



# Human Rights and Modern Slavery Policy

SBFM Limited, 3 Greengate, Cardale Park, Harrogate, North Yorkshire, HG3 1GY

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VAT number: 190967565 | Company registration number: 8517137  
Registered in England & Wales

## 1. About this Policy

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. SBFM has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or supply chains.
- 1.2. SBFM is committed to ensuring that there is transparency in our own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. SBFM expects the same high standards from all contractors, suppliers and other business partners, and as part of our contracting processes, SBFM includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. SBFM seek to act in accordance with internationally-recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Right at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. We're working to guard against being complicit in human rights violations and to uphold the human rights of our people and any other individuals that we're in contact with, either directly or indirectly.

## 2. Who this policy applies to

- 2.1. This policy applies to all persons working for SBFM or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### 3. Principles

SBFM will:

- 3.1. Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner
- 3.2. Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships
- 3.3. Provide for or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts
- 3.4. Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence

### 4. Policy

This sets out our position with respect to human rights and modern slavery and sits alongside our Employment Handbook and Health & Safety Policy.

Our statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work;

- 4.1. Child Labour: SBFM will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with applicable laws and regulations.
- 4.2. Modern Slavery: SBFM will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the firm and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach toward human trafficking.
- 4.3. Health & Safety: All SBFM employees will work in an environment that is both healthy and safe, in line with our Health & Safety Policy
- 4.4. Discipline: SBFM prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all our employees. All disciplinary measures of a serious nature are recorded and actioned.

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- 4.5. Freedom of Association and Employee Representation: SBFM recognizes that all its employees have the right to form and join organisations of their own choosing as long as this does not contravene the employees contractual terms and conditions. We take active measures to seek employees views about the company, respects employees' rights to belong to trade unions and fully complies without legal obligations to inform and consult employees.
- 4.6. Working hours: SBFM will ensure that working hours are reasonable and comply with law as per our Managing Working Time Policy.
- 4.7. Equality of Treatment: SBFM is fully committed to eliminating discrimination in recruitment, training and working conditions, and to promoting equitable opportunity and treatment as per our Equity, Diversity & Inclusion Policy
- 4.8. Employment terms: SBFM provides written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that work performed by employees is on the basis of employment law and practice.
- 4.9. Remuneration.: SBFM will, at a minimum provide wages and benefits that meet national standards. We are an accredited Living Wage employer. We will provide employees with clear written information on their pay and conditions. SBFM prohibits deductions from employees' wages as a disciplinary measure. SBFM is committed to equal pay and benefits for men and women for work of equal value.

## 5. Responsibility for the Policy

- 5.1. SBFM Limited's board of directors has overall responsibility for ensuring this policy complies with SBFM's legal and ethical obligations, and that all those under our control comply with it, but has delegated responsibility for overseeing its implementation to the Chief People and Culture Officer. Suggestions for change should be reported to the Head of the HR.
- 5.2. The HR Department has day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
- 5.3. This policy is reviewed annually by the Head of the HR.

## 6. Compliance with the Policy

- 6.1. All stakeholders must ensure they have read, understand and comply with this policy.
- 6.2. The prevention, detection and reporting of human rights violations and modern slavery in any part of SBFM or its supply chains is the responsibility of all those working for SBFM or under its control. All stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3. All stakeholders must notify their manager (if you are a colleague of SBFM) or the HR Department as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. SBFM Ltd utilise their partnership with Unseen, an anti-slavery charity. Whistleblowing and/or confidential reporting can be made on the modern slavery & exploitation helpline 08000 121 700.
- 6.4. SBFM encourages all stakeholders to raise concerns about any issue or suspicion of human rights violations and modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage.
- 6.5. If there is a believed or suspected breach of this policy or that it may occur, you must notify your manager or the HR Department as soon as possible.
- 6.6. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier SBFM's supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HR Department.
- 6.7. SBFM aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. SBFM is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that human rights violations or modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any stakeholder believes they have suffered any such treatment, they should inform the HR Department immediately. If the matter is not remedied, (and you are a colleague), this should be raised formally using the SBFM Grievance Procedure.

## 7. Communication and Awareness of this Policy

- 7.1. Training on this policy, and on the risk our business faces from human rights violations and modern slavery in its supply chains, forms part of the induction process for all office-based colleagues and operational managers who work for SBFM and regular training is to be provided as necessary. A copy of this policy is available on our intranet or on request from the HR Department.
- 7.2. SBFM's zero-tolerance approach to human rights violations and modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 8. Breaches of this Policy

- 8.1. Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2. SBFM may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.
- 8.3. This policy does not form part of any colleague's contract of employment, and we may amend it at anytime

## 9. Due diligence process

- 9.1. SBFM Ltd will proactively monitor and visit sites, while sample-based validation of documents and Right to Work checks will be made. This will be driven by the QHSE division in conjunction with Human Resources. Any incidents will be reported centrally.
- 9.2. SBFM enforce our policies and procedures in an effort to ensure that human rights violations and modern slavery is not taking place anywhere in our business or supply chain.
- 9.3. SBFM supplier on-boarding process includes standard due diligence procedures, which help us assess the suitability of a supplier to provide goods and services to us against compliance to required standards. This process captures confirmation that they are committed to ensuring that human right violations and modern slavery is not taking place within their own supply chain.

- 9.4. The SBFM Procurement Team carry out desktop audits as part of our supply chain management as appropriate, to provide assurance that our suppliers are responsible partners in our service delivery.
- 9.5. SBFM continue to analyse our supply chain for potential risk in the light of changes which impact our business, suppliers or sector.
- 9.6. Human rights and modern slavery is an agenda item at supplier days and key supplier reviews. This enables us to identify, understand and seek to mitigate risks associated with human rights and modern slavery
- 9.7. If any weaknesses in processes or governance are identified, SBFM will seek to agree a detailed plan of action with the supplier to remedy the deficiencies. Failure by a supplier to agree to adhere to legal requirements, to respond to any audit questionnaire or to provide assurances that it has satisfactorily assessed its risk of human rights violations and modern slavery, may lead us to review our business relationship.

**Unseen (independent modern slavery charity)**

**Helpline: 08000 121 700**

**Website: [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)**

**Reviewed by – Kelly Dolphin**  
02/09/2025 Chief People and Culture Officer

**Review Date:**