

## 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 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 UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Also, risk scorecards shall be conducted on all our suppliers.
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:** We conduct training for our procurement team 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. Additionally, we also provided our site teams with an online anti-slavery and human trafficking course.
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 should they feel uncomfortable completing it then.
6. **Supply chain:** Both our suppliers and recruitment agencies must complete an anti-slavery and human trafficking questionnaire to ensure their policies and actions are in line with ours.
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.

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 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 2024



**Markus Lauble**  
Managing Director



**Tomer Meirom**  
Managing Director



**Naoum Karikas**  
Managing Director