

Modern Day Slavery Statement Update 2021-22

This is an update on the work UCL has undertaken during the financial year beginning 1 August 2021 ending 31 July 2022 (FY21/22), to value the people working at UCL and within our supply chains, and to protect them from slavery and exploitation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 July 2022. It was approved by the President and Provost of University College London company number RC000631 ("UCL") on behalf of UCL on 6th December 2022.

Companies within the University College London group can be found in Appendix 1.

| | |
|--|----|
| Modern Day Slavery Statement Update 2021-22..... | 1 |
| Summary | 3 |
| Introduction | 3 |
| Our structure, business and supply chains | 4 |
| Modern slavery and human trafficking policies | 5 |
| Prevention of Bullying, Harassment and Sexual Misconduct Policy..... | 6 |
| Supply Chain Policy | 6 |
| Sustainability Strategy | 6 |
| Goals and Key Performance Indicators (KPIs) | 6 |
| Reporting and assessing the risk of Modern Day Slavery (actions taken 2021/22) | 7 |
| Managing the risk of Modern Day Slavery (actions taken 2021/22) | 8 |
| Due diligence..... | 12 |
| Training and engagement | 12 |
| Goals and KPIs for FY22/23 | 13 |
| Appendix 1: Companies within University College London control | 15 |

Summary

During the period 1 August 2021 – 31 July 2022 (FY21/22) we have continued to focus on issues of Modern Day Slavery and exploitation of people in our supply chains through our Commercial & Procurement Services and Sustainability functions.

Steps we have taken during FY21/22 to ensure that slavery and human trafficking is not taking place include:

- Implemented changes via an Action Plan sponsored by the Vice-President Operations.
- Promoted awareness of the risk of Modern Slavery and transparency of supply chains, across UCL via our mission and values and through our Supply Chain.
- Maintained [Living Wage Foundation](#) accreditation and continue to promote this amongst our supply chain.
- Registered our Modern Day Slavery Statement is registered with [UK Government's Modern Slavery Statement Registry](#) and [TISCreport](#) and used [TISCreport](#) to assess and monitor compliance within our supplier base, actively encouraging our supply chain to register.
- Using TISCreport we can report 99.998% compliance with section 54 of Modern Slavery Act 2015, of UCL's 6,000+ suppliers
 - Less than 10% (453 suppliers) of our supply base are required to submit a Modern Slavery Statement.
 - 15 suppliers have been identified as non-compliant and subject to additional review.
- Enrolled and encouraged our supplier to enrol with [Open Apparel Registry \(OAR\)](#).
- Reviewed the risk profile of suppliers with whom we have low value spend.
- Reviewed our supply base and consolidate suppliers via Preferred Supplier Lists whereby suppliers are contracted against UCL's standard contract terms which include Modern Day Slavery reporting requirements.
- Assessed and managed risk for those categories at highest risk of modern slavery including Audio visual & IT Equipment, Catering, Cleaning, Construction, Recruitment agencies, Security, Travel, and Waste management.
- Enhanced our due diligence processes using enhanced questions and supplier management processes.
- Introduced goals and KPIs to provide better visibility of UCLs modern slavery risk profile.
- Promoted staff and supplier engagement. A new mandatory training course, Change Possible including a module highlighting Modern Day Slavery and exploitation was released in May 22
 - Staff engagement has increased from 7,949 (53%) of all permanent (excluding Honorary appointments and contingent) completing this training to 14,392 (96%) staff completing this course by 31 July 22.

Introduction

The purpose of this document is to provide an update on UCL's commitment to identify, mitigate, prevent and remedy Modern Day Slavery within our supply chain.

In 2016, UCL published its first Modern Day Slavery Statement, followed by annual updates. This is our update for the financial year ending 31 July 2022. This work has primarily been led by Commercial & Procurement Services and Sustainable UCL.

Since the first statement, we have committed to the following principles:

- Commitment to better understand our supply chains and work towards greater transparency and responsibility towards people working in them.
- Raise awareness of how to identify and report suspected Modern Slavery.
- Monitor supply chains that have been identified as a potential risk and take appropriate action as necessary.
- Implementation and enforcement of effective systems and controls to tackle slavery and human trafficking which may be taking place in our supply chains.
- Provide appropriate training to our staff to raise awareness of Modern Slavery and how to identify potential risks.

Our structure, business and supply chains

UCL is London's leading multidisciplinary university, with more than 14,000 staff and 42,000 students from over 150 different countries.

Founded in 1826 in the heart of London, UCL was the first university in England to welcome students of any religion and the first to welcome women on equal terms with men.

- UCL is comprised of 11 Faculties.
- UCL is an exempt charity, in accordance with the Charities Act 2006 and receives funding from multiple sources to support activities and research.

Our business

Our [Mission](#) is to be a diverse intellectual community, engaged with the wider world and committed to changing it for the better; recognised for our radical and critical thinking and its widespread influence; with an outstanding ability to integrate our education, research, innovation and enterprise for the long-term benefit of humanity.

As a global university with a diverse community, we have an opportunity to inspire sustainability action from local to international scale. This is delivered through our [Sustainability Strategy 2019-2024](#), with the [United Nations Sustainable Development Goals](#) (UN SDGs) providing the framework – prepared in consultation with UCL staff.

UCL is governed by [Council](#) who oversee the management and administration of UCL and the conduct of its affairs, subject to the advice of the Academic Board on matters of academic policy. Council approves UCL's mission and strategic vision and its long-term academic and business plans. Council delegates authority to the Provost, as chief executive, for the academic, corporate, financial, estate and human resources management of UCL. [Governance and the workings of Council](#) are available publicly. An effectiveness review of our Modern Slavery Policy and practices was conducted by an external management consultancy (KPMG) in June 2021. Following this an Action Plan was agreed, sponsored by the Vice President Operations. This Action Plan complete and closed October 2022 in agreement with KPMG.

Locations

- UCL's main campus is in the heart of Bloomsbury, London, however we have buildings across the UK.

- UCL has built a new campus at Queen Elizabeth Olympic Park, to form part of a wider education and cultural quarter in the capital due to open Autumn 2022.
- UCL works with partners all over the world.

Our supply chain

During FY21/22 UCL spent in excess of £600m per annum with its supply chain – third party suppliers of goods or services, as well as research, professional services or teaching. The way we manage supply chain activity is core to UCL’s financial position, reputation, risk management and Corporate Social Responsibility (CSR) objectives. We seek to partner with suppliers who are most aligned to our values and principles whilst being innovative and competitive via our Commercial & Procurement Services’ function.

We procure a wide range of goods and services to support the effective running of the university and to facilitate our research, across diverse supply chains, including:

- Books and printing
- Catering services
- Construction
- Electronics (computers, audio visual etc.)
- Facilities management (hard and soft)
- Furniture
- Laboratories and medical services
- Security services
- Stationery
- Travel management services
- Waste and recycling services

Goods and services are procured from suppliers across the world and our direct suppliers range from individuals, local small and medium-sized enterprises (SMEs) though to large multi-national/global companies. As part of our supplier due diligence, we record the Head Office locations of our suppliers and record policies such as Modern Slavery and Human Trafficking.

We conduct risk analyses to understand the likelihood of exploitation in different categories and prioritise action according to this risk. We partner with a number of Tier 1 organisations (those with whom we are in direct contract) and work with these companies to map their supply chains and identify potential risks.

Modern slavery and human trafficking policies

Addressing modern slavery is a priority for UCL. As part of our commitment to fair working practices for all, we ask our suppliers to comply with the following UCL policies which support fair working practices for all and ensure we buy ethically.

Policies and Governance

| Policy | Purpose | Owned by | Published |
|---|--|--|--------------------------|
| Human Resources Policies | Sets out workplace rights at the University, including ensuring our new staff have the right to work in the UK | HR | Multiple 2010 onwards |
| Market Pay Policy | Is agreed in partnership between UCL and the recognised trade unions, Unite (formerly Amicus), AUT and UNISON. This ensures UCL pay for UCL staff reflects the sector rates and is extended to outsourced staff (such as catering, cleaning and security staff) | HR | 2010 |
| Prevention of Bullying, Harassment and Sexual Misconduct Policy | Assists in maintaining a healthy working environment where unacceptable behaviour is easily identified, challenged and stopped this is intended to improve staff performance, raise morale, reduce stress and aid retention and we expect all of our suppliers to have similar policies in place | Provost Equality, Diversity & Inclusion | |
| Sustainability Strategy | Includes objectives on supplier engagement, procurement training for staff and modern slavery auditing by 2024 | Sustainability | 2018 |
| Fairtrade Policy | Sets out UCL and Students' Union UCL's support of the principles, ethos and aspirations of Fairtrade and commits to using, selling and promoting Fairtrade products through all of our outlets and relevant activities (particularly applies to our catering partner) | Sustainability | 2018 |
| Supply Chain Policy | Sets our principles and practices in the responsible acquisitions of goods and services | Commercial Director | 2021 |

Goals and Key Performance Indicators (KPIs)

Following an audit of our policies by KPMG we have monitored progress against an agreed action plan to strengthen our approach, policies and procedures to manage the risk of Modern Day Slavery within our supply chain.

Specific actions we have implemented are contained in this Statement:

- Improved due diligence of low spend goods/services
- Improved policies associated with key risk areas
- Enhanced supply chain mapping
- Introduction of Key Performance Indicators
- Processes in support of Supply Chain Policy
- Collaboration and approved contracted suppliers
- Enhanced training

We have promoted transparency by uploading our Modern Slavery Statement to the UK Government's [Modern Slavery Statement Registry](#) and [TISC](#) (Transparency in Supply Chain). We have reviewed our supply chain compliance against the [TISC](#) dashboard and encouraged our suppliers to register. We continue to promote sustainability tools and mandate the provision of action plans or ESG policies to be provided by all new suppliers whilst also promoting best practice.

Reporting and assessing the risk of Modern Day Slavery (actions taken 2021/22)

Living Wage

We continue to maintain [Living Wage Foundation](#) accreditation and continue to promote this amongst our supply chain. As part of our accreditation with Living Wage Foundation we are conducting annual audits with our suppliers to promote pay parity for those suppliers providing staff regularly to UCL sites. Revised terms and conditions of purchase for low value goods and services promote payment of in country living wages.

Reporting

Our Modern Day Slavery Statement is registered with [UK Government's Modern Slavery Statement Registry](#) and [TISCreport](#). We have used [TISCreport](#) to assess and monitor compliance within our supplier base actively encouraging our supply chain to register.

Using TISCreport we can report 99.998% compliance with section 54 of Modern Slavery Act 2015:

- UCL has 6,000+ suppliers
- 453 suppliers were identified as eligible to provide statutory Modern Slavery Statements – representing £221m or 30% of UCL's third party spend during FY21/22;
- 15 suppliers have been identified as non-compliant and subject to additional review.

Whilst promoting greater transparency and rigour among our supply chain, we have enrolled and encouraged our supplier to enrol with [Open Apparel Registry \(OAR\)](#) (closed 14 October 2022 to become [Open Supply Hub](#) with effect on 2 November 2022). This register provides factory level detail on manufacturing plants worldwide – primarily related to garments (uniforms etc.) We are investigating similar tools for personal protective equipment and other consumables.

Supplier consolidation

We continue to review the risk profile of suppliers with whom we have low value spend. Actions are also in place to review our supply base and consolidate suppliers via Preferred Supplier Lists whereby suppliers are contracted against UCL's standard contract terms which include Modern Day Slavery reporting requirements. In total Tier 1 suppliers have reduced by 33% from prior years, against which there is a higher degree of assurance.

Assessment of risk

We have evaluated our purchasing categories using risk assessment guidance set out in the UK Government's [modern slavery procurement guidance](#) and risk data from a range of sources, in particular the International Labour Organization's [Global Estimates of Modern Slavery](#) (GEM) and the [US Department of Labor - List of Goods Produced by Child Labor or Forced Labor](#).

Risk is evaluated against the following criteria:

- Country of origin
- Sector
- Transaction type
- Business partnership
- Subcontracting

Our highest risk categories (based on risk and spend) therefore are:

- Audio visual & IT equipment
- Catering
 - Agriculture/ Fisheries/ Forestry/ Horticulture
- Cleaning
- Construction
- Furniture
- Health & Safety (Personal Protection Equipment) & Security
- Printing
- Recruitment agencies
- Stationery
- Vehicles Fleet Management
- Estates & Buildings

Managing the risk of Modern Day Slavery (actions taken 2021/22)

We continue to review action plans to understand and tackle risks annually. Our terms and conditions are explicit regarding the need to comply with Modern Slavery legislation and also our policies around Modern Slavery and Human Trafficking.

Our main Facilities Maintenance contracts, including catering, cleaning and waste collections are outsourced to third party companies, who rely on a mix of UK and non-UK staff. Modern Slavery risks are addressed directly at each stage of the Procurement activity and each supplier has robust policies and audits in place across their supply chains. There are requirements to report any breaches.

Audio visual (AV) and IT equipment

We purchase electronic equipment, including IT hardware and AV equipment, with parts (including minerals) sourced globally and predominantly manufactured in Asia. Hardware purchases are centralised and standardised via a central supplier – a signatory to the UN Global Compact committed to upholding internationally proclaimed human rights.

Our AV and IT equipment is provided by approved suppliers who have been selected following competition. Part of our sourcing criteria is compliance with Modern Slavery legislation. We have reviewed the Modern Slavery and Human Trafficking policies and Conflict Mineral Statements of our Original Equipment Manufacturers (OEM), the supplier in turn states “We are committed to having transparency in our supply chains to remove slavery and human trafficking.” We will continue to supplier monitor performance via reporting tools such as [Electronics Watch](#).

Our primary OEM, DELL for desktops and laptops is a founding member of the Responsible Business Alliances (RBA) and has adopted its Code of Conduct.

For IT peripherals we use Jabra speaker devices. The parent company GN Group encourages suppliers to be certified or follow the requirements of SA8000, an international Social Accountability Standard requiring the ban of any form of forced labour. This is assessed through supplier audits including onsite inspections of supplier facilities.

Catering

Within catering, a sector high for reports of UK labour exploitation, we purchase front of house (retail) and back of house (events and hospitality) food and services. We work closely with our Catering partners to identify and mitigate or prevent risk of forced labour or human trafficking in our supply chain. We also source products that contain palm oil, cocoa and sugar cane, which are all identified as high-risk products. In accordance with UCL Healthy & Sustainable Food Policy, we have included certifications to support ethical sourcing of products which have risk of exploitation. These certifications include requirements for fair labour practices:

- [Marine Stewardship Council \(MSC\)](#) - Fish
- [Roundtable on Sustainable Palm Oil \(RSPO\)](#) - Palm oil containing products
- [Round Table on Responsible Soy \(RTRS\)](#) or [ProTerra](#) - Soy containing products

Our catering services are provided by a single supplier with c. 151 staff on site. We continue to focus on sustainability within UCL catering services. Our provider's priority is to source fresh, local and seasonal goods where possible and the majority of their Tier 1 suppliers are UK based. Some additional products are sourced from the EU and the rest of the world. There is an ongoing exercise by our provider to achieve 100% compliance in our supply chain and support suppliers to become compliant with the Modern Slavery Act 2015.

As per our supplier's Modern Slavery Statement they, "require our business partners to provide training to their staff, suppliers and providers. To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme. ... We have engaged with [Authenticate](#) a supply chain database whereby all our suppliers are required to upload their own Modern Slavery Policies and sign and comply with our own Modern Slavery Policies." Zero cases of Modern Slavery have been identified in UCL's catering supply chain to date (direct or via our third party). Our supplier has the following KPIs to maintain focus due to the high risk of modern slavery in this sector:

- KPI 1: All employees will receive Modern Slavery Training each year
- KPI 2: All suppliers will be required to share their Modern Slavery Policy and upload to [Authenticate](#)

Cleaning & non-hazardous waste collection

Cleaning and collection of non-hazardous waste remains an area of high risk for Modern Day Slavery. All of our cleaning and waste providers are committed to paying the London Living Wage for staff on UCL's site. Following the success of the Modern Slavery Strategic Supplier Forum created by our main cleaning provider (c. 662 staff on site) last year, the supplier has formed a "Service & Infrastructure Project Providers Modern Slavery Council to find ways to identify and eradicate modern slavery in our marketplace and to set standards to ensure this is the case." This provider works closely with charities such as the Slave-Free Alliance and also works with an audit partner [Verisio](#) to monitor the supply chain. Our main cleaning provider also works with [Open Apparel Registry \(OAR\)](#) regarding provision of uniforms etc.

Construction

UCL is undertaking a large construction programme (often highlighted as a high-risk area), with many contractors and subcontractors working on UCL construction sites. In the construction industry there is a risk of forced labour being used. We have worked with our suppliers to achieve accreditation from the London Living Foundation and to embed this as a contractual requirement for those suppliers providing staff regularly to UCL sites. All our prime contractors have rigorous modern slavery provisions in place.

Security

Provision of onsite security services is an area that is acknowledged to be a medium level risk in terms of labour and rights violations. We will continue to work with our supplier to ensure that best practice is adhered to and promoted, we estimate c. 285 security staff operate on our sites. Our security services' provider has policies in place to ensure that its supply chain fulfils the same standards, "In the first instance, this means only working with subcontractors who can prove their own rigorous recruitment procedures and commitment to laws and legislative guidelines." Internal training courses and employee toolbox talks are provided to equip managers, supervisors, team leaders and HR professionals with the necessary skills to spot the signs of modern slavery.

As part of the supplier's standards, potential suppliers must apply the following recruitment techniques:

- All applicants have been interviewed to ensure that they have filled all registration forms themselves
- Applicants can only be interviewed at an approved location
- Unauthorised agents or individuals will not be allowed to introduce job applicants
- Supervisors and Team Leaders must bring any suspicion of illegal activity regarding agents to management and subsequently the police.

Supplier staff are also monitored on an ongoing basis after employment. Supervisors are trained to spot the signs of modern slavery, with particular attention paid to a number of factors:

- Physical appearance of their employees – in terms of potential of abuse or malnutrition
- Employees' personal effects, documentation and freedom of movement
- Whether employees are regularly dropped off / collected by a third party
- The influence of third parties on staff.

Recruitment agencies

Recruitment of staff is identified as a high-risk area for modern slavery. The majority of our temporary labour demand is via a Master Vendor introduced in 2020. Although we have subsequently changed suppliers, standards remain consistent – these standards include:

- Compliance audits of pre-employment checks including eligibility to work, references, qualifications and proof of national insurance numbers per branch.
- Random checks are used in the UK business to identify where agency workers may be sharing bank accounts, addresses or telephone numbers as this can be an indication of illegal or unethical behaviour. Where accounts are shared, the individuals involved are approached to ensure this is voluntary, eg. where couples share a bank account. To date no incidents of modern slavery have been identified.

Similar checks are used for permanent recruitment agencies to reduce the risk of modern slavery.

Travel

The provision of travel management services has been rated as high risk for modern slavery due to the breadth of services procured from UK and international suppliers. Our chosen Travel Management provider reviews their supply chain and has a formal escalation process in case serious issues affecting working conditions are found within the supply chain.

Purchasing activities are assessed against principles of accountability and internal controls including but not limited to policies across:

- Quality Management
- Environment
- Ethical Code of practice
- Anti-Bribery
- Modern slavery and Human Trafficking.

During 2021 our supplier has not received reports of any incident in the supply chain (or of any human trafficking offence). No action (termination of contract or otherwise) against has been taken in response to the findings of the modern slavery questionnaire or otherwise in relation to modern slavery in the same period.

Our provider has a Responsible Sourcing Code which “embodies our commitment to conduct business with integrity, in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The code sets out requirements on human and labour rights and we aim to ensure that our suppliers understand and collaborate with the criteria in the Code.”

Waste and Recycling Services

We differentiate our Waste and Recycling Services between non-hazardous and hazardous waste. Non-hazardous waste services are managed by our cleaning supplier as above.

For hazardous waste services we competed this service during FY21/22. Our chosen supplier has been selected due to their adherence to ethical standards and the cascade of these standards through their supply chain including, amongst other things, the mitigation of risks associated with slavery and human trafficking. “We believe that improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.”

The supplier continues to assess the risk of noncompliance within their organization and supply chain, where areas are identified, an audit is conducted, which will include a focus on compliance with employment as well as other regulatory and sustainability criteria.

UCL’s supplier uses a supplier on-boarding process including standard due diligence procedures, to assess the suitability of a vendor to provide goods and services against compliance to required standards. This process captures confirmation that they are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain. Desktop audits are conducted as part of supply chain management to provide assurance that suppliers are responsible partners in service

delivery. Tier 1 (based on volume of spend and risk) suppliers within the supply chain are subject to twice per year reviews to identify, understand and seek to mitigate risks associated with modern slavery.

Key performance indicators (KPI's) are used to measure the effectiveness of communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act, and our other actions to seek to ensure that slavery and human trafficking is not taking place in any of our businesses or supply chains.

Due diligence

Enhanced Questions

When procuring goods or services identified as high risk we continue to use best practice additional questions derived from [UK Government's Transparency in Supply Chain's Guidance](#).

Supplier management

UCL maintains records of contracted Suppliers including the following information:

- Modern Day Slavery Statement compliance and registration
- Sign up to [TISC](#)
- Records supplier accreditation, compliance and registration with bodies such as [Sedex](#) or [Open Apparel Registry \(OAR\)](#) now the [\(Open Supply Hub\)](#) or the [Living Wage Foundation](#)
- Shows if the supplier has a Carbon Reduction Plan and action plan for Modern Slavery

We are engaged with suppliers to promote greater alignment to UCL's values.

Training and engagement

We have updated our mandatory training module Change Possible (sustainability) to be more explicit regarding risks of Modern Slavery in our supply chain and continue to monitor completion rates under the sponsorship of the Vice-President (Operations) to achieve greater compliance. Monthly reports are provided to Directors and Vice-Presidents demonstrating compliance and non-compliance.

This module is required to be completed within six weeks of joining for all new staff joining UCL and annual completion is required for all other staff. This is a bespoke training course.

During the period FY21/22 completion compliance rates increased from 7,949 (May 22) (53% of all eligible staff) to 14,392 (July 22) (96%) of all eligible staff.

Staff Engagement Actions

We introduced a new "Change Possible" course for all UCL staff that has been updated to include a responsible procurement section which highlights Modern Day Slavery and exploitation as issues for purchasing at UCL. Compliance rates for end FY21/22 were 96% of eligible staff.

We will continue to monitor, improve and report completion rates.

Supplier Engagement Actions

Following a review of our supplier base via [TISC](#) 453 of our suppliers are required to comply with Modern Slavery Act 2015, 399 have provided the relevant statements. Of the 54 suppliers identified as

potentially being required to comply but not having provided a statement, a desktop audit has identified 30 of the missing statements, 4 of the suppliers have annual turnover less than £36m and we will contact the remaining 10 suppliers (c. 2%). We continue to encourage our Small Medium Enterprise suppliers to complete action plans via the NETPositive tool.

Goals and KPIs for FY22/23

We will build on the progress we've made so far and have signalled some of our planned areas of focus in this Statement.

Policies

The Supply Chain Policy is subject to annual review. This year this will be supported by processes published on the Commercial & Procurement Services' website. Within Commercial & Procurement Services standardised templates for competitive sourcing will be rolled out that includes additional governance for procurements with high and medium risks of Modern Slavery.

Modern Slavery and Sustainability topics will be included as part of our ongoing supplier management. We continue to engage with suppliers and HE Purchasing Consortia to identify and promote best practice.

Risk

We will continue to assess and monitor the risks of modern slavery at every stage of a procurement. Via our supplier engagement we will also seek to review practices within the supply chain.

Due diligence

We are rolling out revised terms and conditions for low spend goods/services and will continue to monitor Modern Slavery risks and compliance via the tools set out above.

During the period September – November 22 we have surveyed the top 500 suppliers within UCL across a number of topics, Climate Emergency, Modern Slavery and Living Wage.

We continue to monitor accreditation and certification bodies for best practice and promote collaboration with suppliers to identify and report any incidences of Modern Slavery.

Enhanced supply chain mapping

Category management plans are in progress and there is a particular focus on high and medium risk areas. These will also be used to examine other supply chain tiers.

As part of our procurement of a Sustainability tool we will consolidate our compliance checks and reporting on Modern Slavery and risk assessment.

Key Performance Indicators

Staff training

- During period FY21/22 98% of UCL employees completed the mandatory training "Change Possible" – including Modern Slavery module.
- More in depth training is being reviewed for Commercial & Procurement Services' staff.

Supplier audits

- Complete 5 supplier audits.
- Review supplier audits from 10 suppliers (prioritised by risk of modern slavery and UCL spend).

Supplier modern slavery statement compliance

- Maintain transparency of supply chain compliance via [TISCreport](#) supplier dashboard.
- Investigate 100% of instances of reported noncompliance.

Whistleblowing

- Report and investigate 100% cases of whistleblowing made to UCL.
- Monitor and review the outcomes of whistleblowing cases reported by our partners.

We will continue to work with [TISCreport](#) to publish our Modern Slavery Statement and review our supplier base. The outputs of this activity are publicly available.

Signed by:

DocuSigned by:

0C6B9E6CD501416...

Dr Michael Spence, President, and Provost University College London

Dated: 06/12/22

Appendix 1: Companies within University College London control

Below is a list of companies operating within University College London (“UCL”) control.

None of these subsidiary companies has annual turnover in excess of £36m per annum.

| Group Structure | | |
|---|---------|-------------------|
| Company Name | country | Registered Number |
| UNIVERSITY COLLEGE LONDON | GB | RC000631 |
| UCL TRADING LIMITED | GB | 02387544 |
| UCL PROPERTIES LIMITED | GB | 02522769 |
| UCL BUSINESS LTD | GB | 02776963 |
| <ul style="list-style-type: none"> • THIOLOGICS LIMITED (dormant) | GB | 07659324 |
| <ul style="list-style-type: none"> • TRIMTOTS C.I.C. | GB | 09422984 |
| <ul style="list-style-type: none"> • BRAINMINER LIMITED | GB | 09537531 |
| <ul style="list-style-type: none"> • UCLB INVESTMENTS LTD | GB | 09918278 |
| UCL RESIDENCES LIMITED | GB | 03034078 |
| UCL CONSULTANTS LIMITED | GB | 03332258 |