

Modern Slavery Statement

Published
June 2026



Introduction

Modern Slavery is recognised as one of the most significant global human rights issues of our time. With approximately 1 in 150 people, an estimated fifty million people globally at risk of Modern Slavery, this includes an estimated twelve million children. That means that children make up one in every four victims. Modern Slavery can take many forms including human trafficking, sexual exploitation, and forced labour and is usually rooted in lack of social protection, poverty, and discrimination.

At City, we take a zero-tolerance stance on Modern Slavery and human trafficking, and we are committed to preventing Modern Slavery and human trafficking in our operations and our supply chain. This statement applies to City Facilities Management Holdings (UK) Limited, and all our UK subsidiary group companies and describes the steps we took during the year ended 31 December 2025, and the actions we have planned to take during 2026.

Our Approach

We drive our approach to Modern Slavery through our leadership team, values, and corporate social value commitments as part of our Environment, Social and Governance (ESG) strategy. Our approach to preventing Modern Slavery aligns with the following UN Sustainability Goals:



We are committed to operating ethically and with integrity in all our relationships and taking all reasonable action to prevent and detect Modern Slavery.

Our Modern Slavery policy is communicated to our supply chain, and is embedded in our Procurement Code of Conduct, Procurement Strategy, onboarding criteria and day-to-day operations. This is set out in further detail in other sections of this statement.

Our Business

City Facilities Management Holdings (UK) Limited (City) is the holding company for one of the largest privately owned facilities management groups in the UK. This statement is made on behalf of City and all the UK companies in its group, specifically City Facilities Management (UK) Ltd, City Facilities Management (Distribution), City Facilities Management Ltd, City Facilities Systems Solutions Ltd, CBES Ltd trading as City Building & Engineering Services Ltd, and City Facilities Management (NI) Ltd.

City provides world-leading facilities management services. We believe that the name City is synonymous with professionalism, quality, customer service, and value. The importance we place on our relationship with colleagues and third-party stakeholders is vital to this reputation. We are committed to treating people fairly within our business and our supply chain.

Our Partnerships

We are proud Corporate Partners of Scotland Against Modern Slavery, working together with other businesses and organisations who are also committed to fighting Modern Slavery in all its forms, sharing good practice across the corporate sector in preventing and detecting Modern Slavery, and committed to assist victims in Scotland to help rebuild their lives.

Scotland Against Modern Slavery fights to create conditions to eradicate human trafficking and exploitation in Scotland. They provide end-to-end support to victims and maximise awareness of Modern Slavery to identify potential victims quickly and provide support.

Current reports state that victims of Modern Slavery have been found in every local authority area in Scotland. Current statistics suggest that over 900 potential victims are identified each year -one in four victims is a child and 70% of all victims are female.

City has been proud to support Scotland Against Modern Slavery as an official corporate partner since October 2021. Our ESG Director and members of our Procurement team attend monthly round table committee meetings to participate in and gain further insight into the meaningful actions the business community needs to take to eradicate Modern Slavery from our society.

As part of our commitment to raise awareness in our communities, City has also partnered with Scotland Against Modern Slavery to deliver presentations to over 400 secondary school pupils in the local community of our head office. These presentations covered topics, including understanding what Modern Slavery is, how prevalent it is in our community, and actions individuals can take to fight Modern Slavery.

[BSA Service and Infrastructure Project Providers' Modern Slavery Council](#)

The Director of ESG sits on the Steering Committee for the BSA Modern Slavery Council (the Council). The Council comprises facilities management and outsourced project providers on a non-competitive cross-industry basis to tackle Modern Slavery, supported by the UK Government. The objectives of the Council are to work together to eradicate risk, remove crime, and support victims of Modern Slavery.

This group continues to meet and share insights, particularly considering the types of Modern Slavery becoming more nuanced and sophisticated, to raise awareness within industry, markets, and the communities where we work.

Our Director of ESG was proud to contribute directly to a comprehensive toolkit, published by the BSA Modern Slavery Council, to help businesses of all sizes navigate the risks of Modern Slavery.

[The Toolkit for Tackling Modern Slavery in the UK Service and Infrastructure Project Sectors](#) is available on the BSA website.

Our Supply Chain and Recruitment

At City we are committed to having a sustainable supply chain which consistently meets our standards, aligns with our policies, and matches our values. We have an extensive supply chain due to the nature of our services across all of City's operations and our geographical spread across the UK. We have circa 1,800 suppliers and subcontractors across our City businesses. We have a total third-party annual spend of over £352million within our supply chain.

This spending covers a broad range of categories that are critical to the delivery of our services, including subcontractor labour, parts and materials, fleet, IT, and recruitment. Over the past year, our Procurement team has been taking greater ownership across the full scale of this spend — increasing visibility, oversight and control across all categories and businesses.

Our Procurement function holds a critical responsibility in preventing Modern Slavery within our supply chain through robust commercial and procurement onboarding controls, engagement, and monitoring procedures.

During 2025, the entire procurement team completed full modern slavery training, now an annual requirement set by City's Procurement Director. We further developed through training and engagement with external bodies leading against Modern Slavery, and challenged the external systems supporting our onboarding to introduce more robust processes and to collect wider ESG data, including specific modern slavery commitments.

In 2026, we will be working closely with our supply chain partners to raise awareness, foster open dialogue, and deepen our collective understanding of risks through regular discussion and information sharing. Through partnership our impact is deeper, with a view to not only support in detecting Modern Slavery within the supply chain but also to ensure enhanced risk mitigation through all operations.

This year and beyond, our focus will be on aligning procurement ever more closely with City's wider ESG targets — mapping our supply chains end to end, supporting our Scope 3 ambitions, and building stronger partnerships and tighter engagement with our suppliers, recognising that a transparent and collaborative supply chain is the most effective foundation for preventing modern slavery and managing risk across our operations.

Pre-qualification

Furthermore, this year we are focusing on developing our Procurement End-to-End system to drive transparency, deepen engagement and manage risk across our supply chain — including enhancing our onboarding through broader information gathering.

The Commercial and Procurement Team engage in conversations at the pre-qualification stage when collaborating with suppliers and subcontractors to ensure they identify any high risks upfront. Pre-qualification helps to avoid engaging with suppliers and subcontractors that do not meet our standards or to support any we choose to work with to take timely and corrective action.

All suppliers and subcontractors must pass our pre-qualification assessments. This qualification process is repeated every year with our suppliers and subcontractors. We review our pre-qualification assessments regularly to ensure the standards we expect of our suppliers and subcontractors reflect the latest policy and guidance.

Ongoing due diligence

To ensure that we remain vigilant to the risk of Modern Slavery within our supply chain, and do not simply rely on the checks we perform at the outset of our contractual relationships, we maintain ongoing due diligence throughout each relationship.

This includes regular engagement through Supplier Relationship Management (SRM) meetings, routine desktop reviews and downward-trend monitoring, and continual risk mapping — with enhanced frequency of checks across the areas of our supply chain where the risk is greatest.

Contracts

Our suppliers and subcontractors must acknowledge and commit to our zero-tolerance stance on Modern Slavery.

Our contractual terms and conditions clearly outline our expectations for our suppliers and subcontractors. They must not knowingly engage in any activities that breach Modern Slavery or Human Trafficking regulations or cause City to violate any anti-slavery regulations. If any supplier or subcontractor breaches legislation, we will take immediate action and terminate relationships in line with our zero-tolerance policy.

Our Purchase Order Terms & Conditions also outline our expectations for adherence to the Modern Slavery Act 2015 for any one-off or low-value purchases. The T&Cs also outline the immediate action we will take should there be any breach.

We aim to deter any Modern Slavery breach in our supply chain with warranties, indemnities, and termination rights in these contracts.

Our sourcing methodology incorporates our Modern Slavery requirements within the Request for Information (RFI) process. Any supplier or subcontractor that does not meet our agreed criteria will not be shortlisted. Ensuring we do not engage with suppliers or subcontractors that do not meet our qualification requirements.

At City, we believe that working with our supply chain at the pre-qualification, tender, and contract stage is not enough. We identify those suppliers and subcontractors who are deemed to be high-risk, high-spend, and strategic, and work with them through the lifecycle of a contract or project via our ongoing strategic review meetings. These meetings focus on areas of risk, including Modern Slavery, for which we review and monitor all relevant policies and procedures to ensure that appropriate processes are in place to continue to meet our Procurement Code of Conduct requirements.

Our policies, procedures, and strategic plans

Employment

We protect the workplace rights of all our colleagues through our people policies. We manage recruitment via a Preferred Supplier List (PSL) of approved recruitment agencies which is maintained and reviewed at regular intervals to ensure that they meet the City pre-qualification criteria and have signed a contract with us. By doing this, we ensure that we only deal with reputable agencies that comply with all applicable laws. City always pays the recruitment fees associated with hiring a colleague or potential colleague.

We conduct Right to Work and Pre-Employment checks on all colleagues joining City. These checks include colleagues providing evidence that they have appropriate identification documents and that the bank account details provided belong to the colleague and not a third party. We investigate any discrepancies we identify thoroughly and take appropriate action.

Payroll and People Record Controls

We perform monthly control procedures to identify and review all instances of duplicate bank details and duplicate addresses prior to each payroll run. All exceptions are investigated, with outcomes documented and, where required, escalated. This ensures appropriate governance, oversight, and timely resolution of any potential risks.

Whistleblowing policies

We have a whistleblowing policy at City that all colleagues are encouraged to understand and follow. We have a dedicated e-mail and phone number available for whistleblowing should any colleague suspect or be concerned about any potential fraud, corruption, or unlawful practices within City.

Should any case of Modern Slavery be suspected, we have an escalation process to ensure we thoroughly investigate and take appropriate action, supporting any victims identified in an appropriate way to ensure that they receive the help that they need. In 2025, whilst there were no cases of Modern Slavery identified in our organisation, we recognise that given the prevalence of this crime in our society, we must remain vigilant and alert to the risks and indicators that may present in our operations, and those of our supply chain.

Procurement Code of Conduct & Ethical Trading Policy

Our Procurement Code of Conduct and Ethical Trading Policy have been updated and supports the critical processes and due diligence we have in place across our Procurement function. Built on City's core values, they govern conduct within our team and across our supply chain, ensure conflicts of interest are identified and avoided, and are underpinned by robust governance — including clear controls for contractual and financial monitoring and sign-off.

Our People

Training

We take seriously our responsibility as an employer to ensure that our colleagues are aware, informed, and alert to this issue. We are clear on our responsibilities within our direct operations and the role we have in the wider business community, to ensure that we do all we can to prevent and detect instances of Modern Slavery.

At City, we are fully committed to tackling Modern Slavery head-on. We understand the seriousness of this issue and ensure that our teams are knowledgeable and empowered to respond effectively. We have taken significant steps to ensure that our training and materials on this matter remain relevant and fit for purpose, as this crime presents in many different ways.

Our online Modern Slavery training module provides focused training and guidance. Ensuring our colleagues explore in more depth the complexities of Modern Slavery. This module continues to receive overwhelmingly positive feedback, becoming one of the highest-rated modules in our online training suite. Based on this feedback, the module has already, and continues to, significantly increase awareness of the dangers Modern Slavery poses to society, the indicators that we should all be alert to and the actions we must take should we identify any concerns.

Through ongoing mandatory training, communication, and targeted refresh activity, we are actively developing a culture of awareness and responsibility across the business. We remain committed to continually evolving our practices, procedures, and training to ensure we are aware of, alert to and equipped to address Modern Slavery in all its forms.

Compliance

Modern Slavery risk is recorded within our City Group Risk Register. While each Business unit and function is responsible for the ongoing monitoring of the risk of Modern Slavery, the Risk and Audit Committee oversees the adequacy of risk management measures, to ensure that the business response to this risk remains appropriate and is consistently applied across all our operations.

The Governance, Risk and Assurance team performs ongoing control design reviews. These reviews ensure adequate mitigating, preventative, or detective controls are in place to reduce the likelihood of Modern Slavery related events. They also ensure that mechanisms for detecting and reporting instances of Modern Slavery are robust.

These controls address risk in colleague recruitment and through the onboarding and ongoing management of third-party suppliers/subcontractors. The Governance, Risk and Assurance team also periodically conducts independent audits to ensure that the relevant business controls are fully implemented and operate consistently and effectively.

Looking Forward

We are currently working on a more in-depth risk analysis to further explore which parts of our operations/supply chain are considered higher risk and this will better inform our supplier onboarding, supplier audits, engagement, and escalation. Risk factors being considered include contract criticality, geography, spend and labour intensity.

To assess how effective our activities are, we will be measuring data as follows:

- % of colleagues completing Modern Slavery training;
- % of procurement colleagues completing mandatory training;
- % of suppliers completing pre-qualification checks;
- number of high-risk suppliers identified and reviewed;
- % of supplier meetings where, Modern Slavery was discussed;
- % of supply chain spend covered by supplier survey responses;
- number of whistleblowing reports or Modern Slavery concerns raised compared with number of investigations, substantiated cases, remediation actions and outcomes;
- audit/control review findings and closure rates.

We will continue to further develop and enhance our existing procedures in place to detect instances of suspected Modern Slavery or human trafficking. We are continuing to work towards Ecovadis Gold standards across all our businesses.

We will continue to use our supply chain surveys and supplier partnerships to continually be alert to the risk of Modern Slavery within our supply chain, including sharing latest information, and identifying ways to collaboratively detect instances and mitigate the risks of Modern Slavery within our supply chain.

This statement has been published in accordance with the Modern Slavery Act 2015 and has been approved by the Board of Directors. City meets the section 54 threshold, including the £36 million turnover requirement. This statement sets out the steps taken in relation to part 6, section 54 of the Act, by City Facilities Management Holdings (UK) Limited and other relevant group companies, during the financial year ending 31 December 2025, to ensure that we are equipped to prevent, identify, mitigate and respond to risks of Modern Slavery and human trafficking in our business and supply chains.

This Modern Slavery statement will be published, on our website at <https://www.cityfm.com/modern-slavery-statement/> and on the UK Government Modern Slavery statement registry.



Colin Seggie,
Chief Executive Officer UK & Europe

A handwritten signature in black ink that reads "Colin Seggie".

This statement was approved on 23 June 2026