

FEBRUARY 8, 2024

## ANTI SLAVERY & HUMAN TRAFFICKING

This policy applies to all individuals working for HUB Engineering Ltd or on our behalf, including employees, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

HUB Engineering Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls to ensure that modern slavery is not taking place within our organization or in any of our supply chains. We also expect our suppliers to uphold these high standards and hold their own suppliers accountable.

Modern slavery encompasses various forms of exploitation, including slavery, servitude, forced labour, bonded labour and human trafficking. It is a crime and a violation of fundamental human rights.

Our Commitments:

**Zero-Tolerance Approach:** We maintain a zero-tolerance approach to modern slavery in our organization and supply chains. Any form of modern slavery is unacceptable and will not be tolerated.

**Responsibility and Reporting:** The prevention, detection, and reporting of modern slavery within our organization or supply chain is the responsibility of all individuals working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that may suggest a breach of this policy.


**Engagement and Collaboration:** We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. Collaboration and communication are essential in combating this issue effectively.

**Risk-Based Contracting:** We take a risk-based approach to our contracting processes and continuously review them. We assess whether specific prohibitions against modern slavery and trafficked labour should be included in our contracts with third parties.

**Code of Conduct Compliance:** We may require employment and recruitment agencies, as well as other third parties supplying workers to our organization, to confirm their compliance with our Code of Conduct. Suppliers engaging workers through third parties must also ensure adherence to our Code.

**Audits and Due Diligence:** As part of our ongoing risk assessment and due diligence processes, we may conduct audits of suppliers to assess their compliance with our Code of Conduct and identify any potential risks of modern slavery.

**Appropriate Action:** If we discover any breaches of this policy by individuals or organizations working on our behalf, we will take appropriate action. This may include remediation efforts, termination of relationships, or any other necessary steps to address the breach and mitigate its impact.



HUB Engineering Ltd is committed to upholding these principles and ensuring that our operations and supply chains remain free from modern slavery and human trafficking. We recognize the importance of continuous vigilance and proactive measures in combating this serious issue.

This policy does not form part of an employee's contract of employment and may be amended at any time to reflect changes in legislation or business practices.

JAMIE MILLERSHIP  
MANAGING DIRECTOR

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