

Modern Slavery Statement 2024

1 January 2024 - 31 December 2024

Doing business in the right way →



TRUE.Values.

Board Approval

The Board of OCS Group Australia Pty Ltd as the principal governing body, approved this Modern Slavery Statement on 30 June 2025.

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 30 June 2025.



Gareth Marriott
Managing Director, OCS Australia and New Zealand

30 June 2025

Contents

Board Approval	2
Message from our Managing Director	4
Introduction	5
Structure, Operations & Supply Chains	6
Operations	8
Identifying and Assessing our Risks	11
Addressing our Risks	15
Awareness and training	19
Effectiveness	20
Planned Focus Areas for the Rest of 2025 and Beyond	21
Appendix A	22

Message from our Managing Director



At OCS, we are clear in our ambition: to be the world's best facilities services company, delivering essential services with integrity, care, and a deep respect for the rights of every individual. This includes doing our part to help eradicate modern slavery in all its forms.

As we publish our second Modern Slavery Statement under the Australian Modern Slavery Act, we reaffirm our commitment to protecting human rights across our operations and supply chain. This is not just a compliance obligation — it's a moral and business imperative that aligns with our TRUE values of trust, respect, unity, and empowerment.

We recognise the increased risk of modern slavery within our industry sectors — including commercial cleaning, and building maintenance — where labour intensity, subcontracting and migrant workforce vulnerabilities can combine to create conditions for exploitation. We have been focusing on building the strong foundations needed to ensure we have a robust and holistic modern slavery response framework. That has meant investing in independent supply chain risk analysis through Fair Supply, developing relationships with experts, strengthening our policies, and creating governance structures such as our Modern Slavery Working Group and update of our contractor agreements.

We assessed 571 suppliers using proprietary software that maps risk down to tier 10. We issued modern slavery self-assessment questionnaires (SAQ's) to suppliers operating in those industries and countries with an elevated risk in an attempt to ascertain how they were mitigating their risks and conducted a targeted desktop audit on a key supplier.

We've also taken steps to ensure our people are equipped to recognise and respond to signs of exploitation. This includes specialist training delivered by Fair Supply for senior managers, targeted training by HR for front line managers, a clear grievance and whistleblowing framework for frontline staff and training on our Code of Conduct.

There is more work to be done. In the coming year, we will continue to audit, engage, and educate — always with the aim of improving transparency, reducing risk, and ultimately supporting fair and safe working conditions for everyone connected to our business.



Gareth Marriott
Managing Director
OCS Australia & New Zealand

Introduction

This is the second Modern Slavery Statement (“this Statement”) prepared by OCS Group Australia Pty Ltd (OCS Australia) in accordance with the Modern Slavery Act 2018 (“the Act”) for the period 1 January to 31 December 2024. It outlines the steps we have taken to assess and address the risks of modern slavery within our operations and supply chains, and reflects our ongoing commitment to transparency, continuous improvement and ethical business conduct.

The Act requires large businesses operating in Australia with consolidated revenue of at least AU\$100 million to publish annual Modern Slavery Statements. These statements must address mandatory reporting criteria set out in Section 16 of the Act and be approved by the principal governing body of the reporting entity.

OCS Australia acknowledges the many forms of modern slavery, including slavery, servitude, forced labour, debt bondage, human trafficking, forced marriage, deceptive recruiting practices, and the worst forms of child labour. We recognise the elevated risk profile of the facilities services industry and are committed to actively identifying, assessing and addressing these risks within our direct operations and across the complex, multi-tiered supply chains in which we operate.

Our modern slavery response is informed by international frameworks, including the United Nations Guiding Principles on Business and Human Rights and the

Global Slavery Index, and is supported by engagement with expert partners such as Fair Supply, the Walk Free Foundation and Slave Free Alliance. As a business committed to our TRUE values – Trust, Respect, Unity, and Empowerment – we believe we have a responsibility to respect the rights of every person connected to our operations and supply chain.

This Statement sets out the actions we have taken over the reporting period, the findings of our risk assessments, and the priorities we have identified to strengthen our approach.



Structure, Operations & Supply Chains

Structure

1. Australian structure

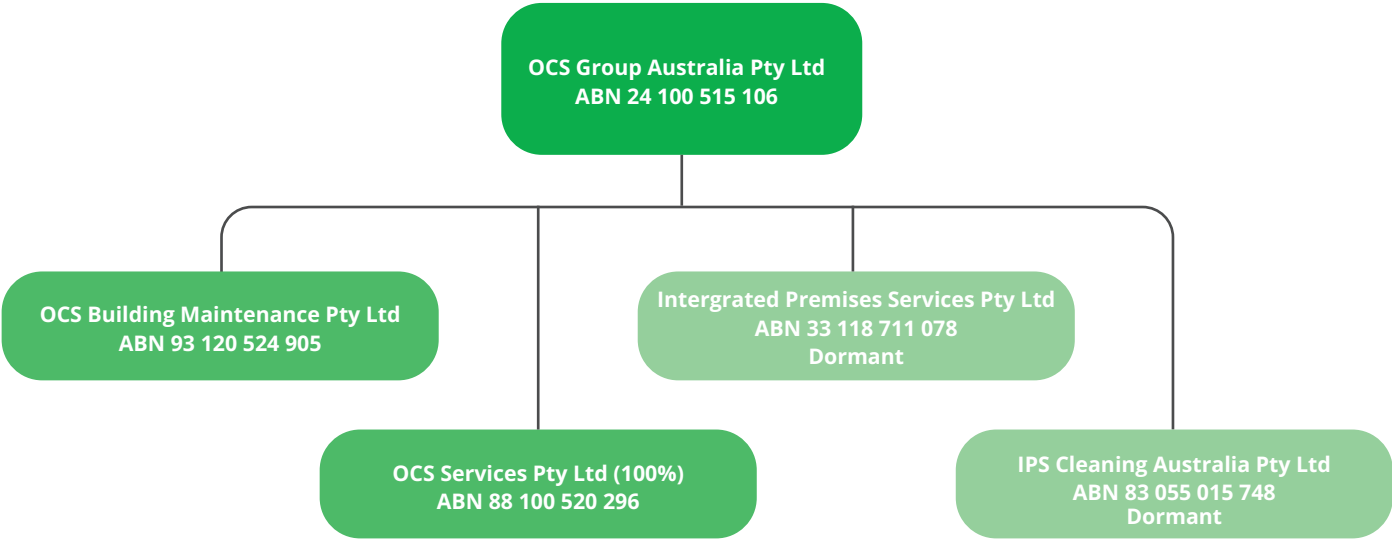
The reporting entity is OCS Group Australia Pty Ltd (ABN 24 100 515 106), a wholly owned subsidiary within the global OCS Group structure. OCS Australia operates as the parent company of a consolidated group of Australian businesses providing facilities management and property services. These businesses include operations under the Midcity Group (Midcity) brand, which specialises in insurance building repairs and commercial construction across multiple Australian states.

OCS Australia employs over 650 colleagues nationally and delivers services across a broad customer base through a combination of directly employed staff and reputable subcontractor arrangements. The company is governed by a Board

of Directors and supported by executive leadership, which oversees key functions including operations, procurement, risk, finance and human resources.

2. Consultation

In accordance with the Act, this Statement covers the operations of OCS Australia and the entities it owns or controls. All relevant subsidiaries and business divisions were consulted during the preparation of this Statement. This included participation in the OCS Australia Modern Slavery Working Group and formal consultation with legal, risk, procurement and HR functions across both OCS and Midcity. All entities included in this Statement are subject to the same risk management processes, modern slavery policies and supplier engagement measures described in this report.



3. OCS Group UK

OCS Australia is part of the broader OCS Group, which has its global headquarters in the United Kingdom. The UK parent company has been reporting under the UK Modern Slavery Act 2015 since its introduction and has implemented a Group-wide commitment to combat modern slavery. This includes setting minimum expectations for due diligence, policy implementation, and awareness training across all international operations. OCS Australia's modern slavery response aligns with this broader global framework, and the Australian team contributes to the development and application of OCS Group-wide standards and reporting.

The latest UK Modern Slavery Statement for OCS Group is available on its website (ocs.com/uk/modern-slavery-act), providing further context for the Group's global approach.

4. OCS globally

OCS Group is a leading international facilities management company with over 120,000 colleagues and 8,000 customers across the UK, Ireland, Europe, the Middle East, and the Asia Pacific. Founded in 1900 and family-owned for much of its history, OCS has built a reputation for delivering essential services across cleaning, security, catering, hard services, and integrated facilities management solutions.

In 2023, OCS Group was acquired by Clayton, Dubilier & Rice (CD&R), a global private investment firm, following a strategic merger with Atalian's operations in the UK, Ireland, and Asia. This new ownership supports further investment in technology, capability, and governance, including the Group's continued commitment to ethical sourcing and responsible business practices. OCS's global leadership has reaffirmed its commitment to international human rights frameworks and the UN Guiding Principles on Business and Human Rights, with a continued emphasis on transparency and ongoing improvement.

OCS continues to demonstrate great commitment in identifying and mitigating the risk of modern slavery and labour exploitation within its operations and supply chains. OCS has further developed its processes and procedures to support its ongoing commitment to protect its workforce. SFA looks forward to supporting OCS in its anti-slavery agenda in 2024 and beyond.

Elenor Smith

Senior Advisor - Human Rights in Supply Chains



**SLAVE-FREE
ALLIANCE**

Working Towards a
Slave-free Supply Chain

Operations

Our Team

OCS Australia's workforce consists of 670 colleagues across a mix of full-time (279), part-time (216), and casual (175) roles. In our Facilities Services Operations (OCS Services), our frontline cleaners, supervisors, and contract managers number 581, and we have two waste coordinators. The Midcity team comprises 37

operational staff members and 17 customer support staff. Our operational teams are supported by shared services including management, administration, payroll, human resources, health and safety, IT, and business development (35 combined).



670
Colleagues



279
Full-time



216
Part-time



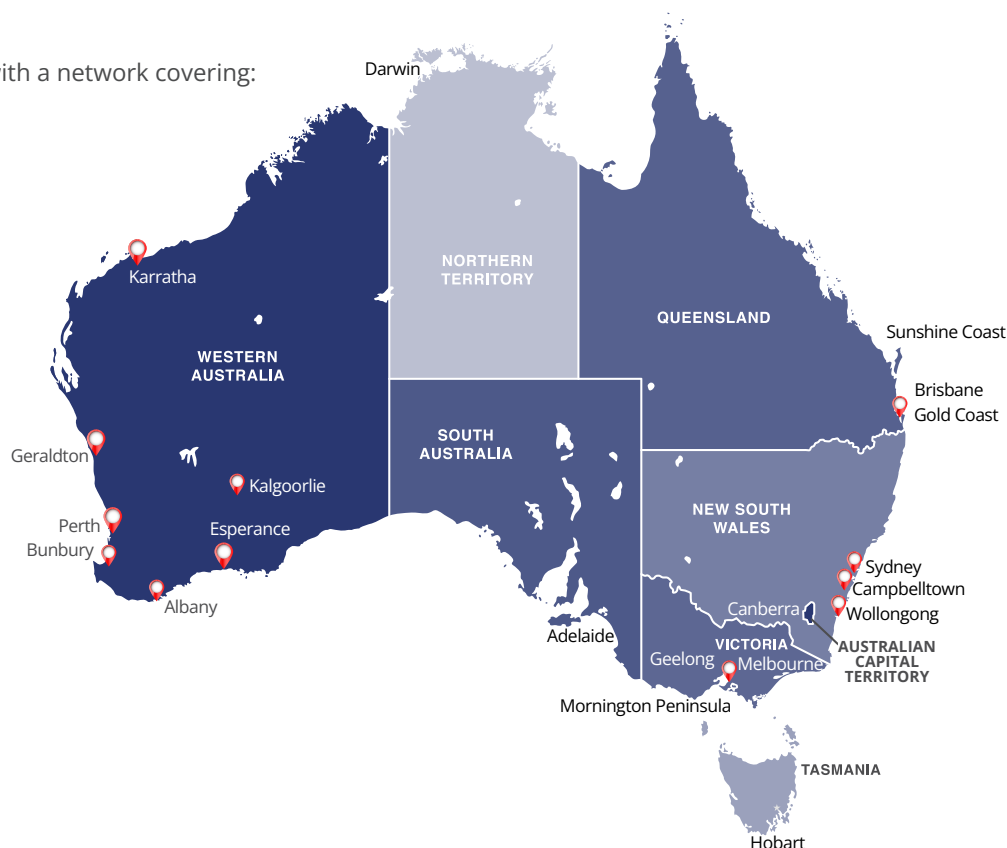
175
Casual

Geographic locations

OCS Australia operates nationally with a network covering:

- Perth (Head Office)
- Sydney
- Melbourne
- Brisbane
- Kalgoorlie
- Albany

These locations support the delivery of services to over 200 customer sites across the country, with teams embedded in customer operations across urban, regional and remote areas.



OCS Services – what we do

OCS Services delivers essential facilities services tailored to the needs of public and private sector customers. Our core service offerings include:

- Commercial cleaning and specialist cleaning services, including in pharmaceutical and food manufacturing
- Facilities management
- Hygiene services
- Grounds maintenance
- Pest control
- Waste management

We are certified under multiple ISO standards, including ISO 9001 (Quality), ISO 14001 (Environmental Management), ISO 45001 (Occupational Health & Safety), and ISO 27001 (Information Security), and hold Toitū Net Carbon Zero certification. A regulated management system with a strong focus on safety, quality, and environmental impact underpins our service delivery. Risk management is embedded into our management system, and our approach to the risks of Modern Slavery follows these principles. Our certifications help to guide us in adopting sustainable and ethical practices underpinned by our global governance structure.

Midcity – what we do

Midcity Group, trading as OCS Building Maintenance Pty Ltd, is a wholly owned subsidiary specialising in insurance-related and commercial building works. With over 35 years of operational history, Midcity provides services across:

- Residential, commercial and industrial building repair
- Insurance repairs and reinstatement works
- Project management for major building events
- Emergency make-safe services.

Midcity operates across Western Australia, New South Wales, Victoria, and Queensland, with a trusted contractor network of qualified tradespeople. The business serves major insurers, loss adjusters and commercial property customers, and is subject to the same governance, risk and compliance processes as OCS Australia.

Midcity holds the same suite of ISO certifications as OCS Services as well as being part of the OCS Australia Toitū Net Carbon Zero certification.



Supply Chains

As we operate two distinct business units, Midcity and OCS Services, our supply chain reflects this distinction. Our support and back office, as well as our operating offices, are shared across both business units, meaning that suppliers in this space, such as legal advisors, telecommunications providers, landlords, and recruitment services, straddle both businesses.

Midcity operates under a model whereby the repair and commercial building services are largely undertaken by a specialised contracted trades base overseen and supervised by our qualified supervisors and construction managers in each state. The work completed for our customers in relation to domestic insurance claims is high volume, low value, which requires the business to employ a large number of tradespeople (contractors) to ensure we can deliver services within our customers' KPIs.

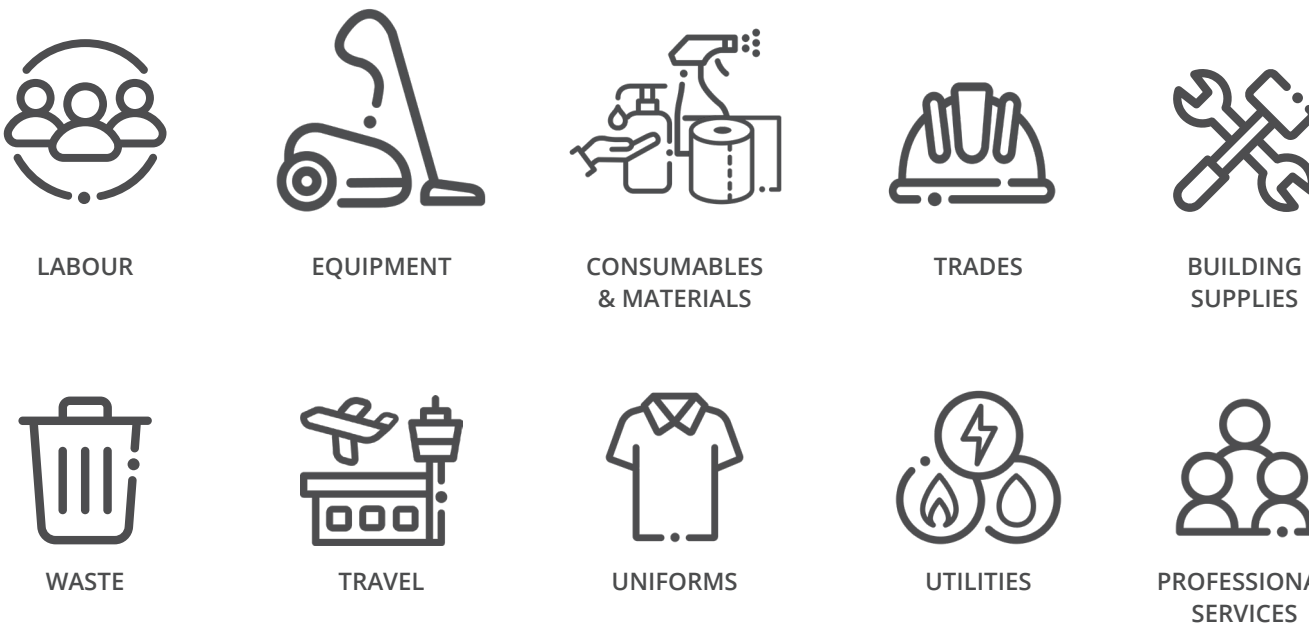
The larger rectification and commercial building services work often requires a different set of trades, with the expertise to deliver on these larger jobs, although some trades do work across both types of jobs. While Midcity purchase some building supplies directly, the trades base also provides supplies as well as labour to complete jobs. This business model means that Midcity requires a large base of suppliers, and in the reporting period we engaged with 676 suppliers. The majority of these were our trades base providing building works and related building products (approx. 94% of the total spend). Other suppliers

are related to builders cleans and waste removal, computer and software, rentals, recruitment and general office expenses.

The model for OCS Services is predominantly direct labour, with some non-direct labour provided through sub-contractors or when specialist cleaning services are required, such as high-level window cleaning. As a labour-based service provider, our labour costs (wages, on-costs and contractors) make up approximately 85% of our cost of doing business, with approximately 68% attributable to our direct labour. Other spend contributing to the balance. There were 76 suppliers engaged by OCS in 2024, with 68% attributable to cleaning labour providers across 12 suppliers. Other related specialist suppliers including hygiene, pest, window cleaning, waste, gardening services and HVAC, accounting for 8% of the spend, and cleaning consumables and supplies, 13%. The remainder includes items such as legal, uniforms, travel and accommodation, utilities, and accounting-related services.

There were approximately 10 suppliers used across both businesses, including office supplies, computer services, recruitment, accreditation bodies, insurance and telecommunications

Goods and services are procured from Australian-based suppliers.



Identifying and Assessing our Risks

The Walk Free Foundation, Global Slavery Index 2023, has identified Australia as low risk for prevalence of Modern Slavery in Asia and the Pacific, registering 26th out of 27 countries in the region and 149 out of 160 countries globally for prevalence of modern slavery.

However, our Australian businesses operate in industries that have been identified as having a higher inherent risk of modern slavery in Australia, including professional cleaning services, security, waste management, and construction/building maintenance services. The Global Slavery Index identifies that forced labour exploitation predominantly occurs in Australia in high-risk industries such as agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. These

industries often rely on migrant workers entering Australia on temporary visas, who typically have lower proficiency in English and a limited understanding of their work rights in Australia.

The use of cleaning sub-contractors in the commercial cleaning sector poses a particular risk, as workers may not be engaged as employees but work as independent contractors, with the potential for sham contracting and exploitation of their visa conditions.

For imported products into Australia, forced labour is more likely to occur at lower levels of the supply chain, across various sectors and points in the supply chain. The Global Slavery Index 2023 has identified the following products at most risk:

Imports of products at risk of modern slavery to Australia

Product at risk of modern slavery	Import value (in billions of \$US)	Source countries
Electronics	8.9	China, Malaysia
Garments	6.4	Argentina, Bangladesh, Brazil, China, India, Malaysia
Solar panels	1.3	China
Textiles	0.5	China
Fish	0.4	China, Ghana, Indonesia, Taiwan, Thailand

The largest areas of spend for our Australian businesses, relating to this table, are garments for uniforms and textiles for flooring (less than 3%).

We have identified that there is an increased risk in our cleaning labour suppliers, with whom we sub-contract

some of these services. We are working on implementing mitigation actions focusing on this area of risk, and we are actively seeking to reduce our reliance on sub-contracted services in our cleaning operations, with a target to reduce spend and suppliers by 30% in 2025.



We undertake analysis of the risk of forced labour in our overall supply chain by using external consultants' proprietary technology (Fair Supply) 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 analysis is conducted on an annual basis to ensure that we monitor and address any changes in our risk profile. This has resulted in an assessment that the overall risk in our supply chain is low.

Our materiality level is \$5,000 and our 2024 assessment shows most suppliers fall into the low-risk category

534, with 34 in the moderate low and 3 in the moderate risk category. The moderate risk is associated with our uniform suppliers and a tarpaulin supplier, and predominantly our moderate/low risk covers supplies for our Midcity business, relating to construction and repair works, which fall mainly into the following sectors, textiles (flooring, shade material), furniture and other manufactured good, fabricated metal products, rubber and plastic products, wood and products of wood and cork, products of forestry and logging, and aluminium and aluminium products. Our stationary supplier also falls into this category as does our machinery and equipment suppliers (2) for our OCS Services business.

While numbers are low, from an industry perspective the analysis shows the greatest risk is in construction, followed by other business services, and textiles.

Other business services include services which support businesses to deliver their input such as accounting, legal advice, provision of outsourced labour, market research, cleaning, waste management, advertising and consulting services.

The graph right, represents the risk of forced labour along our supply chain by Geography of the top 10 countries. The fact that the majority of our suppliers are Australian based means the greatest percentage of our risk sits in Australia and at tier 1. The risk relating to other countries being related to lower tiers in our supply chain. The risk is very low overall.

Following this industry and country supply chain assessment, the business issued modern slavery specific self assessment questionnaires (SAQ) in the reporting period, in an attempt to ascertain how those suppliers operating in those industries and countries with an elevated risk were mitigating those risks.

To gain further insights, we conducted a desktop audit of an individual key supplier, facilitated by external subject matter experts. It was found that they have a moderately elevated overall modern slavery risk, with a reliance on thousands of different products with complex and higher risk supply chains and direct procurement from suppliers identified as having potential linkages to alleged instances of exploitation. The supplier was assessed as having a sophisticated and appropriately adapted response to modern slavery in areas of elevated risk. It was found to have a well-developed system of internal and external auditing, as well as an established practice of directly engaging with its suppliers, particularly in Asia, to educate and remedy areas of non-compliance that were detected.

While the use of external contractors heightens the risk of modern slavery, we also recognise that in our OCS Services business operations, there is a heightened risk in our directly employed labour and hence controls need to be put in place to mitigate this risk. This risk arises from the fact that we employ visa holders, predominantly on student visas, and our general workforce is low-skilled, with many having English as a second language. Our workers are also dispersed and work on customer sites, rarely visiting an OCS office. The nature of the business is

characterised by low margins, which has the potential to lead to poor practices in order to meet budgets.

The business 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.

Risk of forced labour along our supply chain by top 10 countries.

	1	Australia	50.26%
	2	India	12.34%
	3	China	9.07%
	4	Indonesia	4.14%
	5	Malaysia	1.57%
	6	Thailand	1.64%
	7	Vietnam	1.52%
	8	Bangladesh	1.42%
	9	United States	1.35%
	10	Russia	1.12%



At a Glance: Identifying and Assessing Our Risk

- Primary risk areas:
 - Labour supply in commercial cleaning operations (subcontractors and visa-holding employees)
 - Uniform and garment suppliers
 - Construction-related products and services via Midcity.
- Top inherent risk factors:
 - Use of student visa holders and migrant workers with limited English
 - Decentralised workforce operating across dispersed customer sites
 - Low-margin contracts increasing pressure on ethical practices.
- Supply chain risk snapshot (2024 Fair Supply analysis):
 - 506 suppliers assessed as low risk
 - 37 as moderate-low
 - 3 as moderate risk
- Risk tools in use:
 - Proprietary Fair Supply software (Tier 1-10 traceability)
 - Supplier-specific SAQs
 - Targeted desktop audit on a key supplier

Addressing our Risks

Our Partnerships

We work in partnership with external experts (Fair Supply) to assist with assessing our risks and providing advice and guidance on how to mitigate our risks and improve our controls and governance. We also benefit from the experience and expertise of our UK-based parent entity, which collaborates closely with the Slave Free Alliance to ensure their compliance with the UK Modern Slavery Act. Part of this is the OCS Global Modern Slavery Committee, which has members from OCS regions, including Australia, as well as the Slave Free Alliance. This ensures alignment across OCS globally and sharing of best practise.

The OCS ANZ Managing Director, in partnership with the Walk Free Foundation, has taken a leading role in external collaboration for responses to modern slavery. As New Zealand's appointed Business Leader to the Bali Process Government and Business Forum, he actively contributes to transnational discussions on business responsibility, ethical labour practices, and regulatory reform. His involvement has included advocating for mandatory modern slavery legislation in Aotearoa New Zealand, supporting initiatives to engage high-risk industries, and helping develop tools and policy frameworks to enhance supplier due diligence across the region.

Who is Fair Supply?

A global leader in modern slavery analytics, Fair Supply uses world-first tech to map supply chains down to Tier 10 — helping us pinpoint risk, act with confidence, and meet our obligations under the Act.



Our Partnership with Fair Supply

OCS Australia has partnered with Fair Supply, a global ESG risk management and modern slavery consultancy, to strengthen our supply chain risk oversight. Since 2023, we have used the Fair Supply platform to map and assess supplier risk across multiple tiers, enabling proactive, data-driven responses.

This technology allows us to:

- Identify modern slavery risk across up to ten tiers of our supply chain
- Pinpoint high-risk industries, products, and geographies
- Engage targeted suppliers through improved due diligence

Fair Supply also facilitates our internal Modern Slavery Working Group, helping us embed the UN Guiding Principles on Business and Human Rights across the business. This partnership ensures our modern slavery framework is strategic, evidence-based, and globally aligned.

Our Governance

The Modern Slavery Working Group is responsible for monitoring and reviewing the performance of our modern slavery framework, as well as driving governance practices and ensuring risks are identified and controls put in place. They also manage any reported incidents and ensure that actions outlined in our Modern Slavery Statement are in place and reviewed for effectiveness.

This working group comprises the Australia and New Zealand Managing Director, Australia and New Zealand Finance Director, Australia and New Zealand Company Secretary (a member of the OCS Group Global Modern Slavery committee), General Manager of Midcity Group, General Manager of OCS Services and external consultant representative (Fair Supply).

OCS Group has a Group Code of Conduct that outlines the guidelines and standards for how colleagues should conduct themselves in their daily business activities, across all countries and in all aspects of their work. This code includes a commitment to providing the necessary safeguards, ensuring that no colleague's human rights are compromised. Through the code and our policies, OCS aims to:

- Prohibit child labour, forced labour and human trafficking
- Provide fair and equitable wages, benefits, and other

conditions of employment in accordance with local laws

- Provide humane and safe working conditions, including safe, clean, and sanitary housing conditions
- Require our customers, suppliers, and other business partners to adopt similar standards regarding human rights

Other policies designed to address modern slavery risk are listed below:

- 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 NZ Grievance Policy and Procedure
- OCS Recruitment Procedure for Operatives
- OCS Recruitment Procedure for Salaried Staff



Our People

We recognise that strong employment practices are central to reducing the risk of modern slavery in our operations. Our directly employed colleagues are recruited through a structured and transparent process led by our Human Resources team.

Fair and Lawful Recruitment

- All candidates must provide documentation confirming their legal right to work in Australia.
- At recruitment, Visa conditions are checked through the Australian Government system (VEVO) to verify right to work in Australia and any conditions placed on the visa. This information is then entered into the payroll system and expiry dates noted.
- Once employed, expiry is monitored by the payroll team through specific payroll reports as well as via Power Bi reporting which looks at Visa's coming up for expiry. The payroll team works actively with the Visa holders to ensure their Visa's are always current and if they do not have a current visa, they are no longer able to work with OCS and would be terminated.
- OCS do not recruit foreign workers through labour hire companies. All employees must be living in Australia with right to work in Australia.
- Onboarding includes confirmation of individual bank account details, with all wages paid via electronic transfer.

Employment Terms and Wage Integrity

- All employees receive a written employment contract in line with the Fair Work Act and National Employment Standards.
- Employees are paid according to the relevant award or a common law agreement where they are Award Free.
- Our time and attendance system calculates wages automatically, and site managers review and approve payroll before processing.
- Automated site clocking will be rolled out in the next reporting period to further strengthen wage accuracy.

Grievance and Reporting Mechanisms

We provide multiple, accessible channels for employees to raise concerns, including about modern slavery:

- A dedicated third-party Whistleblowing service, SafeCall, which enables anonymous reporting.
- A confidential email address (MyVoice) that goes directly to our Head of HR in Australia.
- Clearly displayed posters and guidance materials at worksites and in handbooks.

Our Whistleblower Policy explicitly lists modern slavery as reportable misconduct. These frameworks are regularly reviewed and form part of our broader risk and governance system.

Our Contractors and Suppliers

We recognise the critical role that our contractors and suppliers play in upholding ethical labour practices and mitigating modern slavery risk across our operations. Our approach balances rigorous onboarding with a commitment to continuous improvement.

Pre-Screening and Onboarding

All contractors across OCS Services and Midcity undergo a formal pre-screening process to verify:

- Licensing and insurance compliance
- Health, safety, and environmental standards
- Agreement to relevant policies, including the OCS Australia Modern Slavery Policy (for trades contractors at Midcity).

In the next reporting period, both business units will be reviewing and updating their contractor onboarding procedures to include specific modern slavery risk assessment questions.

Strengthening Our Supplier Code of Conduct

All engaged contractors and suppliers are provided with the OCS ANZ Supplier Code of Conduct, which includes a clear commitment to preventing modern slavery and human trafficking.

Following an external legal review, we amended the Code to include:

- A commitment to collaboration with OCS
- Joint efforts to identify and close compliance gaps
- Improved transparency and information-sharing

The updated Code was issued to all suppliers and contractors during this reporting period for signature and reaffirmation.

Modern Slavery Clauses in Agreements

Our standard contractor agreements include a modern slavery clause. Based on external legal advice, we have enhanced this clause to:

- Clarify expectations for supplier due diligence
- Strengthen cooperation in identifying and managing modern slavery risks.

These revised agreements will be issued to all new contractors during the next reporting period.

Targeted Audits and Risk Assessment Procedures

We recognise the elevated risk associated with labour contractors, particularly in our cleaning operations.

To address this we will be:

- Finalising, the audit of all labour-related contractors (on track for completion in 2025)
- Implementing a new supplier engagement procedure using the Fair Supply Spotlight risk assessment tool identifying, prior to engagement, risk down to tier 10

From the engagement risk assessment,

- suppliers or contractors flagged as moderate or higher risk will be escalated to the ANZ Managing Director or Company Secretary for review.
- Suppliers rated moderate/low will automatically receive a tailored Self-Assessment Questionnaire (SAQ)
- Labour hire contractors will be issued a labour-specific SAQ to further probe risk areas.

At a Glance: Addressing Our Risks

- 3 levels of oversight:
 1. Local ANZ Working Group
 2. OCS Global Modern Slavery Committee
 3. External partners: Fair Supply & Slave Free Alliance
- 1 cross-functional governance group monitoring policy, risk controls, and incident response
- 2024 Supplier Code of Conduct update issued to all active contractors and suppliers
- Enhanced contract clauses introduced to strengthen due diligence and supplier collaboration
- All new contractors to undergo modern slavery risk assessment at onboarding (2025)
- Completion of the audits for all labour-related contractors (2025)
- Strong Governance structure:
 - Supplier Code of Conduct
 - Policies and procedures
 - Modern Slavery Working Group
 - OCS Group Modern Slavery Committee
 - Employee screening
- Fair Supply Spotlight tool adopted for supplier screening across up to 10 tiers

Awareness and training

Raising awareness and building capability across our workforce and supply chain is fundamental to embedding a meaningful response to modern slavery risk. Throughout this reporting period, we prioritised foundational training for high-risk roles, enhanced internal communications, and supported supplier education.

Internal Training and Awareness

We delivered tailored modern slavery training to key employee groups:

- **Cleaning Managers:** As frontline leaders, they received face-to-face training from our HR Manager, focused on recognising red flags and understanding how to respond appropriately.
- **Senior Management:** External subject matter experts delivered targeted training on sector-specific risks (cleaning and construction), legislative obligations under the Modern Slavery Act, and risk indicators within our supply chain.
- **All Employees:**
 - Code of Conduct training was included in onboarding and reinforced through toolbox talks
 - Whistleblower Policy was covered during induction and through an annual toolbox talk
 - Safetrac e-learning modules on whistleblowing were completed by managers, supervisors, support, and administrative employees.

Upcoming Training Initiatives

To strengthen capability and consistency, we are rolling out additional global training tools in the next reporting period:

- A new online modern slavery module, developed by the OCS Group Modern Slavery Committee and the Slave Free Alliance, to be delivered via the OCS Academy for all managers, supervisors, support and administration staff.
- Printed materials, toolbox talks, and posters for frontline colleagues, also developed in partnership with the Slave Free Alliance.

These activities will form part of our annual compliance training programme and will be tracked through our existing systems.

Supplier Awareness and Education

To support our supply chain partners, we distributed modern slavery awareness materials — developed by Fair Supply — alongside the rollout of our updated Supplier Code of Conduct. This material covered:

- Definitions of modern slavery
- Indicators of forced labour
- Key statistics and country-specific risks
- Guidance on how to identify and report concerns.

We intend to expand supplier engagement in 2025 through refreshed campaigns and additional education opportunities.

Reinforcing Ethical Conduct

As part of our broader compliance focus, we also rolled out updated Anti-Bribery Policy training across the business in 2024. Toolbox talks were delivered to ensure that all colleagues understood their responsibilities in identifying and responding to bribery and corruption risks.

Effectiveness

With this statement being our second statement, we are working on developing measures of our effectiveness.

Effectiveness relates to evaluating whether our actions to address modern slavery are working.

Focus Area	How we assess our effectiveness	Key outcomes
Governance & Policy	<ul style="list-style-type: none">Regular review of policies and proceduresImplement new or amended policies and undertake trainingModern Slavery Working Group in place and meets according to scheduleGlobal initiatives from OCS Group Modern Slavery Committee rolled outExternal advisors in place	<ul style="list-style-type: none">Reviewed and updated Supplier Code of ConductReviewed Modern Slavery clause in Contractor AgreementsModern Slavery Working Group meetings took place in line with scheduleNo new global initiatives from OCS GroupExternal advisors – Fair Supply and Slave Free Alliance
Supplier engagement	<ul style="list-style-type: none">Supplier Code of ConductContractor Agreements with Modern Slavery clause	<ul style="list-style-type: none">Updated Supplier Code of Conduct sent to all suppliers
Risk assessment	<ul style="list-style-type: none">Annual assessment of suppliers through Fair Supply software	<ul style="list-style-type: none">Assessment completed for all suppliers
Due diligence	<ul style="list-style-type: none">Targeted self-assessment questionnaire (SAQ's) to higher risk suppliers	<ul style="list-style-type: none">SAQ's sent to target group
Training and Awareness	<ul style="list-style-type: none">Effectiveness is measured through engagement and completion of training	<ul style="list-style-type: none">Frontline cleaning managers completed training module delivered by HRExternal SME delivered awareness training to senior managersTraining on Code of Conduct completed (online or via toolbox talk)Safetrac Whistleblower training completed by managers, administration and support staff.Whistleblower toolbox talk delivered to frontline colleagues
Grievance and remediation	<ul style="list-style-type: none">Grievance mechanism in placeMechanisms communicatedMonitor reporting and trends	<ul style="list-style-type: none">Grievance Policy and procedure in placeWhistleblower programme in placeCommunication through posters, induction, toolbox talks, handbook

Planned Focus Areas for the Rest of 2025 and Beyond

Focus Area	Continuing Focus Areas for 2025
Governance & Policy	<ul style="list-style-type: none"> Implement clocking to all OCS sites Improvements to risk management documented in next modern slavery statement
Supplier engagement	<ul style="list-style-type: none"> Rollout and expand the use of updated model Modern Slavery Contract Provision Track the percentage of new contracts/supplier agreements with modern slavery provisions. Monitor return of the updated Supplier Sustainability Code of Conduct Update supplier onboarding to include questions to assess modern slavery risk Profile new suppliers at engagement stage through Fair Supply proprietary software Reduce labour related supplier spend and number in OCS Services by 30%
Risk assessment	<ul style="list-style-type: none"> Suppliers utilised in 2025, assessed to tier 10, through Fair Supply proprietary software. Review current controls
Due diligence	<ul style="list-style-type: none"> Issue SAQ's to highest risk suppliers, identified through Fair Supply proprietary risk assessment Continue to undertake supplier specific due diligence on identified suppliers from risk assessment Finalise audit program of labour related contractors Labour hire specific self-assessment questionnaires to labour related contractors (cleaning)
Training and Awareness	<ul style="list-style-type: none"> OCS Academy Modern Slavery online training module rolled out to managers, support and administration colleagues Modern Slavery toolbox talk delivered to frontline staff Modern Slavery awareness posters rolled out to sites Embed modern slavery training into colleague induction Training options based on risk for targeted suppliers and contractors rolled out Publish training completion
Grievance and remediation	<ul style="list-style-type: none"> Develop mediation framework for suspected instances of modern slavery

Appendix A

The below table sets out where each aspect of the mandatory criteria set out in The Commonwealth Modern Slavery Act 2018 can be located in the document.

Criteria	Location
Identify the Reporting Entity	Page 6
Describe the Entity's Structure, Operations, and Supply Chains	Pages 6-10
Describe the Risks of Modern Slavery Practices	Pages 11-14
Describe Actions Taken to Assess and Address Risks	Pages 15-19
Describe How Effectiveness of Actions is Assessed	Page 20
Describe the Process of Consultation	Page 6