

# Modern Slavery Statement Atlas FM Group

## Reporting entity & legislative compliance

This statement applies to all companies within and associated to Atlas FM Group Limited (referred to in this statement as “the Atlas FM Group”). The information included in this statement refers to the financial year ended 31 December 2025, as approved by the board.

Previous Modern Slavery Statements can be accessed from the [Atlas Group website](#).

## Definitions

The Atlas FM Group 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 restriction placed on freedom of movement.

## Commitment

The Atlas FM Group acknowledges its responsibilities in relation to tackling modern slavery and is committed to complying with the provisions in the Modern Slavery Act 2015. We recognise that this requires continual review of both our internal practices in relation to our labour force and, additionally, our supply chains.

We have a zero-tolerance approach to slavery and human trafficking and will not enter into business with any organisation that knowingly supports or is found to involve itself in slavery, servitude, or forced or compulsory labour

No labour provided to the Atlas FM Group in the pursuance of the provision of our services is obtained by means of slavery or human trafficking. We strictly adhere to, and in many cases exceed, the minimum standards required under relevant employment legislation in the United Kingdom.

## Organisational structure

Atlas FM Group is a United Kingdom-based company providing facilities management services, including cleaning, security, technical, and associated soft and hard services.

The Group operates nationwide with multiple offices and regional hubs across the United Kingdom. The Atlas FM Group comprises several companies operating under one umbrella to deliver services to both public and private sector clients across a range of industries including corporate offices, public buildings, theatres, gyms, and hotels.

We actively promote safe, fair and ethical working conditions, including the responsible management of environmental and social issues within our organisation and our supply chain. We expect our suppliers and business partners to uphold the same high standards and to cascade these principles through their own supply chains.

The business is managed by an executive leadership team, overseen by the Board of Directors, who are responsible for ensuring compliance with all ethical, legal and regulatory standards, including the Modern Slavery Act 2015.

The labour supplied to the Atlas FM Group in pursuance of its operation is carried out within the United Kingdom.

### **Supply chain structure**

To deliver our services, the Atlas FM Group relies on a network of suppliers and subcontractors who provide materials, labour, equipment, systems and professional support. Our supply chain includes:

- Cleaning and janitorial product suppliers
- Equipment and uniform providers
- Subcontracted labour providers
- Technical services and maintenance contractors
- Suppliers providing business systems and functional support

All suppliers are required to adhere to our Vendor Code of Conduct and Ethical Trading Policy, which explicitly prohibit the use of forced, bonded, or involuntary labour and require compliance with all applicable employment laws.

Atlas FM Group's procurement team carries out supplier due diligence and ongoing reviews to ensure compliance.

### **Organisational policies**

Atlas FM Group has a zero-tolerance approach to modern slavery and human trafficking. We do not use, or permit the use of, any form of forced, bonded, trafficked, or child labour. All Atlas FM Group employees work for the company on a voluntary basis and are not subject to any form of threat, penalty, or coercion. We also ensure that no individual is employed below the legal minimum age for employment.

To uphold these commitments, we have a comprehensive framework of policies and procedures designed to ensure we operate responsibly, ethically, and in full respect of human rights. These include, but are not limited to:

- Ethical Trading Policy
- Vendor Code of Conduct
- Suppliers Policy
- Safeguarding Policy (Children and Vulnerable Adults)
- Whistleblowing Policy
- Recruitment and Selection Procedure
- Employee Handbook
- Equality and Diversity Policy
- Code of Business Behaviour and Conduct Policy

Each policy is reviewed annually and approved by the Group Chief Executive to ensure it remains current and effective. All policies are accessible through Atlas FM Group's internal platforms.

### **Assessing and managing risk**

Atlas FM Group provides a wide range of services in sectors which may be considered higher risk from a modern slavery perspective, including security and cleaning. These services are either delivered directly by Atlas FM Group colleagues or in conjunction with our supply chain partners. This elevated risk is due to the nature of the workforce, which can often involve low- skilled labour, a high number of temporary or agency workers, and demanding jobs.

We mitigate these risks by:

- Conducting pre-employment checks, including Right to Work verification
- Requiring all labour suppliers to demonstrate compliance with UK employment law
- Auditing supplier compliance through our Brilliant Basics Audit programme
- Ensuring all recruitment practices are transparent, fair, and regularly reviewed

Atlas FM Group is committed to continuing to take proactive steps to ensure that modern slavery and human trafficking do not occur within its own operations or within the businesses of any organisation that supplies goods or services to us.

### **Due diligence in relation to modern slavery**

Atlas FM Group 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.

Our due diligence measures include:

- Enforcing policies and procedures that ensure slavery and human trafficking do not occur in our business or supply chains
- Regular reviews of supplier contracts and compliance
- Vetting new suppliers through a pre-qualification process
- Investigating and taking immediate action in response to any concerns raised through our Whistleblowing channels

## **Training**

Atlas FM Group provides the following training to staff to effectively implement its stance on modern slavery:

- Mandatory Modern Slavery Awareness training for all managers, HR, and procurement teams
- Induction training for all new employees, including information on our ethical standards and Whistleblowing Policy
- Ongoing communication campaigns to reinforce the importance of vigilance and reporting concerns

## **Monitoring and evaluation**

Atlas FM Group has set the following key performance indicators to measure the effectiveness of our actions in preventing modern slavery within our operations and across our supply chains.

We monitor the effectiveness of our actions in preventing modern slavery within our operations through:

- Regular audits and compliance reviews
- Tracking the completion rate of training programmes
- Reviewing the number and nature of concerns raised through our Whistleblowing process
- Annual supplier performance assessments

These metrics enable us to evaluate our progress and identify any areas for improvement.

## **Our progress and future actions**

Atlas FM Group 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, we have taken the following steps to ensure that modern slavery is not taking place:

- Conducted supply chain risk assessments and audits
- Implemented a zero-tolerance policy towards modern slavery across all companies within the Group
- Embedded awareness and training programmes across the organisation
- Strengthened governance through Board oversight and policy review

Looking to the future, we will continue to engage closely with high-risk suppliers, extending due diligence to lower-tier suppliers, and review how we monitor and support those not classified as high risk. We will also continue to refresh and deliver targeted training programmes for key teams, ensuring that our people remain informed, alert, and proactive in identifying and preventing modern slavery within our operations and supply chains.

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

**Signed and Dated:**



**Chris Wisely**

**Group Chief Executive Officer**

**Date: 29<sup>th</sup> June 2026**