

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

HUBER car park systems international GmbH

This policy, pursuant to the Modern Slavery Act 2015 (UK) and the Directive 2011/36/EU of 5 April 2011, applies to all persons working for HUBER car park systems international GmbH (HUBER), including employees at all levels and contractors.

HUBER strictly prohibits the use of modern slavery and human trafficking. 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.

Our Business

HUBER is a manufacturer of steel-frame car park systems. We design in-house, manufacture, construct and operate multi-storey car park facilities.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We expect the same standards from our suppliers and business partners.

Our Policies

We adhere to a number of internal guidelines to ensure that we conduct business in an ethical and transparent manner. These include:

1. **Recruitment:** We operate a robust recruitment policy, including conducting eligibility to work in the EU checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Further, all recruitment agencies we work with receive a bespoke modern slavery questionnaire annually in order to mitigate risk of our employing the services of any organisation, which may be involved with forced labour.
2. **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.
3. **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.
4. **Training:** All our site staff, as well as management and our procurement team, attended an all-day workshop focused on both the relevant signs to look out for regarding modern slavery and how to deal with a situation should forced labour be suspected. In addition to this, we aim to provide face to face refresher courses, as well as online training to ensure everything is done to make our employees aware of the gravity of this problem.
5. **Workers:** All our labourers are provided with an anonymous questionnaire to complete during their induction reporting any concerns they may have with their employment process. This remains available to them throughout their employment with us should they feel uncomfortable completing it at the induction stage. Moreover, we randomly conduct on-site interviews with labourers to identify potential areas of concern.
6. **Supply chain:** All our suppliers, including recruitment agencies, must complete our PQQ to ensure they comply with our zero-tolerance policy on modern slavery. Moreover, should their profession be considered a higher risk category, they will be asked to complete an anti-slavery and human trafficking questionnaire. Any suppliers suspected of not adhering to our zero-tolerance policy will have their contract ceased with immediate effect.

7. Workplace: As well as educational posters on the risks of modern slavery, posters with our anti-slavery and human trafficking policies are clearly displayed on all our sites. We ensure that all staff potentially dealing with forced labour are fully trained regarding the relevant warning signs and procedural steps.

Our anti-slavery 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 contract.

Our Suppliers

HUBER 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.

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, January 2023

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

Markus Lauble
Managing Director

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

Arno Geis
Managing Director