

Rubax Lifts Limited

Wilson House
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**RUBAX LIFTS LIMITED POLICY**

Document Title	Human Trafficking & Modern Slavery
Document Number	RPPGC_09
Document Revision	01
Author	AJ Brown

Revision History – All revision details are logged within the Master Document Register, held within the HSEQ Department.

Authorisations - This document requires the following authorisation from the below named individuals(s)

Name:	Title:
Dave Verey	Managing Director

Human Trafficking & Modern Slavery Statement

1 INTRODUCTION

Rubax is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, Rubax will not knowingly use unlawful child labour or forced labour in any of the utilities, products and/or services it provides, nor will it accept products and/or services from suppliers who employ or utilise child labour or forced labour.

2 SCOPE

Human trafficking and slavery are crimes under UK, US, Australian and international law. These crimes exist in countries throughout the world. This policy statement defines Rubax's commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how Rubax will make efforts to eradicate the same from other businesses with whom it maintains a relationship (and especially from within its supply chain).

2.1 Definitions

Human Trafficking	The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
Forced Labour	All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
Harmful Child Labour	Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

3 RESPONSIBILITY

All employees are required to report actual or potential violations of the Code of Conduct to the Rubax Compliance Officer.

Senior leadership will take appropriate steps to ensure its own compliance and also that these requirements are followed by its suppliers, subcontractors and/or business partners.

4 ACTIVITY

4.1 Requirements for Suppliers

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum;
- Will abide by applicable law concerning the maximum hours of daily labour;

- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to the Group, also adhere to these requirements.

Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

4.2 Communication and awareness of this Policy

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.

4.3 Consequences

Rubax takes any breach of this Policy extremely seriously.

Employees who breach this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with Rubax terminated immediately, without compensation.

If a supplier to Rubax is found in violation of this policy, Rubax will take prompt action which may include terminating any supply agreement, arrangement or other contract with that supplier (as above).

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Human Trafficking & Modern Slavery Policy

Rubax Lifts Ltd installs, repairs, modernises and services a wide range of elevator and escalator products, which provide broad market coverage across the UK, with its Headquarters based in Warrington. We are a national company with a proven project management capability in all regions of the country coupled with a first-class service organisation.

Rubax is opposed to all forms of human trafficking and slavery and takes all necessary steps to ensure the promotion of sound, moral and ethical practices throughout the whole of its business. We will ensure transparency within our organisation and with suppliers of goods and services to us.

We adopt a highly professional standard and will comply with all the laws and regulations applicable to our business. We are fully committed to social and environmental responsibility and have no tolerance for slavery and human trafficking in whatever form, as outlined under the Modern Slavery Act 2015.

Rubax Lifts Ltd fully complies with the provisions of the Act, with respect to all our operations. We expect the same standard of all employees who work for us. We also expect all organisations/suppliers that we have business dealings with to ensure that human trafficking and modern slavery are eliminated from within their respective Companies and/or Supply Chains.

To that end, we will not work with any organisation/supplier that either has or is found to be knowingly involved with either human trafficking and/or modern slavery.

All employees are required to report actual or potential violations of the Code of Conduct to the Rubax Compliance Officer.

This Statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Rubax Lifts Ltd Human Trafficking and Slavery statement for the current financial year.

This statement will be reviewed and published annually, unless circumstances dictate that it should be done more frequently. This statement is signed on behalf of Rubax Lifts Ltd by our Managing Director and is both supported and implemented by our Management Team.

Signed:

A handwritten signature in blue ink, appearing to read "Dave Verey", with a horizontal line underneath.

Position: Dave Verey, Managing Director

Date: 6th January 2021