

# Modern Slavery and Human Trafficking Policy

## Introduction

This statement sets out Tenon fm’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the Facilities Management Industry, Tenon fm recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Tenon fm is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational Structure & Supply Chains

This statement covers the activities of Tenon fm (including Elite Cleaning and Environmental Services):

- The business offers Cleaning, Waste and Hard Services as part of a full facilities management service. These activities are carried out on client premises nationwide. There is no formal supply chain but there are sub-contracted services on some sites.
- Tenon fm operates across the United Kingdom.

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Stakeholders are identified and educated to follow the risk process when procuring services or goods
- All medium or high-risk suppliers will be audited

The following activities are considered to be at high risk of slavery or human trafficking:

- Currently there are considered to be no areas of high risk

## Responsibility

Responsibility for Tenon fm’s anti-slavery initiatives is as follows:

- **Policies:** The HR Director will draft and implement the policies and ensure they are reviewed a minimum of once a year. The MD has responsibility for ensuring adherence to the policies.
- **Risk assessments:** Have been put into place by the QuESH Team who will have ownership of the process and continue to review this. The QuESH Team complete a risk assessment on the supplier, asking them to complete a supply chain partner questionnaire and assessing them against specific criteria.
- **Investigations / due diligence:** Will be conducted by the stakeholder (i.e. whoever is procuring the product or service) and signed off by the FD.
- **Training:** The supplier & employee code of conduct will be covered at induction and also annually a refresher will be provided by all department heads.

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## Relevant Policies

Tenon fm operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy**

Tenon fm encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Tenon fm. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Tenon fm’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.

- **Employee Code of Conduct**

Tenon fm contracts of employment makes clear to employees the actions and behaviour expected of them when representing Tenon fm. Tenon fm strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

- **Supplier Code of Conduct**

Tenon fm is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Tenon fm works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of Tenon fm’s supplier code of conduct will lead to the termination of the business relationship. We do this by ensuring that all suppliers are made aware of our modern slavery and human trafficking act and ensure that we carry out the necessary procedures before working with new suppliers.

- **Anti-Bribery and Corruption policy**

Tenon fm is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Company’s position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

## Due Diligence

Tenon fm undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Tenon fm’s due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments by Tenon fm which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

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## Performance Indicators

Tenon fm has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, Tenon fm:

- Requires relevant employees to complete training on modern slavery
- Is continually reviewing its supply chain verification systems and processes, whereby Tenon fm evaluates potential suppliers before they enter the supply chain
- Is reviewing its existing supply chains to evaluate all existing suppliers

## Training

Tenon fm requires HR team members, employee members with procurement responsibility and all Operational Managers to complete training on modern slavery.

The Company's modern slavery training covers:

- Mapping the supply chain broadly to assess particular product or Geographical Risks
- Assess modern slavery and Human Trafficking Risks through approval processes
- Supply Chain Partners Auditing with emphasis on Modern Slavery
- Sanctions against SCP or termination of business who violate our supplier code of conduct.

## Awareness-Raising Programme

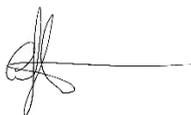
As well as training team members, Tenon fm has raised awareness of modern slavery issues incorporating the Company's Modern Slavery and Human Trafficking Policy into the induction programme for all management employees.

Increased communication awareness programme will be undertaken. This will be through the Company's employee newsletter. This will include:

- The basic principles of the Modern Slavery Act 2015
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag potential slavery or human trafficking issues to the relevant parties within Tenon fm
- What external help is available through the Modern Slavery Helpline

## Approval

This statement has been approved by the MD who will review and update it annually.



Mr Gareth Leverton  
Managing Director  
Tenon fm

Date: 24 August 2022

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