

UK Modern Slavery Act 2015 Statement combined with Modern Anti-Slavery & Human Trafficking Statement for Financial year 2024

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

Cubic are fully committed to playing our part in eradicating modern slavery. Cubic firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 24 February 2022. It sets out the steps taken by Cubic FM Limited's businesses to prevent modern slavery and human trafficking in our own operations and supply chains.

We published our first Modern Slavery Statement in May 2017.

Since then, we have further increased our efforts and have particularly focused on: • Strengthening our work in the areas of greatest risk. • Building a holistic approach that includes victim support. • Awareness-raising and capacity building of our internal teams and our suppliers.

This statement was approved by the Board of Cubic FM Limited

1. Purpose of the Policy

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Cubic FM Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cubic FM Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Our business predominantly encompasses work involved in Fire Stopping, Fire Prevention & Protection, Facilities Management, Commercial Painting & Decorating and Construction works. Based in the West Midlands we operate in all areas of the United Kingdom and work alongside numerous suppliers and clients to fulfil projects.

Our high-risk areas

If there is a high risk this would be the resourcing of labour from agencies. To mitigate this risk service agreements are agreed with suppliers outlining their contractual and lawful obligations in relation to the supply of personnel. Spot audits are undertaken to ensure these obligations are met.

Our policies

2. Steps to prevent

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

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1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

3. Responsibility

Cubic FM Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light]

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Internal – Employees are encouraged to raise any concerns about suspected modern slavery associated with the Company or our suppliers and should do this either through their line manager.

External – Members of the public or people not employed by the Group to write, in confidence, to the Group HR department to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective.

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Individuals are therefore encouraged to put their names to allegations.

5. BREACHES OF THIS POLICY

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

We reserve the right terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

6. Training and communications

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.

Approval for this statement/Policy

This statement was approved by the Board of Directors on 09/01/2025

Bernadette Grainger
B. Grainger

Brett Kelly
B. Kelly

Todd Kelly
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Tara Till
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Review Date: 09/01/2026

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