

UK&I LGL Anti-Slavery & Human Trafficking Policy

Date: July 2025

PURPOSE

To ensure compliance with current applicable legislation, to promote ethical business practices within ISS (the Company) and to prevent exploitation of individuals, including in respect of modern slavery and human trafficking.

SCOPE

This policy applies to all Placemakers working for ISS, or on our behalf, in any capacity and at all levels including directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

A Placemaker is defined as any employee of the Company.

POLICY STATEMENT

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

As a signatory to the United Nations Global Compact, the Company has a zero-tolerance approach to modern slavery. We respect the human rights principles stated in the United Nations Declaration of Human Rights and the Core Convention of the International Labour Organisation and the Company is committed to upholding these.

We are committed to acting ethically and with integrity in all our business dealings and relationships. Also, to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

In line with our disclosure obligations under the Modern Slavery Act 2015 (UK) and the Criminal Law (Human Trafficking) Act 2008 (Ireland), we wish to promote and ensure transparency not only in our own business, but also in our approach to tackling modern slavery throughout our supply chains.

We have systems, policies, and processes in place to underpin our zero-tolerance approach to modern slavery. Actions and progress on this issue can be found in our annual Modern Slavery Statement published on our website and the UK Government's Modern Slavery Registry.

We expect the same high standards from all our contractors, suppliers, and other business partners. 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 adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

ISS Classification - **Restricted - Internal**

WARNING – Printed versions may be out of date. It is the responsibility of the user to verify that this copy is of the latest revision.



We expect all suppliers to have their own policy communicating a zero-tolerance approach to modern slavery and ask for this to be evidenced as a prerequisite for working with us (this requirement applies to all labour providers regardless of size, while other micro-size organisations are exempt).

Policy Responsibilities

Our UK Modern Slavery Working group meet frequently, monitoring its use and effectiveness, dealing with any queries, and implementing any feedback.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on modern slavery and safeguarding, and the risk associated with modern slavery in supply chains.

Safeguarding

Modern slavery is a broad term used to encompass the offences of slavery, servitude and forced or compulsory labour and human trafficking. In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else's financial gain or benefit.

Modern slavery is when an individual is exploited by others for personal or commercial gain or benefit.

Forced labour is where victims are forced to work against their will under the menace of a penalty or to pay off debts that they will never be able to realistically.

Modern slavery is a form of abuse recognised within the safeguarding of children and vulnerable adults.

The Company has established a Safeguarding Framework consisting of a Policy, Procedure Managers Guide and Reporting Template. All Placemakers must adhere to the requirements set out in the UK PPC Safeguarding Procedure.

Child safeguarding involves actions taken to protect children from maltreatment, whether that is within or outside the home, including online, preventing negative impacts on their health or development, ensuring they grow up with safe and effective care, and setting them up to have the best outcomes.

Adult safeguarding is about protecting an adult's right to live safely and free from abuse. This involves individuals and organisations working together to stop or prevent harm to those experiencing, or at risk of, abuse.

Compliance with the Policy

You must ensure that you read, understand, and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any



activity that might lead to, or suggest, a breach of this policy.

You must report any concerns immediately to the ISS Central Safeguarding team by email to safeguarding@uk.issworld.com, or by using the Company **SpeakUp tool** (details outlined below) if you believe or suspect that a potential breach of this policy may have occurred within the business or our supply chain or is likely to occur in the future.

Please refer to the UK PPC Safeguarding Procedure available on SharePoint for further information.

The **SpeakUp tool** can be accessed:

- online at <https://iss.whistleblownetwork.net/setup>; or
- by calling UK: 0203 987 7736 (local) / 0808 238 9893 (toll free) or Ireland: 014311025 (local) / 1800851328 (toll free).

The protection of 'at risk' or vulnerable individuals is paramount, so ensure that you:

- maintain confidentiality in order to protect the victims;
- make an accurate record of events using the UK PPC Safeguarding Reporting Template and report your concerns to your line manager, People & Culture representative and safeguarding@uk.issworld.com;
- contact the police on 112 or 999 if you or anyone else feel threatened or are in immediate danger; and
- record and retain all evidence which may be useful to a future official investigation.

You can also call the Modern Slavery helpline (UK) on 0800 0121 700 (24 hours a day) or Blue Blindfold (Ireland) on 1800 666 111 to report a suspicion or get advice

If you are unsure about whether a particular act, the treatment of Placemakers more generally, or their working conditions within the Company or any tier of our supply chains constitutes any form of modern slavery, **you must report it**, using one of the options set out above

Support

Anyone reporting an incident or involved with an investigation will be protected from intimidation or victimisation. Our Employee Assistance Programme and Mental Health First Aiders can also provide support to those involved. Individuals who report a safeguarding issue, who support a colleague in making such a report, or who participate in any investigation connected with this policy in good faith, will be protected from any form of retaliation, intimidation, or victimisation.

If you believe that you have suffered any such treatment, you should raise it formally using our UK PPC Grievance Procedure.



Communication and awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, is provided on our Learning Management System. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any Placemaker who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Where appropriate we may also notify the relevant authorities. We may terminate our relationship with other individuals and/or organisations working on our behalf if they breach this policy.

DEFINITIONS

Placemaker - A Placemaker is defined as any employee of the Company.

REFERENCES

ISS Group Speak Up Policy

UK PPC Resolution & Grievance Policy

UK PPC Grievance Procedure

UK PPC Disciplinary Policy

UK PPC Safeguarding Policy

UK PPC Safeguarding Procedure

UK PPC Safeguarding Managers Guide

UK PPC Safeguarding Reporting Template

CHANGE LOG

Mandatory

Date of Change	Author of Changes – Name and a Job Title	Short Summary of Changes
July 2025	Modern Slavery Working Group	Content review and moved to new OneISS document template

