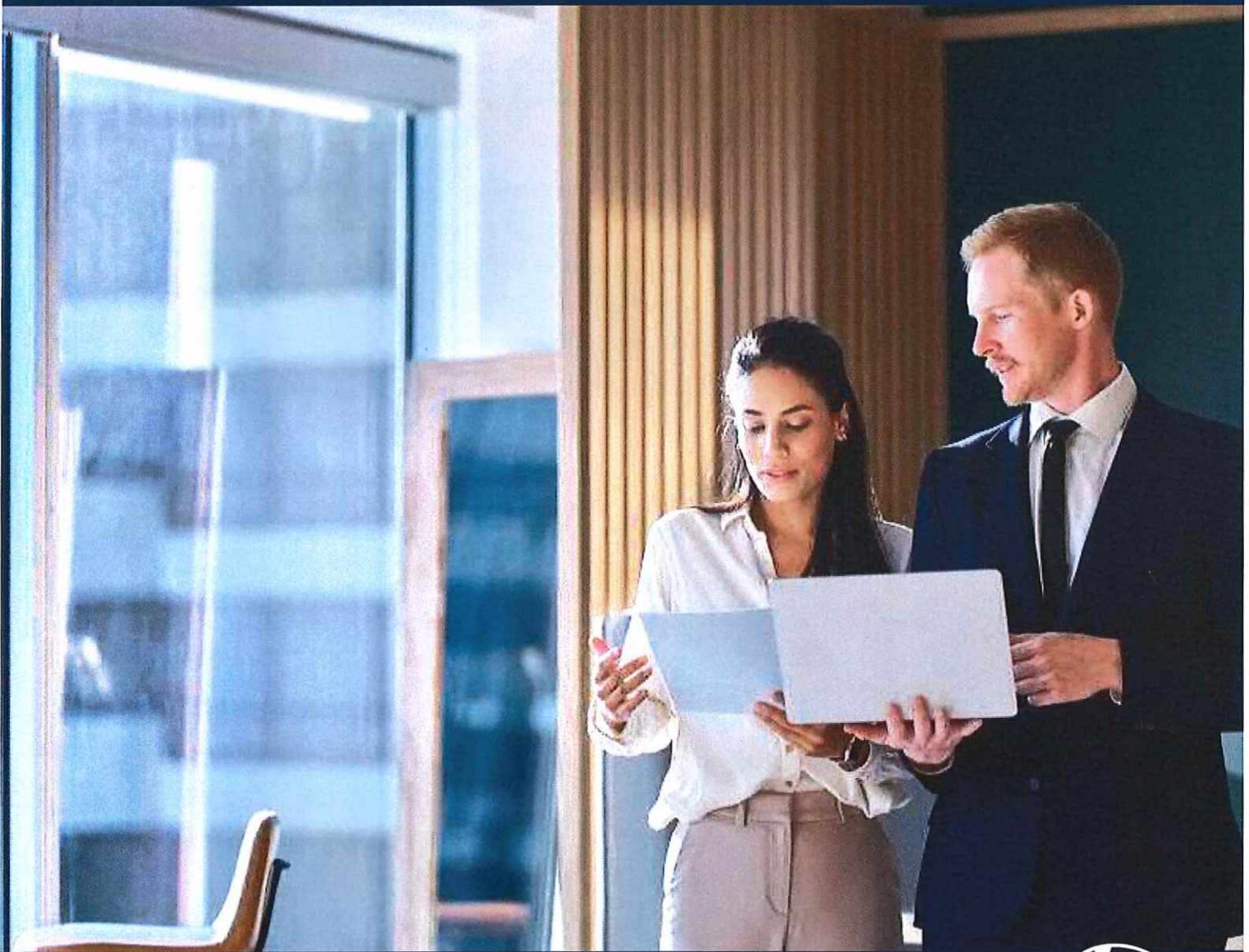


ISS UK LIMITED, ISS FACILITY SERVICES LIMITED AND ISS
MEDICLEAN LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



PEOPLE MAKE PLACES



INTRODUCTION FROM ISS UK&I 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 [Anti-slavery and Human Trafficking Policy](#) states our 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.

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 promote diversity, inclusion and belonging, and support individuals facing barriers to entering the workforce by offering mentoring, upskilling, and targeting recruitment opportunities. These initiatives not only empower vulnerable populations but also provide pathways to fair employment, helping to break the cycle of exploitation and trafficking.

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 2024.



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 2024:

- 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 'OneISS Way' project to standardise and improve access to process documentation across our business includes Modern Slavery information and resources hosted on a 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 must 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

Key supplier engagement metrics that we strive to uphold annually include:

1. 100% of suppliers expressly complying with our Supplier Code of Conduct prohibiting child and forced labour, human trafficking and protecting the health, safety, and inclusion of workers
2. 100% of suppliers who disclose during our onboarding or reassurance programme that they do not hold relevant policies and/or have uncovered instances of modern slavery in their operations or supply chain will be appropriately reviewed
3. 100% suppliers participating in procurement tenders will be assessed on their policies, processes and practices relating to modern slavery as part of our weighted scoring process before they can be selected as a preferred supplier
4. A minimum of three on-site Ethical Employment audits on high-risk tier 1 and 2 suppliers, undertaken by an external partner, will be conducted

We uphold a minimum standard that requires all suppliers to have an anti-human trafficking and modern slavery policy before they can be onboarded as an ISS UK & Ireland supplier (this requirement applies to all labour providers regardless of size, while other micro-size organisations are exempt).



SUPPLY CHAIN ETHICAL EMPLOYMENT AUDITS

To enhance our existing programme of supplier due diligence we undertake Ethical Employment Audits of key Preferred Small and Medium (SME) Suppliers. 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 suppliers 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.

In 2024 we worked with a key construction supplier through the Ethical Employment Audit programme to address the identified non-compliances and improve their employment policies and practices, in turn, helping to protect employees from modern slavery and human trafficking risks. This process saw the supplier enhance their documentation and process relating to right to work checks, undertake certified Fairness, Inclusion and Respect training via the Supply Chain Sustainability School, introduce new wording in their employee handbook relating to modern slavery, and make enhancements to their Whistleblowing and Modern Slavery Policies. Above all, this was communicated to their employees through a number of channels.

RISK ASSESSMENT AND MANAGEMENT

As a facilities management company we provide a range of services to customers in different industries, in partnership with suppliers, which are considered higher risk including cleaning, construction and waste. As an organisation we manage risk through our Audit and Risk Committee who review progress against our KPIs, on a quarterly basis, designed to help reduce the risk of modern slavery occurring in our operations and supply chain.

Our workforce is fundamental to our success but one of our highest risk areas. We are committed to protecting employees and to help with this we have 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 97% of our UK employees now have digital RTW checks using the secure checking tool with the remaining 3% 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 2024 we reviewed our Temporary Labour policy and completed 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 embedded processes focussed around our contingent labour providing an entry route for the temporary to permanent recruitment model.

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 2024, scoring 81%** The recommendations produced by the tool are reviewed for implementation feasibility by our Modern Slavery Working Group.

KEY PERFORMANCE INDICATORS

In 2023, ISS UK 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.

Updated in 2024, our KPIs include measurement and monitoring across the following themes:

- Policies and documentation
- Incidents of modern slavery and human trafficking
- Training
- Business awareness
- Risk assessment

These KPIs and progress actions have been developed and implemented by the ISS UK Modern Slavery Working Group consisting of representatives from relevant functions including People & Culture, Legal, Supply Chain & Procurement, Social Value and Operations. The KPIs are approved by the ISS UK & Ireland Country Leadership Team (CLT). Progress is reported to the CLT on a quarterly basis through the Audit, Risk and Compliance Committee and KPIs are 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.

Our Global Social Sustainability commitment sets out commitment work with policy makers and our customers to pay a living wage¹. To achieve this in the UK we continue to support the Real Living Wage as a Recognised Service Provider (RSP), engaging with the RSP Leadership Group, industry peers, and seeking to influence our customers to support paying our people 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.



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.

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 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. The module is mandatory for all salaried employees and supported with a Toolbox Talk delivered on-site to non-salaried employees.

5,326 (97%) of our current salaried employees have completed this training, with 1,363 completions taking place in 2024.

**stronger
together**

Responsible recruitment | Fair work | Free from exploitation



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.

ISS is represented on the Business Services Association (BSA) Modern Slavery Council; a cross-industry, government-backed group to confront modern slavery. As members, ISS UK have contributed to publications including the 'Tackling Modern Slavery in UK Service and Infrastructure Projects Sectors Toolkit', aimed at providing SMEs with practical guidance on addressing the risks of modern slavery, and more recently in 2024 the 'Frontline Workers Modern Slavery Pack'.



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 2024. This Statement received Board approval on 15 May 2025

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

A handwritten signature in black ink, appearing to read 'Scott Davies', written over a horizontal line.

Scott Davies
Chief Executive Officer, ISS UK & Ireland
DATE: 15 May 2025

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