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SFM (UK) LTD



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Specialists in Security & Facilities Management

MODERN SLAVERY ACT 2015

COMPANY POLICY STATEMENT

SFM (UK) Limited is committed to preventing acts of modern slavery, servitude, forced labour and human trafficking within its business operations and supply chains.

We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to acting ethically, with integrity and transparency in all business dealings.

Scope

This policy applies to:

- All employees
- Directors
- Contractors
- Agency workers
- Sub-contractors
- Suppliers
- Business partners

Commitment

SFM (UK) Limited:

- Will not tolerate modern slavery or human trafficking in any part of its operations or supply chain.
- Will not knowingly engage with organisations involved in slavery or human trafficking.
- Will act promptly if concerns are raised.
- Will comply with all applicable legislation.

Governance & Responsibility

The Directors and Senior Management Team are responsible for:

- Implementing and monitoring this policy
- Ensuring adequate resources are allocated
- Reviewing risk exposure annually
- Approving and signing the annual Modern Slavery Statement (where applicable under Section 54)

This policy will be reviewed annually.

Risk Assessment & Due Diligence

As part of our due diligence processes:

- Supplier approval procedures include assessment of ethical standards.
- High-risk suppliers may be subject to additional scrutiny.
- Contracts may include modern slavery compliance clauses.
- We reserve the right to terminate supplier relationships where non-compliance is identified.

Risk assessments consider:

- Geographic risk
- Sector risk
- Use of agency labour
- Subcontracting arrangements

Supply Chain Controls

We expect all suppliers and subcontractors to:

- Comply with the Modern Slavery Act 2015
- Operate fair employment practices
- Pay at least the National Minimum Wage
- Prohibit forced, bonded or compulsory labour
- Provide evidence of compliance upon request

Failure to meet these standards may result in termination of contract.

Employee Awareness & Training

SFM (UK) Limited will:

- Provide appropriate awareness training to staff
- Ensure management understand indicators of modern slavery
- Include modern slavery awareness within induction where appropriate

Reporting Concerns

Employees and workers are encouraged to report concerns regarding modern slavery without fear of retaliation.

Reports can be made through:

- Line management
- HR Department
- Company Whistleblowing Procedure

All reports will be treated confidentially and investigated appropriately.

Disciplinary Action

Any employee found to be in breach of this policy will be subject to disciplinary action, which may include dismissal.

Integration with Management Systems

This policy aligns with our Integrated Management System and supports our compliance with:

- ISO 9001:2015
- ISO 14001:2015
- ISO 45001:2018

Transparency Statement

Where required under Section 54 of the Modern Slavery Act 2015, SFM (UK) Limited will publish an annual Modern Slavery and Human Trafficking Statement.

Approved by: George Hewitt
Position: Director, SFM UK LTD
Effective Date: 13/02/2026
Review Date: 12/02/2027

