

Modern Slavery and Human Trafficking Policy & Statement 2025/26

Prepared pursuant to section 54 of the Modern Slavery Act 2015

Document number	HRP 30
Department	Human Resources
Version / revision date	Version 4.0 / August 2027
Reporting period	Financial year ended 31 st March 2026
Document controller	Head of Department

Board and leadership commitment

Tenon FM has zero tolerance for slavery, servitude, forced or compulsory labour, human trafficking, exploitation through debt or coercion, and any practice that deprives a person of freedom for another person's benefit. We recognise that modern slavery can occur within the UK as well as overseas and that labor-intensive service sectors, including facilities management, can face heightened risks where work is low-paid, outsourced, temporary, agency-supplied or delivered through multiple tiers of subcontracting.

We are committed to acting ethically, strengthening our controls, working constructively with suppliers and clients, protecting workers from retaliation when concerns are raised, and responding promptly where indicators of exploitation are identified.

Page 1	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

1. Purpose, status and scope

This Policy & Statement sets out Tenon FM's approach to preventing modern slavery and human trafficking in our own operations and supply chains, the controls that were in place during the financial year ended 31st March 2026, and the priorities through which we intend to strengthen our approach during 2026/27.

This statement is made by Tenon FM Limited and describes the measures taken within its operations and supply chains, including, where relevant, activities undertaken in connection with its subsidiary, Elite Cleaning and Environmental Services.

This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015 and with reference to current UK Government guidance on transparency in supply chains and identifying and managing modern slavery risks. Tenon FM also recognises that many public-sector and regulated clients assess these controls as part of tendering, contract management and supplier assurance.

2. What we mean by modern slavery

Modern slavery is an umbrella term encompassing serious forms of exploitation in which a person cannot freely refuse or leave because of threats, coercion, deception, abuse of power or vulnerability, debt, restriction of movement, withholding of documents or other forms of control.

- Slavery and servitude.
- Forced or compulsory labour.
- Human trafficking for the purpose of exploitation.
- Debt bondage or recruitment practices that trap workers through unlawful fees or debts.
- Child labour where work is unlawful, exploitative or harmful.
- Workplace practices involving threats, intimidation, retention of identity documents, control of wages or bank accounts, or restriction of a worker's freedom.

Modern slavery may be hidden within otherwise legitimate employment relationships. A worker may have a contract, a right-to-work document and a bank account and still be subject to coercion or exploitation. Our controls therefore look beyond documentary compliance alone.

3. Our organisation and supply chains

Tenon FM is a national provider of integrated facilities management services. Our services include cleaning, environmental and facilities services across a diverse portfolio of public and private sector client sites throughout the United Kingdom. Delivery is primarily undertaken by directly employed colleagues, supported where required by subcontractors, specialist providers, agency labour and suppliers of goods and services.

Our London office is based in Uxbridge, where core functions including Human Resources, Finance, Procurement and central support are coordinated. Our Manchester office supports operational and central teams across the North.

Page 2	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

Supply-chain categories

- Labour providers and recruitment agencies.
- Specialist and regional subcontractors.
- Cleaning chemical, consumables, equipment and machinery suppliers.
- Waste, recycling and environmental service providers.
- Uniform, PPE and workwear suppliers.
- Technology, professional and business-support suppliers.
- Other third parties embedded in, or supporting, client service delivery.

Our supply chains can include multiple tiers. We recognise that risk may therefore arise not only with a direct supplier, but also through that supplier's own recruitment methods, subcontractors, labour providers and sources of goods.

4. Our modern slavery risk profile

Tenon FM applies a risk-based approach rather than assuming that all suppliers, roles or locations present the same level of risk. We pay particular attention to the characteristics that can increase vulnerability in labor-intensive service environments.

Risk area	Why it matters	Examples of indicators we consider
Labour supply and agency work	Workers can be separated from the end employer by intermediaries or opaque recruitment arrangements.	Recruitment fees; unexplained deductions; workers not understanding who employs them; third-party control of communication or pay.
Low-paid and migrant labour	Financial pressure, language barriers or immigration dependency can increase vulnerability.	Withheld identity documents; threats linked to immigration status; excessive dependence on one intermediary; inability to explain own employment terms.
Subcontracting and multiple tiers	Risk can become less visible beyond the direct supplier.	Unapproved subcontractors; inability to identify the actual employer; sudden changes in labour provider; inconsistent worker records.
Pay, bank and identity anomalies	Exploitation may involve control of wages or identity.	Multiple workers using the same bank account, address, telephone number or email without a credible explanation; wages diverted to a third party.
Working time and accommodation	Excessive hours or employer-controlled living arrangements can indicate coercion.	Repeated excessive hours; workers appearing unable to refuse shifts; overcrowded or controlled accommodation linked to employment.
Goods and materials	Some products and raw materials may carry elevated global forced-labour risk.	High-risk origin, lack of traceability, supplier unwillingness to explain source, or material inconsistency between policy and practice.

Page 3	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

5. Governance and accountability

Modern slavery prevention is a shared responsibility. Accountability is embedded across HR, Procurement, Operations, Finance, contract management and senior leadership rather than sitting with a single function.

Function	Core responsibilities
Board / Senior Leadership	Sets tone, supports proportionate controls, considers significant escalations and approves this statement in line with corporate governance.
Human Resources	Maintains policies; supports ethical recruitment and right-to-work controls; leads internal people-related investigations; coordinates escalation where worker exploitation is suspected.
Procurement / Commercial	Applies supplier due diligence and contractual safeguards; considers modern slavery risk in onboarding, sourcing and contract review; escalates medium/high-risk suppliers.
Operations / Contract Management	Maintains visibility of labour used on client sites; challenges unexplained labour or subcontracting arrangements; escalates concerns observed in day-to-day service delivery.
Finance / Payroll	Supports controls around pay, bank-detail anomalies and unexplained payment arrangements; escalates patterns that may indicate coercion or third-party control.
Managers and employees	Remain alert to indicators, follow policies, avoid retaliation and raise concerns through the available reporting channels.

6. Policies and standards supporting our approach

The prevention of modern slavery is supported by a wider framework of employment, ethical and supplier controls. Relevant documents include:

- Modern Slavery and Human Trafficking Policy & Statement.
- Employee Code of Conduct.
- Supplier Code of Conduct.
- Whistleblowing Policy.
- Anti-Bribery and Corruption Policy.
- Recruitment, right-to-work and pre-employment screening procedures.
- Procurement and supplier onboarding controls.
- Grievance, dignity at work and disciplinary procedures.
- Health and safety and safeguarding procedures where relevant to client environments.

These controls are intended to reinforce lawful employment, ethical conduct, safe reporting, due diligence and appropriate escalation. Serious or repeated supplier non-compliance may lead to corrective action, suspension or termination of the commercial relationship.

Page 4	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

7. Recruitment and workforce controls

Our own workforce is a critical part of our modern slavery control environment. Hiring Managers and HR work together to ensure that workers are recruited lawfully and that identity, right-to-work and employment information is appropriately verified.

Pre-employment and onboarding controls

- Right-to-work verification in accordance with UK requirements.
- Identity and address checks appropriate to the role.
- Background, reference or safeguarding checks where role/client requirements apply.
- Clear information about pay, working hours, role expectations and reporting lines.
- Equivalent assurance expectations for agency labour and third-party labour providers.

Ongoing workforce monitoring

HR and Payroll controls include review of employee data and anomalies that may warrant further enquiry. Examples include duplicate bank details, repeated shared addresses or contact details, inconsistencies in worker identity data, unexplained third-party involvement and unusual patterns in pay or attendance. Such indicators are not treated as proof of exploitation; they are prompts for proportionate verification and welfare-focused enquiry.

Employees can access Company policies through internal systems and can raise concerns through management, HR, the whistleblowing route or other appropriate channels. Concerns can be escalated confidentially and are investigated on their facts.

Recruitment principles

- We do not tolerate recruitment fees being unlawfully charged to workers for obtaining work with Tenon FM.
- We do not permit managers or labour intermediaries to retain workers' identity documents except where temporarily required for lawful verification and returned promptly.
- Workers must receive wages directly through legitimate payroll arrangements unless a lawful and documented alternative applies.
- Any indication that a worker is being threatened, controlled, accompanied by an unexplained third party, prevented from speaking freely or deprived of access to wages/documents must be escalated.

8. Supplier due diligence and contract controls

Tenon FM applies proportionate due diligence when engaging and reviewing suppliers. The depth of due diligence is informed by the nature of the goods/services, labour model, geography, subcontracting structure and available risk information.

Supplier onboarding and risk classification

- Review of the supplier's modern slavery statement where applicable.
- Review of relevant labour, ethical or recruitment policies where risk justifies it.
- Consideration of country of operation/source, labour intensity, temporary labour and subcontracting.
- Assessment of whether the supplier relies on further tiers of labour or goods providers.
- Enhanced checks where concerns or medium/high-risk characteristics are identified.
- Ability to decline engagement where the supplier cannot provide adequate assurance.

Page 5	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

Contractual safeguards

Supplier agreements are expected to require compliance with applicable law and Tenon FM's ethical standards, including prohibition of forced, bonded or involuntary labour and child labour. Our Supplier Code of Conduct reinforces expectations on lawful employment, fair treatment, safe working conditions, non-discrimination, freedom from coercion and cooperation with proportionate assurance activity.

Ongoing monitoring and escalation

Supplier risk is not treated as a one-off onboarding exercise. Existing relationships may be reviewed where risk changes, intelligence or complaints emerge, subcontracting arrangements change, or the nature of the service creates heightened labour risk. Where justified, Tenon FM may seek further evidence, conduct focused reviews or audits, require a Corrective Action Plan, suspend activity or terminate a relationship.

9. Public-sector and client procurement expectations

Tenon FM recognises that modern slavery controls are increasingly examined during public and private sector procurement. Current UK Government procurement guidance requires in-scope public bodies to identify and manage modern slavery risk in new procurements and existing contracts using a proportionate, risk-based approach. The Procurement Act 2023 framework also contains supplier exclusion provisions relevant to specified modern slavery offences.

In addition to meeting our statutory transparency obligations, we aim to maintain documentation and controls capable of supporting client due diligence, tender responses, contract mobilisation and ongoing supplier assurance.

10. Reporting concerns, investigation and remediation

Any employee, worker, contractor, supplier or other stakeholder who suspects modern slavery or worker exploitation should raise the concern as soon as possible. Concerns can be raised through line management, HR, Procurement/Commercial, the whistleblowing route or other appropriate safeguarding channels.

Tenon FM does not require an individual to prove that modern slavery has occurred before raising a concern. Indicators should be reported so they can be assessed by people with the appropriate authority and expertise.

Our response principles

- Protect potential victims and avoid actions that may increase risk to them.
- Preserve relevant evidence and maintain confidentiality on a need-to-know basis.
- Avoid confronting suspected exploiters where doing so could endanger a worker or compromise an external investigation.
- Escalate to senior management and appropriate external authorities where required.
- Investigate internal process failures and identify corrective actions.
- Use supplier remediation where appropriate, but reserve the right to suspend or terminate relationships where serious or unresolved non-compliance exists.
- Ensure no worker suffers retaliation for raising a genuine concern in good faith.

Where immediate danger or suspected criminal conduct exists, the appropriate emergency or law-enforcement route should be used. Where a potential victim requires specialist support, Tenon FM will cooperate with the appropriate statutory or specialist agencies.

Page 6	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

11. Training and awareness

Awareness is essential because modern slavery is often identified through behaviours, patterns and inconsistencies rather than through a single document. Tenon FM's existing framework includes policy access for employees, management-level induction signposting and mandatory anti-bribery and corruption training for new starters, which reinforces ethical behaviour and escalation expectations.

The 2025 statement also identified a programme of further development. Where these initiatives have not yet been fully embedded, they remain priorities for 2026/27 rather than being treated as completed activity.

2026/27 training priorities

- Introduce/strengthen foundational modern slavery awareness for new starters, proportionate to role and risk.
- Provide targeted manager and team-leader guidance on recognising red flags and responding safely.
- Include modern slavery reminders in toolbox talks, internal communications or intranet content where relevant.
- Provide additional guidance for Procurement, Commercial, HR, Payroll and operational managers who assess suppliers or workforce anomalies.
- Review the value of external resources and sector initiatives, including Stronger Together materials, to support practical awareness.

12. Measuring effectiveness

Tenon FM recognises that the existence of a policy is not, by itself, evidence that modern slavery risk is being effectively managed. During 2026/27 we will strengthen the way we evidence effectiveness by using proportionate management information and assurance measures.

Measure	What it helps us understand	2026/27 approach
Supplier due diligence completion	Whether required onboarding assurance is being completed consistently.	Track proportionate completion and escalation of exceptions.
Higher-risk supplier reviews	Whether increased-risk relationships receive enhanced scrutiny.	Maintain a record of enhanced reviews, actions and outcomes.
Right-to-work / identity compliance	Whether workforce onboarding controls are operating effectively.	Monitor exceptions and remediation through HR controls.
Training / awareness completion	Whether relevant colleagues have received appropriate guidance.	Track completion as training is introduced or refreshed.
Concerns raised and investigated	Whether reporting routes are understood and concerns are acted upon.	Record concerns, investigations, themes and corrective action without identifying victims unnecessarily.
Supplier corrective actions	Whether issues are remediated rather than simply identified.	Track CAPs, follow-up dates and closure or escalation.
Data anomalies reviewed	Whether payroll/HR indicators are receiving proportionate scrutiny.	Retain evidence of review and outcome where concerns arise.

Page 7	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

13. Priorities for 2026/27

Our priorities for the next reporting period are designed to move from a largely policy-based framework towards more consistent evidence of implementation and effectiveness.

- 1. Strengthen supply-chain risk tiering:** Refine supplier classification so that labor-intensive, subcontracted or otherwise higher-risk suppliers receive proportionate enhanced due diligence.
- 2. Improve supply-chain visibility:** Increase understanding of significant subcontracting and labour-provider tiers on contracts where modern slavery risk is higher.
- 3. Formalise effectiveness metrics:** Introduce a simple management-information framework covering due diligence, training, concerns, corrective actions and selected workforce-control indicators.
- 4. Expand targeted training:** Provide practical modern slavery awareness to relevant managers and high-impact functions, with emphasis on real indicators and safe escalation.
- 5. Review supplier contractual controls:** Check that modern slavery and ethical-labour provisions remain suitable within supplier onboarding and contract documentation.
- 6. Strengthen mobilisation and labour-provider assurance:** Ensure appropriate vetting of agency and subcontract labour arrangements during mobilisation and significant contract change.
- 7. Maintain tender-ready evidence:** Keep this statement and supporting assurance material current so that clients can understand Tenon FM's controls without relying on generic declarations.
- 8. Continuous improvement following incidents or concerns:** Use investigations, audit findings and operational lessons to improve procedures and prevent recurrence.

14. Our continuing commitment

Tenon FM recognises that modern slavery risk cannot be eliminated through declarations alone. Effective prevention depends on credible recruitment practices, accurate workforce controls, informed managers, transparent supply chains, responsible purchasing decisions and a culture in which concerns can be raised safely.

We will continue to review our approach as our business, client portfolio, workforce and supply chains evolve. Where weaknesses are identified, our aim is to act proportionately, protect workers, address root causes and strengthen controls rather than treating compliance as a one-off exercise.

Page 8	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed

Approval

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and relates to the financial year ended 31st March 2026. It will be reviewed annually and updated to reflect material developments in our business, operations, supply chains and approach to managing modern slavery risk.

Reference framework

- Modern Slavery Act 2015, including section 54 (Transparency in Supply Chains).
- Home Office guidance: Publish an annual modern slavery statement.
- Cabinet Office Procurement Policy Note 009: Tackling modern slavery in government supply chains (updated 2025).
- Procurement Act 2023 and Procurement Regulations 2024, where relevant to public procurement

Page 9	Tenon FM	Doc Number: HRP 30
	Department: Human Resources	Version: 4.0
	Doc Controller: Head of Department	Revision date: August 2027
	File Location: Sharepoint> Master Doc Folder> HR Policies	Uncontrolled when printed