

## **Modern Slavery Statement 2024/2025**

This statement is made by International SOS Assistance (UK) Limited under the legal requirement set out under Section 54 of the Modern Slavery Act (2015) for the financial year ending 30 June 2025 and was approved and signed on behalf of the board of directors on the 11 December 2025.

International SOS is the worldwide registered trademark for the diverse group of companies operating under the International SOS trademark umbrella. The parent holding company is AEA International Holdings Pte. Ltd. which is incorporated in Singapore and operates under Singaporean Law. International SOS is committed to protecting our corporate reputation as a trustworthy, ethical group of companies so that we can continue to safeguard our clients, their employees and the employees of third party service providers and prosper as a company. 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, consistent with our disclosure obligations under the Modern Slavery Act 2015.

### **Summary**

International SOS is committed to operating responsibly and ensuring that modern slavery has no place in our business or supply chain. We maintain robust controls and continuously improve our practices to identify, mitigate and respond to modern slavery risks. The company's latest [Sustainability Report](#) provides more information about the ethics, values and goals of International SOS. International SOS has a comprehensive set of policies and processes that enable our business and our personnel to identify and mitigate risks related to modern slavery. These policies include our Code of Conduct and Ethics, Labour and Individual Rights, Safeguarding of Children and Vulnerable Adults, Combatting Human Trafficking and Whistleblower, which are discussed further below and can be found here: [International SOS Policies: Employer, Ethics, Privacy and More](#).

International SOS is committed to maintaining a respectful, caring and safe working environment in which all employees are treated fairly and are able to raise concerns without fear of retaliation. Our culture of openness supports early identification of any potential ethical or labour-related issues, including modern slavery risks, and is reinforced through our Whistleblowing Policy and confidential reporting channels.

### **Structure and Supply Chains**

International SOS Assistance (UK) Limited operates as part of the wider International SOS Group but is responsible for delivering services within the United Kingdom. Our UK operations focus on medical assistance, travel risk management, consultancy services and related support functions provided to corporate, government and NGO clients. These services are delivered through a combination of in-house medical and operational personnel and an established supplier network.

Our UK supply chain primarily consists of third party medical service providers, including clinics, hospitals, and specialist healthcare professionals. In addition, we engage a range of non-medical suppliers to support our operational and administrative needs, such as facilities management, technology and IT services, and professional service providers. The scale and diversity of these suppliers reflect the broad range of services delivered to our clients, and we recognise that the varying nature of these sectors may present differing levels of exposure to modern slavery risks. As such, our supply chain management and due diligence processes are tailored to the specific risk profile of each supplier category and service type.

### **Policies**

International SOS has a comprehensive set of policies and processes that contribute to enabling our business and our employees to identify and mitigate risks related to modern slavery.

#### **Code of Conduct and Ethics**

International SOS places strong emphasis on ethical and responsible conduct across all areas of our business. Our approach is guided by two key documents: our **Employee Code of Conduct and**

**Ethics**, which sets out the standards expected of all staff, and our **Supplier Code of Conduct**, which outlines the ethical, labour and human rights requirements we expect from our suppliers and service providers.

Together, these Codes underpin our commitment to integrity, respect and professional behaviour and form an important part of our framework for identifying and managing risks related to modern slavery and broader human rights concerns. They set clear expectations regarding responsible conduct, ethical decision-making and the standards we require across our operations and supply chain.

All employees are required to complete annual training on the Employee Code of Conduct and Ethics through our Global Compliance Course, ensuring continued awareness of our ethical obligations and the behaviours needed to maintain a safe, respectful and compliant working environment. Suppliers are required to adhere to the Supplier Code of Conduct as a condition of doing business with us, and compliance forms part of our due diligence and ongoing supplier monitoring processes.

### ***Individual Rights***

Our Individual Rights Policy sets out our commitment to respecting and protecting human rights across our operations and supply chain. The policy prohibits the use of child, forced or bonded labour in any part of our business and requires that all employees and those working within our supply chain are treated with dignity and respect. The Policy forms part of our broader ethical and compliance framework and is supported by our due diligence processes, supplier onboarding requirements and reporting mechanisms, helping us to identify and address any potential risks of modern slavery or human rights abuses.

### ***Safeguarding of Children and Vulnerable Adults***

At International SOS, we recognise the heightened risks faced by children and vulnerable adults and our responsibilities when providing services to these groups. Our Safeguarding of Children and Vulnerable Adults Policy sets out clear behavioural and procedural requirements for our employees to ensure that the rights of these individuals are protected and that our employees are aware of their responsibility to protect them from harm or abuse when delivering our services. Our safeguarding processes also help us identify situations where individuals may be at heightened risk of exploitation, including potential indicators of modern slavery, and ensure that any concerns are raised and addressed promptly.

### ***Whistleblowing***

International SOS promotes a culture of openness and accountability, encouraging employees, contractors and suppliers to speak up about concerns they may have. Our Whistleblowing Policy provides clear direction and reporting channels for staff who may become aware of or suspect wrongdoing, including concerns relating to unethical behaviour, labour practices or potential indicators of modern slavery within our business or supply chain. Individuals can report concerns without fear of retaliation, and all disclosures are reviewed and addressed in accordance with our internal investigation procedures. Where appropriate, issues are escalated to senior management to ensure that any necessary actions are taken promptly and effectively.

### ***Due Diligence***

International SOS does not use forced, bonded or child labour in any part of our operations. We expect the same of our service providers and take appropriate steps to ensure they operate ethically and without exploitative labour practices.

Our UK supply chain comprises a range of medical and non-medical providers that support the delivery of our services. This includes medical practitioners, clinics and hospitals, as well as suppliers in areas such as facilities management, logistics and transportation, information technology, training, and other professional services. These suppliers vary depending on the nature of the services we provide, and we recognise that different supplier categories may present differing levels of exposure to labour related risks. Where the services are delivered in the UK, we only use locally registered suppliers and service providers for delivery of medical services. We monitor these providers closely to ensure that they meet our ethical and professional standards. This includes verifying that they uphold high standards of conduct, safeguarding and service quality, and that they meet the obligations set out in our contractual arrangements and supplier oversight processes.

Our due diligence approach includes the following measures:

- **Supplier Self-Assessment**

All new suppliers are required to complete a self-assessment questionnaire covering labour standards, human rights and ethical conduct. This includes declarations relating to forced, bonded or child labour and confirmation that appropriate controls and grievance mechanisms are in place.

- **Background Checks and Verification**

Where individuals are engaged directly to provide services on behalf of International SOS, appropriate background checks are conducted in line with our internal policies. All suppliers are also screened against sanctions, regulatory and compliance databases to identify any integrity, financial crime or human rights concerns. In addition, we request evidence of relevant certifications, quality standards and compliance frameworks to support supplier responses.

- **On-Site Audits for Higher-Risk Providers**

Suppliers assessed as critical or higher risk may be subject to on-site audits. These reviews are conducted by International SOS specialist teams.

- **Contractual Requirements and Consequences for Non-Compliance**

Our supplier contracts include modern slavery clauses and incorporate our Provider Code of Conduct. These require suppliers to maintain ethical labour practices, comply with the Modern Slavery Act 2015, and notify us of any actual or suspected breach. Failure to comply may result in corrective action requirements, suspension of services or contract termination.

- **Supplier Modern Slavery Statements**

Where suppliers are legally required to publish a modern slavery statement, we expect them to meet this obligation and may request copies as part of our due diligence or ongoing monitoring process.

- **Reporting Mechanisms and Escalation**

Concerns relating to labour practices or potential indicators of modern slavery are escalated through our Whistleblowing channels and reviewed by the Legal and Compliance teams. Serious concerns are escalated to senior management and, where appropriate, to the Board of Directors.

- **Ongoing Monitoring and Periodic Review**

Supplier information is reviewed periodically, and higher-risk suppliers are subject to enhanced monitoring. This includes follow-up assessments, review of updated documentation and verification of any corrective actions required. Our audit programme is risk-based and prioritises providers operating in higher-risk sectors or jurisdictions.

### **Risk Assessment**

When International SOS engages with a supplier or service provider, we assess their suitability to provide us with goods and services. Included in this assessment is a risk assessment that considers if they are providing goods and/or services from countries with a high-risk profile for slavery and whether the goods and/or services provided are from a low skilled staff group as further described in the International SOS Modern Slavery Policy found at [International SOS Policies: Employer, Ethics, Privacy and More](#).

Where a supplier or service provider is considered high risk, we may require further evidence of their due diligence processes to prevent modern slavery. Additionally, we closely monitor our suppliers and service providers to ensure they adhere to the highest ethical standards.

Our assessment of modern slavery risk considers a combination of factors, including the geographic location of the supplier, the sector in which they operate, the type of labour involved, and the regulatory environment in the jurisdiction where services are delivered. We also consider the nature of the services being procured, the use of subcontracting, and whether any part of the supply chain involves lower-skilled or vulnerable labour groups. This assessment is reviewed annually, or more frequently where there is a material change in risk, to ensure that emerging risks are identified and managed appropriately.

**Measuring Effectiveness**

We take the following steps to ensure we are effectively mitigating modern slavery:

- Our policy and procedures related to modern slavery are reviewed annually and may be reviewed more regularly if an incident is reported;
- Reported incidents are analysed to establish if there are any areas of risk that require further mitigations.

**Training for Staff**

International SOS recognises that effective training is essential to ensuring our employees can identify and respond appropriately to the risks of modern slavery. All UK-based employees are required to complete our annual Global Compliance Course, which includes dedicated training on modern slavery, human trafficking, and recognising indicators of labour exploitation. Training completion is monitored by our HR team and line managers, and employees are required to complete the course annually. Non-completion is followed up as part of performance management processes to ensure full compliance.

To ensure the training remains relevant and effective, the content is reviewed annually by our Compliance and Legal teams and updated to reflect changes in legislation, emerging risk areas, or feedback from prior years. Additional targeted training is provided to employees in higher-risk or supplier-facing roles, including those working in procurement, operations, HR and contract management, to strengthen their understanding of supply chain risks and reporting obligations.

During the 2024–2025 financial year, 96.6% of UK staff completed the training within the required timeframe. We continue to strive for 100% completion annually and monitor progress throughout the training cycle to ensure that all employees are equipped with the knowledge needed to help prevent modern slavery in our operations and supply chain.

**Governance and Accountability**

International SOS maintains a clear governance framework to oversee the management of modern slavery risks within our UK operations and supply chain. Responsibility for implementing and monitoring our modern slavery controls sits primarily with the Legal, Compliance and Procurement functions. These teams work collaboratively to ensure that relevant policies are maintained, supplier due diligence is conducted, and any concerns or incidents are appropriately escalated.

The Compliance team is responsible for coordinating our annual modern slavery risk review and for monitoring adherence to internal policies. The Procurement team integrates modern slavery requirements into supplier onboarding, ongoing monitoring and contractual arrangements. The Legal team provides oversight of policy development, contractual safeguards and compliance with the Modern Slavery Act 2015.

Updates on modern slavery risks, due diligence outcomes, training completion and incidents raised through our Whistleblowing channels are reported to senior management. A consolidated summary is presented annually to the Board of Directors, ensuring clear oversight and accountability at the highest level of governance.

**Looking Forward**

Over the coming year, we will continue to assess and refine our processes to ensure that modern slavery is prevented across our operations and supply chain. We will continue strengthen our approach to preventing modern slavery through a number of planned actions. These include undertaking a review of our internal policies to ensure they remain aligned with current legislative and regulatory requirements; enhancing the content of our staff training to reflect emerging risks and good practice; and updating our supplier due diligence questionnaires to ensure that they continue to capture relevant information on labour standards and ethical conduct. These steps will support continuous improvement in our controls and oversight.

**WORLDWIDE REACH.  
HUMAN TOUCH.**



### **Approval and Publication**

This statement was approved by the Board of Directors of International SOS Assistance (UK) Limited on 11 December 2025 and is signed on its behalf by the General Manager – Northern Europe. In accordance with the requirements of the Modern Slavery Act 2015 and UK Government guidance, this statement will be published on the International SOS public website and will be accessible at [International SOS Policies: Employer, Ethics, Privacy and More](#).

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*Peter Jenkins*

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**Peter Jenkins**

**General Manager – Northern Europe**

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