



## **ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT**

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Huber Car Park Systems International GmbH is taking to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Huber Car Park Systems International GmbH has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Huber Car Park Systems International GmbH is a manufacturer of steel-frame car park systems. We design in-house, manufacture, construct and operate multi-storey car park facilities. The company was founded in Germany and operates in the European market.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective system and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are committed to ensuring there is transparency and no modern slavery in our own business and throughout our supply chains. We expect the same standards from all of our contractors, suppliers, and business partners as part of our contracting process.

### **Our policies**

This policy applies to all persons working for us or on behalf in any capacity, including employees at all levels, directors, agency workers, interns, contractors, and external consultants.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery:** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our antislavery policy is available to all our staff via the company intranet and we inform our suppliers of our commitment to preventing modern slavery through their service contact.

### **Our suppliers**

Huber Car Park Systems International GmbH operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to

become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage
4. We may terminate the contract at any time should any instances of modern slavery come to light

### **Training**

We regularly conduct training for our procurement teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Rheinbrohl, Germany**

**January 2018**

A handwritten signature in purple ink, appearing to read "Valentin Rüther".

**Valentin Rüther**  
Managing Director

A handwritten signature in black ink, appearing to read "Erwin Lötsch".

**Erwin Lötsch**  
Managing Director

A handwritten signature in black ink, appearing to read "Arno Geis".

**Arno Geis**  
Managing Director

A handwritten signature in blue ink, appearing to read "M. Lauble".

**Markus Lauble**  
Managing Director