

## Modern Slavery and Human Trafficking Statement

### **Our Business**

SBFM is engaged in the provision of cleaning services and complete soft facilities management to a variety of sectors across the UK and Ireland.

### **Commitment**

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery includes slavery, human trafficking, forced/bonded labour and servitude. SBFM is committed to ensuring that slavery and human trafficking have no place in our business or our supply chain.

### **Assessing and Managing Risk**

The Home Office statutory guidance on modern slavery states that an organisation's approach to modern slavery should be based on assessing and managing risk.

We recognise that some of our suppliers may source products from countries such as China and South East Asia, which carry an increased risk of non-compliance with modern slavery and human trafficking prevention.

We also recognise that there may be some risk associated in the recruitment of our employees, including those transferred to us under TUPE legislation.

### **Policies**

In line with this policy statement, we operate a number of internal policies to ensure SBFM conducts its business in an ethical and transparent manner, including:

#### *Recruitment Policy*

Our recruitment policy outlines our compliance with the Home Office Right to Work in the UK checks for all employees.

#### *Whistle-Blowing Policy*

Our whistle-blowing policy provides assurance to all employees that they can raise concerns relating to SBFM's business operations without fear of detrimental treatment for reporting suspicions in good faith.

#### *Purchasing Policy*

SBFM's Purchasing Policy states that the company incorporates social, economic and environmental considerations into supplier and product selections and purchasing processes and that we ensure that we comply with all statutory and organisational requirements applicable to purchasing. Our commitment to ensuring that we do not purchase goods and services affected by human slavery, trafficking or other forms of exploitation is encompassed within this policy statement.

### **Learning and Development**

Our recruitment and procurement teams receive modern slavery training as part of their induction with SBFM and refresher updates throughout their employment with us. This is so they understand the signs of modern slavery and are able to act appropriately if they suspect that it is taking place in any area of our business or supply chain.

### **Key Performance Indicators**

Any reports received from employees, clients, the public or government agencies are recorded, measured, monitored and reviewed. This is to ensure an effective response to any concerns relating to modern slavery and/or human trafficking. SBFM's target is to ensure recruitment, training and resources are sufficient so that our genuine reporting levels remain at nil.

### **Approval**

This statement has been approved by SBFM's Compliance Director on 4<sup>th</sup> August 2020 and will be reviewed every 3 years, or when new UK Government and/or guidance is made available.