

Modern Slavery and Human Trafficking

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Policy Statement

It is our policy to conduct all of our business in an honest and ethical manner.

We take a zero-tolerance approach to modern slavery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing, enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We will uphold all laws relevant to modern slavery and human trafficking (in all the jurisdictions in which we operate). However, we remain bound by UK laws, including the Modern Slavery Act 2015, in respect of our conduct both at home and abroad. We expect the same high standards from all of our contractors, suppliers and other business partners.

About this policy

The purpose of this policy is to:

1. set out our responsibilities, and of those working for and with us, in observing and upholding our position on modern slavery and human trafficking;
2. provide information and guidance to those working for and with us on how to recognise and deal with modern slavery and human trafficking.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Who must comply with this policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our obligations, and that all those under our control comply with it.

The COO/CMO have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

What is Modern Slavery and Human Trafficking?

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms such as slavery, servitude, forced and compulsory labour and human trafficking all of which deprive a person's liberty by another in order to exploit them for personal or commercial gain.

Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

How to raise a concern?

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any suppliers or clients at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager, Head of Humans, the COO, CMO or one of the founders.

Protection

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Huboo is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Head of Humans immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

Training and communication

Regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.