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# Ethical Code of Practice

2026

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# Think FM Solutions Ltd

## Ethical Code of Practice

### Document control

**Policy owner:** Think FM Solutions Directorate

**Approved by:** Managing Director

**Review date:** 06 January 2026

**Next review date:** 06 January 2027.

## 1. Policy statement

Think FM Solutions Ltd ("the Company") is committed to conducting its business ethically, lawfully, and responsibly. This Ethical Code of Practice sets out the standards of behaviour expected of all employees, workers, contractors, and those acting on behalf of the Company.

Ethical behaviour underpins our reputation, client relationships, and long-term success. Every individual working for or with the Company shares responsibility for upholding these standards.

This Code applies to all Company activities and should be read in conjunction with related policies, including Equality, Health & Safety, Environmental, Quality, and Whistleblowing policies.

## 2. Our ethical values

Our culture is built on four core values which guide our behaviour and decision-making:

### Integrity

We act honestly, transparently, and in accordance with Company policies and legal requirements at all times. We safeguard Company assets and foster trust with employees, clients, suppliers, and the wider community.

### Excellence

We strive to deliver high-quality cleaning and facilities management services while preventing harm to people and the environment. We continually seek to improve our services, systems, and performance.

### Teamwork

We promote open communication, collaboration, and mutual respect. We support diversity, inclusion, and a safe working environment where concerns can be raised without fear.

## **Accountability**

We take responsibility for our actions, honour our commitments, and support continuous improvement across the business.

## **3. Modern slavery and human trafficking**

### **Statement**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and relates to the financial year 2024–2025.

Think FM Solutions is committed to preventing modern slavery, human trafficking, forced labour, and exploitation within its business and supply chains.

### **Our business and structure**

- Think FM Solutions is an independently owned cleaning and facilities management company operating primarily within the UK
- Head Office and Registered Office: 22-24 Ely Place, London, EC1N 6TE.
- Core services include daily office cleaning, specialist cleaning, and facilities management support

### **Our commitment**

- We operate a zero-tolerance approach to modern slavery
- We comply with UK employment and labour laws
- No labour used in our operations is obtained through slavery or human trafficking.

### **Supply chain due diligence**

- Supplier checks are undertaken where appropriate
- Contracts may include termination rights where modern slavery risks are identified
- Concerns relating to suppliers are investigated and addressed.

### **Reporting concerns**

A designated senior manager acts as the Modern Slavery Compliance lead. Any concerns must be reported immediately and will be investigated appropriately.

This statement is reviewed annually.

## **4. Child and young workers**

The Company is committed to protecting children and young workers and complying with all legal restrictions relating to their employment.

- Right to work and age verification checks are completed

- Additional risk assessments are undertaken for young workers
- Working hours and duties comply with legal restrictions
- Enhanced supervision and training is provided where required.

## **5. Anti-bribery and corruption**

### **Policy statement**

The Company operates a zero-tolerance approach to bribery and corruption in all forms, in accordance with the Bribery Act 2010.

### **Prohibited conduct**

Employees and those acting on behalf of the Company must not:

- Offer, give, request, or accept bribes or inducements
- Make facilitation payments
- Attempt to influence decisions improperly.

### **Gifts and hospitality**

- Modest and proportionate hospitality may be permitted
- All gifts or hospitality must be declared and approved in advance by the Managing Director
- A register of gifts and hospitality is maintained.

Breaches may result in disciplinary action or termination of engagement.

## **6. Anti-tax evasion**

Think FM Solutions prohibits the facilitation of tax evasion in any form and operates in accordance with the Criminal Finances Act 2017.

Employees and representatives must:

- Act lawfully and transparently
- Not assist in tax evasion or its facilitation
- Report any concerns immediately.

Appropriate training, monitoring, and review arrangements are in place.

## **7. Whistleblowing**

The Company encourages employees and workers to raise genuine concerns in the public interest without fear of retaliation.

## **Protected disclosures**

Concerns may include:

- Criminal activity
- Breaches of legal obligations
- Health and safety risks
- Environmental damage
- Attempts to conceal wrongdoing.

## **Reporting process**

- Concerns should normally be raised with the Managing Director
- Issues will be handled confidentially and investigated appropriately
- Victimisation or retaliation will not be tolerated.

This section should be read alongside the Whistleblowing Policy.

# **8. Responsibilities**

## **Directors**

- Provide ethical leadership and oversight
- Ensure this Code is implemented and reviewed.

## **Managers and supervisors**

- Promote ethical behaviour
- Address concerns promptly.

## **Employees and workers**

- Comply with this Code and related policies
- Raise concerns where ethical standards may be breached.

# **9. Monitoring and review**

Compliance with this Ethical Code of Practice is monitored through:

- Management review
- Internal audits
- Complaints and whistleblowing reports.

This Code is reviewed annually or sooner if required by changes in legislation or business operations.

**Signed:**

A handwritten signature in black ink, appearing to be 'M. H.', written over a light blue grid background.

Managing Director

Think FM Solutions Ltd

Date: 06 January 2026