

<b>CUBIC WORLDWIDE POLICY</b>  <u>HUMAN RIGHTS</u>	<u>No.</u> CWP Ethics - 06	<u>Page</u> Page 1 of 3	<u>Scope</u> All Cubic Entities
	<u>Rev. Date</u> 5/10/2023	<u>Approved (CEO)</u> S. Slijepcevic	<u>Approved (RDH)</u> SVP & GC

## I. **PURPOSE**

*Stevan Slijepcevic*  
 Stevan Slijepcevic (May 10, 2023 10:46 PDT)

This policy states Cubic's processes to demonstrate our commitment to social responsibility as a good corporate citizen, respecting human rights and combatting modern slavery in its operations and supply chains. Cubic respects the rights of all people and does not tolerate discrimination or harassment in any form, including, but not limited to, discrimination based on race, ethnicity, age, gender, gender identity, sexual orientation, national origin, ancestry, religion, mental disability, military or veteran status or citizenship status.

## II. **SCOPE**

This policy applies to all subsidiaries and operating units of Cubic Corporation and third parties under agreement to represent Cubic before current, or potential, customers, and business partners worldwide.

## III. **POLICY**

Cubic Corporation recognizes the significant adverse impacts of procuring goods that fund human rights abuses. As a responsible corporate citizen, we take a stand to respect human rights and not contribute to global conflict in the way we do business. Cubic has set forth its commitment to refrain from any action that contributes to the financing of conflict, or that supports or encourages unlawful labor practices, and to comply with relevant United Nations sanctions resolutions and, where applicable, domestic laws implementing such resolutions.

**A. Human Rights.** Cubic is committed to respecting all human rights and will not tolerate human rights abuses. All employees will respect human rights by:

- Avoiding infringements on the rights of others and addressing adverse human rights impacts as they arise.
- Avoiding, causing or contributing to adverse human rights impacts and addressing such impacts when they occur.
- Seeking ways to prevent or mitigate adverse human rights impacts that are directly linked to Cubic's business operations, products or services by a business relationship, even if Cubic does not contribute to those impacts.
- Participating in human rights due diligence and remaining up to date on training regarding their influence on human rights impacts.
- Providing for or co-operating through legitimate processes in the remediation of adverse human rights impacts where they identify Cubic may have caused or contributed to these impacts.

Cubic bans the use of forced/coerced labor (modern slavery). Cubic will neither tolerate, nor profit from, contribute to, assist with, or facilitate the commission by any party of:

- any forms of torture, cruel, inhuman, and degrading treatment.
- the recruitment, harboring, transportation, provision, or obtaining of a person for:
  - labor or services or slavery using force, fraud, or coercion for the purposes of

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- subjection to involuntary servitude, peonage, debt bondage; or
- the services of a commercial sex act using force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age.
- any child labor that is illegal, exploitative and/or interferes with a child's ability to participate in required schooling.
- other human rights violations and abuses such as widespread sexual violence.
- war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

**B. Supply Chain.** To do business with Cubic, suppliers/subcontractors must ensure they follow all US and International Laws where applicable and implement best business practices to the reasonable extent possible to combat human rights abuses.

Cubic expects its suppliers and partners to commit to respecting human rights in their operations and supply chain as outlined in our [Third Party Code of Conduct](#) as well as in our subcontracts and terms and conditions.

Cubic will immediately suspend or discontinue engagement with any third party where we identify violations. This includes second tier suppliers/subcontractors sourcing from, or linked to, any party committing serious violations.

**C. Conflict Minerals.** Cubic's manufacturing operations often require the use of components containing tantalum, tin, tungsten, and gold ("3TG"). Regardless of their country of origin, these minerals are known as "conflict minerals." Cubic strives to procure components that are not manufactured using conflict minerals that directly or indirectly fund non-state armed groups.

Cubic will immediately suspend or discontinue engagement with any third party where we identify a reasonable risk that it is sourcing from, or linked to, any party committing serious abuses as defined in this policy. For further details on Cubic's Modern Slavery program please contact [corporate.compliance@cubic.com](mailto:corporate.compliance@cubic.com)

#### **IV. STAKEHOLDER INVOLVEMENT**

Stakeholder input is a key element of this policy for efficiency, compliance, and to implement process improvements. We communicate with our stakeholders across multiple channels at the local and global level. By doing so, it allows Cubic to identify issues of importance and relevance that we can review and make decisions to act and improve. Our stakeholders include, customers, suppliers, employees, regulators, NGOs, and the communities in which we operate.

The General Counsel in coordination with the Executive Leadership Team (ELT) is responsible for the corporate oversight of this policy.

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## **V. TRAINING**

Annual training will be provided for employees with influence over risk factors as identified during Cubic's risk mapping exercises. Training will target how their actions influence the risk of human rights abuses and steps they may take to mitigate those risks.

## **VI. GRIEVANCE REPORTING MECHANISMS**

Cubic retains a helpline to allow individuals both domestic and abroad to state their concerns regarding any issue pertaining to ethics and compliance. This information is posted at all Cubic locations. You may report any concerns via the Cubic Helpline at [cubichelpline.com](https://cubichelpline.com). or email [Corporate Ethics & Compliance at corporate.compliance@cubic.com](mailto:Corporate Ethics & Compliance at corporate.compliance@cubic.com).