

At Hub South East Scotland Limited (Hub SE) we recognise that slavery and human trafficking are significant human rights issues. We are therefore committed to taking appropriate and proportionate steps to mitigate the risk of these occurring within our businesses and our supply chain.

As a business operating within the UK, the key areas of our operation that could be affected by slavery and human trafficking are our employees/seconded, agency workers working on our behalf, subcontractor operatives working on our sites and office and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

- **Employees:** Although all employees are seconded into Hub SE, we ascertain that their ultimate employer has:
  - Verified that all employees have the right to work in the UK upon commencement of their employment.
  - Ensured employees are aware of their working hours, leave and absence entitlements and other employment benefits via the Employee Handbook.
  - Prohibited the use of forced labour in their Code of Conduct and training on modern slavery is available to employees.
- **Agency workers**
  - We aim to only engage agency workers that are provided by suppliers on our Preferred Supplier List.
  - We require all Preferred Supplier List suppliers to a) ensure their agency workers have the right to work in the UK b) confirm that they do not charge workers a work finding fee and c) to have procedures in place to minimise the risk of recruiting forced or compulsory labour.
- **Contractors/Consultants:**
  - We require Contractors/Consultants to ensure their employees have the right to work in the UK, including any subcontractors employed by them.
  - We consider Contractors/Consultants approaches to employee rights and any breaches of human rights related legislation during our selection process.
  - We want all Contractors/Consultants that purchase materials for use on our sites to consider the risk of modern slavery in their supply chain, including any subcontractors employed by them.
- **Suppliers:**
  - We procure that our Contractors source the majority of their directly sourced materials from UK based organisations and are required to comply with UK laws on forced labour. Where materials are directly sourced from outside of the UK we require contractors to consider the risk of slavery and human trafficking as part of our selection process.

Our whistleblowing procedure allows any employee or third party to confidentially raise a concern.

We will ensure all persons/organisations working for us comply to this statement and we will request proof of their own policy.

This statement will be reviewed and updated as necessary on at least an annual basis. Accountability for compliance with this statement rests with the Executive Board.

*Signed for, and on behalf of, the Executive Board:*



**Paul McGirk**  
**Chief Executive**  
**Hub South East Scotland**

**Last Reviewed: April 2021**