

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2023 to 2024

Introduction from the Board

Slavery and human trafficking remain a blight on our global society and we acknowledge our responsibility to be alert to the risks within our own business and in the wider supply chain.

This statement sets out QUBA's assessment of any potential modern slavery risks related to its business and the steps it has put in place to ensure that there is no slavery or human trafficking in its own business and its supply chains. It relates to the financial year ending on 30 June 2024.

Organisational Structure

QUBA provides both a finance and back-office support service within DynamiQ, a convenient online platform, allowing recruiters to run and grow a successful recruitment business. QUBA operates in multiple industries, including but not limited to:

- Driving
- Engineering
- Construction
- Industrial
- Information Technology
- Legal
- Medical
- Office/Admin workers
- Sales & Marketing
- Social/Care
- Education

QUBA is a leading member of its trade association, UK Finance. We operate in accordance with the Invoice Finance and Asset Based Lending Standards Framework, including the Code of Conduct and independent complaints process.

Our Supply Chain

QUBA is committed to acting ethically and we expect all of our suppliers to make the same commitment. QUBA will address any failures by its suppliers to meet our standards on a case-by-case basis. If we are not satisfied with the outcome of our enquiries and/or investigation, we may cease to trade with the relevant supplier.

Our Policies on Slavery & Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery policy reflects our commitment to always acting ethically and with integrity throughout our business relationships.

Due Diligence for Slavery & Human Trafficking

As part of our policy and procedures to identify any risk, we ensure that:

- Where viable, we run regular Assignment Checks to ensure that workers' hours and pay are accurate and that their working environment matches our requirements.
- We always complete a Right to Work check, ensuring that workers have the right to work in the UK and are aware of the rights and responsibilities associated with working in the UK.
- Where possible, we speak with agency partners to ensure that workers are provided with adequate support throughout their assignment.
- We aim to always build long standing relationships with suppliers and clients and always make our expectations clear in respect of business practices and ethics.
- We aim to work with suppliers which are members of their appropriate trade association.

- We encourage all of our workers, customers and other business partners to report any concerns related to our business activities and supply chains. This may be carried out in accordance with our Whistleblowing Policy.
- With regards to international supply chains, our primary point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and procedures which mirror our own policies and procedures.

Supplier Adherence

We have a zero-tolerance approach to slavery and human trafficking. We expect all those in our supply chain and any contractors to comply with the values set out in this document. Wherever practicable, we will ensure that we are contractually entitled to terminate a supplier contract for cause in the event of any non-compliance by a supplier.

Training

To guarantee a high level of understanding and engagement with this policy and the risks associated with modern slavery and human trafficking in our supply chain or business, we provide training to relevant members of staff. All staff members are encouraged and regularly reminded to raise any concerns that they may have either to their manager, the Head of HR or General Counsel.

We provide essential legislation training to new employees as part of their induction. Modern Slavery training is also included within our Management Development Programme, the second cohort for which have completed the programme over the course of 2024. We have also included Modern Slavery within refresher training which is due to be delivered to all QUBA employees over the course of 2025. All Directors have been briefed on this subject.

Measuring Our Effectiveness

In the last financial year, there were no modern slavery related risk incidents reported to management.

We use the following key performance indicators (KPI's) to measure how effective we have been in combatting slavery and human trafficking in any part of our business or supply chain:

- Completion of Audits by Managers and Business Development Managers.
- Use of Labour monitoring and Payroll Systems.
- Communications and personal contact with agency partners and other supply chain members to ensure their level of compliance and understanding matches our own.

Declaration

This statement has been approved by QUBA's board of directors and is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the business' slavery and human trafficking statement.

Approved by the Board of Directors on 23 December 2024 and signed by an authorised director:



Name: Rik King
Job Title: Director
Date: 23/12/2024