

urbanbubble

People Policy



Modern Slavery Statement

Our Statement - at a glance

Modern Slavery Statement

urbanbubble do not tolerate slavery and human trafficking in our company and our supply chain. We are committed to engaging with our stakeholders to address the risk of slavery and human trafficking in our supply chain.

We believe everyone has the right to live and work with dignity, safety and fairness. This statement sets out the steps we are taking to prevent modern slavery and human trafficking in our operations and supply chains, in line with the Modern Slavery Act 2015.

Organisational structure and supply chains

urbanbubble operates within the UK Real Estate Industry, covering property management, development, construction partnerships and facilities management. We work with a range of suppliers and contractors in the UK and we have a proven holistic end to end service which supports our clients from conception to completion through to ongoing management.

We acknowledge our responsibility to ensure that our operations and supply chains are free from exploitation and uphold the highest standards of human rights.

Our Commitment

We are dedicated to creating an environment where our people are treated with respect and are protected from harm. Our commitment includes:

- **Putting people first:** Ensuring that the rights and wellbeing of individuals are at the heart of our decision-making.
- **Transparency:** Being open about the risks we face and how we are tackling them.
- **Collaboration:** Working closely with suppliers, partners, and industry bodies to raise standards and prevent exploitation.
- **Continuous improvement:** Reviewing and strengthening our approach regularly.

Risks in Our Sector

We recognise that modern slavery risks may arise in:

- Construction and building services, particularly in subcontracting chains
- Facilities management such as cleaning, maintenance and security
- Recruitment agencies supplying temporary or low-wage labour

By identifying these areas, we can direct our focus to where risks are greatest.

urbanbubble currently operates in United Kingdom. The nature of our supply chain is relatively simple:

- Most of our suppliers are based in United Kingdom, therefore in a low risk country;

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- Our teams have the objective of working directly with producers and remove intermediaries (brokers) as much as possible;

The following is the process by which urbanbubble assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- Questionnaires are completed with each supplier prior to pursuing commercial engagement
- Social and Ethical statement which aims to look at compliance to the Modern Slavery Act of 2015
- Our teams review any new information available to consider if risks have changed to our supply chain.

Responsibility for the organisations anti-slavery initiative is as follows:

- **Policies:** Our Procurement Manager is responsible for putting in place and reviewing policies in relation to the supply chain and the process by which they are developed is determined by best practice and the gathering of information relating to Modern Slavery and Human trafficking.
Human Resources are responsible for internal policies and ensuring that no slavery or human trafficking happens through the employment channels at urbanbubble locations of employment;
- **Risk Assessments-** The risk analysis for human rights and modern slavery is influenced by the information supplied by agencies and other interested parties relevant to the industry;
- **Investigations and Due Diligence** – Our Procurement Manager is responsible for investigating and completing due diligence in relation to known or suspected instances of slavery or human trafficking;
- **Training** – Internally, employee awareness is conducted via our learning platform, where we outline what an employee's responsibility is in preventing modern slavery and human trafficking, what signs they should look out for and how to raise concerns about anything they may have witnessed.

Company Policies

urbanbubble operates the following policies that describe its approach to the identification of modern slavery risk and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** – urbanbubble encourages all its workers, customers and other business partners to report any concern related to the direct activities, or the supply chain of urbanbubble. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Whistleblowing policy is designed to make it easy for employees to make disclosures without fear of retaliation;
- **Recruitment Procedure** – **urbanbubble** uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

urbanbubble undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. urbanbubble due diligence and reviews include:

- Supplier due diligence checks that require partners to confirm compliance with the Modern Slavery Act 2015
- Taking steps to improve and support those with substandard supplier practices, which includes providing advice and giving notice of required changes within a set time period;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of business relationships.

The Procurement Manager has full Director level oversight and has the authority to review and update this statement annually.

The Small Print

This statement is non-contractual and applies to all colleagues. We may update it when we need to, so it stays useful and relevant.

We're committed to reviewing our policies annually to make sure they reflect what people need to know.

Here's the small print.

Policy Owner (Job Title)	Date of Last Review & Version	Approved By (Job Title)
People Team	23/07/2026 v 1	Head of HR