I. **PURPOSE**

The purpose of this policy is to state Cubic’s commitment to respecting human rights, combatting modern slavery in its operations and supply chains, and to state the processes in place to address this commitment. Cubic respects the rights of all people and does not tolerate discrimination including, but not limited to, any form of harassment 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.

III. **POLICY**

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 through the use of force, fraud, or coercion for the purposes of subjection to involuntary servitude, peonage, debt bondage; or
  - the services of a commercial sex act through the use of 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.
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 paragraph. For further details on Cubic’s Modern Slavery program please contact cubic.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 shareholders, customers, suppliers, employees, regulators, NGO’s, and the communities in which we operate.

Cubic’s Board of Directors supports this policy and expects all businesses and employees to comply. The General Counsel in coordination with the Executive Management Committee is responsible for the corporate oversight of this policy and reports to the Board on a semi-annual basis or when appropriate as matters arise.

V. STRATEGIES/DUE DILIGENCE

In our efforts to eliminate all forms of modern slavery and forced/coerced labor, Cubic has implemented due diligence processes aimed at addressing the root causes of these issues. Designed after the Organization for Economic Cooperation and Development (OECD) Guidance on Responsible Business Conduct, Cubic has embedded into its policies and management systems conduct that:

- Promotes human rights and combats modern slavery;
- Identifies and assesses actual and potential adverse impacts associated with our enterprise’s operations, products, and services;
- Ceases, prevents, and mitigates any adverse impacts or risks of adverse impacts identified;
- Tracks process implementation and results;
- Annually communicates how impacts are addressed; and
- Provides for or cooperates in remediation (when appropriate).

The commitment Cubic has made by designing its programs after this guidance is consistent with the UN Guiding Operational 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.

Cubic reviews these processes annually.

VI. 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.
VII. SUPPLY CHAIN COMPLIANCE

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. To further aid in the development of robust diligence practices, Cubic's supply chain compliance team provides resources to its vendors, such as sample policies and industry risk information, per the processes developed in accordance with OECD Due Diligence Guidance on Responsible Business Conduct (RBC).

This diligence program performs supply chain risk mapping, supplier capacity training, and assists with supplier audit functions regarding modern slavery and other social responsibility issues (including new supplier on-boarding risk mitigation review).

VIII. GUIDANCE

This policy was designed to reflect many of the best practices identified by internationally recognized guidelines and declarations, including: the Organization for Economic Cooperation and Development (OECD) guidelines and guidance for multi-national enterprises, the United Nations (UN) Universal Declaration on Human Rights, and UN Guiding Principles on Business and Human Rights.

IX. 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 find all Cubic Helpline phone numbers or report any concerns at cubichelpline.com.