

Human Rights Policy - Hubexo

Owner: Chief People officer

Approved by: The board of directors

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Distribution: All employees



The Old Post Office,
St. Nicholas Street,
Newcastle Upon Tyne,
United Kingdom, NE1 1RH

1 Human Rights Policy Introduction

As a leading technology company within the construction sector, Hubexo interact with various stakeholders across the globe. We respect that all people are equal in dignity and rights, and that we are all equally entitled to our human rights, without discrimination. Human rights are interrelated, interdependent and indivisible. This policy applies to all Hubexo stakeholders both directly and indirectly when conducting business with Hubexo. Stakeholders include our own workforce, the board, our investors, and our upstream and downstream suppliers, and customers.

2 Our commitment

Hubexo are committed to respecting human rights as set out in the United Nations Guiding Principles on Business and Human Rights (UNGPs). This commitment encompasses internationally recognized human rights as defined by the International Bill of Human Rights — which consists of the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; and the International Covenant on Economic, Social and Cultural Rights — as well as the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

We recognize the diversity of laws in the locations where we operate, and where people use our products. We strive to respect domestic laws. When faced with conflicts between such laws and our human rights commitments, we seek to honor the principles of internationally recognized human rights to the greatest extent possible. In these circumstances, we seek to promote international human rights standards by engaging with stakeholders and companies.

3 Implementation of this policy

We implement our commitment to human rights using approaches set out in the United Nations Guiding Principles on Business and Human Rights (UNGPs). These approaches include:

- applying human rights policies.
- conducting human rights due diligence and disclosure.
- providing access to remedy.
- maintaining oversight, governance, and accountability; and
- protecting human rights defenders.

4 Application of the human rights policy

All employees of Hubexo both direct and indirect must familiarize themselves with our company's policies including our human rights policy and all associated policies. The company also makes available on the company website, all relevant policies that are deemed appropriate for public facing domain.

In developing our products and services, we ensure that all tools are aligned to our principles on human rights and the extended principles set out within our company's policies.

As a technology business, our supply chain is typically limited to general office equipment and consumables that allow daily functions of the business, and professional services such as consultancy services and business travel services. Our supply chain is therefore deemed to be low risk in relation to any negative impacts upon human rights, however, we do recognize that human rights impacts can vary and notably may vary depending upon location. When considering any significant supply chain agreement, the company will always seek to ensure that our suppliers adhere to the principles of human rights.

Associated Policies

Human rights extend to a diverse range of topics, some of which require individual descriptors and definitions. Below is a list of associated Hubexo policies to be read in conjunction with this human rights policy:

- Anti-bribery and corruption policy
- Code of Conduct
- Equality policy
- Health and Safety policy
- Information security policy
- Modern slavery policy
- Social policy
- Sustainability policy
- Whistleblower Policy

5 Conducting human rights due diligence

Hubexo employees are provided with access to the relevant information as set out within their onboarding program when joining the company. Furthermore, all employees are provided with compulsory online training modules in relation to compliance with human rights and other associated topics. This functionality is owned by the company's People & Culture team and rolled out via controllers at subsidiary

level. The training modules are set out as such, so that employees must answer questions at the end of each learning module. Users must achieve a minimum score before the training is completed. Should the scoring be unsatisfactory at the end of a training session, the users must review the relevant sections again where knowledge may be missing. The test questions must then be re-done until a pass score is achieved.

Should any policy be updated, a revision will be uploaded to the company website and notification of such change will be communicated to all employees via the company intranet platform and/or communicated to employees directly via management.

In respect to the company's supply chain both upstream and downstream, notification of company's policies and procedures in relation to human rights and other topics are identified within any contractual agreement. Hubexo will only source products and services from reputable suppliers.

6 Providing access to remedy

Queries relating to Hubexo's human rights practices can be communicated in various ways to the company from both internal and external parties.

General queries from employees should in the first instance be communicated to the line manager of the employee making the query. Should additional input be required, these queries can then be escalated to the subsidiary level executive team, and then to the Chief People Officer.

Where any notable breach of human rights is identified, any individual, internal or external to the company should follow the group whistleblower function. Contacting the whistleblower function can be made in various ways as identified below:

Phone number: +447786256701 or **E-mail:** whistleblower@Hubexo.com

Post address: *Private and Confidential, Lindi Teate, The Old Post Office, St Nicholas Street, Newcastle upon Tyne, NE1 1RH. United Kingdom.*

When submitting a report you should use the whistleblower-template and include details such as:

- date, time and location.
- names of person(s) involved, roles and their business group.
- your relationship with the person(s) involved.
- the general nature of your concern.
- how you became aware of the issue.
- possible witnesses.
- other information

All submitted Whistleblower Reports will be considered by the whistleblower function, who will appoint an investigator to investigate the Whistleblower Report. All Reports will be taken seriously and will all be assessed carefully to determine whether an investigation is required. The outcomes of the investigation are reported to the Head of the whistleblower function. The head of the whistleblower function will review the outcome and determine appropriate actions to respond to the matter. For further information, please see the whistleblower policy.

7 Maintaining oversight, governance, and accountability

Hubexo remain committed to ensuring that all current international laws and regulations are adhered to in relation to human rights. Our executive team, the board, and the ESG committee closely follow international regulation and any associated changes. Any new regulatory requirement will be reviewed, and any required updates will be made to the policies and procedures and communicated effectively to our stakeholders via the methods set out in section 5 of this policy.

8 Protecting human rights defenders

Hubexo does not tolerate any form of detrimental conduct taken by any person against the defenders of human rights or any people who are involved in a related human rights investigation. Examples of detrimental conduct can include, but are not limited to:

- dismissal of an employee or alteration of an employee's position/duties to their disadvantage, or negative performance feedback that is not reflective of actual performance.
- harassment, intimidation, or bullying.
- threats to cause detriment directly or indirectly.

Hubexo takes all allegations of detrimental conduct very seriously. If you believe that you are suffering detriment you should report it to us, and we will take appropriate steps in accordance with this and the company's other policies.

False or misleading reports

When making a disclosure, you are expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be subject to a penalty if the information turns out to be incorrect. However, it is prohibited to submit a report, which you know is untrue or is misleading. This may be a breach of our business principles, code of conduct, or other policies and will be considered a serious matter.