

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, 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.

- **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.

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 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.

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 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.

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:

- We will provide a refresher online course on preventing modern slavery company-wide, which will be mandatory for all to complete.
- In particular, we are currently designing a bespoke Huber online training module for specifically our site and procurement teams, which informs on how to spot signs of modern slavery and importantly what actions are to be taken by our site teams.
- In combination with the training module, we intend to organise a bespoke online workshop for site management and other staff 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, to ensure workers are aware of the risks of forced labour and potential warning signs of it.

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