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UNITED LEGAL ASSISTANCE

Modern Slavery and Human Trafficking Policy
Approved By: Director
Effective Date: 04 November 2026
Review Date: November 2027
Version: 1.0

Modern Slavery Helpline number 0800 0121 700

1. Policy Statement

United Legal Assistance (ULA) is committed to conducting its business ethically, responsibly and in accordance with applicable UK legislation.

We recognise the importance of preventing modern slavery, human trafficking, forced labour and exploitation within our business operations and supply chains.

ULA adopts a zero-tolerance approach to modern slavery and expects its employees, contractors, suppliers and business partners to uphold appropriate legal and ethical standards.

Although ULA does not currently meet the turnover threshold requiring publication of an annual statement under Section 54 of the Modern Slavery Act 2015, we have voluntarily adopted this policy to demonstrate our commitment to responsible business practices.

2. Scope

This policy applies to all employees, directors, temporary workers and contractors engaged by ULA.

It also sets out the standards we expect from suppliers, service providers and other organisations with which we conduct business.

3. Our Business and Supply Chains

ULA operates within the UK insurance and claims management sector, providing legal expenses insurance-related services, accident management and associated claims services.

Our operations are predominantly office-based. Our business relationships include insurers, insurance brokers, professional service providers, technology suppliers, claims service providers and facilities contractors.

While our direct operations are not generally associated with sectors considered at higher risk of modern slavery, we recognise that exploitation can occur in any industry, including through indirect supply chains.

4. Employment and Recruitment

ULA is committed to maintaining fair, lawful and transparent employment practices.

Our employment standards include:

- Undertaking appropriate right-to-work checks in accordance with UK immigration legislation.
- Complying with applicable employment legislation, including National Minimum Wage and National Living Wage requirements.
- Providing employees with written terms and conditions of employment.
- Ensuring employment is undertaken voluntarily and without coercion.
- Prohibiting unlawful recruitment fees, forced labour and the withholding of identity documents as a means of control.
- Providing employees with appropriate channels to raise workplace concerns.

Any suspected exploitation or breach of these standards will be taken seriously and addressed through appropriate procedures.

5. Suppliers and Third Parties

ULA expects suppliers, contractors and business partners to comply with applicable laws relating to modern slavery, human trafficking and employment practices.

Where concerns are identified, ULA will assess the circumstances and determine proportionate action.

Depending on the nature and seriousness of the concern, this may include seeking clarification, requesting corrective action, reviewing contractual arrangements, reporting concerns to the relevant authorities or ending a business relationship where appropriate.

ULA recognises that any action taken should consider the safety and welfare of potentially affected individuals.

6. Risk Management and Due Diligence

ULA takes a proportionate, risk-based approach to identifying and addressing potential modern slavery risks.

Relevant considerations include the nature of services supplied, the location of operations, the use of subcontracted labour and any concerns identified during the course of a business relationship.

Particular attention may be given to recruitment services, cleaning, maintenance, facilities management and other activities where vulnerable or subcontracted workers may be involved.

Where a potential risk is identified, senior management will consider whether further enquiries, safeguards or remedial action are necessary.

7. Reporting Concerns

All employees are expected to report genuine concerns or suspicions of modern slavery or human trafficking.

Concerns should be raised with a line manager or the Operations Manager. Where this is inappropriate, employees may report directly to a director.

Reports will be treated seriously, sensitively and with appropriate confidentiality.

ULA will not tolerate victimisation of individuals who raise genuine concerns in good faith.

Employees are not expected to investigate suspected exploitation themselves or confront individuals who may be involved.

Where there is an immediate risk to life or safety, the emergency services should be contacted on 999.

Where appropriate, ULA will cooperate with law enforcement and other relevant authorities.

8. Awareness and Responsibilities

All employees are expected to comply with this policy and report suspected breaches.

Managers are responsible for escalating concerns promptly and ensuring that appropriate management action is considered.

The Operations Manager is responsible for maintaining the policy, coordinating its review and referring significant concerns to the directors.

ULA will consider whether additional guidance or awareness training is appropriate for employees whose responsibilities involve recruitment, supplier relationships or other potentially relevant activities.

9. Breaches of This Policy

Any employee found to have engaged in conduct involving modern slavery, human trafficking or related exploitation may be subject to disciplinary action, up to and including dismissal, in accordance with ULA's disciplinary procedures and applicable employment law.

Concerns involving contractors, suppliers or other third parties will be assessed individually and may result in appropriate contractual or legal action.

Where criminal conduct is suspected, the matter may be referred to the relevant authorities.

10. Monitoring and Review

This policy will be reviewed annually, or earlier where there are significant changes to legislation, business operations or identified risks.

ULA will consider reported concerns, relevant supplier risks and any necessary improvements to its procedures as part of this review.

Responsibility for reviewing and maintaining this policy rests with the Operations Manager, with oversight from the directors.

11. Approval

This policy has been adopted voluntarily by United Legal Assistance as part of its commitment to ethical employment practices and responsible business conduct.

Approved by: A Hughes

Position: Director

Date of Approval: 5/11/2026

Next Review: November 2027

United Legal Assistance