

# Modern Slavery and Human Trafficking Policy & Statement

Published in accordance with Section 54 of the Modern Slavery Act 2015

## Introduction

Tenon FM is unwavering in its commitment to operating responsibly and ethically, upholding the highest standards of integrity, human rights, and social responsibility across all aspects of our business. We maintain a zero-tolerance approach to all forms of modern slavery and human trafficking, recognising these practices as severe violations of fundamental human rights and dignity.

Modern slavery is an umbrella term encompassing slavery, servitude, forced or compulsory labour, and human trafficking each of which involves the exploitation of individuals through coercion, deception, or abuse of vulnerability. We acknowledge that these abuses can occur in any country, industry, or business model, including within the UK and the facilities management sector in which we operate.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015, and outlines the measures taken by Tenon FM during the financial year ending 31 March 2025 to identify, assess, and address the risks of modern slavery and human trafficking within our own operations and our extended supply chains.

As a provider of cleaning, environmental, and facilities services across diverse client sites, our operational model involves subcontracting, temporary and agency labour, and third-party suppliers—each of which can present vulnerabilities. We understand the responsibility we hold to protect workers from exploitation and to promote ethical practices throughout our value chain.

Tackling modern slavery is not a one-time initiative but a continuous and evolving obligation.

It requires:

- Active leadership and governance from our Board and senior management.
- Robust internal controls, due diligence, and supplier engagement.
- Training and awareness across all levels of the organisation.
- Transparency and collaboration with employees, commercial partners, and external stakeholders.

This statement serves as our commitment to eliminate modern slavery in all its forms and to foster a working environment and a supply chain that respects freedom, fairness, and fundamental rights for all.

Page   1	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

## Organisational Structure & Supply Chains

This statement covers the activities of Tenon FM, including its subsidiary Elite Cleaning and Environmental Services.

### Business Operations

Tenon FM is a national provider of integrated facilities management services, delivering cleaning, waste, and hard services across a wide range of client sites throughout the United Kingdom. These services are tailored to meet the operational needs of public and private sector clients and are primarily delivered on-site by our directly employed and subcontracted workforce.

- Our Head Office is based in Uxbridge, where core functions such as Human Resources, Finance, Procurement, and Customer Relations are managed.
- A regional office in Manchester supports our operational and central teams in the North, enabling better coordination, communication, and access across the country.

### Supply Chain Overview

Tenon FM works with an extensive and diverse supply chain to support our service delivery. This includes:

- Labour providers and recruitment agencies
- Subcontractors for specialised or regional services
- Suppliers of cleaning products, equipment, and materials
- Partners offering waste management and environmental services

Many of our supply chain partners are embedded on client sites, which necessitates strong risk controls and regular oversight to ensure compliance with our standards and values.

### Modern Slavery Risk Assessment Process

Tenon FM adopts a risk-based approach to supplier and contractor management, ensuring that all third parties meet our ethical and legal standards. Our process includes:

#### Stakeholder Identification and Training

- Relevant internal stakeholders particularly those involved in procurement, contract management, and operational delivery are trained to understand modern slavery risks and how to assess them during supplier selection and onboarding.

### Supplier Risk Classification

Prospective and current suppliers are evaluated using a structured framework that considers:

- Geographic location of operations
- Sector and service type
- Use of subcontracted or temporary labour
- History of compliance or concerns

### Risk-Driven Decision-Making

- Low-risk suppliers may proceed with standard due diligence and contractual commitments.
- If a supplier is assessed as medium or high risk, additional checks are conducted, and the relationship may be declined or terminated if the supplier is unable or unwilling to meet our standards.

Page   2	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

### Contractual Safeguards

- All supplier agreements contain clauses requiring compliance with the Modern Slavery Act 2015 and our Supplier Code of Conduct, which mandates ethical business practices and prohibits exploitative labour.

### Responsibility for Anti-Slavery Initiatives

Tenon FM has established clear roles and responsibilities across the business to support the implementation, monitoring, and continuous improvement of its anti-slavery and human trafficking measures. The responsibilities for key functions are outlined below:

#### Risk Assessments

- Procurement and Operational Teams, in collaboration with HR, are responsible for conducting modern slavery risk assessments during the supplier onboarding process.
- This includes a review of suppliers’ internal policies, codes of conduct, and modern slavery statements, where applicable.
- Suppliers flagged as presenting a medium or high risk are subjected to enhanced scrutiny, and relationships may be declined or terminated if concerns cannot be adequately mitigated.

#### Policies and Governance

- The HR Department is responsible for developing, implementing, and maintaining all policies relating to the prevention of modern slavery and human trafficking.
- Policies are reviewed annually or as required by legislative or operational changes, and are approved in line with Tenon FM’s corporate governance structure.

#### Investigations and Due Diligence

- The HR Department leads all internal investigations relating to actual or suspected cases of modern slavery within Tenon FM or its supply chains.
- This includes coordinating any required due diligence, documentation reviews, interviews, or escalations to senior management.
- Outcomes from investigations inform future risk controls and supplier engagement decisions.

#### Employee Induction and Conduct

- As part of the onboarding process, all new managers are introduced to Tenon FM’s Employee Code of Conduct, which outlines expected behaviours, including adherence to ethical labour practices.
- The Code is supported by additional guidance on identifying and reporting modern slavery indicators.

Page   3	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

### Recruitment and Vetting

Hiring Managers and HR collaborate to ensure that all employees undergo thorough pre-employment checks, including:

- Right to work verification
- Identity and address confirmation
- Background and reference checks

These procedures also apply to agency workers, with third-party labour providers subject to the same vetting standards and policy compliance.

### Ongoing Employee Monitoring

- The HR team conducts regular reviews of employee data, including duplicate bank details and registered addresses.
- Using our HR software and employee app, our employees are able to reach out to using the mood tracker and can access all our associated policies online. Allowing them to understand and access the support available.
- These checks help to detect anomalies that could indicate labour exploitation, coercion, or identity fraud, such as shared bank accounts or duplicate contact information across multiple workers.

By embedding these responsibilities into everyday processes, Tenon FM ensures that anti-slavery controls are not only policy-driven but also operationally enforced at every level of the business. This supports our broader mission to uphold ethical practices and protect the rights of all workers.

### Policies Supporting Anti-Slavery Measures

Tenon FM has implemented a suite of internal policies and procedures designed to support the identification, mitigation, and prevention of modern slavery and human trafficking across our operations and supply chains.

These policies form the foundation of our compliance framework and reflect our values of integrity, accountability, and respect for human rights.

### Whistleblowing Policy

Tenon FM encourages all employees, contractors, suppliers, and external stakeholders to report concerns regarding unethical, illegal, or inappropriate conduct—specifically including suspected cases of modern slavery or human trafficking.

- Our whistleblowing procedure is designed to provide a confidential, accessible, and non-retaliatory mechanism for raising concerns.
- Individuals may report anonymously, and all disclosures are investigated promptly, with outcomes escalated to senior management where appropriate.
- The policy is actively promoted across the business and is available via our internal portal and onboarding documentation.

Page   4	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

### Employee Code of Conduct

The Employee Code of Conduct clearly outlines the standards of behaviour expected of all staff, including ethical decision-making, lawful conduct, and respect for others.

- It reinforces our zero-tolerance approach to any form of exploitation, abuse of power, or coercive labour practices.
- Employees are made aware of this Code upon joining the business, and its principles are revisited during training, performance reviews, and misconduct investigations.

### Supplier Code of Conduct

Our Supplier Code of Conduct sets out the minimum standards we expect from all organisations that provide goods or services to Tenon FM. It covers:

- Compliance with all applicable labour laws and international human rights standards.
- Prohibition of forced, bonded, or involuntary labour and child labour.
- Commitment to safe, healthy, and non-discriminatory working conditions.
- Freedom of association and fair wages.

Suppliers are required to confirm compliance with the Code as a condition of engagement. Where non-compliance is identified, Tenon FM works collaboratively to support improvements. However, serious or repeated breaches may result in the termination of the business relationship.

We also make all suppliers aware of their obligations under the Modern Slavery Act 2015 and conduct appropriate checks and audits as part of our supplier onboarding and contract renewal processes.

### Anti-Bribery and Corruption Policy

Tenon FM upholds the highest standards of ethical conduct, transparency, and integrity in all its business dealings.

- Our Anti-Bribery and Corruption Policy aligns with the Bribery Act 2010 and prohibits all forms of bribery, corruption, or undue influence by employees, suppliers, or agents acting on our behalf.
- The policy is embedded within our governance processes, reinforced through employee training, and monitored by senior leadership.
- By ensuring our business is free from corrupt practices, we help mitigate conditions that could conceal or facilitate modern slavery.

### Due Diligence

Tenon FM applies a rigorous and systematic due diligence process when engaging new suppliers and reviewing existing business relationships. This process is central to our commitment to identifying and mitigating the risks of modern slavery and human trafficking in our operations and extended supply chains.

Our approach is aligned with best practice and includes both preventative and corrective measures to ensure our suppliers uphold ethical labour standards.

Page   5	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

## Key Due Diligence Activities

### Supply Chain Mapping

We conduct broad mapping of our supply chains to understand the structure, layers, and nature of goods and services being provided. This helps us assess geographical, industry, and labour-related risk factors associated with modern slavery and human trafficking.

### Risk Evaluation of New Suppliers

All new suppliers undergo an initial risk assessment as part of the onboarding process. This assessment includes:

- Review of the supplier’s modern slavery statement (if applicable)
- Evaluation of their internal labour policies and recruitment practices
- Consideration of country of operation, subcontracting levels, and reliance on low-skilled or temporary labour

### Ongoing Risk Reviews

Existing suppliers are reviewed regularly based on updated risk indicators, changes in operations, or market intelligence. These reviews are particularly focused on suppliers operating in sectors or regions with known vulnerabilities.

### Targeted Supplier Audits and Assessments

Where potential risks are identified through due diligence, external alerts, or employee concerns Tenon FM may initiate a focused supplier audit. These assessments:

- Examine worker welfare, contractual arrangements, grievance procedures, and compliance with labour laws
- May be carried out internally or by third-party auditors, depending on the nature and complexity of the relationship

### Incident Management and Remedial Action

Any violation of our Supplier Code of Conduct, particularly those involving forced labour, unsafe working conditions, or unethical recruitment practices, triggers an immediate investigation. Based on the findings:

- Suppliers may be required to implement a Corrective Action Plan (CAP)
- In cases of non-compliance or failure to remediate, Tenon FM reserves the right to suspend or terminate the business relationship

By embedding these due diligence measures into our procurement and supplier management systems, Tenon FM ensures that ethical sourcing is not only a policy requirement, but a practical and enforceable standard upheld across all levels of our supply chain.

Page   6	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

## Awareness-Raising and Training Programme

Tenon FM recognises that raising awareness and building knowledge at all levels of the organisation is essential to effectively identifying, preventing, and responding to modern slavery and human trafficking risks. We have taken foundational steps through policy development and employee induction and are committed to expanding these efforts over the next 24 months through a structured awareness and engagement strategy.

### Current Activities

#### Modern Slavery and Human Trafficking Policy

Our policy is publicly available and clearly outlines our zero-tolerance stance. It is actively signposted during all management-level inductions and is accessible to all employees through our internal systems.

#### Anti-Bribery and Corruption Training

New starters receive mandatory training on our Anti-Bribery and Corruption Policy, which includes guidance on ethical behaviour and how exploitative practices may be concealed through corrupt activity.

#### Planned Initiatives (2024–2026)

Over the next 24 months, Tenon FM will roll out an enhanced awareness-raising programme across all levels of the business. This will include:

#### Foundational Training for All New Starters

All employees, not just managers, will receive basic awareness training on:

- The Modern Slavery Act 2015
- Recognising indicators of forced labour and exploitation
- Reporting mechanisms within Tenon FM

#### Manager and Team Leader Workshops

Targeted training sessions for operational and frontline managers to equip them with tools for spotting red flags and appropriately escalating concerns.

#### Company-Wide Communications Campaigns

Ongoing internal communications—through newsletters, posters, toolbox talks, and intranet posts—will reinforce key messages, such as:

- How to identify signs of modern slavery or human trafficking
- How to report concerns safely and confidentially
- How to access external support, including:
  - The Modern Slavery Helpline
  - Guidance and resources from Stronger Together

#### Stronger Together Engagement

Tenon FM will explore active participation in the Stronger Together initiative, adopting its guidance materials and toolkits as part of our supplier and workforce education efforts.

By embedding awareness into the employee lifecycle and operational routines, Tenon FM aims to create a culture of vigilance, accountability, and informed action. These initiatives will ensure all personnel are empowered to play a meaningful role in preventing exploitation within our organisation and beyond

Page   7	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 3.0
	Doc Controller: Head of Department	Revision date: February 2025
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed