

Modern slavery statement

Grosvenor Services is a service business, and we pride ourselves on our approach to our people, who are our most important resource. 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 as far as is reasonably practicable that modern slavery is not taking place anywhere in our business, or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we do everything reasonable possible, to ensure the same high standards from all of our contractors, suppliers and other business partners. The Board is fully committed to ensuring as far as is reasonably practicable, that the company and its suppliers comply with the Modern Slavery Act.

Organisational structure

Grosvenor Services is made up of several limited companies in the UK and Ireland.

These are:

- Grosvenor Cleaning Services Ltd.
- The Grosvenor Cleaning Services.
- Grosvenor CS Ltd incorporating Grosvenor Corporate Security Ltd. (UK)
- Grosvenor Corporate Security (IRL)

We are a facilities management provider in both the UK and Ireland. Our principal services are, cleaning, security services, the management of facilities including pest control, post room, reception, waste management and hard services. Our head offices are based in Sandyford, Dublin and Skegness, United Kingdom. We have number of suppliers and subcontractors who deliver product and services into our client sites and or company premises. This includes but is not exhaustive to cleaning chemicals, equipment and machinery and plant, mechanical parts for our hard services division such as air conditioning electric etc. We subcontract services such as high-level cleaning, specialist electrical, plumbing and building maintenance.

As a business with many of Grosvenor Services employees operating in the cleaning and security sectors, the company acknowledges a level of risk to its operational staff in terms of labour and rights violations; as such, Grosvenor Services takes all possible steps to mitigate these risks and ensure compliance to all legislative acts and guidelines.

As a business we have reviewed the areas where we believe we are at risk from human slavery. Our assessment has clearly identified that there are three main areas of risk.

1. Agency workers
2. Sub-contractors
3. Supply chain

Agency workers

Our policy is to directly employ staff working on our contracts. We ensure we comply with the relevant legislation relating to employment in the countries in which we operate, including any minimum wage, holiday, maternity, or other entitlements. Where it is necessary to employ agency staff the period of employment will always be kept to a minimum. The use of agency staff is currently under review. We intend to select partners who are affiliated to the 'Association of labour providers.

Sub-contractors

We review all our sub-contractors with the sole intent of ensuring that only directly employed labour work for our sub-contracting companies, and that those companies provide evidence that they comply with the anti-slavery Act.

Legislative Guidelines

The legislative guidelines incorporated into all aspects of Grosvenor Services activities are as follows:

- The Employment Equality Act aim to: promote equality, ban discrimination across all grounds, ban sexual and other harassment, ban victimisation, make sure suitable facilities for people with disabilities are available in relation to access to employment, advancing in employment and taking part in training, allow positive action to ensure everyone gets full equality across all grounds.
- Health and Safety Welfare Act
- Prevention of Bully and Discrimination
- Modern Slavery Act 2015
- The Employment and Equality (Age) Regulations
- The Employment Equality (Sexual Orientations) Regulations

Procurement

Grosvenor Services takes steps to ensure that its supply chain is held up to the same high standards. This means only working with subcontractors who can prove their own precise recruitment procedures and commitment to laws and legislative guidelines. Grosvenor Services Procurement department is further committed to mitigating any risk of labour rights violations within the supply chain.

Values

Pursuit of Excellence, Reliable, Openness, Accountability, Customer Services, Team Work, Innovation, Value, and Experience are key to Grosvenor Services success in mitigating the risk of modern slavery and bonded labour within its supply chain.

Internal training courses and employee tool box talks have been designed in order to fully equip managers, supervisors, team leaders and HR professionals with the necessary skills to spot the signs of modern slavery.

As part of our Supplier Risk Assessment process and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are assessed and the information held on our supply base is kept up to date. This may include supplier audits or on-site assessments dependent on the nature of the goods or services being provided and on the industry sector in which the supplier

operates. The frequency of these audits or on-site assessments will be dependent on the risk profile of the contract and/or supplier. For those suppliers deemed to be high risk, a standard approach to auditing is adopted which focusses on interviewing the management and employees to identify any worker exploitation in areas such as recruitment, pay, entitlements, treatment, accommodation and grievance mechanisms. If an audit reveals risks of modern slavery, this could result in termination of the supplier's contract.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our whistle-blowing policy.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children.

Supply Chain

Supply chain To mitigate risk we require our suppliers, as part of our tender procedures, to complete a self-assessment pre-qualification questionnaire, which includes questions targeted at slavery and human trafficking risk. The PQQ is used to determine the risk profile of suppliers for supplier sustainability issues. Suppliers completing a self-assessment questionnaire are also expected to provide evidence to support their responses to address areas such as discrimination, freedom of information, forced labour and child labour.

Our systems are designed to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Our policies on Slavery and Human Trafficking

Our Procurement policy and supplier evaluation process 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 where reasonably practicable, slavery and human trafficking is not taking place anywhere in our supply chains.

Spotting the Signs of Modern Slavery Supplier staff are also monitored on an ongoing basis after employment. Supervisors are trained to spot the signs of modern slavery, with particular attention paid to a number of factors:

- Physical appearance of their employees – in terms of potential of abuse or malnutrition
- Employees' personal effects, documentation and freedom of movement
- Whether employees are regularly dropped off / collected by a third party
- The influence of third parties on staff.

The Dignity at Work Policy

A policy setting out the expected standards and the channels for redress, The Dignity at Work Policy, is in place Group wide. This policy exists as a reference guideline and facilitates any employee or perspective employee who believes that he or she has been treated unfairly, within the scope of this policy, to raise the matter through the Company Harassment Procedure.

Continuous Improvement

Grosvenor Services will keep under review all of the relevant policies and Acts for changing circumstances across all jurisdictions. This includes appropriate application of both Positive Action and Affirmative Action measures as advised by statutory bodies.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Bernard McCauley

Group Managing Director

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