

## ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Huber Parking UK Limited

This policy, pursuant to the Modern Slavery Act 2015, applies to all persons working for Huber Parking UK Limited, including employees at all levels and contractors.

Huber Parking UK Limited 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 Parking UK Limited 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 consistently analyse our policies to ensure their 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.  
With regards all operatives recruited for site, the following measures must be carried out prior to their being given permission to commence work:
  - annual bespoke modern slavery questionnaires to all recruitment agencies, and other sub-contractors who fall into the professions where modern slavery is particularly proficient. These questionnaires must be signed by the authorised signatories of the company prior to any workers starting on site;
  - confirmation of right to work checks having been carried out on each individual starting on site (we would not accept a blanket confirmation). All individuals who have not been confirmed by name will not be permitted to start work until their right to work has been confirmed;
  - the submission and signing of our Huber PQQ by all suppliers prior to working with us. Should these be long-term suppliers, the PQQs are to be updated on an annual basis. Regular internal audits to ensure PQQs are executed and up-to-date.
- Whistleblowing: Inform and update our employees and those contracted by us with regards our policy via online training courses, toolbox talks and company policy.
- Code of Conduct: Ensure our suppliers have read and adhere to our Supplier Code of Conduct to ensure they are fully aware of the standards we expect. Should a supplier breach our Code of Conduct react decisively and immediately, as we will not tolerate non-compliance with our expectations and values.
- Training: Continue to provide our employees with regular training on the signs of modern slavery: both via our online training portal, as well as face-to-face training sessions. These may include physical appearance; behaviour; admin and documents; financial situation; isolation and control; and approaches for informal employment (please see the Modern Slavery Guidelines for more details).
- Workers: Continue to ask workers to fill in an anonymous questionnaire during their induction with targeted questions regarding possible abuse of their rights. Continue spot checks conducted by our Health and Safety manager or other members of the management team regularly.

- Workplace: Display posters regarding anti-slavery and human trafficking and the broader risks of forced labour visibly on all sites. Ensure posters displaying helplines and specific hand signs signalling a need for help are prominent in areas frequented by all.
- Vigilance: Ensure our site teams are vigilant in spotting signs of modern slavery and have a clear idea of what actions to take in the case of suspected modern slavery.
- Action Process: Produce a site-specific process for site teams to follow should they suspect modern slavery is occurring on their sites.

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.

#### 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:

- We provide a refresher online course on preventing modern slavery company-wide, which is mandatory for all to complete.
- In particular, we have put together Huber Parking specific guidelines for our site and procurement teams, which inform on how to spot signs of modern slavery and importantly what actions are to be taken by our site teams. These Modern Slavery Guidelines are readily available on all sites.
- In combination with the guidelines, we organised a bespoke face-to-face workshop for site management and other staff, as well as sub-contractors, with regards actions to be taken should modern slavery be suspected.
- We provide and clearly display up-to-date posters to all our sites detailing helplines and help signs (including the hand sign signalling distress), to ensure workers are aware of the risks of forced labour and potential warning signs of it.

#### 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 promptly investigated and steps are 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 questionnaire to all labourers during their induction checking their experience with the agency they have been recruited from.

Also, the recruitment agencies and those sub-contractors working in we work with are obligated to

complete an annual questionnaire to assess their commitment to fighting modern slavery.

#### 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 continue to have online and face-to-face training sessions, workshops, and toolbox talks. We intend to widen this process to our sub-contractors.

We intend to implement internal and potentially external audits to ensure our guidelines, measures and policies are being conscientiously adhered to by our employees and our suppliers.

We aim to continue conducting interviews regularly with our on-site labourers, both unskilled and skilled, to better understand their involvement with recruitment agencies and any experiences they have had or witnessed regarding modern slavery. These are to be conducted by our Health and Safety Manager and members of our QHSE team as spot-checks to ensure there is no forced labour on our sites.

We aim to initiate interviews with our suppliers and contractors, as part of our annual reviews, regarding their actions against modern slavery and any potential issues they may have had regarding it. It is our intent to be very clear that this is a decisive factor in our ongoing working relationship.

#### Procedure if modern slavery is suspected

Please see the Modern Slavery Guidelines for more details concerning the information described in this section.

Modern slavery may be suspected due to details concerning physical appearance; behaviour; admin and documents; financial situation; isolation and control; and approaches for informal employment.

If the situation is non-urgent, please contact the relevant site or project manager. They will then communicate with the business manager and/or health and safety manager, who will advise if it is an internal or criminal issue.

If the situation is urgent requiring immediate action, discreetly invite the potential victim for a conversation without the possibility of being overheard. A Huber colleague should be there as a third-party, ideally the business manager and/or health and safety manager via video call. Explain to the potential victim the support available and how to access it, ensuring that the interview is treated as confidential by all involved. Ensure the appropriate procedure is then followed, contacting the Modern Slavery and Exploitation Helpline if necessary (08000 121 700).

If a Huber colleague or trusted sub-contractor is suspected of being implicated, contact the business manager and/or health and safety manager directly.

#### Our Suppliers

Huber Parking UK Limited 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.

Langley, January 2025



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