



CubicWorks

Modern Slavery Statement

**1st October 2022 -
30th September 2023**

About our business

CubicWorks is a business that focuses on an end to end business model which allows us to design, build and maintain environments that thrive. We are building the business on a strong foundation of “doing the right thing” with mutual trust for our customers, colleagues, suppliers and partners.

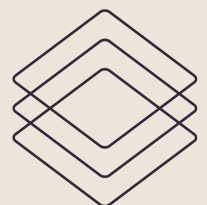
Doing the right thing

As a business, we are committed to ensuring that acts of modern-day slavery and human trafficking do not exist within our business and look to assist with eliminating this within our industry, by working with trusted supply chains. We have a zero-tolerance approach to modern slavery and are committed to consistently reviewing and strengthening our processes and systems to minimize the risk of human rights infringements anywhere in our supply chain.

This statement is for the financial year ending 30 September 2023 and has been written in accordance with the requirements of the UK Modern Slavery Act (2015). The Act requires that businesses with a turnover of more than £36 million disclose information regarding their policies and actions over the financial year to eradicate modern human slavery and trafficking from their operations and supply chain. Whilst this is the second year where CubicWorks turnover has exceeded £36 million, this is the third annual statement on slavery and human trafficking.

The following sections provide details on how CubicWorks is addressing each of the following sections:

- The organisation’s structure, its business and its supply chain
- Its policies in relation to slavery and human trafficking
- Its due diligence processes in relation to slavery and human trafficking in its business and supply chains
- Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chain
- The training about slavery and human trafficking available to its staff



Organisational structure, business and supply chains

We are an independent company operating solely within the UK, with our headcount at the end of the financial year being 159. Our business is made up by various site based tradespeople and associated operational support based at Spinnaker Court, Chandlers Point, Salford, M50 2YR.

The company has a low risk of slavery or human trafficking among our workforce. Our business is within the UK and accordingly our geographic risk of slavery and human trafficking is considered to be low.

Our sub-contract suppliers are predominantly small to mid sized local businesses and our goods and materials are procured through established and reputable wholesalers and manufacturers. We have a divisional management approach to procurement activities based on trade, which allows us to work closely with our supply chain to ensure they share our goals and values whilst building relationships founded on collaboration and respect. We expect our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights.

Policies

We operate a number of internal policies to ensure that we are conducting our business in an ethical and transparent manner.

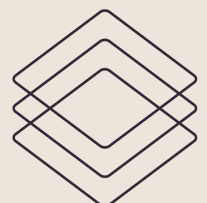
These include the following:

- Staff code of conduct
- Speak up policy
- Equality, Diversity and Inclusion policy
- Bullying, Harassment and Discrimination policy
- Recruitment, selection and career development policy

Due diligence

We consider ourselves to be a 'low risk' business with regard to slavery and human trafficking. However, we foster a culture that encourages the identification and reporting of any such risks within or connected to our business. We recruit all our employees directly and we do not recruit from outside the UK. Any agency workers used are arranged through registered members of the Recruitment and Employment Confederation or Constructionline accredited.

We have over 600 direct suppliers providing goods and services who play a vital role in supporting our business activities, and our reputation depends on the quality of the services they deliver. For this reason, any new supplier set up requires Director approval and completion of a pre qualification questionnaire where we conduct our own due diligence enquiries using a risk-based approach. As part of the process, the supplier's policies, including their modern slavery and human trafficking policy will be reviewed. If they do not have their own policy, they will be required to adhere to our policy.



Effectiveness in combating slavery and human trafficking

We have zero tolerance to slavery and human trafficking and will view any breaches of these practises or the contractual commitments (if any) by our suppliers very seriously. Breaches may result in CubicWorks requiring an immediate remediation plan. We may also terminate our relationship with any supplier that is in breach or fails to cooperate with remedying a breach.

We know that the risk of Modern Slavery is dynamic and ever-evolving. For this reason, will commit to the following actions:

- Regularly review our approach to assessing and mitigating the risk of Modern Slavery
- Train our staff about modern slavery issues and increase awareness within the Company
- Continue to ensure compliance of all new suppliers via the pre qualification process
- Carry out regular audits of existing suppliers - 50% each year

Training

We provide appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains. The training covers:

- How to identify the signs of slavery and human trafficking
- What steps should be taken if slavery or human trafficking is suspected
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high risk scenarios, including their removal from the Company's supply chain

Review: This statement, updated on 10th March 2024 will be reviewed as necessary or on an annual basis to reflect legal requirements or changes in the operation of the company.

The statement has been reviewed and approved by the following CubicWorks Directors

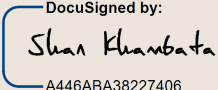
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Role: Director

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Name: Mark Wright
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Name: Shan Khambata
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