



UBT EU Ltd
Modern Slavery Statement



Introduction from The Senior Management team

This Modern Slavery and Human Trafficking Statement relates to actions and activities for the financial year ending 31 December 2024.

We, UBT (EU) Ltd (registered number 04938684), are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We aim to work to the highest of standards and at the heart of our operations is a commitment to contributing to charities and supporting local communities and schools. We take our responsibilities under the Modern Slavery Act 2015 seriously and are fully committed to monitoring regularly and ensuring our business and supply chain do not permit slavery or human trafficking to occur. Through our robust due diligence and standard contractual arrangements we ensure suppliers are aware of both their and our responsibilities under the Act and are taking appropriate steps to ensure no person is subject to human trafficking or slavery. Equally our contracts with our own employees ensure they are engaged on a fair and transparent basis with access to the rights and information to ensure they are aware of the Modern Slavery Act 2015.

Organisation's structure

We are a provider of membership based business advice services to Plymouth Brethren community members in the business and household sectors. We have around 200 employees and operate in the UK.

Our business

Our business is organised into various business units: UBT Household offering household services to its member; UBT Events offering seminars and event services; UBT Commercial & Partnership offering procurement services; UBT Advisory offering consultancy and coaching services; UBT Finance offering finance related services; UBT Services including travel services; UBT People including recruitment and training and human resources; UBT Technology offering IT related services.

Our supply chains

We are primarily a provider of business advice and our supply chains include sourcing goods for supporting our office functions including office supplies, catering, marketing materials and digital and IT services and products; uniform suppliers; corporate travel supply, cleaning and maintenance; security services, we also source products for our members including IT and technology products and services; insurance products; as part of our group buying services we



source opportunities for our members to purchase products from a variety of sectors including retail, travel and logistics.

Our policies on slavery and human trafficking

We have appropriate policies in place that 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. We continuously review and update all our policies.

Our Anti-slavery Policy 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 slavery and human trafficking is not taking place anywhere in our supply chains. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Ethical policy.
- Whistleblowing policy
- Anti bribery policy
- Anti money laundering policy
- Corporate social responsibility policy
- Environmental policy

Due diligence processes for slavery and human trafficking

We understand that the following areas give rise to the highest modern slavery risks:

Supply Chain

Our supply chain includes the provision of technology hardware which may have been manufactured in countries with less developed modern slavery regulations. We monitor and review our suppliers.

Employees and Recruitment

We have sought to ensure as many of our staff as possible are engaged by us directly and we use well established, robust HR processes to ensure our recruitment process is fair and the terms we engage our staff on are competitive and offer our employees comprehensive rights including the following policies:

- Equality and diversity;
- Whistleblowing;
- Anti money laundering;



- Modern slavery awareness;
- Grievance.

Cleaning and maintenance staff are employed by contractors who we monitor to ensure staff are employed on fair terms and paid at least the minimum wage.

Food and catering – our catering staff are our direct employees apart from occasional temporary additional agency labour when required. We take all necessary steps to ensure such additional agency staff are sourced from established and reputable sources and engaged on fair terms and are paid at least minimum wage.

As part of our initiative to identify and mitigate risk we:

- Offer robust and comprehensive pay and contractual rights to all employees.
- Train employees in modern slavery and anti-bribery awareness as part of their initial induction and include it in our staff handbook and easily accessible on our intranet. Employees are also required to undertake this training every two years.
- Provide whistle blowing and grievance policies so staff are aware of what they should do if they suspect an issue and who they should contact.

We also have in place processes and systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking and expect our suppliers to share our expectations and values. We build wherever possible long term relationships with our suppliers and explain our ethos as a company to ensure alignment with our supplier base. To further ensure all those in our supply chain and contractors comply with our values we have in place standard contractual provisions in our inhouse contract templates which:

- oblige our suppliers to comply with relevant modern slavery laws including modern slavery laws which apply to us in the UK;
- allow for termination if breached; and
- require notification to us if a supplier is in breach.



Should we become aware of any modern slavery breaches we would inform the relevant law enforcement agencies and work openly to assist and rectify the issues. We would look to terminate the relevant contract if appropriate.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Risk and compliance.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff and include our modern slavery policy in our staff handbook.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains: requiring all staff to complete training on modern slavery every two years and maintaining automated records and reminders to renew training; ensuring key contracts contain modern slavery provisions requiring the supplier to comply with relevant laws; producing and monitoring a supplier due diligence form for use with suppliers informing us of a supplier's compliance with modern slavery regulations to enable us to contract with compliant suppliers.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Expand supplier due diligence checks and monitor progress annually
- Undertake supplier site visits where appropriate
- Review purchasing practices to ensure fair pricing.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board on 29th May 2025.

A handwritten signature in black ink, appearing to read "Roddy Cox", with a horizontal line underneath.

Roddy Cox - Regional General Manager

UBT (EU) LIMITED

Date: 29th May 2025