

MODERN SLAVERY ACT 2015 STATEMENT

Huber Parking UK Limited

1. Structure, Business and Supply Chain

Huber Parking specialises in the design, manufacture, construction and maintenance of MSCPs. In line with modern changes in lifestyle and values, Huber additionally offers unique expertise with regards the design and build of mobility hubs, serving a broader range of transport and parking demands.

Operating within the construction industry, which is consistently ranked as one of the top three sectors in which modern slavery occurs, 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, which means many of our resources are sourced from Europe. Moreover, our site operatives often hail from diverse nationalities. Consequently, we are 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 consistently analyse 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.
With regards all operatives recruited for site, we require the completion annual bespoke modern slavery questionnaires; confirmation of individual right to work checks; and submission and signing of Huber PQOs by all suppliers and recruitment agencies.
- **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.
- **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.
- **Workers:** Continue to ask workers to fill in an anonymous questionnaire during their induction with targeted questions regarding possible abuse of their rights, as well as conducting spot checks.
- **Workplace:** Display posters regarding anti-slavery and human trafficking and the broader risks of forced labour visibly on all sites, including those featuring helplines and specific hand signs signalling a need for help.
- **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.

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. All suppliers, new and old, must agree to our Supplier Code of Conduct (including the section on anti-slavery and human trafficking policies), and any issues found will be promptly investigated and resolved.

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, regular checks are carried out, and workers are only allowed on site if their individual right to work check has been carried out.

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.

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 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 also aim to conduct more internal and external audits and interviews both to ensure our measures are being adhered to and to better understand the situation. As such, we interview both on-site labourers, and suppliers and contractors to ensure our processes are being duly followed and there is minimal risk.

In a situation where modern slavery is suspected, our process is clearly described in our Modern Slavery Guidelines, which are available to all staff online.

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.

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, measured by number of training workshops and on-site interviews annually
- Responsiveness and adherence of companies and firms within our supply chain to our requirements, measured by number of completed surveys annually.

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:

- 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.

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Markus Lauble
Managing Director



Tomer Meirom
Managing Director



Naoum Karikas
Managing Director