

HUBFORT

CHILD LABOUR POLICY

Policy Title	Child Labour Policy
Document Owner	Managing Director, HUBFORT
Applies To	All employees, contractors, directors and agents of HUBFORT
Effective Date	16 April 2026
Version	1.0
Review Cycle	Annual
Jurisdiction	United Kingdom

1. Purpose

HUBFORT is committed to protecting children from exploitation in all parts of its business and supply chain. This policy sets out the standards that apply to HUBFORT, its employees, its suppliers, and any organisation acting in its name.

2. Scope

This policy applies globally to all HUBFORT operations, employees, contractors, and suppliers. It covers direct hiring, supplier selection, and ongoing supplier monitoring. There are no geographical exemptions.

3. Policy Statement

HUBFORT prohibits child labour in any form within its own operations and will not knowingly engage with any supplier or partner that uses child labour. We require the same standards from those we do business with, and we will terminate relationships where credible evidence of child labour is not remediated.

4. Definitions

HUBFORT adopts the definitions set out by the International Labour Organization (ILO) conventions, in particular:

- ILO Convention 138 (Minimum Age): the general minimum age for employment is 15, or 14 in countries whose economies are not sufficiently developed, with work completed before the end of compulsory education
- ILO Convention 182 (Worst Forms of Child Labour): the prohibition on all forms of slavery, trafficking, debt bondage, prostitution, illicit activity, and hazardous work for anyone under 18
- Hazardous work: work that by its nature or circumstances is likely to harm the health, safety, or morals of children, prohibited for anyone under 18 in all circumstances

The higher of local law, ILO standards, or HUBFORT's own standards applies in every case.

5. HUBFORT's Own Operations

- HUBFORT does not employ anyone under the age of 16 in any capacity
- Employment of 16 and 17 year olds (for example apprenticeships, work experience, or trainee schemes) must comply with UK working time rules for young workers, including limits on hours, night work restrictions, and mandatory rest breaks
- Age verification documents are checked and recorded as part of the onboarding process for all staff
- No young worker is permitted to undertake work classed as hazardous, including unsupervised work on live client networks, handling confidential client data in isolation, or carrying out offensive security testing

6. Work Experience and Internships

HUBFORT welcomes short-term work experience placements for school-age students, subject to the following:

- Placements are agreed in advance with the school and parent or guardian
- The student is always supervised by a named HUBFORT employee
- Activities are limited to observation, learning, and age-appropriate tasks
- The placement does not displace a paid worker
- Health and safety, safeguarding, and DBS checks for the supervisor are in place

7. Supplier Requirements

All suppliers, subcontractors, and delivery partners must:

- Warrant that they do not use child labour as defined in this policy
- Apply equivalent standards to their own supply chain
- Maintain records that allow age verification to be audited
- Co-operate with reasonable requests from HUBFORT to verify compliance
- Notify HUBFORT promptly of any suspected or confirmed breach in their operations or their own supply chain

These requirements are written into HUBFORT's standard procurement and supplier contracts.

8. Due Diligence

HUBFORT carries out risk-based due diligence on suppliers, with enhanced checks where:

- The supplier operates in a country identified as higher risk for child labour by the US Department of Labor, ILO, or other recognised indices
- The supplier's workforce includes manual or informal labour
- Hardware, components, or physical goods are being sourced
- Indirect labour (cleaning, catering, logistics) is provided on HUBFORT premises

Due diligence may include supplier self-assessment questionnaires, documentary review, third-party audit reports, and site visits.

9. Modern Slavery Act

Although HUBFORT currently falls below the £36 million turnover threshold requiring a formal Modern Slavery Act statement, the company voluntarily applies the principles of the Modern Slavery Act 2015 and reviews its position annually. Where HUBFORT's turnover passes the threshold, a formal statement will be published.

10. Reporting Concerns

Any employee, contractor, supplier, client, or member of the public who suspects child labour, modern slavery, or trafficking in connection with HUBFORT or its supply chain should report it:

- Internally: to the Managing Director, directly or through the whistleblowing channel
- Externally, where serious: to the UK Modern Slavery Helpline (08000 121 700) or the Gangmasters and Labour Abuse Authority
- Where a child is in immediate danger: to local police or children's services without delay

Reports made in good faith are protected. Retaliation against anyone raising a concern is itself a serious disciplinary matter.

11. Remediation

Where child labour is identified in HUBFORT's operations or supply chain, the priority is the welfare of the child. Action will include:

- Immediate removal of the child from the work situation
- Working with recognised NGOs and local authorities on the child's education, family support, and reintegration
- A full investigation of how the breach occurred
- Remediation requirements for the supplier, with a clear timeline
- Termination of the supplier relationship if remediation is refused, delayed, or inadequate

HUBFORT will not simply walk away from a supplier if doing so would leave affected children worse off. Action will be co-ordinated to prioritise the child's welfare.

12. Training and Awareness

Staff involved in hiring, procurement, and supplier management receive training on child labour, modern slavery, and safeguarding, refreshed every two years. The policy is included in the staff handbook and supplier onboarding pack.

13. Governance and Review

The Managing Director is the accountable owner of this policy. The board receives an annual report on supplier due diligence, any concerns raised, and any remediation activity. The policy is reviewed at least annually and updated where needed.

14. Related Documents

- Code of Conduct
- Supplier Code of Conduct

- Modern Slavery and Human Trafficking Statement
- Safeguarding Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy

Approval

This policy has been reviewed and approved for release by the undersigned.

Approved By	Role	Date
Syed Ehsan	Managing Director	16 April 2026