ISS UK LIMITED, ISS FACILITY SERVICES LIMITED AND ISS MEDICLEAN LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



PEOPLE MAKE PLACES

INTRODUCTION FROM ISS UK&I INTERIM CEO

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, including its subsidiaries ISS Facilities Services Limited and ISS Mediclean Limited (together referred to in this statement as "ISS UK", "we", "our" and "us"), have a zero-tolerance approach to modern slavery. ISS UK 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 2023 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 regularly reviewing and, where necessary, improving our risk management systems, procedures, and training to ensure modern slavery stays out of our business and supply chain.

In 2023, we formed a Modern Slavery Working Group for ISS UK, bringing together colleagues from relevant functions to lead a zero-tolerance approach to modern slavery in our own organisation and our supply chains. The working group meet regularly and participate in external forums to gain further insights, which has led to the initiation of five internal KPIs specifically relating to modern slavery.

ISS UK's commitment to maintaining a zero-tolerance approach to modern slavery is also reflected in our Employee Value Proposition 'A Place to be You' and our Social Value Purpose. Through these strategies, ISS delivers a range of programmes that drive diversity, inclusion and belonging, and support people who face barriers to entering the workforce through mentoring, upskilling and targeted recruitment.

We set out in this statement some of the key steps we have taken toward minimising the risks of modern slavery in the financial year ending 2023.



OUR ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

ISS UK Limited is the UK subsidiary of a leading global provider of integrated facility services, ISS Global A/S, offering services on an international scale. ISS's UK business comprises ISS UK Limited and its subsidiaries (ISS Facilities Services Limited and ISS Mediclean Limited) and employs circa 25,000 employees in the UK.

Our business is organised into various companies, which are set out below for the full year 2023:

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

Further details are available on our website: https://www.uk.issworld.com
The policies, standards and procedures referred to in this statement apply to all of ISS UK's businesses.

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 employees and for our customers.

Our global supply chain includes providers of goods and sub-contracted services across categories of spend to support the delivery of our core services including, for example, contingent labour, food and beverage, cleaning products and consumables, security services, engineering services and fleet. It is managed by ISS Global A/S, and at a country level by ISS UK 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. As a result, the supply chain used to deliver our services in the UK has a global footprint with suppliers and the products purchased, sourced from various countries.

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** (including as outlined in our **Sustainability Policy**) 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 and our supply chain is required to uphold these same principles as detailed in our **ISS Supplier Code of Conduct**.

The current 'OneISS Way' project to standardise and improve access to process documentation across our business includes Modern Slavery information and resources hosted on a new document management system, alongside all other business-critical processes.

DUE DILIGENCE IN OUR SUPPLY CHAIN

We recognise that all our suppliers play a vital role in eliminating modern slavery.

Our commitment to protecting human rights, and expectation that all our suppliers share this commitment, is communicated to every supplier before they are onboarded to work with through the ISS Supplier Code of Conduct. It is applicable to our direct suppliers as well as their supply chain. Our standard ISS Terms and Conditions of business for suppliers and subcontractors mandates compliance with legal requirements, including the UK's Modern Slavery Act 2015.

Before becoming a supplier to ISS – and then periodically again throughout their partnership with ISS – suppliers are required to comply with our vetting process. During this process, suppliers are required to complete questions on modern slavery, including:

- Compliance with the ISS 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 2023, we introduced a new minimum standard that required all suppliers (excluding micro-organisations) to have an anti-human trafficking and modern slavery policy before they can be onboarded as an ISS UK & Ireland supplier.



SUPPLY CHAIN ETHICAL EMPLOYMENT AUDITS – PILOTING A NEW APPROACH

To enhance our existing programme of supplier due diligence and audit, in 2023 we piloted a new standalone Ethical Employment Audit with one of our key suppliers within our Food & Beverage category.

Delivered by our external partner, Achilles, this on-site audit assesses policies, processes and evidence within areas including, for example:

- Recruitment & Right to Work
- Business Ethics
- Working Hours
- Freedom of Association
- Supply Chain Management

Suppliers receive a score and comprehensive report including strengths and areas of opportunity. Suppliers are expected to address any non-compliances as a matter of priority, with updates being provided to our supplier relationship and supply chain sustainability managers. The audit process is of mutual benefit, providing our partners with a bespoke plan to strengthen and enhance their modern slavery risk mitigation actions, whilst contributing to the reduction in risk of modern slavery occurring in the supply chain of ISS and our customers.

RISK ASSESSMENT AND MANAGEMENT

Our workforce is fundamental to our success. We are committed to ensuring that we have robust Right to Work and new hire onboarding processes in place to help eliminate exploitative behaviours that have an adverse impact on the employment of people who are lawfully in the UK.

Our processes for ensuring our direct 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,' an 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. **Over 96% of our UK employees now have digital RTW checks using the secure checking tool with the remaining 4% being digitally recollected over a phased approach.**

In addition to this, 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.

To ensure we can fulfil the needs of our customers and respond to unexpected situations we rely on temporary labour to support our permanent workforce. We recognise that this brings increased risk of modern slavery in our supply chain and therefore take steps to mitigate this.

We have partnerships with two neutral vendors for managing most of our contingent labour services – Pretium and Magnit Global. Working with these partners we have confidence in the due diligence in place in the selection and management of the agencies we work with, ensuring that necessary processes are in place to protect our contingent labour.

In 2023 we reviewed our Temporary Labour policy and commenced a process to enhance ID checks of contingent labour. Our Key Account Network (KAN) have been at the forefront of championing enhancements to our Temporary Labour Recruitment Process, including increasingly more robust processes around on-site ID verification on day one of the worker's engagement with ISS. Our KAN team have also been using data around our contingent labour to inform their permanent resourcing strategy, which has led to 600 people in our contingent labour workforce being permanently recruited as ISS employees.

MODERN SLAVERY ASSESSMENT TOOL

As a strategic supplier to the UK Government, ISS uses the Modern Slavery Assessment Tool (MSAT) as an indicator of our risk of modern slavery occurring in our operations and supply chain. **ISS completes the MSAT annually, most recently in September 2023, scoring 77% 'High'.** The recommendations produced by the tool are reviewed for implementation feasibility by our Modern Slavery Working Group.

KEY PERFORMANCE INDICATORS

ISS UK has enhanced our modern slavery governance approach with the introduction of Key Performance Indicators (KPIs) to measure the performance of the anti-slavery and human trafficking actions undertaken by our organisations and in collaboration with our supply chain.

Introduced in 2023, our KPIs include measurement and monitoring across the following themes:

- Policies and documentation
- Incidents of modern slavery and human trafficking
- Training
- Real Living Wage
- Risk assessment

These KPIs have been developed by the ISS UK Modern Slavery Working Group and approved by the ISS UK & Ireland Country Leadership Team (CLT). Progress is reported to the CLT on a quarterly basis and KPIs are to be reviewed annually to ensure relevance and usefulness.

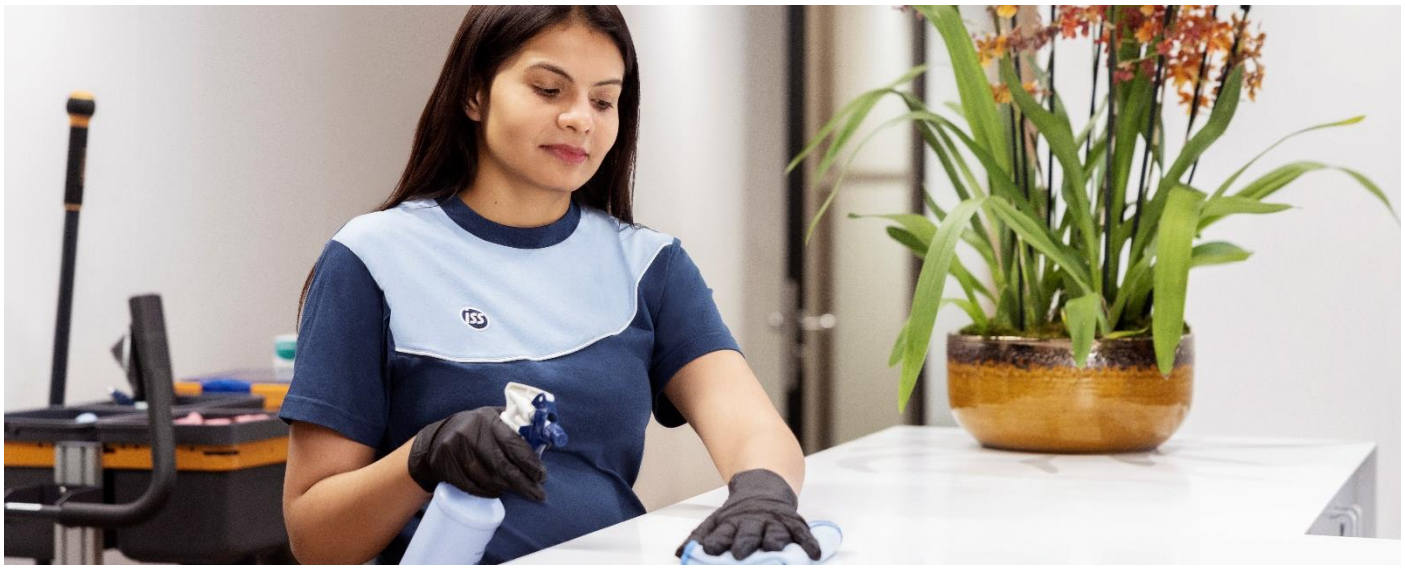
PAYING A REAL LIVING WAGE

As a responsible employer, we recognise that our success depends upon on a motivated and productive workforce, where all employees receive a level of remuneration sufficient to afford a decent standard of living.

ISS continues to support the Real Living Wage as a Recognised Service Provider (RSP) and regularly engages with the RSP Leadership Group, alongside industry peers. In 2023, ISS made a global pledge to work together with policy makers, our customers, and our suppliers to implement living wages[1].

Across our UK workforce, 68% of all employees were paid at least the real Living Wage in 2023, with 100% of direct employees (not tied to client contracts) paid at least the real Living Wage.

We consider payment of a real living wage to lessen the likelihood of people becoming victims of modern slavery, and to support survivors of modern slavery and their families to access essential services and have a decent standard of living.



[1]The 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.

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 UK has produced a dedicated e-learning training module on modern slavery, to educate our workforce on the risks of modern slavery and how to spot the signs.

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 updated annually and 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.

stronger together

Responsible recruitment | Fair work | Free from exploitation



5,347 of our current employees have completed this training, with 1,845 completions taking place in 2023.

The online training module is supplemented by guidance documents available on our modern slavery portal on our 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.



DECLARATION

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes ISS UK Limited and its subsidiaries' (ISS Facility Services Limited and ISS Mediclean Limited) slavery and human trafficking statement for the financial year ending 31 December 2023. This Statement received Board approval on 18/06/2024.

Signed for on behalf of ISS UK Limited, ISS Facility Services Limited and ISS Mediclean Limited by:



Joanne Roberts
Interim Chief Executive Officer and Chief Financial Officer, ISS UK & Ireland
DATE: 19/06/2024

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