

ISS UK LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



INTRODUCTION FROM LIZ BENISON, CEO ISS UK&I

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

ISS UK Limited and its subsidiaries (ISS) have a zero-tolerance approach to modern slavery. ISS is committed to compliance with its obligations under UK legislation relating to modern slavery and human trafficking, including the Modern Slavery Act 2015, and ensuring that our employees have the right to work in the UK.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chain. From the very outset, our corporate behaviour has been guided by a set of ethical values which are now firmly embedded in our culture: entrepreneurship, quality, respect, unity, and honesty. Within the ISS global group, success is measured not only in economic terms but also by the

way in which we live up to our obligations towards our employees, customers, shareholders, and society.

Our [ISS A/S 2022 Sustainability Report](#) states our global commitment to eradicating modern slavery. While ISS is proud of the steps it has taken so far to prevent slavery and human trafficking, we are aware that the risk environment is continually changing. We are committed to improving our risk management systems, procedures, and training to ensure modern slavery stays out of our business and supply chain.

In 2022, we also launched our new Employee Value Proposition - #APlaceToBeYou – our promise to enable our people to be who they are, become what they want and be part of something bigger. We come together to care for our customers and colleagues, championing our talents and uniting with trust to make the world work better. We continue to grow our people-centric projects including social and professional mentoring and education programmes, refugee employment and diversity & inclusion initiatives, creating a positive, inclusive environment where our people thrive.

I set out below some of the key steps we have taken toward minimising the risks of modern slavery in the financial year ending 2022:

Right to work and new hire onboarding

Illegal working often leads to exploitative behaviour and can have an adverse impact on the employment of people who are lawfully in the UK.

Our processes for ensuring our employees have the right to work (RTW) have long followed the guidance contained within the Home Office Guidance for Employers on Preventing Illegal Working.

All RTW checks, for new joiners and time limited RTW re-checks for existing employees are conducted using a secure checking tool, which provides re-assurance of document validity and has enhanced security features, including facial

recognition. The use of facial recognition technology is in place to stop the practice of "substituting imposters", another exploitative tactic used by those extorting the unlawful labour market.

The secure checking tool automatically updates as legislation changes, ensuring all new checks conducted are fully compliant.

Exploitative behaviours can also include control over accommodation and withholding of individuals' earnings by gangmasters.

To monitor and prevent the risk of our employees being exploited in this way, ISS UK has a centralised onboarding team in place to ensure a consistent and compliant approach for all new joiners. All new joiners are required to provide proof of their current home address, along with proof that the bank details they wish to be paid into are in their name.

Living, not surviving



We formalised our support by joining the Living Wage Service Providers Recognition Scheme in 2014.

As a responsible and ethical employer, we recognise that our success depends upon on a motivated and productive workforce that is well looked after.

Intrinsic to this is a fair rate of pay, which is why ISS supported the Real Living Wage before it became a statutory requirement in the UK. We believe that all our colleagues should receive a level of remuneration that is sufficient to afford a decent standard of living for the individual and their immediate family.

We recognise that in the UK the National Living Wage may no longer be sufficient and therefore ISS UK has pledged to work together with policy

makers, our customers and our suppliers to increase the implementation of the Real Living Wage across our UK sites.

We understand that a real living wage lessens the likelihood of people becoming victims of modern slavery and supports survivors of modern slavery and their families to access essential services and have a decent standard of living.

In 2023, ISS made a global pledge to work together with policy makers, our customers and our suppliers to implement living wages¹ across our industry, as one of our three signature moves to becoming the Company of Belonging.



¹The ISS Living Wage pledge is global and therefore the definition of a living wage differs from region to region. In the UK, the living wage is defined by ISS as the Real Living Wage set by the Living Wage Foundation.

OUR ANTI-TRAFFICKING AND SLAVERY POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In the UK, our **Anti-slavery and Human Trafficking Policy** reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains. This is underpinned by the **ISS Global Policies on Corporate Responsibility** and **Global People Standards**.

We also have a suite of HR policies and guides for our managers and supervisors across the UK business, which equip them to recognise and address difficult conversations, manage employee wellbeing and mitigate human slavery risks. These include our **Pre-Employment Screening Policy** and **Recruitment Policy**. We also have a **Speak Up Policy**, which offers a way for people to anonymously raise concerns.

The ethical standards relating to our workforce are enshrined in our **ISS Code of Conduct**, which sets out the type of behaviour expected from all colleagues.

DUE DILIGENCE IN OUR SUPPLY CHAIN

We recognise that all our suppliers play a vital role in eliminating modern slavery, and so ISS regularly communicates with our suppliers and assesses risks.

Our commitment to human rights is communicated to every supplier upfront through the ISS Supplier Code of Conduct, which is applicable to our direct suppliers as well as their supply chain. Our standard ISS Terms and Conditions of business for suppliers and subcontractors cover compliance with legal requirements, including the Modern Slavery Act 2015.

All suppliers are required to undertake our global onboarding and reassurance programme, **ISS ProcurePASS**. During this process suppliers are required to complete questions on modern slavery including:

- Re-confirming compliance with the ISS A/S Supplier Code of Conduct
- Identifying risks in their own operations and their supply chain
- Describing how they address and mitigate these risks
- Declaring any incidents of modern slavery
- Providing contact details for further queries in relation to modern slavery

In 2022 we introduced an additional review process during onboarding and reassurance to improve management of risk within our supply chain. Where a supplier indicates they do not have sufficient policies addressing modern slavery and/or reports in incident of modern slavery in their businesses, this is raised internally with a subject matter expert for review before the supplier is approved to transact with.

We also introduced a new Supply Chain Escalation and Response document which outlines the appropriate course of action to take, including processes and templates, if an incident of modern slavery is suspected or identified in our supply chain, including direct suppliers and sub-contractors.

CONTINGENT LABOUR

In 2022 ISS UK engaged in partnerships with Pretium and Magnit Global, suppliers of contingent labour services. We have built positive relationships with our partners, including the introduction of technology to ensure compliance with Right to Work. These new processes align to existing ISS UK best practice and ensure the same level of due diligence is awarded to our contingent labour workers as for our own employees.

Both partnerships have contractual obligations in place to:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes (Anti-Slavery Laws) including the Modern Slavery Act 2015
- Not to engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the Modern Slavery Act 2015 if such activity has been carried out in the UK

Pretium and Magnit Global include anti-slavery and human trafficking provisions in contracts with their subcontractors and Panel Agencies who supply ISS UK, and they are committed to notifying ISS UK as soon as

they become aware of any actual or suspected breaches. Records are maintained so that we can track the supply chain of the services provided and permit ISS UK to inspect those records to audit compliance.

Both partners warrant that they have not been convicted of any offence involving slavery and human trafficking or been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence in connection with slavery and human trafficking.

ISS UK reserves the right to terminate agreements with these partners with immediate effect if there are any breaches of any of the anti-slavery and human trafficking obligations.



TRAINING AND AWARENESS

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, ISS A/S has produced a mandatory e-learning programme on the ISS Group Code of Conduct, which includes a section on modern slavery.

Our Modern Slavery online training module has been developed in partnership with Stronger Together, a not-for-profit organisation working to support business to embed responsible recruitment and employment practices and mitigate labour exploitation in their operations and supply chains. The training is designed to build understanding across the business of what Modern Slavery is, what signs to look out for and how best to respond to it. 5,465 of our current employees have completed this training to date.

The online training module is supplemented by guidance documents available on our Modern Slavery portal on the home page of our internal employee intranet, which includes posters, toolbox talks, management guides and other resources to be used by our account teams to raise awareness on Modern Slavery with their teams at operational sites.

**stronger
together**

Responsible recruitment | Fair work | Free from exploitation



FOCUS ON CONTINUOUS IMPROVEMENT

We are committed to continually reviewing and improving our processes to consider industry guidance and best practice.

As a strategic supplier to the UK Government, ISS completes the Modern Slavery Assessment Tool (MSAT) on a regular basis, most recently in September 2022, scoring 76% 'High'. The MSAT is owned by our Procurement Excellence Team and its recommendations are adopted by our modern slavery working group as key priority areas for improvement.

Key improvement measures taken in 2022 include:

- **Engagement with external bodies**, including:
 - Home Office: Right to Work (RTW) workshop attended by key members of the People & Culture and Vetting team
 - Business Services Associate (BSA): modern slavery roundtables attended by our Managing Director – Government and modern slavery working group members. As part of the BSA Modern Slavery Council, ISS contributed to the 'Tackling Modern Slavery
- in UK Service and Infrastructure Projects Sectors' toolkit, published in June 2023.
- **Improvement of our modern slavery risk assessment processes**, including pre-transaction approval where insufficient response has been provided by suppliers during onboarding.
- **Updated content for our online modern slavery training**, as advised by Stronger Together.
- **'OneISS Way' project to standardise and improve access to process documentation** across our business will see all Modern Slavery resources hosted on a new system, alongside all other business-critical processes.
- **Establishment of an internal Modern Slavery Working Group** responsible for delivering a coordinated approach to modern slavery. The working group includes representatives from Legal, Operations Performance (Supply Chain & Procurement; Sustainability), and People & Culture, and is chaired by the Managing Director for our Government sector. The group reports to the UK Country Leadership Team (CLT) on a quarterly basis.

OUR ORGANISATIONAL STRUCTURE

ISS is the UK subsidiary of a leading global provider of integrated facility services, offering services on an international scale. It comprises ISS UK Limited and its subsidiaries and employs around 25,679 employees in the UK.

Our business is organised into various companies which are set out below for the full year 2022:

- ISS UK Limited which is the parent company and employs our head office staff
- ISS Facility Services Limited which comprises our private sector business
- ISS Mediclean Limited which comprises our public sector business operating in the healthcare, education, local authority and defence sector

Further details are available on our website: <https://www.uk.issworld.com/>

OUR SUPPLY CHAINS

Our supply chain includes providers of goods and sub-contracted services.

Our supply chain enables us to work with our customers, day to day, to manage and maintain environments that make life easier, more productive, and more enjoyable for our Placemakers and for our customers.

Our global supply chain is managed by ISS A/S, and at a country level by the companies listed in our Business Structure and by our client-facing operational teams, using tools which reflect the professional procurement processes in use. Our supply chain includes global preferred suppliers, country preferred suppliers, and local suppliers appointed by operational teams to address specific needs.



DECLARATION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ISS UK Limited and its subsidiaries' slavery and human trafficking statement for the financial year ending 31 December 2022.

ISS UK LIMITED SIGNATURE

A handwritten signature in black ink, appearing to read 'Tom Buisson', written over a light blue horizontal line.

DATE 28/06/2023

ISS UK LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

PEOPLE MAKE PLACES

