
Ethical Code of Practice

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Ethical conduct policy

At Think FM Solutions, we are committed to doing the right thing in all aspects of our business. This requires that every day, everyone working for our needs to have an unwavering dedication to the highest ethical standards. It is fundamental that every employee and worker carries a share of the responsibility for our conduct and contributes to our success.

Our culture is built on four key values. These shape our behaviour toward customers and one another. Together, they drive our organisation forward. From this point forward Think FM Solutions will be referred to as 'The organisation' or 'The Company.'

The values are:

INTEGRITY

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing because it is the right thing to do. It is every employee's responsibility to safeguard organisation assets and foster an environment of trust with our workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

EXCELLENCE

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers' businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

TEAMWORK

We foster an environment that encourages innovation and creativity and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communications and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there's no limit to what we can achieve.

ACCOUNTABILITY

We honour the commitments we make and take personal responsibility for all actions and results. Our actions match our words, and we demand responsibility from ourselves and others in everything we do. We were operating on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full

potential.

- Providing a healthy and safe work environment and complying with applicable environmental laws and regulations wherever we operate around the world, contributing to the sustainability of the communities in which we live and work.

Modern slavery statement

A) ORGANISATION

This statement applies to Think FM Solutions (referred to in this statement as 'the organisation'). The information included in the statement refers to the financial year 2024 - 2025.

B) ORGANISATIONAL STRUCTURE

Contracted location is within the London Orbital M25. The company is controlled by the Director Mr Malcolm Hill, supported by a team of area managers and administration staff.

Think FM Solutions is an independently owned Facilities Management company with a Head office located at first floor 70 St John Street EC1M 4DT, Registered office 10 Orange Street London WC2H 7DQ.

The company provide a Facility Management service with Cleaning as its main provision. Our core service is; Daily Office Cleaning, Specialist Floor and Window Cleaning and Mechanical and Electrical service.

We are ISO 14001, 18001, 9001, NCZ silver and Safe Contractor certified. We are also a member of the Living wage Foundation.

DEFINITIONS

The organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have a restriction placed on freedom of movement.

C) COMMITMENT

The organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the organisation in the pursuance of the provision of its own services is obtained by means of

slavery or human trafficking. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

D) SUPPLY CHAINS

In order to fulfil its activities, the organisation's main supply chains include those related to providing FM services to our clients within the UK.

E) POTENTIAL EXPOSURE

The organisation considers its main exposure to the risk of slavery and human trafficking to exist within our supply chain. In general, the organisation considers its exposure to slavery/human trafficking to be limited, and it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

F) STEPS

The organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the organisation has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Measures in place to identify and assess the potential risks in its supply chains;
- Undertaking impact assessments of its services upon potential instances of slavery;
- Creating action plans to address the risk to modern slavery;
- Any actions are taken to embed a zero-tolerance policy towards modern slavery;
- If you have taken no steps, this fact should be stated.

G) KEY PERFORMANCE INDICATORS

The organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the organisation or its supply chains.

H) POLICIES

The organisation has the following policies which further define its stance on modern slavery

- Equal Opportunities and Diversity Policy
- Recruitment procedure.

I) SLAVERY COMPLIANCE OFFICER

The organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Child labour

The company will ensure that all relevant legislation and restrictions are adhered to in regard to the use of young workers. We will ensure that the necessary checks are carried out to verify an individual's age and right to work and that relevant Health and Safety codes are adhered to.

Where required, the company will ensure that the relevant employment permit is received from the education department of the local council.

We will also carry out spot checks when required and will retain copies of age records within the place of work.

RESTRICTIONS FOR CHILDREN AGED 14 YEARS OLD

There are restrictions that apply to the employment of children aged 14 years old, as follows:-

- They must not work before 7.00 am. or after 7.00 pm. on any day;
- They must not work for more than 2 hours on any day when you are required to be at school;
- They must not work during school hours;
- They must not work for more than 5 hours on a Saturday or on weekdays during school holidays;
- They must not work for more than 2 hours on a Sunday;
- They must not work for more than 4 hours in any day without a rest break of 1 hour.
- They must not work for more than 12 hours in any school week; and
- They must not work for more than 25 hours a week during school holidays.

RESTRICTIONS FOR CHILDREN AGED 15 AND 16 YEARS OLD

There are restrictions that apply to the employment of children aged 15 and 16 years old, as follows:-

- They must not work before 7.00 am. or after 7.00 pm. on any day;
- They must not work for more than 2 hours on any day when you are required to be at school;
- They must not work during school hours;
- They must not work for more than 8 hours on a Saturday or on weekdays during school holidays;
- They must not work for more than 2 hours on a Sunday;
- They must not work for more than 4 hours in any day without a rest break of 1 hour.
- They must not work for more than 12 hours in any school week; and
- They must not work for more than 35 hours a week during school holidays.

RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- They must not work for more than 8 hours a day;
- They must not work for more than 40 hours a week;
- They must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- They must have a rest period of not less than 48 hours in each seven-day period.

Anti-Bribery Policy

A) INTRODUCTION

Bribery is, in the conduct of the organisation's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The organisation prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by Think FM Solutions employees or by third parties acting for or on behalf of Think FM Solutions.

B) OFFENCES

It is a criminal offence to:

- Offer a bribe;
- Accept a bribe;
- Bribe a foreign official;
- As a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The organisation could also face prosecution and be liable to pay a fine.

C) PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Think FM Solutions the rules of the organisation in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Think FM Solutions conducts its business in a fair, professional and legal manner.

D) DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

E) SCOPE

This policy applies to all employees of Think FM Solutions, regardless of seniority or site. It also extends to anyone working for or on our behalf, e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties, e.g. suppliers; contractors.

F) POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for the organisation, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical. It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official. If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact The Managing Director so that action can be taken if considered necessary. You may be asked to give a written account of events. If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the Managing Director. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The organisation will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Think FM Solutions takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the organisation's Whistle-blowing Policy, which is available in the Employee Handbook, or upon request.

G) GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return help form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery, and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given, nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from The Managing Director similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Managing Director.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the organisation reserves the right to amend this policy without prior notice.

Anti-tax evasion policy

A) INTRODUCTION

Tax evasion is a criminal offence. The organisation prohibits any form of tax evasion. Involvement in the criminal facilitation of tax evasion exposes the organisation and the person facilitating the evasion to a criminal offence. It will also damage our reputation and the confidence of our customers, suppliers and business partners.

Indicators of tax evasion are:-

- Request for payment by cash;
- Overly complex payment mechanisms;
- Services/goods provided to jurisdictions that do not subscribe to common reporting standards;
- Transactions involving overly complex supply chains;
- Transactions involving private banking facilities; and/or
- Records are incomplete or missing.

Our position is simple: we conduct our business to the highest legal and ethical standards. We will not be a party to tax evasion or the facilitation of tax evasion of any form. Such acts would damage our reputation and expose us, and our staff and representatives, to the risk of fines and imprisonment.

We take a zero-tolerance approach to tax evasion facilitation by our people and our third-party representatives. We are committed to:

- Rejecting the facilitation of tax evasion; and
- Not recommend the services of others who do not have reasonable prevention procedures in place.

We require compliance in regard to this from everyone connected with our business. Integrity and transparency are of utmost importance to us.

B) DEFINITIONS OF TAX EVASION

Tax evasion is the practice of using illegal methods to avoid paying tax. It frequently involves contrived; artificial transactions that serve no purpose other than to reduce tax liability.

C) POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to take part in any activity relating to tax evasion.

If we suspect that you have taken part in such activity, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect any activity related to tax evasion or attempted tax evasion has taken place, even if you are not personally involved, you are expected to report this to the Managing Director. You may be asked to give a written account of events.

D) TRAINING/MONITORING/REVIEW

The organisation will ensure that it gives all relevant training for staff in relation to financial crime detection and prevention, it will ensure it monitors and enforces compliance with the prevention procedures and regularly review the effectiveness of prevention procedures, refining them where necessary.

E) CONCERNS

Staff are reminded of the organisation’s Whistle-blowing policy, which is available in the Employee Handbook, or upon request.

Whistle-Blowing Procedure

A) INTRODUCTION

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

B) QUALIFYING DISCLOSURES

1) Certain disclosures are prescribed by law as “qualifying disclosures.” A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the organisation has committed a “relevant failure” by:

- a) Committing a criminal offence;
- b) Failing to comply with a legal obligation;
- c) A miscarriage of justice;
- d) Endangering the health and safety of an individual;
- e) Environmental damage; or
- f) Concealing any information relating to the above.

- 2) These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The organisation will take any concerns that you may raise relating to the above matters very seriously.
- 3) The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest." We encourage you to use the procedure to raise any such concerns.

C) THE PROCEDURE

- 1) In the first instance, you should report any concerns you may have to The Managing Director, who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- 2) If you do not report your concerns to the Managing Director you should take them directly to the appropriate organisation or body.

D) TREATMENT BY OTHERS

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.