

ANTI-SLAVERY TRANSPARENCY STATEMENT

Introduction

This statement constitutes the University of Lincoln's anti-slavery and human trafficking statement for the financial year ending 31st July 2026. The University is required to publish an annual statement by section 54 of the Modern Slavery Act 2015 (hereafter the "Act").

Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University has taken, and will continue to take, on this issue. It covers both our own workforce and how we will address the prevention of modern slavery in our supply chains.

We have robust staff recruitment procedures in place to ensure that there is no material risk of slavery in our institution's own workforce, and we are committed to using our procurement activities to address the issue of modern slavery in our supply chains.

Organisational structure

The University of Lincoln is a Higher Education Corporation and, as an exempt charity, operates on a 'not for profit' basis. Our primary activities are the provision of inspirational teaching, undertaking world-leading research and developing links with industry. The University is organised into two academic colleges (the College of Arts, Social Sciences and Humanities and the College of Health and Science) which are supported by a number of Professional Services (non-academic) departments.

The University also has an active subsidiary company (UOL Services Limited) through which a proportion of its non-academic and support staff are employed. This company does not meet the criteria to be subject to the Act in its own right. Two new subsidiary companies, Decisionworks Ltd and University Of Lincoln Dental Services CIC, were established in the financial year but were not actively trading.

Our recruitment practices

We employ a workforce of circa 1,750 core staff and have a thorough set of employment related policies and procedures that aim to prevent modern slavery occurring within our workforce. Our People, Performance and Culture (PPC) department and recruiting managers are appropriately trained and follow a recruitment policy and processes that are regularly reviewed for compliance with employment legislation.

Job interviews take place either in person or online using Microsoft Teams, where candidates are visible to the panel via a video feed. This provides additional assurance that candidates are seeking employment of their own free will. A minimum of one employment reference, including from the current or most recent employer, is sought as part of our due diligence before making an offer to the successful candidate.

Right to work information (which involves checking that individuals can legally work in the UK) is then reviewed at the employment offer stage by our PPC team and prior to any work being undertaken by the prospective employee. The University also continues to review and track payment of the voluntary real living wage as set by the Living Wage Foundation.

Our supply chains

We have great diversity in the types of purchases we make through our supply chains. Our Digital Services and Campus Services departments are responsible for the majority of our

high value contracts with suppliers. The expenditure in Digital Services includes software solutions, IT hardware, connectivity and other related technology services. Campus Services have requirements including energy, building maintenance, refurbishment works, facilities management and construction related work. Our other major expenditure categories include scientific instruments and laboratory consumables, library services, catering supplies, external professional services, marketing and business travel.

The suppliers from whom we purchase directly are known as our first tier suppliers. These first tier suppliers, in turn, trade with their own supply chains (at the second tier, third tier and so on) to be able to provide the goods, services and works that the University requires. Our first tier suppliers range from locally based micro businesses through to large global companies. It is not practical to formally map our supply chains due to their breadth, variety and complexity.

In some cases, the supply chain will be short and visible to us. For example, when we require external professional service providers (such as for audit, legal and similar consultancy services), we will usually directly communicate with the individuals who are actually doing the work. We consider there to be no material risk of slavery within the direct provision of such services.

By contrast, other expenditure (e.g. construction works, ICT hardware, laboratory equipment, catering supplies etc.) involves complex extended supply chains going down many tiers. The multiple tiers of these supply chains are not visible or transparent to us. These supply chains are global and involve activities from the extraction of raw materials through to the processing and assembly of finished products.

Supply chains are rarely static. Suppliers adjust and reconfigure their own supply sources in response to competitive pressures and wider economic forces. Geopolitical events, supply chain disruptions, tariffs and movements in currency exchange rates can all significantly impact and reshape supply chains.

The risk of slavery occurring at some level within one of these extended supply chains is very high. It is not realistic for the University to directly manage or significantly influence complex, multi-tiered global supply chains. Instead, we work with our first tier suppliers (in higher risk categories) to raise awareness and to encourage them to take positive action on managing modern slavery risk further down the supply chain.

Global nature of our suppliers

The majority of our first tier suppliers are based in the UK where commercial business activities are not a common source of modern slavery. However, we also made use of suppliers based in a total of 51 different countries in the 2025/26 financial year. Out of the 2,250 suppliers actively used by the University during this period, 247 of them were based overseas. The spend with these suppliers represented 3% of our total supplier expenditure.

Overseas suppliers provide us with a range of services including international student recruitment, software solutions, library-related services and academic support services. We consider slavery risks in these expenditure categories to be relatively low. In the last year, we made very few purchases of physical products, which are more likely to have a higher slavery risk, directly from overseas suppliers.

Suppliers based in certain countries are known to pose a greater risk of modern slavery occurring. The evidence based Global Slavery Index (published by the Walk Free human rights organisation) has identified the ten countries which have the highest prevalence of modern slavery. In the last financial year, the University directly engaged with a total of three separate suppliers based in two of these highest risk countries (Turkey, United Arab Emirates).

One of these suppliers is a private individual delivering regular consultancy work to the University and the circumstances of this are such that the University has confidence there is no risk of slavery. The expenditure with the other two suppliers was of minimal value and the nature of the services being purchased presented a low risk of slavery.

Actions taken in this financial year

The main actions that have been undertaken by the University in the last financial year (2025/26) in relation to anti-slavery are as follows:

Sourcing Plan improvements

At the outset of any major procurement exercise, we use a Sourcing Plan template to help us systematically identify relevant issues and risks that need to be considered. We have enhanced this document to include more information on the categories and types of expenditure that are at greatest risk of slavery occurring within their supply chains. The Home Office's Modern Slavery Risk Assessment Tool has been used to inform these enhancements, resulting in a more comprehensive section on slavery risk in the Sourcing Plan template.

The Sourcing Plan now considers how the industry sector, commodity type, supply chain model and the underlying nature of the supply chain's workforce can all influence slavery risk for specific expenditure. This updated template helps us to make an initial risk assessment and informs the approach to anti-slavery we will then take during the procurement exercise. The refreshed Sourcing Plan template also now signposts to good practice examples of previous contract clauses and question sets regarding anti-slavery. These past examples can be repurposed and adapted for use within live procurement exercises.

Networking contract procurement

We conducted a major procurement exercise this year for the renewal of our ICT networking contract; this is a high value contract that could be in place for a maximum of 6 years. This contract is used to procure various physical hardware (such as servers, switches and access points) for use in our network infrastructure. The manufacture and assembly of this hardware present a significant risk of modern slavery; the electronics industry is known for incidences of worker exploitation being prevalent. Also included within the contract's scope are maintenance services, software solutions and consultancy – however, these other elements present a low risk of slavery.

As part of developing the procurement process for this contract, we included an appropriate weighted, scored question for potential suppliers to set out how they would address modern slavery risks relating to the physical hardware and work with the University to manage those risks. The successful supplier scored well on this question during the bid evaluation process, giving the University confidence in its capabilities in this regard.

Wording was also included in the contract terms and conditions requiring the successful supplier to collaborate with the University to pragmatically manage supply chain slavery risks after contract award. This included provisions requiring the supplier to engage in slavery risk assessments and to provide information that may be required to enhance supply chain transparency and traceability regarding the networking hardware that will be supplied.

Maintaining due diligence in the coming year

We now have more than a decade of experience of considering anti-slavery matters within relevant procurement processes. During this period, our central Procurement Team have participated in various training and refresher sessions on modern slavery. We have also

developed and refined proportionate approaches to address the issue of slavery. Our focus in the coming year will now be on maintaining the due diligence practices we have embedded in this regard.

At the start of any significant procurement, we will use the enhanced Sourcing Plan to make an early assessment of whether the nature of the expenditure being procured is at a higher risk of slavery occurring within the supply chain. Where this is the case, we will consider the most appropriate way of addressing this risk within the specific procurement exercise.

We use a range of different procurement procedures, many of which are regulated by public procurement law. In some cases, we will use a Procurement Specific Questionnaire (PSQ). This is a document which potential suppliers must complete to demonstrate that they have appropriate experience and capabilities before they can be considered for a contract opportunity. Where proportionate, we will use the PSQ to pre-screen suppliers to ensure they comply with the Act as a minimum. Only suppliers who do so will be considered further.

Where relevant, we will also continue to include a weighted question within the bidding information we require back from potential suppliers. These questions will be forward-looking, asking suppliers how they intend to work with the University to address the specific modern slavery risks associated with what is being procured. Supplier responses to these questions will be evaluated by the Procurement Team and this scoring will inform the overall contract award decision. All suppliers will be given feedback on the substance and quality of their response once an award decision has been made.

For higher value contracts where slavery within the supply chain is a significant risk, we will also include contractual requirements where appropriate to do so. This will be through wording included in the specification on anti-slavery measures. This will place binding obligations on the successful supplier to work with the University during the contract period to mitigate and manage slavery risks.

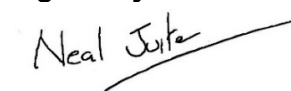
The University has a significant portfolio of “renewable contracts” for supplies and services that are needed year-after-year. These contracts typically have an initial period, with optional extension periods that can be exercised at the University’s discretion. Any exercise of an extension option will involve a review of the supplier’s overall performance. As part of this, we will consider whether there are any anti-slavery issues (such as the supplier’s continued compliance with the Act) to address before granting an extension.

Furthermore, we will continue to monitor good practice on the issue of anti-slavery. We will continue to engage quarterly with our regional procurement consortium and through sector networking groups which meet to share good practice on various procurement matters. Where we become aware of further ways of improving our approach to anti-slavery, we will review to see whether we can also adopt them within our procurement processes.

We will again complete a supplier spend analysis at the end of the financial year to identify any significant changes in our buying patterns and to our country specific risks.

This statement has been approved by the Board of Governors on 8th October 2026 and will be revised annually.

Signed by:

A handwritten signature in black ink that reads "Neal Juster". The signature is written in a cursive style and is positioned above a horizontal line.

Professor Neal Juster, Vice Chancellor

On behalf of the University of Lincoln on 13th October 2026