

Last Modified: March 21, 2025

Introduction

Cubic Corporation (“Cubic”) and its group of companies (including Cubic Transportation Systems (Australia) Pty Limited, Cubic Digital Intelligence Australia Pty Limited, Cubic Defence Australia Pty Limited, Cubic Transportation Systems Limited, Cubic (U.K.) Limited, Cubic Surface Transportation Systems Limited, Cubic Defence UK Limited, Cubic Transportation Systems Canada, Cubic Field Services Canada, Cubic Transportation Systems, Inc. and, Cubic Defense Applications, Inc (CDAI)) recognize the significant adverse impacts of procuring goods that fund Human Rights abuses, and we are resolved not to contribute to global conflict in the way we do business. To achieve this goal, we have created processes to engage with suppliers, assess risks and create transparency within our supply chain, and educate our employees on Human Trafficking and the role they play in eradicating it.

About our Business and Supply Chain

As of 2021 Cubic is a private company owned by Veritas Capital, and no longer publicly traded. Cubic is a leading international provider of cost-effective systems and solutions addressing the mass transit and global defense markets’ most pressing challenges with business units and employees in many countries throughout the world, including USA, Mexico, Canada, Australia, New Zealand, the United Kingdom, Ireland, Germany, India, South Korea, Oman, Singapore, Italy, Sweden, Republic of Armenia, Denmark, Norway, Grand Cayman, and Saudi Arabia. Cubic creates and delivers technology solutions in transportation that make people’s lives easier by simplifying their daily journeys, and defense capabilities that help promote mission success and safety for those who serve their nation. Led by our talented teams around the world, Cubic is driven to solve global challenges through innovation and service to our customers and partners. Cubic Corporation leads centralized procurement on behalf of its operation units, with procurement teams located in Orlando, Florida; San Diego, California; Durham, North Carolina and Tullahoma, Tennessee. Some ancillary procurement activities also occur in Concord, California; Ashburn, Virginia; Huntsville, Alabama; the United Kingdom; Sugarland, Texas; Australia and New Zealand, where Cubic’s offerings are generally service based. Cubic’s labor and material supply chains extend throughout industry and in dozens of countries throughout the world.

About Our Anti-Human Trafficking Program

At the heart of our program is our worldwide policy entitled “Human Rights Policy” (available [here](#)). This policy sets forth our commitment neither to tolerate nor profit from Human Trafficking and to suspend or terminate our relationship with any supplier we reasonably suspect is sourcing from, or linked to, any party committing Human Rights abuses. Our “Human Rights Policy” was designed to reflect Cubic’s commitment to respect Human Rights in a way consistent with the UN Guiding Principles on Business and Human Rights regarding the Corporate Responsibility to Respect Human Rights and the United Nations Global Compact (UNGC) Declaration on Human Rights: Guidance for Businesses. We maintain an ethics hotline, available 24/7, worldwide, for anyone to report violations, and we maintain two fulltime employees dedicated to supply chain compliance issues to lead Cubic’s push towards more sustainable development.

Averting Modern Slavery practices is part of Cubic’s overall Social Responsibility Program. Social responsibility in the supply chain is discussed on page nineteen of Cubic’s Code of Business Conduct (available [here](#)) and page three of our Code of Conduct for Third Parties (available [here](#)). Our Code of Business Conduct states, among other things, that we will take all reasonable steps to ensure that our supply chain is free of products made by forced labor; while our Code of Conduct for Third Parties obligates our suppliers to obey all applicable laws regarding the prohibition on use of trafficked or child labor and to cooperate with us in our diligence process to ensure no such practices exist in our supply chain.

Our values, embodied in our code of business conduct, serve as the foundation for supplier relations. These core values guide our interactions with customers, suppliers, co-workers, team partners and associates in the United States and around the world – wherever we conduct business. Consistent with our standards of integrity, we pursue relationships with suppliers who demonstrate high ethical standards and conduct business within the spirit and letter of the law. Cubic and its partners must consider the effect of our words and actions on our customers, employees, stakeholders, the public and the environment. Cubic provides overview training on Ethics and Compliance to all employees as new hires and again as an annual refresher. Select Integrated Supply Chain (ISC) Purchasers/Subcontract Administrators and Purchasing Management receive annual training regarding supply chain Modern Slavery risks specific to Cubic and how their actions can mitigate those risks.

Cubic's processes and procedures require suppliers to be surveyed prior to onboarding. Cubic's suppliers complete a consolidated survey questionnaire that has a range of questions to assess risk of Human Trafficking and Modern Slavery. In addition, Cubic has a supplier assessment that requires suppliers to provide details on their Social Responsibility commitment by providing evidence of systems implemented to ensure that the organization follows all local labor laws and internationally recognized labor best practices. Suppliers are evaluated on Sub-tier management, Ethics, Avoidance of Slave Labor, Avoidance of Child Labor, Hours of Work, Safeguarding Employee Rights, Health and Safety, and Environmental.-Supplier compliance diligence and documentation is kept for recording keeping purposes. Cubic's Supply Chain Compliance Group's annual process review meetings incorporate insight from its consultations with departments throughout the corporation. Cubic's Senior Counsel maintains oversight of the processes. Cubic's Modern Slavery statement is sent to the CEO and Board of Directors for review and approval prior to publication.

About Our Progress This Year

Cubic annually updates its statement in the UK and Australia Modern Slavery Registries to help increase awareness of Cubic's developing program and to ensure Cubic implements leading practices into its program going forward. Part of the UK government's efforts to eradicate Modern Slavery within its supply chains involved the requirement of their vendors to complete of their Modern Slavery Assessment Tool. Completion of this tool will highlight areas where Cubic's program can be further developed to improve the effectiveness of our program if deficiencies are found. Specific improvements will be made by developing additional policies defining Cubic's processes for managing the remediation process, by improving language within existing policies and contractual language to ban key practices that contribute to or decrease controls over higher risks by defining which metrics most accurately reflect the state of our program, by expanding training both in availability to relevant stakeholders within Cubic and within our supply chain and in content including by incorporating the International Labour Organization (ILO) 11 indicators by name of circumstances where forced labor may be found.

Cubic complies with the newly enacted Canadian law called the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "**Supply Chains Act**") to prevent/reduce the risk that forced, or child labor is used. Cubic utilizes this statement to cover the annual reporting obligation. Throughout our Modern Slavery Statement, we include our structure, activities and supply chain. We have documented our policies and due diligence process in relation to forced labour and child labour. Below we discuss our risk and risk assessment processes to identify the parts of our business and supply chain that could potentially carry a risk of forced labor or child labour and the steps we take to assess and manage that risk. This includes measures taken to remediate any forced labour or child labour. What we do, and how we do it, makes a difference – every day. As a company and as individuals we must be committed to impeccable ethics in all aspects of our business. With this commitment comes the personal responsibility of every Cubic employee to practice and uphold the standards we have set. It is not just what we do, but how we do it that creates our reputation and dictates our success. All employees receive annual Ethics and Compliance training. We also make training available to Integrated Supply Chain (ISC) Purchasers/Subcontract Administrators and Purchasing Management on recognizing and mitigating the risk of Human Trafficking and Modern Slavery in supply chains.

Cubic assesses its effectiveness through grievance reporting mechanisms as outlined in our Cubic Worldwide Policy on Human Rights. Cubic retains a [Cubic Helpline](#) to allow individuals both domestic and abroad to state their concerns regarding any issues pertaining to Ethics and Compliance. Our Helpline is administered by an independent third-party reporting service that allows one to share concerns anonymously and confidentially – online or by telephone – anytime, day or night. No concerns were made during the Reporting Period. We have not identified any instances of Modern Slavery or Human Trafficking in Cubic’s supply chain. This remains dependable with our assessment that our subjection to Human Trafficking and Modern Slavery is relatively low. The Canadian law also requires a mandatory questionnaire. This questionnaire provides documentation of the successes within Cubic’s Supply Chain and areas that are a work in progress. Collecting this information each reporting period is expected to improve Cubic’s capacity to identify, prevent, reduce, and address forced labour and child labour risks.

About Our Risks and Risk Assessment Processes

Cubic buys a large volume of various electronics, electronic/mechanical components, and sheet metal parts for its business. We have not identified any instances of Modern Slavery or Human Trafficking in Cubic’s supply chain. This remains dependable with our assessment that our subjection to Human Trafficking and Modern Slavery is relatively low.

To mitigate the risk of Modern Slavery within its supply chain, Cubic has Prime Contracts with the U.S. Government contain Federal Acquisition Regulation (FAR) clause 52.222-50 Combating Trafficking in Persons (48 C.F.R. § 52.222-50). Cubic flows the clause down to our defense suppliers in our non-commercial and commercial terms and conditions. Additionally, Cubic flows the clause down to our transportation/commercial suppliers in our good and services terms and conditions. Cubic Integrated Supply Chain (ISC) Purchasers and Subcontract Administrators complies with various laws and regulations to ensure a conflict-free and slavery-free supply chain, including the 2010 USA Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502 and the California Transparency in Supply Chains Act of 2010. To that end, Purchasers and Subcontract Administrators requires its suppliers to use due diligence to comply with these legal requirements and to provide product which has neither been manufactured, created nor assembled using slavery or forced labor ; any of the worst forms of child labor, forced or indentured child labor, and child labor that is exploitative and/or interferes with a child’s ability to participate in required schooling; nor directly or indirectly funds non-state armed groups. Upon request, supplier shall provide Cubic with evidence that products sold to Cubic by supplier have not been manufactured, created, or assembled using slavery or forced labor. Supplier must represent and warrant that it is in full compliance with FAR 52.222-50 (Combating Trafficking in Persons), 52.222-18 (Certification Regarding Knowledge of Child labor for Listed end Products), and the California Transparency in Supply Chains Act of 2010, and that supplier does not engage in forced labor, slavery, or Human Trafficking. Supplier further represents and warrants that it provides a workplace free of harassment and discrimination, and that supplier’s workplace is safe and sanitary.

Cubic requires suppliers that support our U.S. Government Prime Contract and U.S. Government Subcontracts to complete our Annual Representations and Certifications. In an award of 550K or greater, suppliers must certify that it has implemented a compliance plan to prevent any prohibited activities and to monitor, detect, and terminate the contract with a subcontractor engaging in prohibited activities. This requirement is only for supplies that are other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States. After conducting due diligence supplier acknowledges neither any of its proposed agents, subcontractors, or agents is engaged in any such activities. If abuse related to the prohibited activities has been found subcontractor is responsible for taking appropriate remedial and referral actions. Suppliers that are considered international outside the United States are required to comply with their local laws, as well as laws that are applicable of the United States. Cubic communicates its third-party code of conduct including the requirement to respect Human Rights in their business operations and supply chain. Training is provided to purchasers directing them to tie a supplier's ethical performance to procurement decisions when it is appropriate; This process is designed to create an expectation for our suppliers to follow the law and preserve Human Rights, remediate insufficient controls, and incentivize the development and maintenance of good controls. We will not tolerate any forms of child labor in supply chain or labor agencies using forced, involuntary prison, indentured, bonded, trafficked or slave labor. To verify that Cubic's supply chains are well-

prepared to protect material supply chains from Human Trafficking and Modern Slavery, Cubic retains the right with its suppliers to review contractual requirements with suppliers to ensure compliance is maintained with labor, health, safety, and environmental laws, regulations, or codes of conduct. Suppliers are expected to document procedures to verify that child labor is not in use in their supply chain and labor agencies do not use forced, involuntary prison, indentured, bonded, trafficked or slave labor.

Cubic assesses the effectiveness of its Modern Slavery program through several means. Most of Cubic's direct suppliers/service providers are located within the United States, the United Kingdom and European Union, and Australia where the risk of Modern Slavery in industrial settings is low. Cubic, therefore, determines its effectiveness by processes identified to decrease the likelihood of slavery within global supply chains. Controls are in place within our supply base (policies, contractual requirements, codes of conduct, etc.) Cubic maintains awareness and bridges communication throughout our supply chain, ever increasing our awareness of, and compliance with, industry best practices and the needs of Human Rights legislations worldwide.



Stevan Slijepcevic (Mar 25, 2025 07:48 PDT)

Signature

Date

Steve Slijepcevic
President & Chief Executive Officer
Cubic Corporation