

## **Utopian Training Solutions Ltd**

### **Policy on Ethical Procurement, and Modern Slavery**

**Effective Date:** 01/02/2025

**Review Date:** 01/02/2026

Utopian Training Solutions Ltd is committed to conducting all business activities with integrity, transparency, and accountability. This policy sets out our approach to ethical procurement, the fair treatment of our supply chain partners, and our zero-tolerance stance on modern slavery in accordance with the Modern Slavery Act 2015 and other relevant legislation and standards. We recognise that our business decisions can have an impact on people and the environment. As such, we strive to ensure that all procurement and supplier management activities uphold human rights, promote sustainability, and create positive social value.

#### **The purpose of this policy is to:**

- Ensure that all procurement practices are carried out ethically and sustainably, with due consideration for environmental, social, and economic factors
- Promote fairness, respect, and partnership within our supply chain, ensuring that suppliers are treated with dignity and professionalism
- Prevent, detect, and respond effectively to modern slavery, human trafficking, forced labour, and exploitation within our organisation and our supply chain
- Demonstrate compliance with SV Organisational Behaviour requirements, fostering a culture of ethical decision-making, social responsibility, and continuous improvement

#### **This policy applies to:**

- All employees, contractors, associates and consultants of Utopian Training Solutions Ltd, regardless of their role or level of seniority
- All suppliers, vendors, and subcontractors providing goods and services to Utopian Training Solutions Ltd, including those involved in the delivery of training, facilities management, IT support, and other operational needs
- All procurement activities undertaken by or on behalf of the organisation, including sourcing, supplier selection, contract negotiation, and supplier performance management

#### **We are committed to a procurement strategy that promotes:**

- Sustainability: Ensuring that products and services are sourced in a manner that minimises environmental impact, supports ethical labour practices, and encourages responsible resource use
- Transparency: Maintaining open and clear procurement procedures, with documented decision-making processes and equal treatment of all bidders
- Integrity: Avoiding any form of corruption, bribery, fraud, or conflict of interest; all procurement staff must declare potential conflicts and act in the best interests of the

organisation

- Social Value: Giving preference to suppliers who demonstrate commitment to community benefit, diversity and inclusion, fair labour practices, and environmentally responsible operations
- Continuous Improvement: Working collaboratively with suppliers to identify opportunities for innovation and performance enhancement in ethical and sustainable procurement

**Utopian Training Solutions Ltd believes in fostering respectful, long-term, and mutually beneficial relationships with all suppliers. To ensure this, we will:**

- Treat all suppliers and contractors equitably, ensuring that procurement opportunities are accessible and inclusive
- Provide clear and accurate information regarding procurement requirements, timeframes, and selection criteria
- Honour contractual obligations fully and pay suppliers promptly within the agreed payment terms, recognising the importance of fair cash flow to smaller suppliers
- Avoid practices that place undue risk or burden on suppliers, including last-minute changes, unfair penalties, or contract terms that disadvantage one party
- Engage in open dialogue with suppliers, seeking feedback and working to resolve disputes fairly and quickly
- Support supplier development and capacity-building, particularly with small, medium, and social enterprises who align with our ethical standards

**We recognise the significant risks of modern slavery in global and domestic supply chains and take a proactive, risk-based approach to prevention. Our commitments include:**

- Conducting detailed due diligence and risk assessments on all new suppliers, particularly those in industries or regions known for higher risks of exploitation
- Requiring all suppliers to sign up to our Supplier Code of Conduct, which outlines our expectations in relation to modern slavery, human rights, working conditions, and ethical business practices
- Embedding modern slavery clauses in all contracts, giving Utopian Training Solutions Ltd the right to audit and terminate relationships with non-compliant suppliers
- Establishing robust mechanisms for reporting and escalating concerns, including anonymous whistleblowing procedures for staff and suppliers
- Providing mandatory training for relevant staff to help them identify indicators of modern slavery, understand their responsibilities, and know how to take action

**In the event of a suspected case of modern slavery within our supply chain, we will:**

- Immediately investigate the report and determine the appropriate course of action
- Engage with the supplier to understand the issue, and work to remedy the situation in line with ethical guidelines and legal requirements

- Where necessary, report incidents to the relevant authorities and cooperate fully with investigations
- Support affected individuals wherever possible, in partnership with appropriate organisations
- Terminate supplier contracts if breaches are substantiated and remediation is not forthcoming

#### **Senior Management:**

- Lead by example in championing ethical procurement and supply chain practices
- Provide adequate resources and support for the implementation and monitoring of this policy
- Review high-risk suppliers and ensure that due diligence is carried out effectively
- Approve and oversee the resolution of any modern slavery or ethical compliance issues

#### **Procurement Staff and Managers:**

- Ensure that procurement processes incorporate ethical criteria, including labour rights, sustainability, and supplier conduct
- Undertake risk assessments and due diligence on suppliers in line with this policy
- Keep accurate records of procurement decisions, supplier assessments, and risk mitigation actions
- Flag any concerns related to supplier behaviour, working conditions, or modern slavery

#### **Suppliers and Contractors:**

- Uphold the standards outlined in this policy and our Supplier Code of Conduct
- Inform Utopian Training Solutions Ltd of any concerns or breaches in ethical or legal practices
- Cooperate with audits, investigations, and information requests related to ethical compliance

#### **To ensure continued alignment with this policy, we will implement a robust monitoring framework that includes:**

- Annual supplier self-assessments to evaluate compliance with ethical standards and labour practices
- Periodic contract performance reviews that assess not only service delivery but also supplier conduct and risk management
- Random spot checks and desk-based audits on suppliers, prioritising those in higher-risk categories
- Internal reviews and staff interviews to assess awareness, training uptake, and policy effectiveness
- Establishing key performance indicators (KPIs) for procurement and supplier diversity, fair trade sourcing, and ethical compliance

**Where non-compliance is identified, we will work with suppliers to develop and implement corrective action plans. Persistent failure to meet our ethical standards may result in suspension or termination of the relationship.**

**We will invest in ongoing training and development to ensure that ethical procurement principles are embedded throughout the organisation. This includes:**

- Induction training for all new staff and associates covering this policy, the Supplier Code of Conduct, and reporting procedures
- Annual refresher training for procurement and management staff on ethical procurement, contract management, and modern slavery awareness
- Dedicated workshops and learning modules for key departments
- Regular updates through internal communications channels, including newsletters and team meetings, to highlight new risks or changes in legislation

**This policy will be reviewed annually by the Compliance and Operations Lead, or sooner if required due to changes in legislation, industry standards, or significant organisational changes. Revisions will be approved by senior leadership and disseminated to all staff and relevant stakeholders.**

Approved by: Edward Hanna

Date: [Insert Date]

Document Control

Policy Owner: Compliance and Operations Lead

Version: 1.04

Next Review: