

## **1 Structure, Business and Supply Chain**

HUBER Car Park Systems UK Ltd. is the UK subsidiary of the multi-storey car park building company HUBER Car Park Systems International GmbH.

Operating within the construction industry, ranked by a 2015 EU report as the economic sector second most prone to labour exploitation, we are very aware of the necessity of proactively and aggressively combatting the threat of slave labour. We believe that honesty and transparency are vital in ensuring the fight against forced labour is carried out diligently and effectively. Hence, we welcome the opportunity to publish our annual statement on slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015, and to fulfil the legal requirement for such a document. Our attempts to combat forced labour are also incorporated within our supplier code of conduct to ensure the companies we work with operate under similar expectations.

As the UK subsidiary of an international company, we operate exclusively within the UK but make use of a multi-national supply chain. In particular, many of the resources we source are from Europe. Moreover, our site operatives often hail from diverse nationalities. We are therefore aware that in order to effectively fight modern slavery we need to be vigilant about the policies of our suppliers abroad, as well as the domestic operations of our company.

Aware of the risks of forced labour within our industry, we welcome this opportunity to openly record and publish our attempts to combat slavery and human trafficking. Recording our efforts so openly will also ensure we can improve the effectiveness of our policies year on year. Over the preceding financial year, we have taken steps to combat slavery and human trafficking.

## **2 Slavery and Human Trafficking Policies**

We have developed our Anti-Slavery and Human Trafficking Policy to ensure its continued efficacy and usefulness. In particular, we outline our plans to combat modern slavery in the following areas:

- **Recruitment:** Continue to operate a robust recruitment process, for example through the implementation of right to work checks for our employees, including all persons engaged to work on our sites. Fine-tune our PQQ for all suppliers to complete prior to working with us. Should these be long-term suppliers, the PQQs are updated on an annual basis. An online service will be implemented to ensure consistent and comprehensive PQQ submission.
- **Whistleblowing:** Ensure our whistleblowing policy is clearly publicised to encourage people in coming forward.
- **Code of Conduct:** Revise, if necessary, and implement our Supplier Code of Conduct to ensure our suppliers are clearly aware of the standards we expect.
- **Training:** Provide our procurement and operational team with regular training on the signs of modern slavery and how to react to them before broadening this to include our wider staff as well: both via our online training portal, as well as face-to-face training sessions.
- **Workers:** Create an anonymous questionnaire to be available to labourers during their induction and throughout their employment in which they can voice any concerns they may have with recruitment or employment processes. Also, introduce spot checks conducted by our Health and Safety manager regularly.

- Supply Chain: Establish an annual questionnaire to ensure our suppliers and recruitment agencies are taking adequate steps in fighting modern slavery. This will be part of the PQQ submission requirements.
- Workplace: Display posters regarding our anti-slavery and human trafficking policy and the broader risks of forced labour visibly on all sites.

### ***3 Due Diligence Procedures***

We are aware that our biggest vulnerabilities to inadvertently helping perpetuate slave labour are related to our product supply chains and on-site labour provisions.

In order to negate the threat in the former area, we work exclusively with trusted partners, most of whom we have been working with for a number of years. As well as requiring all new suppliers to agree to our supplier code of conduct (which includes a section on anti-slavery and human trafficking policies), we work with existing suppliers to ensure continued adherence to the standards we expect. If any issues are found, they are appropriately investigated and steps taken to solve any potential problems.

Annual PQQs and questionnaires will ensure adherence to our standards is maintained. These PQQs will be rigorously checked and a zero-tolerance policy strictly maintained.

Similarly, our on-site labour is exclusively provided from reliable and respected firms with established reputations in their field. Nonetheless, we insist on carrying out regular checks on them as well to ensure ethical standards are maintained. We do not allow workers on site without prior confirmation from the agency that each individual's right to work check has been carried out. If it has not and the individual does not have their right to work share code, they will be asked to leave site. Furthermore, our staff remain constantly vigilant when on-site to ensure any potential warning signs are spotted regarding potential exploitation of workers on our sites.

We issue a new questionnaire to all labourers during their induction checking their experience with the agency they have been recruited from.

Also, the recruitment agencies we work with are obligated to complete an annual questionnaire to assess their commitment to fighting modern slavery.

### ***4 Identifying, Assessing and Managing Risk***

Aware that the wider construction industry is extremely susceptible to the exploitation of forced labour, and that this situation has been worsened by the uncertainty caused by the combination of Covid-19 and Brexit, we have taken measures to better educate our staff and suppliers with regards to modern slavery. We aim to ensure this training is maintained and everyone is aware of the importance of remaining vigilant.

In order to achieve this, we plan to have online and face-to-face training sessions, workshops, and toolbox talks. We also want to produce a site-specific process for site teams to follow should they suspect modern slavery is occurring on their sites. As well as this, we aim to improve the training we offer for sub-contractors.

We also plan to better utilise Stronger Together's Employer Good Practice Implementation Checklist to assess our own actions regarding the prevention of modern slavery and pinpoint potential areas of improvement. As part of this, we shall also appoint relevant people to specific roles regarding our modern slavery response in order to ensure it is effectively considered and structured to cover the entire company. We did make a start on this last year but feel there remains room for improvement.

Secondly, we aim to continue conducting a series of interviews with our on-site labourers, both unskilled and skilled, to better understand their involvements with recruitment agencies and any experiences they have had or witnessed regarding modern slavery. These will then be conducted on a regular basis by our Health and Safety Manager as spot-checks to ensure there is no forced labour on our sites.

Thirdly, we aim to initiate new checklists to act as annual reviews for our suppliers and sub-contractors, regarding their actions against modern slavery and any potential issues they may have had regarding it. This follows our current policy of making sure they confirm each individual's right to work check by name prior to working on site. We initiated these questionnaires for recruitment agencies last year and feel they worked very effectively.

### **5 Key Performance Indicators**

In order to analyse the efficacy and usefulness of our efforts to combat slavery and human trafficking, we use the following criteria to monitor our performance:

- Level of staff knowledge and training regarding forced labour
- Responsiveness and adherence of companies and firms within our supply chain to our requirements

### **6 Training Available to Staff**

We are entirely cognisant that a vital part of the battle against modern slavery within the construction industry is the raising of awareness of the situation and risk. Hence, we have committed to providing training to a number of our staff and wider community, including the following measures:

- In particular, we plan to continue providing our site and procurement teams with regular training on how to spot and combat modern slavery.
- We will provide an online course on preventing modern slavery company-wide, which will be mandatory for all to complete.
- We provide and clearly display up-to-date posters to all our sites detailing our anti-slavery and human trafficking policy to ensure workers are aware of the risks of forced labour and potential warning signs of it.

Langley, 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 "Tomer Meirom".

**Tomer Meirom**  
Managing Director