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Introduction

Cubic Corporation (“Cubic”) and its family of companies 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

Cubic is a leading international provider of cost-effective systems and solutions addressing the mass transit and global defense markets’ most pressing challenges. Cubic Corporation leads centralized procurement on behalf of its operation units, with procurement teams located in Orlando, Florida; San Diego, California; and Tullahoma, Tennessee. Some ancillary procurement activities also occur in Concord, California; Ashburn, Virginia; Huntsville, Alabama; the United Kingdom; Australia; and New Zealand. Cubic’s supply chain extends throughout nearly every industry and in dozens of countries throughout the world.

About Our Anti-Human Trafficking Program

Cubic’s program was designed to reflect many of the best practices in the Organisation for Economic Co-Operation and Development (OECD) Guidance on Responsible Supply Chains of Conflict Affected and High Risk Areas as well as the OECD Guidelines for Multinational Enterprises on Human Rights. At the heart of our program is our worldwide policy entitled “Corporate Social Responsibility in Supply Chain Management.” The policy sets forth our commitment not to tolerate or 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. We maintain an ethics hotline available 24/7, worldwide, for anyone to report violations, and we maintain a fulltime employee dedicated to supply chain compliance issues.

Social responsibility in the supply chain is discussed in both Cubic’s Code of Business Conduct (available at <https://www.cubic.com/investor-relations/governance>) and Code of Conduct for Third Parties. The two Codes state, among other things, that we will take all reasonable steps to ensure that our supply chain is free of products made by forced labor. Cubic provides overview training on anti-human trafficking to all employees as new hires and again as an annual refresher. Suppliers are surveyed prior to onboarding, and audited annually for social responsibility. Supplier compliance diligence and documentation is kept on SharePoint for easy accessibility for those who may need the information.

About Our Progress This Year

In July of 2017, senior procurement staff and Cubic’s senior legal counsel met to discuss the importance of social responsibility and to develop a plan to increase our engagement on various issues. Following the meeting, Cubic decided to join the SRA (the Social Responsibility Alliance) to help produce a unified

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template for determining areas of risk within supply chains. The most recent version of this risk template can be downloaded at <http://www.socialresponsibilityalliance.org/>.

Using this template as a guide, and through constant updates from sources such as the Ethical Trading Initiative (ETI, <https://www.ethicaltrade.org/>) and Ropes and Gray (<https://www.ropesgray.com/en>); Cubic has provided training to its procurement personnel to create awareness of possible geographical areas reported to have high risk for acts of Modern Slavery.

In August of 2017, Cubic also completed its employer assessment to begin working with BEST (Businesses Ending Slavery & Trafficking). We also recently joined the Modern Slavery Registry to help increase awareness of Cubic's developing program and ensure Cubic implements leading practices into its program going forward.

About Our Risks and Program Effectiveness

Cubic buys a large volume of various electronic components for its business, which are implicated in many countries as being high-risk for forced labor. Cubic is a member of the Conflict Free Sourcing Initiative and uses its membership to support transparency in how these electronics are manufactured, down to the mining of the metals used to make them. Because our anti-human trafficking program is still developing, we are currently measuring program effectiveness in terms of our ability to reach suppliers and create awareness on the issue. We expect that our metrics will change as our program matures.

By keeping up to date with reported findings, Cubic maintains awareness and bridges communication throughout our supply chain.

DocuSigned by:

Signature

4/11/2018
Date

Brad Feldmann
CEO and Chairman of the Board
Cubic Corporation