

## Modern Slavery Policy - Hubexo

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**Owner:** Chief People officer

**Approved by:** The board of directors

**Last update:** 2025-09-01

**Distribution:** All employees



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

# 1 Introduction

Modern slavery is defined by Hubexo as, any form of slavery, forced labour, servitude, and/or human trafficking. All these activities are criminal acts that deprive victims of their liberty and usually involves financial and other exploitation.

Hubexo do not tolerate any breach of human rights or conduct of modern slavery. We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains.

All stakeholders within Hubexo's value chain must comply with this policy, including;

- Employees (both direct and sub-contractual)
- Non-executive directors and board members
- Consultants
- Volunteers
- Suppliers, and;
- Clients

Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It may also involve legal action being taken against you.

If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

# 2 Preventing Modern Slavery within our operations

Hubexo carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we understand who is working for us or on our behalf.

## **Employees**

Employees are provided with a written contract of employment, and they are paid in accordance with the law.

Hubexo adhere to our legal obligations to ensure the health and safety of all our employees and workers, including in relation to working hours, rest breaks and holidays.

### Suppliers

All suppliers of goods and/or services to Hubexo must assess their business and supply chains and confirm to Hubexo within any contractual documents that they comply with all legal obligations, in relation to Modern Slavery; and are committed to ensuring there is no Modern Slavery taking place in their business, or within their own supply chains.

Hubexo may terminate any contract with suppliers and may also pursue legal remedies against those suppliers, should any breach of this policy occur, for example;

- if a supplier is found to have Modern Slavery within their business, or;
- if a supplier knowingly has modern slavery within their supply chain.

### Customers

Hubexo's approach to supply chain enforcement is also extended to our downstream supply chain, including clients and customers of Hubexo and our subsidiaries. Should any client or customer of Hubexo be found to have breached modern slavery laws, Hubexo may terminate any contract of sale with the company.

## 3 Reporting suspicion of modern slavery

If you are an Employee or a Worker providing services for Hubexo (including our subsidiaries), you must immediately report any suspicions of Modern Slavery in our business or supply chains to the whistleblower function. The whistleblower function will review the concern in reasonable time and delegate an investigator to assess the matter further. Proceeding actions will be determined subject to the outcome of any investigation and will be individual to each specific circumstance.

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 whistleblower function. Contacting the whistleblower function can be made in various ways as identified below:

**Phone number:** +447786256701

**E-mail:** [whistleblower@Hubexo.com](mailto: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.

## **4 Protecting modern slavery whistleblowers**

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 modern slavery 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.

## **5 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 and/or other policies and will be considered a serious matter.