ANTI SLAVERY POLICY STATEMENT

This statement sets out the steps Ordnance Survey Limited (**OS**) has undertaken, and is continuing to take, to ensure modern slavery or human trafficking is not taking place within our business or supply chain.

OS has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain and impose those same high standards on our contractors, suppliers, and other business partners.

COMPANY ACTIVITY, STRUCTURE AND SUPPLY CHAINS

OS's vision is to be recognised as world-leaders in geospatial services, creating location insight for positive impact. The principal activity of OS is the collection, maintenance, and distribution of up-to-date geospatial information. Under our Public Sector Geospatial Agreement (PSGA) with the UK government, OS provides Great Britain's national mapping services. We create, maintain, and provide access to consistent, definitive, and authoritative location data of Great Britain. Our expertise helps organisations maximise the use, value, and benefit of the data for the national interest and the public good. OS licenses a range of mapping products to businesses, local and central government bodies, and consumers.

OS is the parent company of Ordnance Survey International Services Limited (**OSIS**) and Ordnance Survey Leisure Limited (**OSL**) (together the **Group**) whose activities form part of its supply chain or business. The Group has over 1,360 employees worldwide. OSIS has branch offices in Singapore and has a Dubai Free Zone Limited Liability Company (Ordnance Survey International Services FZ-LLC) which has a branch office in Dubai.

OS recognises two Trade Unions and has formalised agreements regarding negotiation, collaboration, and consultation.

As at 31 March 2022 the Group has a global annual turnover of approximately £182.3 million.

OS has an extensive supply chain and during 2021-22 procured goods and services of approximately £116 million . We work with a wide range of different suppliers, subcontractors and partners each of which will have their own subcontractors, affiliates and associate entities. OS therefore is connected to multiple entities through numerous contractual relationships across many countries (including India, USA, mainland Europe, the Middle East and Africa).

OUR POLICIES

We operate internal and external policies to ensure we are conducting business in an ethical and transparent manner. These include:

Internal Policies:

1. Modern Slavery Act guidance sets OS's stance on modern slavery, it explains how employees can identify any instances of this and where they can go for help.
2. OS's Whistleblowing Policy is included in the Employee Handbook and ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This specifically includes any concerns about slavery or trafficking activity.

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3. OS's Procurement Policy confirms OS follows government procurement guidance, references modern slavery and the use of RACI outlining roles and responsibilities from tender to contract management (General procurement and tender opportunities (ordnancesurvey.co.uk).
4. OS's Personal Security Policy confirms eligibility to work in the UK checks are conducted on all employees, including but not limited to checking an original passport, birth certificate or other qualifying documentation.
5. The Resourcing, Bullying and Harassment and Diversity and Inclusion Policies stipulate that OS must provide an inclusive and accessible work environment culture where employees feel safe, respected, and valued, free from bullying, harassment, and discrimination.
6. OS's Wellbeing Policy acknowledges that OS has a duty of care to its employees and sets out its commitment to provide an environment that encourages, promotes and supports the good health and wellbeing, both physically and mentally, of all employees.
7. OS's Code of good business practice explains how we behave as an organisation and how we expect our employees to act.

External Policies:

1. Suppliers and their subcontractors must comply with OS's Supplier's Code of Conduct which includes compliance with the Modern Slavery Act 2015, a prompt payment commitment and ethical behaviour (Supplier Code of Conduct (ordnancesurvey.co.uk)).

RISK MANAGEMENT AND DUE DILIGENCE PROCESSES

As part of our risk management approach, we:

- Operate strict procurement processes, requiring suppliers to comply with all applicable laws and standards, including those which relate to the Modern Slavery Act.
- Use a Modern Slavery Assessment Tool prior to starting a tender to help assess the likely risks in respect of slavery and human trafficking when there is a high value spend and/or we are sourcing goods and/or services from regions where such incidents have occurred and/or if the supply chains extend into regional risk areas.
- Depending on the level of risk highlighted in our Modern Slavery Assessment Tool, additional due diligence questions may be incorporated into the tender documentation, additional annual reporting requirements implemented, and additional terms incorporated into the contract.
- Record such risk assessment outcomes separately for audit purposes.
- Base our tender documents on the government standard selection questionnaire (SSQ) with specific questions in the ITT response around the Modern Slavery Act and compliance with it.
- Expect our suppliers to have suitable policies and processes in place within their own businesses to prevent child labour, modern slavery, and human trafficking and to cascade those policies to their own suppliers.
- Undertake a continuous review of assurance information from existing suppliers and partners, which includes gathering yearly assurance on modern slavery via contract management meetings and each supplier being asked to complete an annual due diligence form which includes commitments to ensure no slavery or human trafficking occurs within their workforce and supply chains.
- Are requesting annual updated responses in relation to the Modern Slavery Act from our suppliers i.e. policy updates or published statements.

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- Where known, are obtaining records of the sub-contractors used by our suppliers to support delivery of goods and/or services. If sub-contractors are unknown, a risk-based approach is adopted based on the information we hold and/or the type of goods and/or services provided by the supplier as to the level of risk further down the supply chain.
- Have included a specific item relating to the Modern Slavery Act in the agenda of the supplier contract management meetings enabling us to be kept informed of and monitor any changes. Note most supplier meetings are now undertaken virtually where standard agenda items are discussed.
- Include appropriate terms in our contractual documentation with suppliers:
    - obliging suppliers and their subcontractors, suppliers and employees to comply with the Modern Slavery Act;
    - obliging suppliers and their subcontractors to comply with the Supplier's Code of Conduct;
    - reserving the right for us to audit suppliers and their contractors, where we consider it appropriate;
    - obliging suppliers to report to us if they are aware of or suspect slavery or human trafficking in a supply chain connected to any OS contracts;
    - reserving the right for us to terminate the contract at any time should any instances of modern slavery come to light;
    - ensuring prompt payment by OS to suppliers within 30 days of receipt of invoice;
    - prohibiting suppliers from sub-contracting without our permission. If sub-contracting is permitted, all duties and obligations from the supply agreement must be included in the sub-contract; and
    - requiring suppliers to pay its subcontractors within 30 days.
- The Procurement Team follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct. The Procurement Senior Leadership Team also undertake an annual Competency Test/Exam set by CIPS on Ethical Procurement including Modern Slavery, in order to retain their CIPS Chartered status.
- Have conducted an internal audit of our Modern Slavery policy and practices for 2021 / 2022 in order to confirm that OS have adequate and effective arrangements for assessing the risk and appropriate controls are in place to ensure compliance with the Act.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.

The above policies and risk management procedures are reviewed regularly. Risks associated with modern slavery are reviewed as part of our organisational risk register, which is reviewed and reported to our Board via the Ordnance Survey Audit and Risk Committee.

TRAINING

All employees are required to complete mandatory training as part of their induction to ensure their awareness of modern slavery. We also conduct modern slavery training for our procurement teams on a twice yearly basis. This training includes guidance to ensure awareness of the issues surrounding modern slavery and what to do if employees suspect that it is taking place within our supply chain.

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OUR PERFORMANCE INDICATORS

- Number of reports in 2021/22 indicating whether modern slavery practices have been identified in OS business or its supply chain: **Zero**.
- Number of complaints received by OS in 2021/22 via its grievance and whistleblowing mechanisms: **Zero**.
- **No recorded instances** of modern slavery within OS and/or its supply chain and any related corrective action have been identified in 2021/22.

APPROVAL FOR THIS STATEMENT

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* and constitutes OS's slavery and human trafficking statement for the financial year ending 31 March 2022.

This statement was approved by the Board of Directors on 20 September 2022 and signed by Stephen Lake Director and Interim CEO.

Following approval this statement is published on the government's Modern slavery statement registry (modern-slavery-statement-registry.service.gov.uk) and on our UK website (Anti-slavery policy statement (ordnancesurvey.co.uk).

Ordnance Survey Limited

Signature 

Name Stephen Lake

Position Interim Chief Executive Officer

Date 20 September 2022

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