Ultima Business Solutions Limited

Slavery and Human Trafficking Statement for the Financial Year 2024

1.0 Introduction

This statement is issued in accordance with the requirements of Section 54 (1) of the Modern Slavery Act 2015 and identifies the steps Ultima Business Solutions Ltd ('Ultima') has taken to ensure that slavery and human trafficking does not take place within our business and also that of our Suppliers for the financial year ending 31 March 2024.

Ultima is opposed to slavery, trafficking in persons and forced labour in any form. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

2.0 Organisation Structure

Ultima is a company based wholly in the United Kingdom providing Information Technology solutions to corporate businesses, mainly within the UK. A small amount of our business is conducted offshore, predominantly (but not limited to) Europe, but this accounts for less than 5% of our revenue. We have one subsidiary company incorporated in South Africa which provides services to Ultima and Ultima's customers. We are headquartered in Reading, UK and we (and our subsidiary) employ approximately 387 people.

Ultima believes that all staff should be paid fairly and in accordance with the law. Ultima offers unpaid short work experience opportunities to local school age children as part of our Giving Back strategy. Ultima does not offer unpaid internships.

Ultima are a Real Living Wage accredited employer. The Real Living Wage is a voluntary rate of pay set by the Living Wage Foundation in the UK and is based on the costs of living, helping to mitigate the risk of labour exploitation among low income workers and households.

3.0 Supply Chain

Ultima sell a wide range of product and services including IT hardware, vendor software licences and asset management, hardware maintenance, professional services (engineering, consultancy and project management) and managed services (cloud management, remote monitoring and management of systems, on-site and remote help desks, third line telephone support).

We use our supply chain to procure hardware for resale to our customers together with vendor software licences; maintenance services; consultancy services; network & communications services and datacentre services. We work with reputable UK distribution channels, but from time to time have a requirement to source offshore. We appreciate there is an increased risk in the latter case and take additional steps to qualify any foreign suppliers before engagement.

We endeavour to appoint suppliers that we can trust, respect and that provide transparency. We require our suppliers to meet our high expectation of standards and business practices. We expect our suppliers to comply with applicable laws and regulations wherever they may operate and in turn to promote and expect similar standards from their own suppliers.

4.0 Responsibilities

Our policies relating to Slavery and Human Trafficking are implemented and maintained under the control of the following departments:

a. People and Talent
b. Legal and Compliance.

Within our company the primary stakeholders for driving the policies are:

a. The Chief Executive Officer
b. The Board
c. The Head of People and Talent

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d. The Head of Legal and Compliance
e. Supplier Relationship Managers

Responsibilities for ensuring that policies are implemented are defined below:

a. The Chief Executive Officer ensures that regular meetings of the stakeholders are held to ensure compliance.
b. The Board assess new and potential risks, ensure training is maintained, make changes to policy to meet changing regulatory practices and ensure that there is appropriate communication to staff and suppliers. They are responsible for risk assessments, investigation, due diligence and training as well as for our ongoing compliance with the Act.
c. The Board is responsible for developing the appropriate controls and checks for the appointment of new suppliers and that existing suppliers are reviewed annually for continuing compliance with the controls.
d. The Head of People and Talent is responsible for providing the prescribed staff training.
e. The Head of People and Talent is responsible for ensuring that staff are able to report concerns in accordance with the Ultima Whistleblowing Policy.
f. The Head of People and Talent is responsible for ensuring that Ultima pay all staff at least the Real Living Wage.
g. The Head of Legal and Compliance will ensure the Board have an awareness of any changes that may affect Ultima with a view to their implementation and will update the policies accordingly.
h. The Head of Legal and Compliance will also ensure that supplier onboarding is performed in accordance with policy.
i. The Head of Legal and Compliance will support the provision of staff training materials in relation to this policy.
j. Supplier Relationship Managers are responsible for complying with the Supplier Management Framework and identifying any new risks and or concerns are identified and reported appropriately.
k. The Chief Executive Officer will ensure that the Key Performance Indicators are achieved and that the policies implemented are effective and appropriate.

5.0 References to other policies

a. Ultima Corporate Compliance Policy
b. Ultima Whistleblowing Policy
c. Ultima Environmental and Social Governance Policy
d. Ultima Supplier Management Framework

6.0 Due Diligence Checks on Suppliers

a. New Suppliers take on procedure pertinent to Modern Slavery:
- Initial selection of a new supplier that typically has an established operation within the UK and good track record within the industry for service and compliance.
- A Supplier Code of Conduct is issued which addresses the behaviour that we expect our suppliers to adhere to which includes modern slavery. This includes a signed declaration that the supplier will comply with the code. If a supplier is unable to sign our Code of Conduct we would expect them to provide their own corporate policy and discuss any resulting risks to ensure that our standards are maintained.
- Questionnaire issued to suppliers and results reviewed. This includes specific questions regarding Slavery, Human Trafficking and employment of young persons to confirm compliance with the law. Where we perceive there to be an elevated risk, due to the nature of the supply, we will seek additional assurances.

b. Existing Suppliers
- Issue revised questionnaire of major points in new supplier questionnaire including those questions related to Slavery, Human Trafficking and employment of young persons.
- Regular issue of the Supplier Code of Conduct to confirm continued compliance.

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7.0 KPI Overview

The Compliance Team will be expected to hold regular, minuted meetings of the stakeholders, discussing the following KPIs:

KPI	Description	Responsibility	Optimal outcome
1	Reports of incidents relating to modern slavery within the business or supply chains	The Board	Nil
2	Completion of training in relation to modern slavery by relevant staff within prescribed timelines	Head of People and Talent	100%
3	Adherence to the Real Living Wage in the UK	Head of People and Talent	100%
4	Regular risk review and update of the Risk Register along with update of the supplier management process and Supplier Code of Conduct where appropriate	Head of Legal and Compliance	In accordance with any changes identified
5	Adherence to the new supplier vetting process	Head of Legal and Compliance	100%

This statement has been approved by the Executive Board of Ultima.

Jamie Beaumont



Chief Financial Officer

Ultima Business Solutions Limited

Date: Sep 12, 2024

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