



Hub West Scotland Limited

Modern Slavery and Human Trafficking Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Hub West Scotland Limited ('the Company') to prevent human trafficking and slavery in our business and supply chain.

Our business and supply chains

Hub West Scotland is committed to looking after our people, sourcing responsibly and creating value for both our customers and the communities in which we operate. Our approach is to develop long-term partnerships with supply chain partners whose policies, values and cultures, are aligned to our own. We expect high standards and work with our supply chain partners to ensure they can deliver against them. Around 70 businesses are registered with the Company and form our Supply Chain partnership.

Our extensive supply chain covers a wide spectrum of businesses and ranges from sole traders through to multinational design and technical consultancies and large building contractors. Our supply chain is a fundamental part of our operations, and our success and reputation is inextricably linked to their performance and ethical practices.

Policies and contractual controls

We have zero tolerance for modern slavery and human trafficking within our own operations and our supply chain.

Our procurement methods are compliant with legislation, including health and safety regulations, and conform to the highest ethical, environmental and responsible business standards.

The Company will not tolerate abuse of human rights in any part of our business or supply chain and will take seriously and respond appropriately and decisively to allegations that human rights are not properly respected.

We have zero tolerance for slavery, servitude, forced labour and human trafficking and we require that all our supply chain partners make the same commitment. Our minimum trading standards require all our supply chain to commit to:

Hub West Scotland Limited
Modern Slavery & Human Trafficking Annual Statement

- Provide their employees with good working conditions and fair treatment;
- Respect workers' human rights and comply fully with all applicable laws;
- Ensure work is not performed under any threat of penalties or sanctions;
- Not require workers to pay any deposits for work, and employers – whether labour users or recruiters – must not keep original identity documents;
- Ensure that workers are free to leave work at any time, with all salary owed to be paid;
- Comply with the Modern Slavery Act 2015 (Transparency in Supply Chains) ('the Act');
- Implement appropriate controls to prevent Modern Slavery; and
- Notify hub West Scotland immediately if they become aware of any incidents of Modern Slavery within their supply chains. Following your notification we will determine any action required by hub West Scotland.

Hub West Scotland encourages our supply chain partners to conduct regular Modern Slavery risk assessments within their own supply chains. Appropriate action will be taken against supply chain partners who fail to respect these commitments and this may include terminating their Supply Chain Agreement.

We will undertake the following activities (over the period 2017 -2020) in respect of our obligations under the Act:

- Undertake a review of our supply chain to identify those that we believe may potentially be at greater risk of instances of Modern Slavery;
- Engage with Supply Chain partners to ensure they comply with the requirements of the Act;
- In 2019/20, we will train all of our employees in Modern Slavery using an online training module which concludes with a test to assess their understanding and knowledge of the Act and all new joiners are required to complete the module.

Responsibility for compliance

The Chief Executive Officer is ultimately responsible for ensuring compliance with the Company's Modern Slavery statement and the Act. The Supply Chain Manager is responsible for ensuring that our Supply Chain partners comply with this Statement and the Act.

This statement is made pursuant to section 54 of the Act and was approved by the Board of Hub West Scotland Limited at their meeting on 10 September 2019.