Modern Slavery Policy Statement

HUB South West Scotland Limited

Date of Last Review: January 2024

Date of Next Review: January 2025

Introduction

Hub South West Scotland Limited ("the Company") is a public private partnership that enables efficient design and construction of community infrastructure within Lanarkshire, Ayrshire and Dumfries and Galloway. The company has established a new regime of collaborative working practices, which has brought together public sector bodies and private companies to deliver real savings and tangible benefits to local people and businesses across the south west territory of Scotland.

The company has entered into a 20-year contract (the Territory Partnership Agreement) extendable by a further 5 years with 15 public sector organisations (the participants) on the 15th November 2012. The Company has a Board of Directors ("the Board"), but there are no employees. The partner organisations involved with the provision of the works and services for the Project are as follows:

- Equitix Management Services ("SPV Operations Manager").
- Equitix Limited

The shares in the Company are held by Scottish Futures Trust Investments Limited (10%), Participants (30%) and Alliance Community Partnership Limited (60%).

Company Structure

hubSW is a public-private partnership that enables cost-efficient design and construction of community infrastructure within the South West of Scotland.

hubSW has an extensive supply chain and produce an annual turnover of over £50 million.

hubSW has a subsidiary company 'hubSW SW NHSL Sub Hub Co Limited' which also falls under the scope of this policy.

hubSW engages with various clients, contractors, sub-contractors, consultants and suppliers during the course of our business and where the risk of modern slavery and human trafficking exists.

Policy statement

hubSW will not engage with or support any business knowingly involved with modern slavery of human trafficking

Modern slavery is a crime and a violation of our fundamental human rights. It takes various forms including slavery, servitude, forced and compulsory labour and human trafficking. However, what all forms have in common is the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The UK Government estimates that tens of thousands of individuals are victims of modern slavery in the UK alone.

hub South West Scotland Limited (hubSW) and all related entities have a zero-tolerance policy towards modern slavery and expect the same level from those in our supply chain. hubSW recognises that construction is recognised as a high-risk area for modern slavery and as such implements and enforces effective systems and controls to ensure that modern slavery is not taking place within any area of the business.

hubSW have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

hubSW are also committed to ensuring there is transparency in their business and their approach to tackling modern slavery throughout our supply chain. hubSW expect the same high standards from all of their contractors, suppliers and other business partners. As part of contracting processes, hubSW include

specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and hubSW expect that their suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for hubSW or on hubSW's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and may be amended at any time.

Policies on slavery and human trafficking

As well as our Anti-Slavery Policy, hubSW has other policies which it believes are relevant in the prevention of slavery and human trafficking. This includes:

- Ethics policy covering anti-bribery

Staff are required to familiarise themselves with the anti-slavery policy and raise any concerns they may have to the Chief Executive, Michael Ross.

Additionally, staff are expected to undergo annual anti-slavery, bribery and corruption training as well as other areas which the employer deems necessary.

To ensure that modern slavery and human trafficking is not going on within our supply chain all members are asked to confirm that an anti-slavery policy exists within their company or are a member of construction line, which encompasses this element, during their Pre-Qualification Questionnaire.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of hubSW's business or supply chain is the responsibility of all those working for hubSW or under hubSW s control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of hubSW's business or the supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of hubSW's supply chain constitutes any of the various forms of modern slavery, they are to raise it with their manager.

hubSW 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. hubSW 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 part of our supply chain. Should an employee believe that they have suffered any such treatment, they should inform their manager immediately.

Communication and awareness of policy

hubSW 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.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

hubSW may terminate our relationship with other individuals and organisations working on their behalf if they are found to be in breach this policy.

Continued commitment to Anti-Slavery Policy

By publishing this anti-slavery policy on our website, we are demonstrating that hubSW and all related entities have a zero-tolerance policy to slavery and human trafficking. We expect all with whom we do business to have an anti-slavery policy in place and on a risk assessed basis to undertake further due diligence as necessary.

This policy statement will be reviewed annually and published on the website pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year 2022-2023.

This statement has been approved by the hubSW board of directors.

Terms

Modern Slavery-The term 'modern slavery' describes anyone forced into labour, owned or controlled by an 'employer', treated as a commodity or physically constrained.

Human trafficking describes the practice of illegally transporting someone from one area or country to another, usually for the purpose of being sold into modern slavery.

Signed Date: 08/01/2024

Michael Ross Chief Executive Officer