
- **ISO 14001:** Our accreditation under this standard demonstrates our commitment to ensuring we minimise our environmental footprint and achieve our environmental objectives. We are also certified Toitū net carbonzero, accredited by the joint Accreditation System of Australia and New Zealand (JAS-ANZ) and ISO 14065.
- **ISO 27001:** This certification demonstrates that we have appropriate information security management systems, enhancing data protection and bolstering defences against cybercrime.

OCS Group

OCS Group has been supporting businesses since 1900 and is now a recognised leader in integrated facility management services, with 120,000 colleagues and 8,000 customers across Asia Pacific (APAC), the United Kingdom (UK), Ireland, Europe and the Middle East. Key services include facilities management, cleaning, catering, pest control, security, and hard services.

We're on a mission to make people and places the best they can be because everyone should have the best conditions and opportunities to thrive.

Our Services

Commercial cleaning and facilities services

OCS Australia provides commercial and specialist cleaning services including the provision of washroom consumables and hygiene services. We predominately outsource our washroom hygiene services. We are GMP (Good Manufacturing Practice) and HACCP (Hazard Analysis and Critical Control Point) certified.

We also provide a diverse range of Facilities Management for the public and private sector. Our technicians and engineers build, manage and maintain critical infrastructure, ensuring safety, compliance and efficient operations.

Waste and recycling

OCS also offers a limited range of waste management and recycling services including biosecurity waste assisting customers with their waste streaming and diversion efforts. We view these services as a critical component in achieving, and helping our customers achieve their ESG goals.

Insurance and building repairs

OCS Building Maintenance Pty Ltd t/a Midcity, has over 35 years specialising in insurance building repairs and commercial building work in Western Australia, New South Wales, Victoria and Queensland. We employ skilled contractors across trades for residential, commercial and industrial sectors.

Our Sectors

OCS Australia services customers across a diverse range of public and private sectors including:

- Aviation
- Commercial
- Education
- Retail
- Manufacturing
- Distribution & Logistics
- Health & Aged Care
- Government
- Justice

Our Team

OCS Australia's workforce was comprised of 632 individual team members across the reporting period, which included a mixture of full-time (254), part time (234) and casual (144) positions. The bulk of these positions were in our cleaning division, with a further breakdown as follows:

Managers	31
Cleaners	531
Waste	2
Administration	24

Cleaning Supervisors	10
Building Maintenance Operations	25
Support Services (Payroll, HR, HSEQ, BD	9

Contracted labour positions are also a characteristic of aspects of our business operations, and OCS Australia acknowledges the potential for elevated modern slavery risk that may be associated with non-direct employment arrangements. Such worker engagement occurs through reputable Australian contracting companies, which employ the workers that are placed within our operations. OCS Australia pays the contracting company through the issuing of a monthly account. The workforce contractor companies are prequalified through an external subject matter specialist platform and sign a sub-contractor agreement that specifically addresses issues relating to modern slavery risk. OCS Australia also has a process in place to check working rights of the contracting company employees.

Our Supply Chains

In anticipation of the potential introduction of modern slavery reporting legislation in Aotearoa New Zealand, OCS Australia undertook joint supply chain review and analysis for both countries, and, in the interests of providing further detailed disclosure in this, our first, modern slavery statement, we have included key aspects of that information throughout this Statement.

Across Australia and Aotearoa New Zealand, OCS engaged with a total of 1,127 suppliers during the reporting period.

OCS Australia: 610 suppliers

OCS Aotearoa New Zealand: 517 suppliers

Significant supplier industry categories represented by our procurement activity include:

Office consumables	Construction related suppliers	Utility providers
Equipment and equipment hire providers	Real estate services	Printing and packaging
Professional, legal and financial services	Transport services	Waste and recycling services
Office furniture	Catering providers	Computer and software
Cleaning goods and chemicals	Postal and telecommunication	Staff Uniforms

Our direct suppliers are predominately Australian and New Zealand-based companies, with a small number of UK suppliers and one China-based supplier.

Identifying, Assessing and Addressing Potential Modern Slavery Risk Areas

(Reporting requirements 3 and 4)

At this early stage of our formal modern slavery reporting, we recognise the importance of comprehensively examining and analysing our supply chains and core operational activities to identify areas of potentially elevated modern slavery risk.

We have partnered with external consultants to provide us with an initial baseline for identifying and assessing modern slavery risk (discussed further below), and to take foundational steps towards developing a comprehensive modern slavery response framework. This partnership has also utilised proprietary technology for comprehensive supply chain risk assessment.

Identified risks in our operations

We recognise key potential inherent risks associated with our core operational activities in several higher-risk Australian sectors, including professional cleaning services, security, waste management and construction/building maintenance services.

Cleaning and security services continue to be higher-risk services, even in Australia, including due to comparatively lower barriers to entry and requisite skills. These are also industry sectors where overall workforce characteristics include a general prevalence of foreign migrant labour and workers with lower levels of English proficiency.

Another industry-wide characteristic of professional cleaning operations is the potential use of contractors and subcontractors. The sourcing of staff may include informal contracts and labour-hire companies. Workers in the commercial cleaning industry are at an increased risk of sham contracting arrangements where the actual nature of their employment relationship is disguised through engagement as an independent contractor. The security industry face similar risks of modern slavery as the cleaning industry.

The Walk Free Foundation's 2023 Global Slavery Index "Spotlight on Australia" identified some of these sectors as higher risk from a modern slavery perspective:¹

"Forced labour predominantly occurs in high-risk industries such as agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. Many of these industries rely on migrant workers who enter Australia on temporary visa"

Identified risks in our supply chains

OCS Australia undertook modern slavery risk assessment that utilised external consultants' proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers all the way to Tier 10 suppliers of the supply chain of our suppliers by spend. The risk assessment approach uses a balanced, global Multi-Regional Input-Output (MRIO) table to perform the supply chain mapping, which links supply chain data from 208 countries, and 37,318 unique industry/country combinations. Fair Supply's data universe comprises over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO is regularly updated and draws from

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The synthesis of global economic supply chain data is overlaid, via a proprietary algorithm, with the best available research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index (last updated in May 2023); the International Labour Organisation's Global Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and our consultant's internally developed database of modern slavery risk factors by country and sector.

A snapshot of key results from the risk assessment:

- On an Australian industry category basis, the areas of **business services** (which includes companies contracted to assist us with providing facilities maintenance services) and **construction services** were flagged.
- Outside of Australia, countries in our supply chains with potentially elevated risks include **China** and **India**.
 - Some of our individual suppliers that were identified as having potentially elevated modern slavery risks (including deeper within their own supply chains) include an **Australian Staff Uniform Suppliers**, and our **Australian Gas Supplier**.

Some general features that were prevalent across the identified areas of potentially elevated risk include:

- The Walk Free Foundation's 2023 Global Slavery Index identifies the construction industry as one of the predominant sectors of forced labour within Australia.² Potentially elevated risks for these sectors are, in general terms, attributable to the potential presence of characteristics such as informal worker payment arrangements, relatively low barriers to entry for unskilled migrant workers, routine use of labour hire agents, and prevailing employment practices such as subcontracting arrangements with relatively low transparency. The kinds of tools and equipment used in the construction industry are often manufactured offshore, using vast 'webs' of inputs and components. The components also usually include high risk inputs, such as electronic materials, conflict minerals and rubber.
- Global garment manufacturing is the most widely recognised at-risk sector for modern slavery, from harvesting cotton to manufacturing textiles. Farms and factories are typically located in high-risk countries including China and India. The universal prevalence of migrant workers in apparel industries, along with typically low skilled positions, and lacking overall supply chain transparency all contribute to the globally elevated risk. Cotton grown in the Xinjiang Region of China is strongly associated with Uyghur forced labour schemes such that it is banned from import into the United States.

Assessing and addressing modern slavery risks

OCS Australia did not receive any reports, complaints, or otherwise become aware of, any actual or suspected incidences of modern slavery in its supply chains or operations during the reporting period.

² <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

In responding to potential modern slavery risks, OCS Australia benefits from the experience and existing framework of the global group of companies to which we belong, including an ultimate parent company that, as noted above, is a reporting entity under the UK *Modern Slavery Act*.

Policy & Governance

Once OCS Australia became aware that we would become a mandatory reporting entity under the Act, we engaged external legal and subject matter advisors to complete a comprehensive review of our **Modern Slavery Policy** and **Supplier Sustainability Code of Conduct** to ensure these are appropriately adapted and reflect good practice. Both these documents contain expansive provisions relating to addressing modern slavery risk and form part of a broader framework of governance and policy that is relevant to our overall approach, including:

- Employee relations policy
- OCS Australia Whistle Blowing Policy and Procedure
- Employee Handbook
- OCS Group Modern Slavery Policy
- OCS Australia Modern Slavery Policy
- OCS Supplier Sustainability Code of Conduct
- OCS Young Workers and Students Policy
- OCS Australia Human Rights Policy
- OCS Australia and Aotearoa New Zealand Grievance Policy and Procedure
- OCS Recruitment Procedure for Operatives
- OCS Recruitment Procedure for Salaried Staff
- OCS Group Code of Conduct

OCS Australia also established a **Modern Slavery Working Group** during the reporting period, which includes key executive positions to demonstrate our commitment to a “top-down” leadership approach to modern slavery issues:

- ANZ CEO
- ANZ Company Secretary
- ANZ Finance Director
- Aotearoa New Zealand National HR director
- External consultant representative

Supplier Due Diligence

As part of two separate initiatives³, OCS Australia issued a total of 183 modern slavery specific supplier self-assessment questionnaires (“SAQ”). These included specific suppliers identified by the risk assessment as having potentially elevated risks and suppliers operating in higher risk industry categories. In the

³ The second round of more targeted SAQs was issued to 25 suppliers after the conclusion of the reporting period, but prior to lodgement of this Statement.

second round of surveys, we also applied a materiality threshold of a minimum procurement spend of \$100,000.

The questionnaire assesses suppliers across various red flags for child labour, forced and bonded labour, and poor working conditions. It also seeks detailed information about the quality of respondent's modern slavery risk mitigation frameworks across the key pillar areas of:

- Due diligence
- Risk identification
- Training and education
- Internal governance and policy frameworks
- Industry collaboration
- Grievance mechanisms
- Measuring effectiveness

Whilst useful insights were gained from the SAQ process, the overall response rate was disappointingly low, which we understand is a common characteristic of this form of supplier engagement on modern slavery issues.

To more fully understand potential areas of inherently elevated modern slavery risks and the specific risk mitigation frameworks of individual key suppliers, OCS Australia also undertook, via external subject matter specialists, two desktop due diligence audits.⁴

The desktop audit for the first key supplier identified several areas of potentially elevated slavery risk, which primarily related to workforce characteristics that include identified vulnerabilities, an apparent lack of supply chain transparency, combined with likely linkages to higher risk countries, and product lines with recognised elevated risks, including suppliers linked to actual alleged human rights infringements. This supplier appeared to have a relatively basic policy and governance framework in place, with some human rights-related due diligence processes being undertaken for its home-branded products. However, the supplier appeared to lack a defined approach to modern slavery-related remediation and grievance mechanisms.

The most notable finding of the desktop audit for the second key supplier was that it demonstrated a modern slavery response that was assessed as being sophisticated and appropriately adapted to areas of inherently elevated risk. It has a well-developed system of internal and external auditing, and established practice of directly engaging with its suppliers, particularly in Asia, to educate and remedy detected areas of non-compliance.

OCS Australia has also undertaken a random audit of a small number of labour hire contractors to confirm workers are being correctly paid under the applicable Cleaning Services Award. We plan to implement a full audit program across all labour provider contractors in the next reporting period.

Contractor Screening

Across both our Midcity Group and OCS Australia, we have pre-existing screening measures in place to review modern slavery related risks for our contractors, requiring our contractors to review and comply with our Modern Slavery Policy.

⁴ This also occurred after the conclusion of the reporting period, but prior to lodgement of this Statement.

Modern Slavery Clauses in Supplier Contracts

OCS Australia completed a comprehensive update of our pre-existing standard provisions for specifically addressing modern slavery issues in supplier contracts. Beyond confirming a commitment to adhering to existing legal requirements relating to worker protection, the updated contract provision is designed to encourage positive collaboration with suppliers to facilitate modern slavery due diligence and risk mitigation steps penetrate beyond the first tier of our supply chains. The increased rollout of our model Modern Slavery Contract Provision throughout OCS Australia's procurement activities is a planned focus area for the next reporting period.

Training & Capacity Building

With our focus on establishing the necessary foundations for long-term modern slavery response framework, OCS Australia has undertaken targeted awareness raising and training initiatives with both internal and external focus.

Internally, one target area has been on ensuring our Cleaning Managers have an appropriate understanding of elevated modern slavery risks associated with the Australian cleaning industry, including how to appropriately act upon any concerns and be vigilant for the presence of any red flags.

Given our sector of operation, OCS Australia has also ensured that our staff are made aware of our Grievance mechanism and its relevance for reporting modern slavery concerns. We have rolled out toolbox talks to our workers, explaining the operation of our Whistleblowing Policy, along with easy to understand posters in our staff common rooms with details of our third party reporting facility.

OCS Australia also engaged our external consultant to provide specialised awareness training to our Australian Senior Management, focusing on risk factors in the cleaning and constructions sectors, high risk areas in our supply chain, our new reporting obligations and indicators of supplier risk and vulnerable workers.⁵

Externally, we have sought to raise the awareness of key suppliers, including through the distribution of a training material deck prepared by external subject matter specialists, which covers a range of topics, including:⁶

- Overview of what constitutes modern slavery, including the definition under the *Modern Slavery Act 2018* (Cth)
- Detailed overview of forced labour indicators
- Summary of key findings from the 2023 Global slavery index, including summary of global prevalence of modern slavery and key statistics for both Australia and New Zealand
- Description of geographic, product based and workforce risks for modern slavery
- Details of key indicators that workers might be victims of modern slavery
- Short summary of actions to take to begin addressing modern slavery, and request for any suppliers to notify OCS Australia of any potential modern slavery related concerns they may have

⁵ This training initiative occurred after the conclusion of the reporting period, but prior to lodgement of this Statement.

⁶ The supplier training pack was also developed and distributed after the conclusion of the reporting period, but prior to lodgement of this Statement.

External Collaboration and Involvement

OCS Australia & Aotearoa New Zealand's Managing Director has, in partnership with the Walk Free Foundation, taking a leading role in external collaboration for modern slavery responses, including through the position of Business Leader for the Bali Process Government and Business Forum.

A key focus of this collaborative effort has been on advocating for mandatory modern slavery reporting legislation in Aotearoa New Zealand. Despite significant progress towards achieving this goal, as at the time of lodging this Statement, the proposed legislation has not been enacted.

Measuring Effectiveness

(Reporting requirement 5)

As this is OCS Australia's first reporting period under the Act, a formal framework for measuring the effectiveness of our modern slavery response remains under development and has not yet been implemented.

This is a priority area that we have identified for development and implementation during the next (FY2024/2025) reporting period.

KPI Area	Action items for Next Reporting Period (Financial Year 2024/25)
Supplier engagement	<p>Rollout and expand the use of updated model Modern Slavery Contract Provision.</p> <p>Track the percentage of new contracts / supplier agreements with modern slavery provisions.</p> <p>Ensure supplier compliance with our updated Supplier Sustainability Code of Conduct.</p>
Risk Assessment	<p>Continue proprietary supply chain risk assessment, including with updated procurement data.</p>
Training and Education	<p>Embed modern slavery training into employee induction program.</p> <p>Rollout modern slavery focused toolbox talk to all staff across Australia and Aotearoa New Zealand</p> <p>Finalise online training module and roll out to all managers, support and administration staff.</p>
Due Diligence	<p>Issue self-assessment questionnaires to highest risk suppliers, identified through proprietary risk assessment.</p> <p>Continue to undertake supplier specific due diligence on identified suppliers from risk assessment.</p> <p>Complete audit program of labour related contractors.</p>
Grievance and Remediation	<p>Develop remediation framework for suspected instances of modern slavery.</p>