

# 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.
- We have supply chains and supply chain partners on our sites.
- Tenon fm operates across the United Kingdom.

The following is the process by which the Company assesses whether or not particular activities or companies 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.
- Tenon will only work with companies that are low-risk to our business. Where a company is flagged as medium or high risk, the contract will be terminated.

## Responsibility

Responsibility for Tenon fm's anti-slavery initiatives are as follows:

- **Risk assessments:** During our supplier onboarding process, we review our suppliers to ensure they are adhering to the current legislation, this may include a review of any their relevant internal policies.
- **Policies:** The HR team will draft and implement the relevant policies and ensure they are reviewed on a regular basis.
- **New employees:** The employee code of conduct will be signposted to all new Management employees at their company induction.
- **Recruitment:** The managers and HR team conduct thorough background checks on all of our employees working on our sites. Any agency recruitment will also follow these background checks.
- **Employee checks:** The HR team will complete regular checks on employee bank details and address to mitigate these risks.

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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.
- Manage any supplier incidents that violate our supplier code of conduct which can result in termination of the business relationship.

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## Performance Indicators

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

- Requires relevant employees to attend our induction programme
- Review the trafficking risk of all of our new suppliers working with the business
- Conduct audits where risk is identified
- Conduct regular checks on our employees (background, bank & address)

## Awareness-Raising Programme & Training

Tenon fm raises awareness by having a Modern Slavery and Human Trafficking Policy. This is signposted in our induction programme for all managers and supporting functions within the business.

Over the next 18 months we are looking to introduce initiatives and training that will raise awareness of modern slavery and human trafficking. Communications will cover:

- 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
- Stronger together initiatives.

## Approval

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



Ian McIlroy  
Managing Director  
Tenon fm

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