



# INTERNATIONAL SOS

## Modern Slavery Policy

Linked to Code of Conduct and Ethics

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**POLICY**

**WORLDWIDE REACH.  
HUMAN TOUCH.**

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INTERNATIONAL  
SOS

## 1. INTRODUCTION

### 1.1. Purpose

- 1.1.1. This Modern Slavery Policy ("**Policy**") is the anti-slavery and exploitation policy of AEA International Holdings Pte Ltd ("**AEA**") and its affiliates (the "**International SOS Group**").
- 1.1.2. This Policy has been developed taking into account, among other sources, the U.K. Modern Slavery Act, 2015, and the Australian Commonwealth Modern Slavery Act 2018, and other similar legislation.
- 1.1.3. Modern slavery is a crime and a violation of fundamental human rights which exploits millions of people globally. International SOS abhors modern slavery, which is completely contrary to all we stand for. We are in the business of saving lives, and are committed to our responsibility to avoid participating, either directly or indirectly, in modern day slavery. Modern day slavery has no place in our company or in our procurement activities.
- 1.1.4. This Policy is consistent with our [Code of Conduct and Ethics](#), that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations and continuous improvement over time.

### 1.2. Scope

- 1.2.1. This Policy applies to:
  - (a) all persons working for International SOS Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners ("**Personnel**");
  - (b) all recruitment and employment agencies from whom employees, contractors and other personnel may be sourced ("**Agencies**");
  - (c) all third party product and service vendors ("**Suppliers**");
  - (d) any distributors, logistic providers (e.g. air charters, freight forwarders) and others involved in the distribution of products on behalf of the International SOS ("**Distribution Partners**");
  - (e) All third party entities which are managed and maintained by the Network Services as providers of "on the ground" health and security assistance services to whom International SOS refers customers or their employees and contracted third party entities which are utilised by the Aspire Lifestyles Service Delivery as providers of concierge services to whom Aspire Lifestyles refers customers or their employees ("**Providers**"); and
  - (f) Any other third party with which any International SOS legal entity or Personnel representing the International SOS Group, contracts for the delivery or supply of services or product (e.g., IT Vendors, consultants, landlords) ("**Others**").
- 1.2.2. **Agencies, Suppliers, Distribution Partners and Others** hereafter will be collectively referred to as **Third-Party Suppliers**.

- 1.2.3. This Policy does not form part of any employee's contract of employment and/or any contract with Third Party Suppliers although all Personnel must comply with it. As business practices and company needs change, this Policy is subject to revision and may be modified or discontinued at any time at the company's discretion.
- 1.2.4. This Policy may be supplemented by other more specific procedures based on country laws and regulations.



## 2. WHAT IS MODERN SLAVERY?

2.1. Modern slavery concerns the suppression of a person's liberty in order to exploit them for personal or commercial gain; examples of which include:

- (a) **trafficking in persons** which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- (b) **slavery** which is where the offender exercises powers of ownership over the victim;
- (c) **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- (d) **forced labour** which is where the victim is either not free to stop working or not free to leave their place of work;
- (e) **forced marriage** which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- (f) **debt bondage** which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- (g) **any forms of child labour** which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- (h) **deceptive recruiting for labour or services** which is where the victim is deceived about the true nature of the proposed labour or service requirements and where the intent of the recruiter is to exploit the individual through any type of modern slavery.

2.2. It can also extend to:

- (a) entering into a commercial transaction involving a victim;
- (b) exercising control or direction over, or providing finance for, any commercial transaction involving a victim or act of trading in victims; and
- (c) conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it).

### 3. STEPS FOR PREVENTION OF MODERN SLAVERY

#### 3.1. Business Activities and Operations

##### 3.1.1. Compliance Requirements

- (a) International SOS has a comprehensive set of policies and procedures that contribute to enabling our business and all Personnel to identify and mitigate any risks related to modern slavery. These include policies on [Code of Conduct and Ethics](#), [Labour and Individual Rights](#), [Safeguarding of Children and Vulnerable Adults](#), [Combatting Human Trafficking](#) and [Whistleblower](#), which are available on our corporate website. All Personnel are required to adhere to these policies and receive training and induction in relation to all relevant International SOS policies and procedures.
- (b) This Modern Slavery Policy:
  - i. outlines our approach to reducing the risk of modern slavery practices within our procurement and operations;
  - ii. provides guidance on the steps International SOS takes to work with any third party to reduce risks; and
  - iii. details the range of supports available for when Personnel become aware that someone is at risk of being affected by modern slavery practices.

##### 3.1.2. Human Resources

- (a) International SOS is committed to ensuring the health, safety and wellbeing of our workforce and we maintain policies that are informed by and compliant with workplace and occupational health and safety laws.
- (b) We ensure that all Personnel, including volunteers are engaged on a truly voluntary and non-exploitative basis.
- (c) We always ensure all Personnel have a written letter of appointment, contract of employment or similar documents and that they have not had to pay any direct or indirect fees to obtain work.
- (d) We always ensure Personnel are legally able to work in the country in which they are recruited.
- (e) We check the names and addresses of all Personnel (e.g., many people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- (f) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

- (g) If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures.
- (h) Due diligence checks shall be implemented and conducted as required on relevant recruitment Agencies that we use to ensure that they are reputable and conducts appropriate checks on all Personnel that they supply to us.

## 3.2. Procurement activities

### 3.2.1. International SOS Provider Code of Conduct

- (a) International SOS engages in the business of providing services to reduce its clients' exposure to health, wellbeing and security risks. We generally do not subcontract our services, however, where appropriate, we refer customers to a network of third party Providers to provide medical and security assistance.
- (b) Providers are requested to:
  - i. provide services to International SOS subscribers in accordance with the processes, program and non-program specific requirements as listed in the provider agreement and agreed to by the Providers; and
  - ii. agree to comply with the [International SOS Provider Code of Conduct](#).
- (c) Fundamental to the International SOS Provider Code of Conduct is an expectation that all Providers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.
- (d) Providers must also agree to use best endeavours to ensure that there are no modern slavery violations occurring in their procurement and operations.
  - i. In the event Providers identify any occurrence of, or material risk of an offence of modern slavery in their procurement or operations, they are to take practical and effective steps to address that occurrence or risk.
  - ii. Providers must notify International SOS as soon as practicable of any occurrence of, or material risk of an offence of modern slavery that they have identified and also notify relevant authorities as required by law.

### 3.2.2. International SOS' contractual terms with Providers

Where appropriate, our contractual terms reflect:

- (a) Providers obligations outlined in the [International SOS Provider Code of Conduct](#), including compliance with all modern slavery laws that apply in the location(s) in which they operate ;and

- (b) We evaluate and credential our Providers from time to time regarding compliance with our policies.

### 3.2.3. Procurement mapping and risk assessment

- (a) To ensure that our Third Party Suppliers deliver the same high levels of professional excellence and social safeguarding required by International SOS, we will continue to do risk based audits. In addition, we include provisions in our contractual agreements that require our counterparties to commit to the prevention of modern slavery, which is outlined in the [International SOS Supplier Code of Conduct](#) and country-specific procedures such as the Government Services Division's [Combating Human Trafficking Procedure](#).
- (b) When International SOS engages with Third Party Suppliers, we must assess their suitability to provide us with goods and services. Included in this assessment is a risk assessment that considers whether they are providing services from countries with a high risk profile for slavery and whether the services or goods provided are from a low skilled staff group (for example, as identified based on the high risk in accordance with the Home Office 'A Typology of Modern Slavery Offences in the UK (2017)' report – click [here](#) for a copy).
- (c) Where Third Party Suppliers are considered high risk, we may require further evidence of their due diligence processes to prevent modern slavery. In addition, we will continuously monitor such third parties closely to ensure that they comply with the highest levels of ethical standards.
- (d) In cases where modern slavery is identified, suspected or alleged, in our business or in Third Party Suppliers, immediate action shall be taken to address it.
  - i. The first step is to undertake a comprehensive, documented investigation in accordance with the [International SOS Investigation Procedures](#).
  - ii. If the investigation confirms the occurrence of an offence of modern slavery is involved, the contractual relationship will be immediately terminated, and International SOS will report the errant Third Party Supplier involved in such abuse to relevant authorities.
  - iii. In the event the investigation is not conclusive, International SOS shall seek written assurances from the relevant Third Party Suppliers that they do not engage in modern slavery in the provision of services to International SOS.
  - iv. Failure to resolve the situation with a Third Party Supplier rapidly and satisfactorily, will result in the termination of the contract.

### **3.3. Communications, Engagement and Training**

3.3.1. All Personnel will be provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, this Modern Slavery Policy and our approach to limiting the risk of modern slavery within our procurement and operations. This includes all Personnel who undertake procurement activity shall undertake additional training so that they are able to follow a procurement process which is designed to reduce the risk of International SOS engaging with a Third Party Supplier who may engage in modern day slavery.

### **3.4. Continuous improvement approach to reducing the risk of modern slavery**

3.4.1. We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our procurement and operations.

3.4.2. We will seek feedback from International SOS Third Party Suppliers and Providers with regard to the success or otherwise of the actions we and they have taken to reduce the risk of modern slavery.

3.4.3. We take the following steps to ensure we are effectively mitigating the risk of modern day slavery occurring:

- (a) Our policy and procedures related to modern day slavery are reviewed annually and may be reviewed more regularly if an incident is reported;
- (b) Reported incidents are analysed to establish if there are any areas of risk that require further mitigations.
- (c) We shall progressively implement a commitment by all our Third Party Suppliers in revised agreements to the principles of this Policy and to gain continued assurance that they have adequate controls to prevent the risk of modern slavery.
- (d) We shall regularly audit for compliance against this commitment.

## 4. RESPONSIBILITIES

### 4.1. AEA Board

4.1.1. The AEA Board of Directors has overall responsibility for this Policy and mandating that it is enacted within the Group. The AEA Board shall conduct an annual review of the risk assessments undertaken pursuant to this Policy in order to satisfy itself that the control measures are appropriate to the identified risk.

### 4.2. Management

4.2.1. Management at all levels in the Group are responsible for ensuring that those reporting to them understand and comply with this Policy, and are given adequate and regular training on the issues of modern slavery.

4.2.2. Managers will remain alert to indicators of modern slavery and will respond appropriately if they find or are informed of any indication of modern slavery.

4.2.3. Managers must actively and proactively engage with the Compliance function to support the implementation of this Policy.

### 4.3. Training

4.3.1. All Personnel shall be required to undertake training relative to this Policy and other country-specific procedures to confirm that they will escalate any concerns they may have on the subjects covered herein.

### 4.4. Legal and Compliance

4.4.1. Compliance shall monitor the implementation of the Policy and its cross-functional compliance across the Group.

4.4.2. The Group's risk management framework shall be designed to support this Policy through independent audit, assessment, and objective oversight. This includes monitoring its use and effectiveness, ensuring that managers and employees receive adequate notification and training, and auditing internal control systems and procedures to ensure these procedures are effective in countering modern slavery.

## 5. REPORTING CONCERNS OF MODERN SLAVERY

### 5.1. Reporting unethical or unlawful conduct

- 5.1.1. International SOS encourages Personnel to raise concerns about any issue or suspicion of modern slavery in any parts of the business or procurement at the earliest possible stage so that senior management can adequately identify issues and manage risk within the group.
- 5.1.2. Personnel do not need to be certain that a violation has occurred. At the same time, Personnel have an obligation to promptly raise a concern when you see a situation in which our integrity, principles or policies are not being followed.
- 5.1.3. Confidentiality is respected, and Personnel may even choose to remain anonymous. The identity and information will only be shared on a “need-to-know” basis. Any retaliation, whether direct or indirect, against Personnel who raise a concern is grounds for discipline up to and including dismissal.
- 5.1.4. International SOS will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Personnel are therefore encouraged to put their names to allegations.

#### How to report a breach

- 5.1.5. International SOS offers four (4) reporting channels for reporting suspected wrongdoing:
  - (a) Personnel can choose to speak to someone about a suspected wrongdoing or put it in writing. Generally, Personnel’s supervisor or manager will be in the best position to resolve a suspected wrongdoing, but other resources include your human resources leader or the Group Manager Compliance at [Compliance@internationalsos.com](mailto:Compliance@internationalsos.com).
  - (b) Personnel can report suspected wrongdoing via Hydra, the application used for customer feedback, incident reporting and management, risk management and quality management within International SOS. Hydra – Incidents supports adverse incident reporting and incorporates automatic escalation to line management and functional management.
  - (c) Personnel can report anonymously using the “Integrity Reporting Form” application for non-Government Services related matters via the web at: <https://app.whispli.com/reports/add/IntegrityReports>.
  - (d) For Government Services related suspected wrongdoings, Personnel can report anonymously using the “EthicsPoint” application via the web at: <https://secure.ethicspoint.com/domain/media/en/gui/59418/index.html>.

## 5.2. Responding to concerns of modern slavery practices

- 5.2.1. The often hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.
- 5.2.2. There are a range of supports available when Personnel become aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within International SOS procurement and operations or in the broader community.
- 5.2.3. Personnel may contact the **Group General Counsel** or the **Group Chief Security Officer** for further information, advice and options available when a person is at risk of affected by modern slavery practices.

## 6. ENFORCEMENT AND BREACHES OF THIS POLICY

- 6.1. Breaches of this Policy may have serious legal and reputation repercussions and could cause material damage to International SOS. Consequently, breaches can potentially lead to disciplinary action that could include summary dismissal and to legal sanctions, including criminal penalties.
- 6.2. International SOS is committed to the UN Guiding Principles on Business and Human Rights. Should undiscovered modern slavery practices be found, International SOS will fully cooperate in remediation efforts to mitigate the impact of these practices.

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