Modern Slavery Act 2019 Statement

Introduction

Hill is an award-winning 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 530 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. We recognise that our people are integral to what we deliver and fundamentally key to our success.

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 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 training is available, via our online training provider, who cover a number of our legal/statutory obligations for all our staff, which would include awareness of the Modern Slavery Act.

Due Diligence

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. Our Whistleblowing Policy provides a mechanism for our employees to report any breach of our legal obligations, including those contained in the Act.

Supply Chain

Our Supply Chain includes the procurement of trade subcontractors, material & plant suppliers, consultants and other service providers to suit our business requirements. Whilst we have thorough due diligence processes in place for managing both new and existing supply chain relationships, we continue to review these to ensure that the intention and requirements of the act are addressed. Working with our supply chain partners we ask that they provide us with the assurance that, modern slavery is understood and not present in their company and wider supply chain. 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.

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 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 all
of our subcontract orders and purchase orders have an appropriate paragraph included as standard regarding the Modern Slavery Act.

Hill has invested significantly in a database, which facilitates both the on boarding of potential new supply chain partners and the maintenance of existing ones. This is done by linking our prequalification question sets to those of Constructionline (PAS91). By using Constructionline as our preferred data validator we capture the provisions for modern slavery within the existing questions. Our new requirements and a copy of this statement are communicated directly to our existing supply chain and via our website and supplier portal for potential new supply chain partners to reinforce our approach.

**Continuous Improvement**

During our current financial year ending 31 December 2019, 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. In addition, we continue to provide further guidance and support to all employees and Supply Chain Partners to raise awareness within our industry. We propose to publish KPIs in our 2020 statement to measure the effectiveness of the steps we have taken.

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 2018. The Hill Holdings Limited Board of Directors approved it in August 2019.

Signed by

Andy Hill MCIOB
Group Chief Executive
Hill Group Services Limited

August 2019