



# MODERN SLAVERY STATEMENT 2025

# SBFM MODERN SLAVERY STATEMENT

This statement is made as part of SBFM's commitment to eradicating the exploitation of individuals under the Modern Slavery Act 2015 (the Act). It outlines the steps SBFM has taken to minimise the risk of modern slavery in our operations and supply chain, including an overview of our business, our policies, the risks we have identified, and how we monitor them. It also details the training provided to our staff to raise awareness and combat these issues.

This statement is made in accordance with section 54 of the Act and covers the financial year ending June 2025. It was approved by the Board of Directors on the 1st October 2025.



**Matthew Chapman**  
Chief Executive Officer

## OUR BUSINESS

SBFM is a limited company operating in the facilities management sector. We deliver a wide range of facilities services to clients across key industries including Logistics and Distribution, Leisure and Hospitality, Entertainment, Retail, and Corporate Professional Services. As an independent business, we pride ourselves on ensuring that ethical standards are embedded across all operations.

### WHO WE WORK WITH:

We maintain full visibility over and employees, all of whom are recruited directly by SBFM. We also engage temporary labour through reputable recruitment agencies to support our operations when required. These agency partnerships are subject to rigorous vetting to ensure they align with our values and legal obligations.

Our client base spans the UK and Ireland, we are committed to safeguarding the rights of all individuals who work within our supply chain.

### OTHER RELATIONSHIPS

We work closely with the following organisations as part of our business relationships:



## OUR POLICIES

SBFM's commitment to ethical operations is supported by a suite of policies designed to combat modern slavery. Our Modern Slavery Policy outlines our stance and approach.

Additionally, we have implemented the following policies to support high ethical standards among our staff and suppliers:

1

Anti Bribery

2

Recruitment

3

Right to Work

4

Whistleblowing

5

Working Time Regulations

6

Ethical Trading

7

Responsible Procurement

### POLICY DOCUMENT & REVIEW

Our policies are developed and overseen by SBFM's Board of Directors and ESG (Environmental, Social, and Governance) Committee, which includes the Chief Operating Officer, Chief Legal & Risk Officer, Chief Financial Officer, Chief Marketing Officer, and Chief People Officer. Policies are reviewed annually, or more frequently, if necessary, to ensure they remain robust and relevant.

[CLICK  
HERE](#)

To Read Our Full  
**Modern Slavery Policy**

## MANAGING RISK

We take a proactive approach to identifying and managing risks related to modern slavery. To assess the potential risks within our supply chain, we use the following processes:



### Supplier Vetting:

We require suppliers to sign our code of conduct, which includes providing evidence of their anti-slavery policies, human trafficking prevention measures, and commitment to ethical labour practices.



### Supplier Audits:

We conduct audits before entering any commercial relationship with businesses where there may be potential risk. Audited suppliers form the basis of our preferred supplier list.



### Ongoing Monitoring:

We regularly review the risk levels in our supply chain and may conduct re-audits or spot checks where necessary to maintain compliance and transparency.

## AREAS OF RISK

After thorough assessment, we have identified key areas where risk may exist in our supply chain, and we take action to ensure:

No child or forced labour is present.

Safe and fair working conditions are provided.

All workers are free from physical, verbal, or psychological abuse and harassment.

Non-discriminatory employment practices are in place.

Workers have the right to join unions or workers' organisations.

Compliance with national labour laws regarding working hours and overtime.

Workers receive fair pay and benefits in line with local standards.

Written contracts are provided to workers, with clear and understandable terms.

# MANAGING RISK

To mitigate risks, we have implemented the following measures:



## OUR PERFORMANCE

To monitor our effectiveness, SBFM tracks the following performance indicators related to modern slavery prevention:

All employees complete modern slavery training as part of their induction and receive annual refresher courses via our e-learning platform.

Any complaints related to modern slavery are investigated within 24 hours of receipt.

All suppliers must provide their own modern slavery statements and sign our code of conduct before joining our preferred supplier list.

The proportion of temporary labour does not exceed 10% of our permanent workforce.

All labour suppliers are audited on a quarterly basis in accordance with agreed framework.

### RISK MANAGEMENT INDICATORS

Percentage of suppliers providing modern slavery statements.

Percentage of workers sourced from the preferred supplier list.

Compliance rates of suppliers with our policies.

Time spent conducting audits, re-audits, and spot checks.

The level of modern slavery awareness among staff through training and reporting.

We continuously assess our KPIs to ensure they are fair and effective, without putting undue pressure on suppliers that could increase risk.

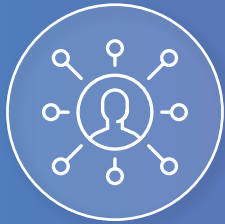
## OUR TRAINING

At SBFM, training is key to raising awareness and ensuring all staff are equipped to recognise and prevent modern slavery. Our approach includes:



### Leadership Training:

Senior leaders and supply chain managers receive in-depth training on identifying modern slavery risks and addressing related concerns.



### Recruitment & Procurement Teams:

Our HR and procurement staff receive tailored training focused on ethical labour practices, modern slavery, human trafficking, and broader human rights issues.



### Awareness for All Staff:

General awareness training is provided to all employees so that they can report any concerns they encounter.

Training is refreshed annually, and staff are encouraged to raise any concerns or suggestions for improving our processes.