

Modern slavery and human trafficking statement 2024

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Reporting entity and legislative compliance

This document constitutes Serco’s Modern Slavery and Human Trafficking (MSHT) statement for the financial year 2024, as agreed by senior management and approved by the Serco Group plc Board. This statement complies with the reporting criteria of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and The Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024. The statement relates to Serco Group plc, covering all business regions, operating companies and business units throughout the world, including wholly owned subsidiaries and majority-owned operations. All entities owned or controlled by Serco Group plc (including all entities owned or controlled by Serco Australia Pty Ltd and Serco Canada, Inc.) have been consulted in the development of this statement and advised of the specific reporting requirements to meet UK, Australian and Canadian MSHT legislation and the actions we are taking or intend to take to address them. See List of subsidiaries and related undertakings in the Serco Group plc 2024 Annual Report and Accounts.

Our commitment



At Serco, we are committed to doing the right thing, acting with integrity, and in accordance with our Values. Through the services we provide, we look after and interact with some of the most vulnerable and disadvantaged people in society. We are committed to respecting the human rights of our service users, our employees and those in our supply chain. We will not therefore engage in forced labour, human trafficking, child labour, or any other form of modern slavery; nor will we knowingly work with anyone who does.

We are not complacent about modern slavery and human trafficking risks and the consequences of not getting it right. We continue to monitor and strengthen our management and mitigation of these risks.

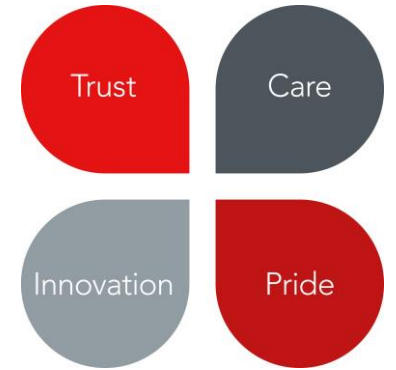
This statement outlines the steps we have taken in the past year to address these issues as we work to Impact a Better Future.

Mark Irwin
Group Chief Executive



Our values

Our Values – Trust, Care, Innovation and Pride – shape how we behave. Underpinning them is a commitment to act with integrity and the right to be treated with dignity, fairness, equality and respect which we are committed to upholding throughout our organisation.



Trust – We work hard to earn trust and respect.

We deliver on our promises; are open, straightforward and honest; do the right thing; and take personal responsibility for getting things done.

Care – We care deeply about the services we provide, and the communities we serve, and we look after each other.

We work together to deliver high-quality public services, often of great importance to the nations and the communities we serve. We take care of each other, and those we serve, and we aim to make a positive difference to people's lives.

Innovation – We aspire to be better than anyone else at what we do.

We continuously improve our ways of working, and try new ideas, big and small. We share our knowledge and experience and embrace change, knowing that if we don't provide innovation and value for money to our customers, our competitors will.

Pride – We want to be proud of what we do.

We know that the work we do is important, and we take pride in doing it well. We value energy and enthusiasm, skill and experience, and an ability to make hard work fun. We contribute both as individuals and as part of a team.

Human Rights and MSHT

Our commitment to human rights and MSHT is defined within our Group Human Rights Policy Statement¹, related operating procedures, and relevant sections of mycode². This reflects our commitment to respect and protect the dignity and human rights of our colleagues and everyone we deal with in our work. This includes those in our care, who use our services or work for our business partners or suppliers.

We use international human rights standards such as the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights to guide decision making, constructive engagement and the assessment and management of adverse human rights impacts.

As part of this commitment, we will not tolerate forced labour or human trafficking in our business. Recruitment at Serco is fair and free and all colleagues have an employment contract, recruitment agreement or similar work document in a language they understand; any housing provided is within defined standards that consider both host country and international housing and safety standards; we do not use and strive not to be complicit in, forced or compulsory labour nor engage in human trafficking or subject individuals to involuntary servitude, debt bondage or slavery. We respect the rights of children and young workers and protect them from any work that deprives them of their childhood, their potential, dignity and development. We recognise that children have the same general human rights as adults and also specific rights that recognize their special needs.

We seek not to cause or contribute to torture and other cruel, inhumane, or degrading treatment or punishment. We take all reasonable steps to avoid the use of force in relation to those who are in facilities we manage or benefit from services we provide. If force is used it is proportionate to the threat, appropriate to the situation and limited to what is strictly necessary.

We consider the risks of adverse human rights impacts including MSHT in our due diligence processes when considering new business opportunities, partners and suppliers. We have guidance for colleagues to understand how to consider human rights impact across the different markets we operate in and the potential red flags to look out for regarding MSHT. We endeavour to remedy or cooperate in the remediation of any substantiated adverse human rights impacts and have procedures for MSHT response and remediation. For further information refer to our Human Rights Supplement³.

We work to make it as psychologically safe and easy as possible for anyone to raise a concern regarding any risk or issue they encounter or experience in relation to Serco, including employment and work conditions. We have several channels through which concerns can be raised. Speak Up channels include line managers, local Human Resources and our Ethics & Compliance teams as well as:

- **Speak Up⁴:** Our global ethics helpline is available online for all employees, suppliers, supplier personnel and the public to use, supported by an online case management system provided by an independent third party. This can be used anonymously. We take all concerns seriously. The Group Executive Committee, Corporate Responsibility Committee and Audit Committee regularly receive detailed reports on Speak Up activity, investigations and actions taken. During 2024, there were 3 issues relating to modern slavery raised through Speak Up. The three were unsubstantiated.
- **Grievance procedure:** Where a grievance cannot be resolved informally, it will be dealt with under our formal grievance procedure where applicable. During 2024, there were no issues relating to MSHT raised in this manner.
- **Corporate Responsibility email channel:** We also invite members of the public to raise any concerns to our Group Ethics and Compliance team through corporateresponsibility@serco.com. During 2024, no issues relating to MSHT were raised through this channel.

Our business, structure and governance

Serco delivers services to governments and other institutions who serve the public or protect vital national interests. This is done through people, supported by effective processes, technology and skilled management. Our customers define what outcomes or services they need to deliver, and we develop new and more effective ways to deliver them. We provide innovative solutions to complex challenges facing governments, bringing our experience, capability and scale to deliver the service standards, cost efficiencies and policy outcomes governments want. In this way we make a positive difference to the lives of millions of people around the world, often looking after some of the most vulnerable and disadvantaged in society and helping to keep nations safe. An overview of our core sectors and where we operate is shown in Figure 1.

Group policy on human rights and its implementation through the business is driven through the Ethics & Compliance (E&C) function. This is led by the Group Head of E&C who is responsible for our Ethics & Compliance programme – including MSHT.

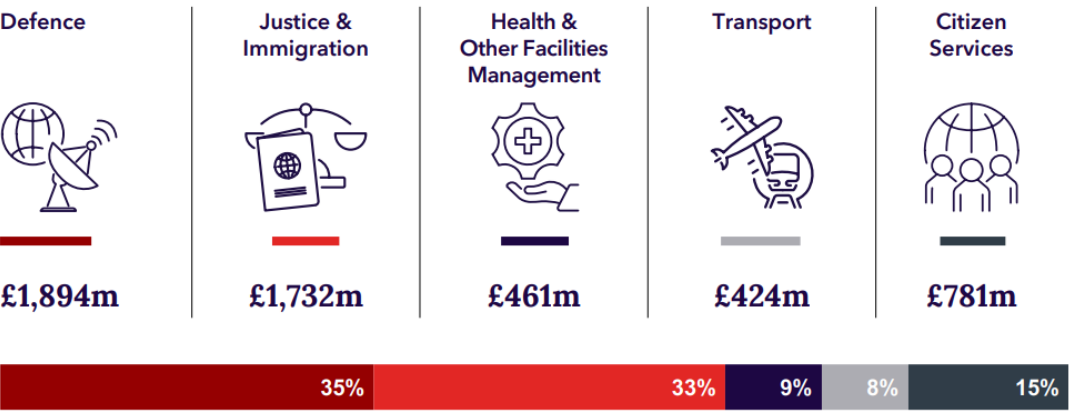
The Group Head of E&C reports to the Group Deputy General Counsel and provides regular updates to the Group Executive Committee. A number of Board Committees also receive regular reports on E&C matters, with the Corporate Responsibility Committee having oversight of MSHT.

Divisional Ethics and Compliance Leads (DECLs) are responsible for ensuring policy is followed, processes are complied with and due diligence is effective in their regional Division. They each report regularly to their respective Divisional Executive Management Team. The Head of Group E&C co-ordinates activity where Group-wide action is needed and chairs regular and ad hoc global meetings with the DECLs as well as having regular contact with each individually.

DECLs are supported by Divisional Ethics & Compliance Champion Networks, comprising functional and operational representatives from across each Division, all of whom have received MSHT training. Figure 2 illustrates our governance structure.

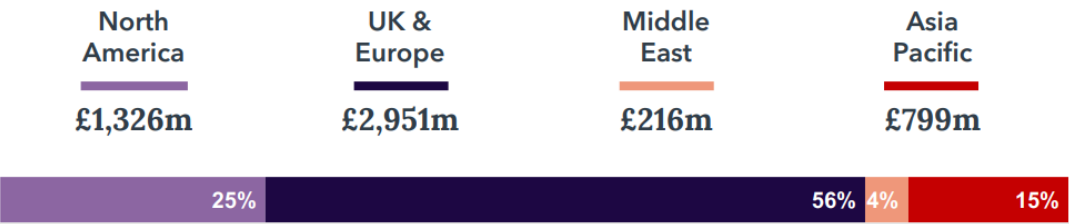
Figure 1 – Summary of turnover in our core sectors and divisions

Our business is focused across five core sectors



Our divisions

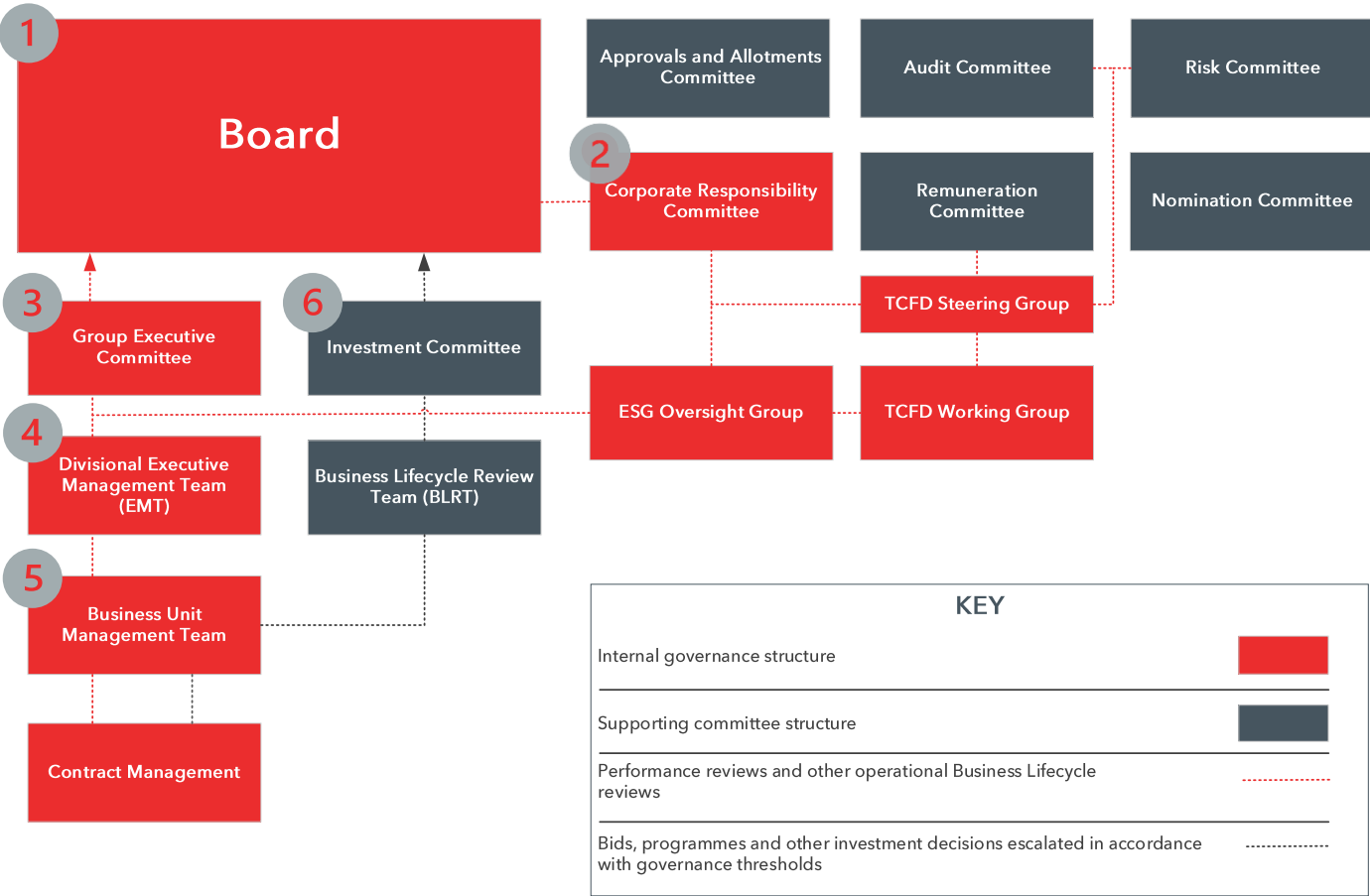
Serco's operations are delivered across four geographic regions.



See 2024 Annual Report and Accounts for further information on our business.

MSHT Governance overview

Figure 2 - Our governance structure



1. The Serco Group plc Board has ultimate responsibility for human rights policy, including MSHT commitment.
2. Oversight and review of human rights including MSHT is undertaken by the Corporate Responsibility Committee (CRC), a formal Board committee.
3. The Group Executive Committee regularly reviews Ethics & Compliance matters.
4. Divisional Executive Management Teams (EMTs) are responsible for ensuring MSHT related requirements are complied with across each Division, that impacts are understood, and appropriate oversight exercised. Red flags arising from third party due diligence are reviewed by Divisional EMTs or specific EMT members. DECLs report regularly to these teams.
5. Business Unit Management Teams are responsible for upholding our MSHT commitment in our Contracts by ensuring the identification, prevention or mitigation of any adverse MSHT impacts caused or contributed to by Contract operations or linked to our operations through customers, business partners or other third parties, including our supply chain.
6. Oversight and approval of contractual structures and arrangements for joint ventures and strategic partnerships is provided by the Investment Committee. Divisional EMTs are responsible for managing these relationships and ensuring compliance with Group Policies and Standards.

Our performance and activities

Work with Slave-Free Alliance

We continued our membership of Slave Free Alliance (SFA) throughout 2024. We value the dedicated specialist support available to us through this arrangement, as we continue to strengthen our commitment to preventing MSHT. In 2024, we collaborated with SFA on the following initiatives:

- developing training for specific business units within Serco, tailored to the specific risks each area faces;
- developing specialised training for our global procurement staff;
- reviewing and enhancing our modern slavery due diligence processes.

We are also able to consult them for investigation assistance and other ad hoc matters as needed. One of the E&C Team also attended SFA's 2024 conference and shared learning from that with the wider team.

Ecovadis

In October 2022, we partnered with EcoVadis, the global sustainability ratings leader, to better understand our key suppliers' social and environmental performance in 4 key areas - environment, labour and human rights, ethics and sustainable procurement. These evidence-based and verified assessments are refined into easy-to-read scorecards, with scores from zero to 100. Rated suppliers are asked to achieve and/or demonstrate progress towards achieving and continuing to maintain a minimum score of 45 for both the Ethics and Human Rights pillars. Of our 276 rated suppliers, 91.3% scored above 45 for Human Rights and 85.5% scored above 45 for Ethics. In addition to this, the average score for Ethics is 58.5 and Human Rights is 61.3 across all our rated suppliers. Serco was awarded a Bronze EcoVadis Sustainability Rating, reflecting the progress we have made on improving our corporate sustainability credentials.

Modern Slavery Council

We continued our active participation as members of the UK Business Services Association (BSA) Modern Slavery Council, alongside the UK Cabinet Office and other strategic service providers. We helped develop their second Modern Slavery Toolkit, published in December 2024, to help organisations raise awareness within their workforce, and to empower frontline workers to be able to identify modern slavery and labour exploitation.

Our performance and activities

Contingent Workforce reduction

We define our contingent workforce as total number Agency (labour hire) workers who are employed by another organisation but provide services to Serco. Notably, our contingent workforce headcount for 2024 decreased by 36% compared to 2023. This reduction aligns with our strategic workforce planning.

Divisional monitoring

Our Divisions continue to monitor human rights and MSHT risks through supplier assurance processes, including accommodation reviews and site visits.

No prosecutions

There have been no prosecutions for human rights violations within the Serco Group in 2024, including for MSHT. This outcome underscores our dedication to upholding human rights across all our operations.

Speak Up

During the year, three Speak Up reports were raised relating to modern slavery concerns. The allegations related to activities in Italy, Australia and the UK. The modern slavery aspects of the three were thoroughly examined and found to be unsubstantiated. We take all such reports seriously and are committed to addressing any issues promptly and effectively.

Australia: Return and Reintegration Assistance Program (RRAP)

Throughout 2024, we continued to deliver the RRAP contract operations on behalf of the Australian Department of Home Affairs. This program includes supporting individuals who are victims of modern slavery, demonstrating our commitment to assisting vulnerable populations and contributing to broader efforts to eradicate modern slavery.

Progress and performance

We use different indicators to monitor our progress and performance regarding MSHT, aligned to the specific objectives of our MSHT program and external best practice.

Indicator	Unit	2023	2024	24 v 23	Definition
Employee engagement: Ethical Standards	No.	76	76	+0	Average score of responses to specific questions related to Business Integrity, namely: I never feel pressured to compromise our ethical standards.
Employee engagement: Reporting Unethical Conduct	No.	74	74	+0	Average score of responses to specific questions related to Business Integrity, namely: I can report unethical conduct without fear of retaliation.
Contingent worker headcount	%	10.7	7.6	-3.1	Total number of contingent workers, defined as those who are employed by another organisation but provide services to Serco, as a percentage of headcount.
Prosecutions for human rights violations (incl. indigenous, modern slavery, etc.)	No.	0	0	+0	Total number of prosecution resulting from a breach of Human Rights legislation where Serco has been found guilty. These are counted where the prosecution has concluded in the reported period, not when the original incident took place.
Tier 1 suppliers categorised as potentially high risk for Modern Slavery	No.	1861	1696	-165	Total number of Tier 1 suppliers that have been categorised as potential high risk for modern slavery
Tier 1 suppliers categorised as potentially high risk for Modern Slavery	%	13.3	12.4	-0.9	Total Number of Tier 1 suppliers that have been categorised as potential high risk for modern slavery as a proportion of the total number of Tier 1 suppliers
Tier 1 supplier enhanced modern slavery assessment completion	%	16.1	7.5	-8.6	Percentage of Tier 1 suppliers categorised as potential high risk for modern slavery who completed an enhanced modern slavery assessment in 2024.
Substantiated Speak Up cases related to Modern slavery	No	0	0	+0	The number of Substantiated Speak Up Cases in the period where the primary issue sub-category is 'Human Rights (incl. Modern Slavery)
Case rate substantiated Modern Slavery cases	%	0	0	+0	The number of Substantiated Speak Up Cases in the period where the primary issue sub-category is 'Human Rights (incl. Modern Slavery)' divided by total number of Headcount (2) employees multiplied by 100.

Spotlight: RRAP New South Wales Outreach

In early 2024 our Return and Reintegration Assistance Program (RRAP) colleagues participated in a regional outreach program to assist people directly impacted by modern slavery and human rights abuses. Serco case workers attended the outreach program in regional New South Wales where human rights abuses had been identified as prevalent on citrus farms in the region. The external agencies involved in the program included the Australian Border Force, the Australian Federal Police, the International Organisation for Migration (IOM) and several not-for-profit organisations.

Serco saw firsthand that citrus farm employees were often underpaid, provided with substandard accommodation, and were struggling to access appropriate medical and other services. Our colleagues met with local community members and organisations to provide information on the RRAP programme and explain how it can support individuals in returning home. This engagement activity was positively received, with community groups providing third-party referrals and prompting active interest from temporary migrant workers wanting to return home. The caseworkers from Serco are now actively assisting the recovery of those individuals.

Our caseworkers focus on a range of supportive activities tailored to individual needs, from pre-return counselling and emotional support to connecting them with resources such as emergency housing and legal aid and obtaining travel documents from their consulates. They also work to empower service users, offering guidance on rebuilding lives and developing coping mechanisms. Their ongoing involvement ensures consistent and compassionate support throughout the return home.



Risk management

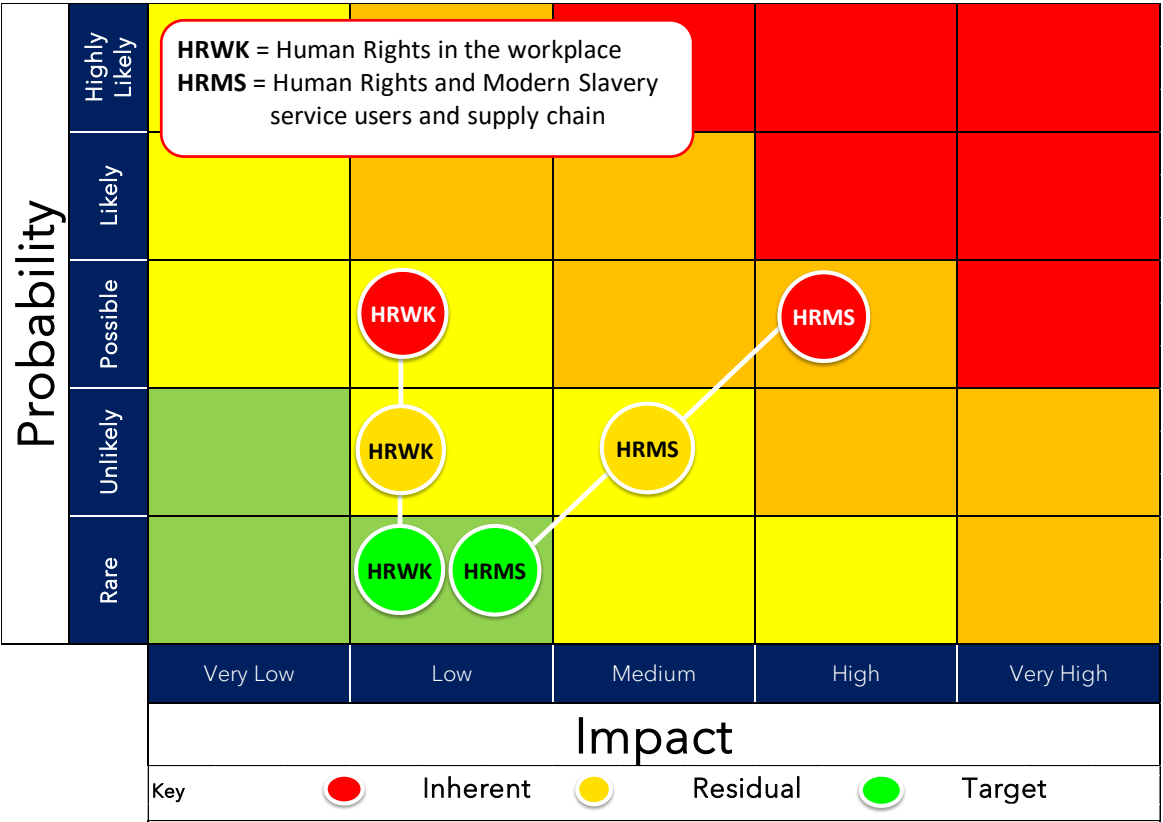
Our MSHT commitment is proportionately embedded in our operations, alongside our commitment to protect those in our care from any violation of human rights.

Contract risks – including potential human rights and MSHT impacts – are managed and monitored throughout the business lifecycle per our Enterprise Risk Management methodology. This requires assessment at Contract, Business Unit and Divisional level, and periodic review by Divisional EMTs.

Each division maintains a register of Ethics & Compliance risks and associated mitigation and controls, including human rights and MSHT. These are consolidated into a Group register of E&C risks, regularly reviewed by the Group Executive Committee and CRC. We currently risk rate Human Rights in two categories. The first is Human Rights in the Workplace, which focuses on the risk to our employees and is rated low. Human Rights and Modern Slavery risks for services users and supply chain are considered together as a broad second category which is rated medium.

The risk of MSHT is embedded in our Group principal risk, ‘Failure to act with integrity’. As such, it is reviewed regularly by our Risk Committee with the Chair updating the Group Board.

Figure 5 – Human rights and MSHT risk heat map



Our Supply Chain

Managing MSHT risks in our supply chain

Our extended supply chain is large and complex, spread across many geographies and purchase categories. We recognise the risk of MSHT within it. We take a risk-based approach, focusing our efforts on mitigation in those areas of our supply chain that we have assessed to represent the highest risk.

An E&C risk profile is created for current and prospective suppliers, based on assessment against key risk indicators. This is informed by our third-party risk management solution, which we use to assess suppliers against a comprehensive set of risks and risk tolerance criteria.

We identify certain purchase categories and sub-categories as high-risk for Modern Slavery based on a number of criteria. The current list of these is as follows:

Purchase Categories in our supply chain identified as high-risk for Modern Slavery (Level 1 Categories):

- Corporate services
- Facilities management
- Ground transportation
- Hard facilities management
- Human resource services
- Information & communication technology
- Marine
- Soft facilities management

Purchase Sub-categories in our supply chain identified as high-risk for Modern Slavery (Sub-categories - Level 2):

- Building maintenance and services
- Catering equipment and services
- Catering food, beverages and ingredients
- Catering equipment, food, and services
- Cleaning
- Cleaning equipment and consumables
- Cleaning services
- Commercial vehicles
- Construction
- Environmental, health and safety
- Fleet
- Freight & logistics
- Furnishing and appliances
- ICT infrastructure
- Landscaping and ground
- Laundry and linen services
- Marine equipment & services
- Professional services
- Recruitment & temporary labour
- Security services
- Travel & events
- Waste services

Our supply chain

The relationship between Serco and its suppliers is an important component in achieving high performance in our business. In selecting suppliers, Serco works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with our own and expect our suppliers to follow our Supplier Code of Conduct.

The data below shows our supplier spend across categories and countries considered high-risk for Modern Slavery. Our spend is generally concentrated in lower risk countries. Our highest spend in a high-risk category is Recruitment & temporary labour.

Coverage 2024: All data is for the total Group*
Total Spend 2024: £2.33bn
Number of Tier 1 suppliers 2024: 13,652

Spend by low and high-risk (Level 2) purchase categories*

- High-risk purchase categories spend 18.6%
- Low-risk purchase categories spend 81.4%

Our % spent in high risk for modern slavery Level 2 categories has increased by 2.8% to 18.6% since 2023.

Top ten countries (supplier location) by spend*

Accounts for more than 97.5% of spend and more than 94.5% of suppliers

- | | |
|------------------------|----------------|
| 1 United Kingdom | 6 Belgium |
| 2 United States | 7 Greenland |
| 3 Australia | 8 Saudi Arabia |
| 4 Canada | 9 New Zealand |
| 5 United Arab Emirates | 10 Germany |

13 * Excludes spend and supplier information from our ORS, EHC and FFA acquisitions

Suppliers and spend in countries in Top 10 Global Slavery Index

www.globalsslaveryindex.org

Country	Spend 2024	% of Total Spend 2024	Suppliers in high risk Level 2 purchase categories
Saudi Arabia	£15.36m	0.66%	18
Kuwait	£998.9k	0.04%	1
Türkiye	£64.6k	<0.01%	0

Top Ten MSHT high-risk purchase sub-categories (Level 2) by spend

Category	% spend Level 2 high risk category
Professional Services (US categorisation of Recruitment and Temporary Labour)	20.62%
Recruitment and Temporary Labour	19.25%
Catering, Food, Beverages, and Equipment	10.8%
Security Services	9.92%
Building Maintenance and Services	7.22%
Construction	6.49%
Waste Services	4.88%
Cleaning Services	3.7%
Commercial Vehicles	3.03%
Catering Equipment and Services	2.53%

Spotlight: Supplier Engagement in the Middle East

Throughout 2024, the Middle East Divisional Ethics Team continued to engage with our supply chain on both Modern Slavery and other Ethics related subjects. We carried out 38 accommodation inspections on our supply chain for current suppliers as part of our supplier audit programme. We also carry out accommodation inspections as part of our pre-onboarding due diligence.

Serco Middle East has been pro-actively working with our suppliers to ensure an open door reporting culture for both Ethics and Safety which has resulted in positive early communication on Ethics and Safety matters. This builds our Company Value of Trust alongside our suppliers to ensure they can call upon us for support and understanding. Our aim is to focus on solutions and driving improvements on maturity levels for both Safety and Ethics.

We continue to both learn from our suppliers, understanding the challenges they have but working with them and educating them across various areas of responsible business conduct. Safety and Environmental topics continue to be an important focus with collaborative working on areas such as HSE Risk Assessments and Method Statements and reducing carbon emissions.



Due diligence

We work to ensure that proportionate risk-based due diligence is completed on third parties (suppliers, agents, strategic partners, customers) and that they are appropriately managed throughout the lifetime of the relationship.

Our core process is as follows:

1. Risk profiling/assessment: To determine the required level and type of due diligence.
2. Information gathering: Through screening, questionnaires, references and interviews.
3. Evaluation: To verify and consider information gathered and resolve issues/red flags.
4. Approval: To gain formal agreement to enter a relationship with the third party.
5. Agreement: To establish a contractual relationship.
6. Monitoring: To manage and mitigate risk throughout the lifetime of the relationship.

In 2022, we invested into a new screening tool to ensure more in-depth screening in the area of human rights and MSHT risks. We have been using this throughout 2024 to screen our supply chain for human rights breaches including MSHT. We also continue to refine the tool to increase the accuracy and applicability across various components of our supply chain.

Training and communication

Our Ethics & Compliance function is responsible for designing human rights training, including MSHT. Training is delivered at two levels:

- All employees required to complete appropriate SMS, mycode and Values training through Serco Essentials, our mandatory all-employee training program. Training is completed on joining Serco, and annually thereafter. Teams in functions and geographies recognised to be high-risk areas periodically receive specific MSHT training to have deeper, specialised understanding.
- All the Divisions continue to raise awareness on MSHT through various channels. The UK&E Division completed 12 Integrated Assurance Reviews (IAR). The purpose of these reviews is to ensure that our frontline staff understand and are aware of Serco's various policies and processes, including those relating to MSHT.

What next

We recognise the need to remain vigilant on MSHT risks. We are committed to continuing to improve awareness, processes and engagement.

In 2025 we will:

- Continue to leverage our relationship with Slave Free Alliance to enhance and improve our MSHT approach. This includes concluding our review of our due diligence processes to ensure that these address modern slavery risks appropriately and proportionately.
- Continue to follow up with selected suppliers following their response to risk-based due diligence to understand their management of MSHT in their supply chain.
- Deliver targeted modern slavery training to global contract managers and procurement staff, in addition to our annual Serco Essentials training.



Mark Irwin

Group Chief Executive Officer, Serco Group plc

February 2025

serco

Impact
a better
future