

Modern Slavery Act Statement

March 2023



Introduction

The Hill Group is an award-winning 5-star housebuilder, and one of the top 15 housebuilders in the United Kingdom. We specialise in developing distinctive new homes across London and the South East and currently directly employ over 680 people in these locations. We are a privately owned limited group of companies who are committed to working alongside other organisations, suppliers and sub-contractors who equally support the aim of reducing modern slavery across the UK. This statement therefore covers the following group companies - Hill Holdings Limited and subsidiaries. It sets out the actions we have taken to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our group companies or supply chain.

As part of the construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. We remain committed to preventing slavery and human trafficking in our activities and those of our supply chain.

We recognise that our people are integral to what we deliver and fundamentally key to our success. Our modern slavery and human trafficking statement is published on our website and can be accessed via a link the footer of hill.co.uk.

Training and Awareness

We have a Group wide policy for our staff confirming that Hill has a zero-tolerance approach to any form of modern slavery and human trafficking. This is reviewed annually and published on our internal website, so is available at all times. All new members of staff attend an induction event where we raise awareness of modern slavery. We continue to check that directly employed staff are eligible to work in the UK, using the appropriate and approved government checklist of documentation. Further mandated training is available, via our online training provider, for all our staff, which includes awareness of the Modern Slavery Act.

Our Modern Slavery training covers :

- *our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;*
- *how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;*
- *how to identify the signs of slavery and human trafficking;*
- *what initial steps should be taken if slavery or human trafficking is suspected;*
- *how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;*
- *what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;*
- *what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and*
- *what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains*

We will also raise awareness through our internal communication channels of the basic principles of the Modern Slavery Act 2015, how employers can identify and prevent slavery and human trafficking and the external help that is available, for example the Modern Slavery helpline.

Modern Slavery Act Statement

March 2023

Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- *mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;*
- *evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];*
- *reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;*
- *conducting supplier audits or assessments through [the organisation's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;*
- *creating an annual risk profile for each supplier;*
- *taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where appropriate*
- *invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship*

We will not tolerate or condone any form of exploitation and will act promptly where any breach of the Act has been identified. We will take appropriate steps against suppliers who do not meet the required standard for example by asking them to take action to improve or terminating the business relationship if the required improvement is not forthcoming

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** *We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.*
- **Employee code of conduct** *Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.*
- **[Supplier/Procurement] code of conduct** *We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.*
- **Recruitment policy** *We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency.*

Supply Chain

Our Supply Chain includes the procurement of trade subcontractors, material & plant suppliers, consultants and other service providers to meet our business requirements.

Hill regularly reviews its trading partners as part of our supply chain management, focusing closely on those we consider to be at the greatest risk, including suppliers; who operate by employing casual or temporary labour, manufacture or trade in raw materials, particularly outside the UK / EU. They need to demonstrate to us, full compliance with our policy and this statement.

We have thorough due diligence processes in place for managing both new and existing supply chain relationships. As part of our vetting processes we check that all prospective Suppliers understand the Modern Day Slavery Act and their responsibilities relating

Modern Slavery Act Statement

March 2023

to it at the earliest opportunity in the process when initially expressing their wish to join our Supply Chain. We also ask that they have processes in place to check their own Supply Chain adheres to the legislation. It is important to Hill that we engage with like-minded and responsible suppliers.

We collect this data via our internal Supply Chain database which can track and monitor changes to a company's data. The system is also linked to Constructionline as our preferred data validator who work closely with to be at the forefront of initiatives relating to all legislative changes. Our vetting process is compliant with the industry pre-qualification standard; PAS 91.

We endeavour to regularly review processes to ensure that the intention and requirements of the act are addressed. We want to make sure that safe and fair working conditions are provided and we require that those in our supply chain have policies, procedures, practices and contracts within their organisations and with their own suppliers to equally reflect this.

We have reviewed the standard order documents that we use to engage with our supply chain to assess and manage any risk, as far as is reasonably practicable. To support our approach further we will ensure all of our subcontract orders and purchase orders have an appropriate paragraph included as standard, regarding the Modern Slavery Act.

Continuous Improvement

During our current financial year ending 31 December 2023, we continue to monitor the effectiveness of our actions against modern slavery and human trafficking and review the risks within our own business and across our supply chain. We continue to provide further guidance and support to all employees and Supply Chain Partners to raise awareness within our industry.

We will set Key Performance Indicators:-

- All staff to complete online training on Modern Slavery annually
- Carry out an bi-annual audit on our supply chain verification system
- Review our existing Supply Chain and ensure that they agree to support our approach to Modern Slavery

Board approval

This statement is made and published in accordance with section 54 of the UK Modern Slavery Act 2015 and constitutes Hill's modern slavery and human trafficking statement for the financial year ending 31 December 2023. The Hill Holdings Limited Board of Directors approved it on 8th February 2023 and will review and update it annually.

Signed by



Andy Hill MCI0B
Group Chief Executive
Hill Group Services Limited

March 2023