



# **Modern Slavery and Human Trafficking Statement 2024/25**

## **1 Introduction**

Ubico are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. This statement is made pursuant to section 54 of the Modern Slavery Act 2015, 'Transparency in Supply Chains' (TISC), and constitutes Ubico's modern slavery and human trafficking statement for the financial year ending March 2025. It sets out our actions to understand modern slavery risks related to Ubico and the steps put in place to mitigate the risks of slavery and human trafficking in our corporate activities and supply chains. It was approved by the company's board of directors on 8 April 2025.

## **2 Structure and supply chains**

### **2.1 Structure**

Ubico is a local authority owned company operating within the United Kingdom, specifically across Gloucestershire and Oxfordshire. We deliver front line environmental services for our local authority shareholders, including household and commercial waste and recycling collections, street cleaning, grounds maintenance, recycling bulking and transfer and the operation of household recycling centres. We directly employ around 1000 people, and we indirectly provide work through temporary and agency staff arrangements.

Our shareholders are Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Gloucestershire County Council, Stroud District Council, Tewkesbury Borough Council and West Oxfordshire District Council.

### **2.2 Supply chains**

Our Contract Management Framework provides a clear and standardised approach to managing our contracts. The framework supports sound planning of our procurement activities, detailing activity necessary in each step of the procurement life cycle relating

to contract management, from procurement planning, requirement definition and tendering through to evaluation, award and into contract management. It also sets out Ubico's contract management procedure, intended to provide a standard corporate approach to contract management, tailored to the size, scale and risk of each individual contract and includes details of our processes for assessing and managing modern slavery risks.

Our supply chain can be grouped into categories as shown in the table below:

<b>Category</b>	<b>Example product/service</b>
Operational supplies, materials and equipment	PPE, safety supplies, handheld tools, holding tanks and drainage, pest control services, weed control services, equipment hire
Equipment maintenance and supply	Machinery maintenance and inspection, spare parts
Fleet	Hired fleet, leased fleet, vehicle parts, fleet servicing and maintenance, tachograph services, driving licence checking, vehicle parts, tyres
Fuel and energy supplies	Fuel cards, bunkered fuel, oil, electricity and gas supplies
Intellectual and specialist services	Insurance, management consultants, recruitment consultants, support services (e.g., IT, Legal, Procurement), external audit, internal audit, absence management provision, air monitoring, key holding, training provision
IT	Hardware and software, systems, mobile phones
General	Office supplies, furniture, travel, temporary staff, storage containers and temporary offices, workshop overalls cleaning, confidential shredding

### 3 Policies in relation to modern slavery and human trafficking

We have appropriate policies in place to underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Modern Slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in our supply chains. We also have the following policies in place that relate to modern slavery.

- **Modern Slavery Policy** – sets out that we have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.
- **Contract Management Framework** - provides a clear and standardised approach to managing our contracts including how we plan our procurement activities. This policy underwent a routine review in October 2024 and required no changes.
- **Whistleblowing Policy** – supports our employees with raising concerns about any aspect of the company’s work to come forward. An independent hotline is provided to facilitate straightforward and confidential reporting. This policy underwent routine review in September 2024 resulting in process and contact details being updated to reflect new arrangements for whistleblowing reporting.
- **Employee Code of Conduct** - sets out the expected behaviours of our employees when representing Ubico. This policy was reviewed and re-issued to all staff during 24/25.
- **Equality, Diversity and Inclusion Policy** - outlines our approach to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. This policy undergoes routine review on an annual basis.

- **Safeguarding Policy** - outlines how Ubico will enable and support our employees to report any safeguarding concerns arising whilst delivering the company's services. Demonstrates our commitment to ensuring safer recruitment practices are deployed in roles which have been identified as requiring enhanced checks, and that employees and casual workers have effective information, training and support to allow them to report any safeguarding concerns appropriately. This policy undergoes routine review on an annual basis.
- **Employee Assistance Programme** – provided by an external, specialist provider, Ubico's employees have confidential access to a comprehensive Employee Assistance Programme providing advice and guidance around a wide range of topics.
- **Contract Rules** – outlines how we will ensure that all works, goods and services are obtained with probity and propriety, appropriate for the purpose for which they are obtained and ensure best value for money. This policy underwent a full review in 24/25 to reflect the changes brought about by the new Procurement Act 2023 which came into force in late February 2025. The updated policy was approved by the board of directors.

All of our company policies have scheduled review periods to ensure they remain up to date and relevant.

## **4 Due diligence and risk assessment and management**

### **4.1 Due diligence and risk assessment**

We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

#### Agency staff

Ubico understands that the provision of agency staff is the area which gives rise to the highest modern slavery risks. We continue to work with our managed service provider for this contract to assess modern slavery risks and ensure mitigations are in place to reduce these.

The managed service provider conducts regular audits of the agencies supplying workers to Ubico. Audits include worker checks, including checking right to work documents, copies of payslip confirming rates of pay, hours of pay, holiday pay and tax deductions and for drivers a DVLA check (dated within six months) and driver CPC (Continuing Professional Competence) checks as required. Audits also check that the agency has the relevant insurances, policies (including GDPR, modern slavery, whistleblowing and recruitment), and licences if required, and that modern slavery processes and procedures are in place.

### Procurement

When undertaking a procurement activity, we outline the grounds which would result in the mandatory exclusion of a tenderer from the tendering process in our invitation to tender documentation. Any convictions in relation to child labour and other forms of trafficking in human beings must be disclosed and would result in mandatory exclusion from the tender process. Tenderers must confirm whether or not they are a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015, and if they are, whether they are compliant with the annual reporting requirements. This is a discretionary exclusion, therefore Ubico may exclude any tenderer who has not met their reporting requirements in relation to the Modern Slavery Act. In accordance with the Procurement Act 2023, the Central Debarment list will be reviewed to ensure contracts are not awarded to suppliers who are excluded from taking part in public procurement.

### Our employees

New Ubico employees are not offered contracts of employment until each individual has provided us with the correct right to work evidence, references appropriate to the level of the appointment, and their bank account details. Where employees transfer to Ubico under TUPE arrangements, we request the right to work evidence within the 60-day grace period in accordance with Home Office guidance. We have a recognition agreement in place with three trade unions with whom we have excellent relationships, and who are fully consulted in relation to any collective bargaining discussions and agreements, including around pay and terms and conditions of employment, as well as being routinely consulted on key policies relating to health and safety and HR.

Routine checks are undertaken to ensure there is no duplication of employees within the payroll system, and routine reconciliations are undertaken to ensure leavers are removed from the payroll systems in a timely manner.

We review our Modern Slavery Policy and produce a Modern Slavery and Human Trafficking Statement on an annual basis, identifying actions taken during the current year, and future actions required.

#### **4.2 Supplier adherence to our values and ethics**

Our Contract Management Framework specifically references risks around modern slavery and human trafficking and prescribes our process for assessing modern slavery risks within our supply contracts. Supply contracts which are at high risk of modern slavery are assessed annually, and we work with those suppliers to mitigate the risks through strengthened contract management. We also require them to work with the company to identify areas of risk and potential mitigations in an approach proportionate to the contract and business size. Suppliers with a turnover of greater than £36 million must provide Modern Slavery and Human Trafficking Policies and Statements annually.

### **5 Actions taken to address modern slavery**

Ubico has not identified any issues nor received any whistleblowing disclosures relating to modern slavery or human trafficking in the 2024/25 year. Our planned actions for 24/25 were:

- Continue to complete modern slavery due diligence/risk assessments on suppliers.
- Report against key indicators in relation to modern slavery.
- Continue to roll out modern slavery training/refresher training as appropriate across the business.
- develop a Recruitment Policy for the company.

Our achievements in relation to these targets was as follows:

- ✓ 100% of contracts on the contracts register assessed against our Contract Management Framework criteria.
- ✓ 95.72% of employees received Modern Slavery and Human Trafficking training.
- ✓ Our contracts and procurement manager completed the 'Chartered Institute of Procurement and Supply's 'Ethical Procurement and Supply 2023' course.

## 6 Training and awareness

Both Ubico's HR teams and those who provide HR and recruitment support to Ubico via external organisations are trained on modern slavery. Modern slavery awareness training is also compulsory for all our office-based staff and is delivered via our e-learning module. Our operational staff receive training through a modern slavery toolbox talk and information about modern slavery is included in new employee induction materials. A manager's guidance document provides a definition of modern slavery and trafficking, guidance on how to recognise the signs, and information about how to report any concerns.

## 7 Summary of planned actions for 2025/26

In 2025/26 we will:

- continue to complete modern slavery due diligence/risk assessments on suppliers;
- continue to report against key indicators in relation to modern slavery;
- continue to roll out modern slavery training/refresher training as appropriate across the business;

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Ubico's Modern Slavery and Human Trafficking Statement for the financial year ended 31 March 2025. The statement has been approved by the board of directors of Ubico Limited who will review and update it annually.



Beth Boughton  
Managing Director  
8 April 2025