Modern slavery statement

Modern slavery statement for financial year 2024/5

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (MSA) and sets out the steps that ISS Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. ISS Ltd has prepared this statement in line with the UK Government's guidance on *Transparency in Supply Chains* and associated Home Office publications.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ISS Ltd has a zero-tolerance approach to modern slavery in any form. We are committed to acting not only ethically but with integrity and transparency in all business in which we partake. We have robust systems and controls in place to effectively safeguard against any form of modern slavery taking place within our businesses and supply chain.

Our approach to the Modern Slavery Act

We continually review our approach to ensure it remains effective and proportionate to the risks faced by our business and industry. We conduct risk assessments to identify areas where modern slavery risks may arise and implement measures to mitigate them. The most recent review of our risk assessment and related policies were completed in January and March 2025. We also maintain clear channels for employees, contractors, and suppliers to raise concerns, including through our whistleblowing policy, which protects those who report issues in good faith.

Governance and Oversight

ISSL's commitment to combatting modern slavery is overseen by our Modern Slavery Champion, who is responsible for coordinating company-wide efforts and ensuring continuous improvement. The Modern Slavery Champion meets annually with the Board of Directors to:

- Review progress made during the year;
- Set and review Key Performance Indicators (KPIs)
- Identify areas for improvement
- Ensure that findings from risk assessments and audits are incorporated into policy and practice.

Our high-risk areas

Labour supply remains one of the more significant potential risk areas for our operations. While ISS undertake limited work in higher risk areas such as agriculture, food processing, packaging and textiles we recognise that vigilance must be applied across all areas in which we operate.

To mitigate these risks, all staff receive modern slavery awareness training, helping them to recognise signs of exploitation and understand how to report concerns.

Our policies

We operate a number of internal policies & procedures which help to ensure that we are conducting business in an ethical and transparent manner. These include:

- Modern slavery policy
- Whistle blowing policy, linked to an awareness of the protection of whistle-blowers
- Codes of Conduct
- Recruitment policy
- Ethical procurement policy
- Management of purchasing procedure

These policies are all linked to the way our business is operated through operational controls, workforce onboarding, labour supply and our engagement with customers and suppliers.

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Our suppliers

We adopt a risk-based approach to supplier management and auditing. ISS maintains an Approved Supplier Process to ensure that all suppliers meet our ethical and legal standards. As part of this process:

- All suppliers complete a Supplier Questionnaire, providing details of their own modern slavery statements and policies.
- Copies of these documents are retained, tracked, and reviewed.
- Suppliers are approved only once requirements have been satisfied.

Suppliers are assessed based on their sector, location, and the nature of goods or services provided. Higher-risk suppliers may be subject to enhanced due diligence, including site visits and audits.

In FY 2024–25, ISS completed an in-person audit of our PPE supplier, reviewing their policies, employment practices, and supply chain controls. Findings confirmed strong compliance, and the audit results are being used to refine our risk assessment framework for future years.

ISSL works with three key intermediaries providing payroll services, The Sterling Group, Workwell and PayStream, all of whom have undergone detailed due diligence by our compliance team and are recognised as leaders in their field.

All candidates supplied via ISSL are processed in accordance with UK tax legislation. We recognise the potential links between unlawful tax evasion and modern slavery and maintain policies to prevent and detect such activity.

Training and Awareness

ISSL provides comprehensive training to help staff identify, prevent, and respond to risks of modern slavery and human trafficking. At a senior director level further modern slavery training has taken place to include The Modern Slavery Act and Modern Slavery. Ongoing awareness is supported through our SMARTbrief system, which delivers regular updates, reminders, and briefings on modern slavery prevention and reporting.

Monitoring and Continuous Improvement

We monitor the effectiveness of our modern slavery controls through regular policy reviews, supplier assessments, and training updates. Our Modern Slavery Champion and Board of Directors review progress annually against agreed KPIs and discuss opportunities for improvement.

External Factors

We continue to consider wider external influences including post-Brexit trade changes, shifts in international supply routes, and the continuation of remote working within our risk assessment. We have determined that these factors have not adversely impacted our ability to identify, prevent, or respond to modern slavery risks.

We remain alert to the global and cross-border nature of human trafficking and will adapt our due diligence processes in response to emerging risks.

Commitment to Continuous Improvement

We are committed to ongoing improvement in the prevention of modern slavery. For FY 2025–26, our planned actions include:

- Expanding supplier audit coverage to further suppliers
- Enhancing training for management teams
- Publishing more awareness material for our workforce

Approval for this statement

This statement was approved by the ISSL Board of Directors in September 2025.

Gary Beeston
Group Managing Director