

1. Introduction

Modern slavery is a criminal offence under the Modern Slavery Act 2015. It encompasses servitude, forced or compulsory labour, and human trafficking — all involving the deprivation of a person's liberty for the purpose of exploitation. This policy sets out Dynamic FM's approach to preventing modern slavery and human trafficking within our business operations and supply chain.

Dynamic FM operates a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to acting ethically and with integrity in all our business dealings and relationships. We expect all who have, or seek to have, a business relationship with Dynamic FM to be familiar with this policy and to act consistently with our values at all times.

2. Policy Framework and Standards

This policy is underpinned by guidance from the Slave Free Alliance. It is developed in accordance with the following internationally recognised frameworks, which are integrated into our due diligence processes, risk assessment methodology, and corrective action approach:

- The UN Guiding Principles on Business and Human Rights (UNGPs) — "Protect, Respect, Remedy" framework
- The ILO Core Labour Standards, including the prohibition on forced and compulsory labour (Conventions 29 and 105)
- The Modern Slavery Act 2015
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

Although Dynamic FM's turnover falls below the statutory threshold requiring publication of an annual Modern Slavery Statement under the Modern Slavery Act 2015, we have published one voluntarily since 2020. Our statement covers the full scope of our operations and supply chain and is reviewed and updated annually. It is available on our website at www.dynamic.fm.

3. Risk Assessment and Due Diligence

Dynamic FM takes a risk-based approach to identifying modern slavery risks, considering product type, worker demographic, and country of origin. Our assessment extends beyond Tier 1 suppliers to include sub-tiers where our operations create exposure.

All subcontractors are required to complete Dynamic FM's Subcontractor Pre-Selection Questionnaire (Form DYN-001a), which includes a dedicated Modern Slavery and Ethical Labour Practices section (Section 8.0). This requires specific confirmation of:

- Compliance with the Modern Slavery Act 2015 and prohibition of forced, bonded or involuntary labour
- Possession of a Modern Slavery and Human Trafficking Policy
- Disclosure of supply chain risk profile, including use of agency labour, labour-only subcontractors, or overseas labour supply

- Sign-off on Dynamic FM's Supplier Code of Conduct
- Confirmation that equivalent standards are applied throughout their own supply chain
- Agreement to notify Dynamic FM of any identified or suspected breaches within their organisation or supply chain

Where a subcontractor cannot demonstrate compliance at pre-qualification stage, Dynamic FM will engage with them to understand their position and, where appropriate, support them in meeting the required standard before appointment. Continued failure to demonstrate compliance, or unwillingness to engage with improvement, may result in removal from the approved supplier list.

Dynamic FM reserves the right to request additional supporting evidence, conduct site visits, or undertake direct audits where intelligence warrants further due diligence.

4. Operational Controls

The following operational controls apply across all Dynamic FM projects and operations:

- Mandatory right-to-work checks, identity verification, and employment history checks for all employees and subcontractors prior to engagement
 - Preference for directly employed labour, reducing reliance on agency or unverified labour sources
 - Compliance with fair pay, working hours, and welfare standards embedded across all projects
 - All operatives complete a mandatory modern slavery awareness module through Atlas Citation before site access is granted.
 - Targeted training for managers and staff involved in procurement and subcontractor engagement, covering risk indicators, escalation routes, and due diligence obligations
 - An anonymous feedback mechanism is available to all site-based operatives, enabling concerns to be raised without fear of identification or reprisal
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5. Incident Response

Dynamic FM's response to any identified modern slavery concern follows the UN Guiding Principles' framework of investigate, remediate, and prevent recurrence. Our approach prioritises collaboration with the supplier to resolve the issue rather than automatic termination of the relationship, which may leave potential victims in a worse position and removes our ability to influence outcomes.

Where a concern is identified, the following steps apply:

- Dynamic FM engages directly with the supplier to understand what has occurred, agrees a corrective action plan, and supports delivery of it — seeking resolution in partnership before escalating to contract remedies
- Where a potential victim of modern slavery is identified, their safety is the immediate priority and takes precedence over any commercial consideration
- The individual will be referred to the Modern Slavery Helpline (0800 0121 700) and the National Referral Mechanism (NRM) for formal support — referral does not require the individual to produce evidence first

- Dynamic FM will not disclose the identity or location of a potential victim to the supplier, or to any other party, before the individual is confirmed safe
- Where the individual is a Dynamic FM employee, paid redeployment away from the affected situation will be provided during the investigation. Where the individual is a subcontract operative, Dynamic FM will take reasonable steps to ensure they are removed from the affected situation and supported, and will engage with the relevant employer or authority to ensure appropriate protective measures are in place
- Law enforcement will be engaged as required by the circumstances
- Formal investigation will be led at senior management level, with outcomes documented and a corrective action plan agreed and tracked
- Lessons learned will be incorporated into policies, training content, and supply chain pre-qualification requirements to reduce the risk of recurrence
- Where a supplier is unwilling or unable to remediate, contract termination may follow as a last resort — this is not the first response

To date, no incidents of modern slavery have been identified within Dynamic FM's operations or supply chain.

6. Whistleblowing and Reporting

Dynamic FM is committed to creating an environment in which concerns about modern slavery can be raised freely and without fear of reprisal. The following reporting routes are available:

- Dynamic FM's Whistleblowing Policy and Procedure — available to all employees and subcontractors, including anonymous reporting
- Direct confidential communication with the Managing Director
- The National Modern Slavery Helpline: 0800 0121 700 (24 hours, 7 days a week)
- The National Referral Mechanism (NRM) — the formal government process for identifying and supporting potential victims of modern slavery

Dynamic FM will support anyone who raises a genuine concern in good faith, even if that concern turns out to be mistaken. No employee, operative, or subcontractor will suffer detrimental treatment — including dismissal, disciplinary action, or unfavourable treatment — as a result of reporting a concern in good faith. This protection applies equally to anonymous reports and named disclosures.

7. Continuous Improvement

Dynamic FM treats modern slavery prevention as a matter of ongoing improvement, not a one-time compliance exercise. This policy is reviewed annually as a minimum. Reviews are also triggered by:

- Legislative or regulatory changes, including updates to the Modern Slavery Act and Home Office guidance
- Emerging intelligence from the Gangmasters and Labour Abuse Authority (GLAA) and the Slave Free Alliance
- Sector-specific enforcement actions involving labour supply chains comparable to ours
- Any concern or near-miss raised through internal reporting channels

Lessons from all reviews are incorporated into training content, pre-qualification criteria, and supply chain engagement practices.

8. Responsibility for this Policy

Ultimate responsibility for the prevention of modern slavery rests with Dynamic FM's Board of Management. The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and is implemented effectively across the business.

Day-to-day operational responsibility sits with project managers and procurement staff in their respective areas of activity.

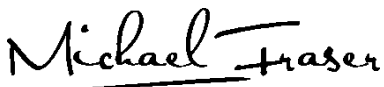
9. Communication and Awareness

This policy is communicated to all employees via the Employee Handbook and included in the induction process. All operatives are required to complete the Atlas Citation modern slavery awareness module before commencing work on any Dynamic FM project.

Our supply chain is made aware of this policy and of Dynamic FM's expectations regarding modern slavery prevention through the Subcontractor Pre-Selection Questionnaire and the Dynamic FM Supplier Code of Conduct.

This policy is published on the Dynamic FM website at dynamic.fm.

Michael Fraser



Managing Director

20th February 2026