



HUBBELL LIMITED
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023-2024

1. INTRODUCTION

- 1.1 Hubbell is committed to promoting the highest standards of ethical conduct and always strives to continually improve its working practices. Hubbell also sees it as its responsibility to encourage appropriate ethical baselines in its supply chains, including the prevention of modern forms of slavery and human trafficking.
- 1.2 This statement constitutes the modern slavery and human trafficking statement for Hubbell Limited for the financial year 2023-2024. It sets out an overview of the business and its supply chain and the steps we have taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.
- 1.3 Hubbell Limited, part of the Hubbell Incorporated ("Hubbell") enterprise, is committed to conducting business in a legal and ethical manner in accordance with the Hubbell Code of Business Conduct and Ethics (the "Code"), which document can be found posted at www.hubbell.com.

2. BUSINESS MODEL AND SUPPLY CHAINS

- 2.1 Hubbell is a US-headquartered corporation founded in 1888 that is primarily focused on the design, manufacture and vending of high quality electrical and electronic products for non-residential and residential construction, industrial and utility applications. Its business is split into two segments: the Electrical Solutions segment (comprising electrical system products and solutions) and the Utility Solutions segment (serving the utility industry) and includes over 80 different brands.
- 2.2 Certain of Hubbell's subsidiaries manufacture finished goods from raw components, semi-finished components and sub-assemblies. These materials may be purchased directly from a manufacturer or through distribution. Hubbell specifications for raw materials may vary from elemental content to form, fit and function as required by the finished product. Certain of Hubbell's subsidiaries also contract to manufacture finished goods.
- 2.3 Hubbell Limited is a UK operating subsidiary of Hubbell. GAI-Tronics, Hawke International and Chalmit Lighting are the operating divisions of Hubbell Limited.
- 2.4 Hubbell's supply chains are spread across the globe. Products are either sourced complete, manufactured or assembled by our subsidiaries in Australia, Brazil, Canada, Chile, China, Ireland, Italy, Mexico, Puerto Rico, Spain, and the US. It also has joint-venture arrangements in the Philippines and Hong Kong and engages with third parties around the globe.

3. POLICIES ON MODERN SLAVERY

- 3.1 As set out in the Code, each of Hubbell's subsidiaries and their employees, including Hubbell Limited, subscribe to Hubbell's core values of integrity, responsibility, respect for the individual, and a commitment to excellence. These values are central to the way in which we do business.



4. **STEPS TAKEN TO ENSURE MODERN SLAVERY AND HUMAN TRAFFICKING ARE NOT TAKING PLACE IN OUR BUSINESS OR SUPPLY CHAINS**
- 4.1 Hubbell Limited requires, as part of its verification process before engaging potential suppliers, that all suppliers enter into a supply agreement or be bound by a purchase order that obligates the adoption of the Code, and requires compliance by such supplier with all applicable laws and regulations. Such applicable laws include, without limitation, prohibiting the use of forced labour, modern slavery, human trafficking and child labour.
- 4.2 Hubbell Limited reserves the right in the majority of its supply agreements to commission independent audits of our suppliers.
- 4.3 All employees of Hubbell Limited are required to comply with the Code and undertake an annual code of ethics training programme. Among other things, the Code includes:
- 4.3.1 guidance and obligations on ethical decision making, including in relation to Hubbell's procurement processes;
 - 4.3.2 arrangements for raising concerns and speaking up to ensure that employees continue to promote the highest ethical standards in our business practices; and
 - 4.3.3 obligations and shared values in relation to protecting human rights. Hubbell recognises the importance of promoting individual health and welfare, economic development and political stability and preventing crimes and human rights abuses such as modern forms of slavery and human trafficking. The Code puts such issues at the fore, with express commitments to avoiding child or forced labour in any of our global operations or facilities and not tolerating unacceptable treatment of workers or involuntary servitude.
- 4.4 Hubbell Limited is also subject to Hubbell's Conflict Minerals Policy and Hubbell's Third-Party Code of Business Conduct and Ethics (the "Third-Party Code").



- 4.4.1 The Conflict Minerals Policy requires Hubbell's procurement teams and employees to carefully analyze the sourcing of certain minerals in our global supply chains originating from the Democratic Republic of Congo and adjoining jurisdictions to ensure that we do not inadvertently fund armed groups which among other things may perpetrate modern slavery, human trafficking and other human rights abuses.
- 4.4.2 Hubbell's procurement teams work with our suppliers to identify potential alternative sources where it is considered that such a risk may arise. Our due diligence measures have been designed to conform, in all material respects, with the framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- 4.4.3 When Hubbell Limited enters into new contracts with suppliers, we also seek to include an obligation requiring suppliers to provide information about the source of Conflict Minerals and smelters.
- 4.4.4 The Third-Party Code describes the minimum standards of ethical and responsible conduct required for our third parties.
- 4.4.5 Hubbell's third parties include, without limitation, suppliers, vendors, sales agents, distributors, subcontractors and any other third parties that work for or with Hubbell. All third parties are expected to inform and educate their employees, officers, directors, agents and subcontractors about this Third-Party Code.
- 4.4.6 Any third party providing or receiving a service or product to or from Hubbell is subject to this Third-Party Code. Failure to follow any of the provisions of this Third-Party Code can result in termination of any and all agreements with Hubbell.
- 4.5 Employees of Hubbell Limited are also covered by grievance and whistleblowing procedures which facilitate the voicing of concerns that our staff may have regarding the ethical standards applicable to our supply chains. Employees and investors who suspect there may have been a breach of the Code or the Third-Party Code are encouraged to contact the Speak Up Today hotline, our confidential reporting service accessible for both employees and third parties via web or phone.
- 4.6 Hubbell Limited and Aclara Meters UK Ltd, as with all of Hubbell, remains committed to improving our processes to help ensure that modern slavery and human trafficking are not taking place in our business or supply chains.



5. **APPROVAL**

5.1 This Modern Slavery and Human Trafficking Statement for the financial year 2023-2024 has been approved by the Board of Directors of Hubbell Limited.

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Katherine A. Lane

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For and on behalf of the board of directors of **Hubbell Limited**