

## QBD.24 Anti-Slavery & Human Trafficking Policy – Issue 2026

### 1. Policy Statement

Modern slavery is a criminal offence and a severe violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking. All forms involve exploiting individuals through coercion, threat or control.

Rayan Facilities Management Ltd is committed to:

- Acting ethically and with integrity in all business operations.
- Implementing robust systems and controls to ensure modern slavery is not present in our business or supply chains.
- Meeting the disclosure and transparency requirements of the Modern Slavery Act 2015.
- Expecting all contractors, suppliers and partners to uphold the same standards and prohibitions.

### 2. Purpose of This Policy

This policy aims to:

- Set out the responsibilities of Rayan FM and those working on our behalf in preventing modern slavery.
- Provide information on how to identify and report concerns about slavery or trafficking.

This policy applies to all employees, directors, officers, agency workers, contractors, subcontractors, consultants, partners, volunteers and any third parties working for or representing Rayan FM.

It does not form part of any employment contract and may be amended at any time.

### 3. Responsibilities

*Managing Director:*

- Holds overall responsibility for ensuring compliance with legal and ethical obligations.
- Oversees the implementation, monitoring and effectiveness of this policy.
- Ensures appropriate systems and controls are audited regularly.

*Managers at all levels:*

- Ensure staff understand and comply with this policy.
- Provide appropriate and regular training.

*Employees:*

- Must read, understand and comply with the policy.
- Must prevent, detect and report modern slavery concerns.

*Feedback:*

Employees are encouraged to provide suggestions on improving this policy at any time.

#### **4. Reporting Concerns**

- Employees must report any suspicions or concerns regarding modern slavery as soon as possible.
- Concerns may relate to any tier of the supply chain.
- If unsure whether something constitutes modern slavery, employees must speak to a manager or director.

Rayan FM supports openness and will protect any individual who raises genuine concerns in good faith, even if mistaken. We will not tolerate victimisation, dismissal, disciplinary action or any detrimental treatment resulting from raising a concern.

Employees who feel they have been treated unfairly after raising a concern should report it immediately. If not resolved, they may raise the matter formally using the company grievance procedure.

#### **5. Training & Communication**

- All employees receive training on this policy as part of their induction.
- Additional training is provided where necessary.
- Our zero-tolerance stance on modern slavery is communicated to all suppliers and contractors at the start of any relationship and reinforced periodically.

#### **6. Breaches of This Policy**

- Any employee who breaches this policy may face disciplinary action up to and including dismissal.
- Rayan FM may terminate relationships with individuals or organisations acting on our behalf if they breach this policy.

#### **7. Review**

This policy will be reviewed annually or earlier if legislation, operational needs or best practice standards change.

Signed:



Siobhan Hamill

Managing Director

10/03/2026

