[ ] CONFIDENTIAL – For director viewing only
[ ] Restricted – For Director and shareholder viewing only
[x] Public

Agenda Item 5.4

Ubico Limited
Formal Decision Report
Board of Directors – 2 October 2026
Policies for Board Approval

PUBLIC REPORT

1. Is the subject of this paper confidential and if yes what are the reasons for the confidentiality?

1.1 Yes. Director viewing only.

2. Sub-committee recommendation

2.1 Has a sub-committee of the board agreed the approach and recommendations outlined in this paper?

2.2 No, however nominated directors have undertaken an early review and their feedback has been incorporated into the final versions, as summarised in section 6.2.

3. Identify any significant legal or other key obligations which are materially impacted by this report.

SHEQ		Legal		People/EDI	X	Climate		Finance	

Impact:

People/EDI - The policies requiring board approval today support the company's obligations to provide a safe, respectful and inclusive working environment and strengthen governance, employee wellbeing, fair treatment and organisational accountability.

4. Executive summary

4.1 The Anti-Harassment and Anti-Bullying Policy, Safeguarding Policy and Shareholder Engagement Policy require board approval as part of the routine review of policies that are approved by the board. The material proposed changes relate to disclosure checks in the Safeguarding Policy, the inclusion of board responsibilities, greater detail on

training and education, and a section about third-party harassment within the Anti-Harassment and Anti-Bullying Policy, and including a table of current LA NEDs and their appointed 'link' shareholder councils in the Shareholder Engagement Policy.

5. Recommendations

I recommend that board:

- Approve the Anti-Harassment and Anti-Bullying Policy, Safeguarding Policy and Shareholder Engagement Policy subject to any further agreed amendments.

6. Summary of policies presented for approval and any changes

6.1 The policies requiring approval have been reviewed as appropriate by the relevant Ubico teams, trade unions, our legal representative and the nominated board reviewer.

6.2 As agreed by the Governance and Nominations Committee, because the board has received the draft copies in advance of the meeting for early review and feedback, a copy is no longer appended to board reports to keep the agenda pack manageable. Instead, a summary of the changes made is provided in the table below. Copies of the updated policies are available on request.

Policy	Last board review date and review cycle	Summary of key changes from last version
Safeguarding Policy	September 2024. Review required every two years. Bring to board if significant changes only.	Addition of adult examples of potential safeguarding concerns added in Section 1. Addition made in 'Section 4 – Safer Recruitment' to include information about when disclosure checks may be required for existing employees and to describe the relevant processes should they be needed.
Anti-Harassment and Anti-Bullying	September 2024. Review required every two years. Bring to board if significant changes only.	Scope extended to include roles previously omitted and responsibilities of the board and shareholders added in the responsibilities section. Addition of 'active bystander expectations' in the responsibilities section Paragraph added about Third Party Harassment Access details for the employee assistance programme updated. More detailed information included about the training, familiarisation and information

PUBLIC REPORT

		methods used by Ubico to prevent harassment and bullying. Addition in monitoring and review section that data relating to harassment and bullying will be regularly reviewed at an appropriate level which may include senior leadership team and board or board committees, as appropriate.
Shareholder Engagement	September 2024. Review required every two years.	Addition of a table of current LA NEDs and their appointed 'link' shareholder councils as Appendix 1.

7. Reasons for recommendation

7.1 The reviewed policies are necessary to support Ubico's people, safeguarding and governance responsibilities. Board approval is required as part of the routine approval schedule for policies reserved for the board.

PUBLIC REPORT

Report author	Managing Director Beth Boughton beth.boughton@ubico.co.uk
Appendices	N/A