

Anti-Bribery, Modern Slavery and Ethical Conduct Policy

Company	URBAN TRANSIT SOLUTIONS LTD
Policy owner	Director
Version	1.0
Effective date	06.06.2026
Review date	06.06.2027
Approved by	Director

Purpose

This policy supports ethical public contract work by preventing bribery, corruption, fraud, modern slavery, exploitation and dishonest conduct in company operations and supply chains.

Scope

Applies to directors, staff, drivers, escorts, self-employed workers, subcontractors, contractors and anyone acting for or on behalf of the company.

Anti-bribery and corruption

No person may offer, promise, give, request or accept a bribe, kickback, improper payment, secret commission, personal favour or inappropriate gift to obtain work, influence a council/client decision, alter a route allocation, hide poor performance or gain unfair advantage. Hospitality and gifts must be modest, transparent and authorised where relevant.

Fraud and dishonest records

Booking records, waiting times, driver attendance, mileage, incident reports, safeguarding records, invoices, DBS/licensing evidence and insurance documents must be accurate. Falsifying records may lead to removal from work, contract notification, referral to authorities or legal action.

Modern slavery and exploitation

The company will not tolerate forced labour, debt bondage, worker exploitation, trafficking, intimidation, unlawful wage deduction or unsafe working arrangements. Concerns involving drivers, escorts, contractors, passengers or supply chains must be reported to the Director or through whistleblowing. Serious concerns may be referred to police or safeguarding partners.

Public contract behaviour

Staff, drivers, escorts and contractors must deal honestly with councils, schools, NHS bodies and public-sector clients. The company will not make false claims in tenders, hide conflicts of interest or use subcontractors that do not meet contract standards.

Conflicts of interest

Workers must declare personal or financial relationships that could affect contract decisions, route allocations, complaint handling, invoice approval or supplier choices.

Reporting concerns

Concerns about bribery, fraud, exploitation, dishonest records, concealment, unsafe subcontracting or unethical conduct may be raised with the Director, Operations Manager, DSL where safeguarding-related, or under the Whistleblowing Policy.

Responsibilities

The Director owns this policy. Managers check evidence and respond to concerns. Staff, drivers, escorts and contractors must act honestly and report concerns.

Procedure

Declare conflicts, refuse improper payments/gifts, record concerns, investigate proportionately, protect evidence, report externally where required and take corrective action.

Records kept

Conflict declarations, gift/hospitality notes where relevant, whistleblowing records, investigation notes, supplier/subcontractor checks and corrective actions.

Review

Reviewed annually and after procurement changes, serious allegations or public contract audit findings.

Approval

Signature	
Name	MOHAMOUD MOHAMED
Position	DIRECTOR
Date	06.06.2026