



# **Modern Slavery and Human Trafficking Statement 2025/26**

## **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 2026. 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 21 April 2026.

Overall responsibility for modern slavery risk management sits with the managing director, with operational oversight provided by the contracts and procurement manager and the head of people. Supplier risk assessments are overseen through the contract management framework, with board level scrutiny through annual review and approval of this statement and the Modern Slavery Policy.

Information for this statement has been gathered through supplier audits, use of the Modern Slavery Assessment Tool (MSAT) and Anti-slavery Risk Tiering Tool (ARTT) assessments, review of procurement documentation, contract management reviews, internal HR policies and discussions with our managed service provider for agency labour.

## **2 Definitions**

Ubico 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.

### 3 Structure and supply chains

#### 3.1 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.

#### 3.2 Our shareholders



### 4 Supply chains overview

In order to fulfil its activities, the main supply chains of Ubico include those related to provision of supplies, services and people to deliver environmental services.

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
People	Temporary staff, permanent staff
General	Office supplies, furniture, travel, storage containers and temporary offices, workshop overalls cleaning, confidential shredding

While Ubico has strong visibility over tier 1 suppliers, we recognise that we do not yet have full visibility of indirect supply chains, particularly for secondary services and products. We intend to map deeper tiers during 2026/27, prioritising categories with elevated modern slavery risk. We are also developing a more detailed profile of direct and indirect suppliers, including the geographic distribution of suppliers, the sectors they operate in, and the nature of any subcontracting. This work includes gathering additional data from suppliers to map lower-tier relationships in high-risk categories such as PPE, uniforms, fleet parts and cleaning services.

## **5 Labour supply chains and recruitment**

### **5.1 How workers are recruited**

Workers at Ubico are recruited in line with our recruitment strategy through a combination of direct advertising on our website, job boards and career sites, and

working with our recruitment partners and agency worker providers. All recruitment arrangements with recruitment partners and agency worker providers are governed by contractual requirements which include ethical recruitment practices and compliance with employment law. Pre employment checks are completed for all workers, regardless of their route to recruitment, in line with UK right to work requirements and our own internal policies and procedures. Ubico does not permit the charging of recruitment fees to workers

## **5.2 Labour providers, agencies, and intermediaries**

Ubico recognises that the provision of agency staff is a high-risk area for modern slavery and human trafficking risks. We continue to work with our managed service provider to assess modern slavery risks associated with this contract, 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 verification of right to work documents, copies of payslip confirming rates of pay, hours worked, holiday pay and tax deductions and where necessary, driver checks including DVLA checks (dated within six months) and driver CPC (Continuing Professional Competence) qualifications. 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.

Agency workers supplied through our managed service provider are provided with a copy of our modern slavery statement and asked to sign to say they have read it.

## **5.3 Routes of labour movement**

Our workforce is recruited locally within the UK, with workers living within commuting distance of our operational sites and offices. Ubico does not routinely recruit workers directly from overseas. If a worker may be a migrant worker, whether directly employed or employed via a recruitment partner or agency worker provider, checks are required to ensure that the recruitment is lawful, and the worker has entered the UK through legitimate visa pathways.

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

### **6.1 Due diligence and risk assessment**

Ubico is 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.

### **6.2 Contract management framework**

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.

### **6.3 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.

### **6.4 Assessment tools**

We use a combination of government aligned tools to identify, assess and manage modern slavery risks within its supply chains. This includes the Modern Slavery Assessment Tool (MSAT) and the Antislavery Risk Tiering Tool (ARTT), which together support a proportionate, risk-based approach to due diligence.

The Modern Slavery Assessment Tool (MSAT) is a government developed supplier assessment tool used to support direct engagement with suppliers. It enables

suppliers to identify and disclose modern slavery risks within their operations and supply chains and supports collaborative action to improve labour protections and reduce the risk of exploitation. Ubico uses MSAT help identify the contracts or services that present the highest risk.

In addition, Ubico has begun using the Antislavery Risk Tiering Tool (ARTT), a buyer led risk assessment tool aligned with PPN 009 (Tackling modern slavery in government supply chains) and the Procurement Act 2023. ARTT is used to assess and tier modern slavery risks at the procurement and contract level, drawing on integrated risk intelligence such as sector, commodity and geographic risk indicators. The tool supports consistent identification of higher risk contracts and helps determine where enhanced due diligence, including the use of MSAT, supplier audits or strengthened contract management, is required.

Together, MSAT and ARTT enable Ubico to embed modern slavery risk management across the procurement lifecycle, prioritise resources proportionately, and continuously improve visibility and oversight of modern slavery risks within its supply chains

## **6.5 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 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.

## **7 Continuous improvement in supply chain understanding**

At Ubico we are seeking to strengthen our visibility of supply chain and labour arrangements year-on-year, as we recognise that understanding modern slavery and human trafficking risks within our supply chain is an ongoing process and an area for continuous improvement. All contracts recorded on Ubico's contracts register have

been assessed against the Modern Slavery Assessment Tool (MSAT) as part of our contract management framework to give us a consistent approach and baseline for identifying and assessing modern slavery risks and informing ongoing contract management.

During 2025/26 we have begun using the ARTT tool during procurement tendering processes. While the overall risk profile identified using the tool was consistent with existing assessments, it has helped us to identify good practice in relation to what information and requirements to include in tender documentation and contractual terms. This will help to strengthen supply chain understanding and controls.

During 2026/27, Ubico is due to retender both vehicle parts and personal protective equipment (PPE) contracts. These processes provide an opportunity to further strengthen modern slavery requirements, including clearer expectations around suppliers' own supply chain oversight and audit activity. In doing this, we will ensure that we balance enhanced due diligence requirements with maintaining fair access for local and smaller suppliers, and will continue to take a proportionate, risk-based approach. Alongside this, Ubico has prioritised improving supply chain mapping, with current controls focused on tier 1 suppliers and labour providers through due diligence, audits and contract management. We continue to explore practical and proportionate ways to improve visibility of lower tier supply chains, strengthening our understanding of modern slavery risks and the controls in place to prevent, identify and mitigate them.

## **8 Policies in relation to modern slavery and human trafficking**

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 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:

Policy	Aim
<b>Modern Slavery Policy</b>	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.
<b>Contract Management Framework</b>	Provides a clear and standardised approach to managing our contracts including how we plan our procurement activities.
<b>Whistleblowing Policy</b>	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.
<b>Employee Code of Conduct</b>	Sets out the expected behaviours of our employees when representing Ubico. This policy was reviewed and re-issued to all staff during 2024/25.
<b>Equality, Diversity and Inclusion Policy</b>	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.
<b>Safeguarding Policy</b>	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.
<b>Employee Assistance Programme</b>	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
<b>Contract Rules</b>	Outlines how we will ensure that all works, goods and services are obtained with probity and propriety,

Policy	Aim
	appropriate for the purpose for which they are obtained and ensure best value for money.
<b>Domestic Violence and Abuse Guidance</b>	Provides guidance to managers and employees on recognising and responding to domestic violence and abuse, including signposting to support and making reasonable workplace adjustments to help keep affected employees safe and supported at work.
<b>Recruitment Strategy</b>	Sets out Ubico's approach to fair, transparent and compliant recruitment, including safer recruitment practices and pre-employment checks, helping to reduce the risk of exploitation and support ethical recruitment across direct hires and agency labour.

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

## 9 Our employees and worker voice

### 9.1 Trade union recognition

Ubico recognises and works in partnership with three recognised trade unions: UNISON, GMB and Unite the Union. These unions represent Ubico employees and are formally engaged on matters relating to pay, terms and conditions, employee relations and wider employment practices.

Ubico follows the National Joint Council for Local Government Services framework for our annual pay awards. This supports fair pay, transparency and consistency across the workforce.

We maintain regular and constructive engagement with our recognised trade unions and consult with them on proposed changes affecting employees, including pay, pension arrangements and our key policies. The trade unions are provided with appropriate information and are involved in formal consultation and balloting processes where required. These arrangements support worker representation and collective bargaining, which are key measures in preventing forced labour, exploitation and modern slavery within our organisation.

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.

## **10 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 2025/26 year. Our planned actions and associated performance for 25/26 were:

- 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.

Our achievements in relation to these targets was as follows:

- ✓ 100% of contracts on the contracts register assessed against our contract management framework and MSAT criteria.
- ✓ 100% of agency providers audited by the managed service provider.
- ✓ 94.03% of employees received Modern Slavery and Human Trafficking training.

### **Case-study: Agency worker managed service provider audits**

The audits undertaken by our managed service provider for agency worker provision cover 100% of their agency worker suppliers (subcontractors). Audits are issued on a quarterly basis and each audit takes a sample from the preceding three months. The audits include the following actions:

- Ensures all suppliers and subcontractors comply with all relevant laws, including the Modern Slavery Act 2015.
- Makes reasonable enquiries to confirm that the supplier's employees and other associated persons have not been convicted of any offence involving slavery or human trafficking and are not under investigation for such offences.
- Ensures that the supplier has sufficient due diligence procedures in place for its own suppliers to ensure that there is no slavery or human trafficking in its supply chains.
- Maintains complete records to trace supply chains and show the steps taken to monitor and enforce compliance and provides these records to the managed service provider on request.

The suppliers are contractually obliged to notify the managed service provider as soon as it becomes aware of any actual or suspected modern slavery or human trafficking in the supply chain. On request, the managed service provider may also require the supplier to provide a slavery and human trafficking report explaining the steps taken to prevent modern slavery in its supply chains. A breach of these modern slavery obligations is treated as a material breach of the agreement and if the breach were critical, the supplier would be removed from managed service provider's supply chain.

## **11 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.

## 12 Summary of planned actions

In 2026/27 we will:

- continue to complete proportionate modern slavery due diligence and risk assessments on suppliers, using our contract management framework and the Modern Slavery Assessment Tool (MSAT);
- continue to use the Antislavery Risk Tiering Tool (ARTT) to inform procurement and contract management activity for higher-risk contracts;
- continue to strengthen the integration of modern slavery considerations within procurement activity, including tender documentation and contractual requirements where appropriate;
- continue to develop our understanding of supply chains and labour supply chains, prioritising higher-risk categories and labour providers, and exploring practical and proportionate ways to improve visibility beyond tier 1 suppliers;
- use forthcoming procurement exercises, including the retendering of vehicle parts and personal protective equipment (PPE), as opportunities to further strengthen modern slavery controls, taking a risk-based and proportionate approach;
- continue to work with our managed service provider to oversee agency labour arrangements, including audit activity and assurance around ethical recruitment practices;
- continue to roll out modern slavery training and refresher training as appropriate across the business, and maintain engagement with recognised trade unions to support worker voice;
- continue to review and update relevant policies and frameworks to ensure they remain effective, proportionate and aligned with legislative requirements and good practice.

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 2026. The statement has been approved by the board of directors of Ubico Limited on 21 April 2026.

Beth Boughton, Managing Director  
21 April 2026

