



Human Rights Policy

Qube Holdings Limited

ACN 149 723 053

1. Our Commitment

Qube acknowledges that all businesses have an obligation to respect internationally recognised human rights and associated principles as defined by the *International Bill of Human Rights*.¹ In a business context, this covers:

- freedom of association;
- a safe working environment;
- access to grievance mechanisms; and
- the prevention of forced labour, modern slavery and the worst forms of child labour.

In keeping with and allied to these rights and principles we recognise and appreciate, through our Statement of Values and Code of Conduct and Ethics, the inherent dignity of each person, the right to life and liberty, and freedom from slavery and discrimination. More specifically, Qube:

- respects the rights of employees to a safe and healthy workplace and is committed to the goal of 'Zero Harm' as set out in our Safety, Health and Sustainability Policy; and
- is dedicated to creating an environment in which inclusion, equity and diversity are recognised as being essential to employee well-being, as set out in our Diversity Policy.

Qube's Statement of Values, Code of Conduct and Ethics and the above policies are available in the corporate governance section of Qube's website at: <http://qube.com.au/about/corporate-governance/>.

Our Human Rights Policy is informed by the goals and practices outlined in the *UN Guiding Principles on Business and Human Rights (UN Guiding Principles)*.

Qube will meet the requirements of the Australian *Modern Slavery Act 2018 (Act)*. Like many businesses, it is our view that addressing modern slavery impacts is best achieved by managing these as a sub-set of a broader suite of human rights risks pertinent to our business operations and across our supply chains.

Qube will issue annual Modern Slavery Statements in accordance with the Act. Qube's current Modern Slavery Statement is also available in the corporate governance section of Qube's website.

2. Scope

Qube operates predominantly in Australia and New Zealand which have well-developed regulatory frameworks for protecting human rights and for preventing modern slavery. We also have a smaller presence in China, India and South-East Asia. Our supply chains extend over jurisdictions that regulate human rights and modern slavery to differing degrees.

This policy covers all global operations and supply chain activities applying to all Qube entities, joint ventures and partnerships where we have operational control, and agents and contractors when representing, or acting for, Qube.

¹ The International Bill of Rights consists of the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (1966) and the International Covenant on Economic, Social and Cultural Rights (1966).

3. Our Approach

We recognise the potential for salient human rights risks to be found in our operations and supply chains, including in the following areas:

- Direct employment practices in operations and joint ventures in countries with weaker regulatory frameworks.
- Contractor recruitment activities of foreign workers associated with our infrastructure projects and facilities management.
- Some procurement expenditure categories sourced from developing countries.

Based on an awareness of risks in the above areas and informed by the UN Guiding Principles, our approach to respecting human rights is expressed in the Qube Group's Human Rights and Modern Slavery Framework and Action Plan (**Framework and Action Plan**). The Framework and Action Plan involves the following:

- Complying with the laws in the jurisdictions in which we operate (however if there are differences between this policy and those laws, then we will apply the higher standard).
- Using our management processes and influence to prevent and mitigate "harm to people". This means:
 - avoiding causing or contributing to adverse human rights impacts through the Qube Group's own business activities and addressing such impacts if they do occur.
 - seeking to prevent or mitigate adverse human rights impacts associated with third party relationships that are directly linked to Qube's operations and services.
- Treating human rights risk as a business risk that needs to be assessed and managed by integrating a human rights lens into risk management processes at all relevant operational levels.
- Conducting due diligence to assess the potential human rights risks in our operations and supply chains and focusing on the most salient human rights risks through adoption of a risk-based approach.
- Applying findings from risk-based assessments to decide when increased due diligence and focus is required in particular areas of our supply chains.
- Maintaining a grievance mechanism to allow those adversely affected to raise concerns.
- Enhancing our capabilities by collaborating with government, civil society organisations and industry.
- Building our employees' understanding and capabilities to assess and manage human rights risk on a day-to-day basis.
- Reporting our progress in meeting our human rights policy commitments in a transparent manner.

4. Governance

Our commitment to respecting human rights is integrated into our corporate governance and management processes as follows:

Role	Accountability
Qube Board	<p>Oversees progress on implementing the Framework and Action Plan through reporting from the relevant Board Committee.</p> <p>Approves Qube's Human Rights Policy and Modern Slavery Statements.</p>
Safety, Health and Sustainability Committee (SHS Committee)	<p>Board Committee responsible for reviewing the Human Rights Policy, monitoring implementation of, and performance under, the Framework and Action Plan and reporting of progress (and any material concerns) to the Qube Board.</p>
Executive	<p>Monitors progress on implementation of the Framework and Action Plan and supports business divisions on implementation.</p> <p>Promotes awareness and delivers training on the Human Rights Policy and Qube's commitments in relation to human rights and requirements under the Framework and Action Plan.</p> <p>Develops and maintains oversight of grievance and remediation responses.</p>
Risk Management	<p>Includes human rights risks (i.e. harm to people and risks to Qube) in group and divisional human rights risk management processes.</p>
Procurement	<p>Integrates the consideration of human rights risks into all procurement processes.</p>
Management	<p>Responsible for assessing and implementing actions to mitigate human rights risks (particularly with respect to modern slavery) in the Qube Group's day-to-day operations in line with this policy and the Framework and Action Plan.</p>
General Manager - Safety, Health & Sustainability	<p>The Human Rights Policy owner.</p> <p>Develops and maintains the Framework and Action Plan.</p> <p>Monitors and reports on human rights and modern slavery matters to the SHS Committee.</p> <p>Provides support to business units and liaises with the Executive and management on human rights risks, particularly modern slavery.</p> <p>Reports progress on the Framework and Action Plan in Qube's annual Sustainability Report.</p> <p>Prepares, in consultation with Qube management and reporting entities, Qube's annual Modern Slavery Statement.</p>

5. Due Diligence

Qube's focus will be to prevent adverse human rights impacts associated with our operations and supply chain activities. Our human rights due diligence processes are embedded within Qube's Framework and Action Plan. These processes will be aimed at identifying, seeking to prevent, mitigating and accounting for how we address any adverse human rights impacts concerning our business. These include:

- assessing actual and potential human rights impacts;
- integrating these findings into business operations and acting on them;
- tracking responses and assessing their effectiveness; and
- communicating about how effectively we addressed those impacts throughout our employment practices and supply chain and procurement activities.

Human rights considerations are taken into account in our procurement practices and engagement with suppliers. Qube has in place a supplier due diligence protocol and code of conduct under which Qube undertakes due diligence and assessment of human rights risks in relation to prospective and current suppliers. Where we do not have direct operational control of procurement practices (for example, in relation to our non-controlled or non-operated joint ventures), we will ensure the entity is aware of its legal obligations and raise any concerns in order for the entity to take appropriate steps to mitigate human rights risks.

6. Grievance and remediation

Qube recognises the importance of a grievance mechanism as a fundamental business practice to ensure a business-related human rights concern can be raised, investigated and, if substantiated, steps taken to remediate the concern.

Qube will develop and maintain an accessible group-wide human rights grievance and remediation mechanism that will enable concerns to be reported direct to the highest levels of management and investigated as appropriate.

A key element of this mechanism is initial notification of a concern. In this regard:

- Qube employees may talk to their manager or supervisor or, if it involves a personnel matter, your Human Resources manager should be contacted.
- Qube has developed a confidential and anonymous procedure to provide notifications under our group-wide Whistleblower Policy. Any such notifications in relation to human rights concerns should be made via one of the ways set out in the policy. A copy of the policy is available at <http://qube.com.au/about/corporate-governance/>.

The relevant Board Committee responsible for overseeing Qube's Human Rights Policy is the Safety, Health and Sustainability Committee. The Committee will be notified of any material substantiated reports and the steps Qube takes to address and remediate the concern.

7. Awareness and training

Qube will ensure this policy is disseminated throughout its operations via publication on its website and employee communication channels. The content and aims of the policy will be included within relevant induction, training and ongoing education programs. Qube will promote an awareness and a culture of respect for human rights to its relevant stakeholders in this area.

8. Reporting

We will report publicly on our progress in complying with this policy through Qube's annual Modern Slavery Statements and Sustainability Reports.

9. Associated Policies

This policy is to be considered, and operates, in conjunction with other Qube Group policies as follows:

- Statement of Values
- Code of Conduct and Ethics
- Whistleblower Policy
- Anti-Bribery & Anti-Corruption Policy
- Safety, Health and Sustainability Policy
- Risk Management Policy
- Diversity Policy

10. Policy Review

This policy will be reviewed periodically by the Safety, Health and Sustainability Committee.

11. Policy Owner

General Manager – Safety, Health & Sustainability