



GROUP MEDIA/PUBLIC RELATIONS POLICY

Communications by Hill & Smith PLC and its operating companies, (the “Group”) that are in response to media questions or are required by local legislation are to be tightly controlled by the use of a press release, which should be approved by the relevant Operating Company Managing Director and the Group Chief Executive Officer and Group Chief Finance Officer before it is released to the media. (For clarity this policy does not relate to marketing or advertising material.)

Basis

As a Public Company listed on the London Stock Exchange, Hill & Smith PLC and its operating companies (the “Group”) need to be conscious of both the Group’s reputation and its obligations in respect of the disclosure of information related to its business affairs. Consequently, communications with third parties outside of the Group, to both the media and external investors, need to be managed with care and closely controlled to ensure that when information is given out it is accurate, consistent and does not breach any regulation applying to any Hill & Smith PLC operating company, the UK Listing Rules or any Group Policy.

Adoption

This Policy has been adopted by the Group and will be updated or modified as appropriate.

Implementation

The Executive Board of Hill & Smith PLC has overall responsibility for ensuring that the group’s operating companies comply with this Policy and ensuring that the Group’s operating companies act ethically towards employees and the environment. The senior leaderships teams of each operating company are responsible for ensuring the employees of their business understand and comply with this Policy.

Principles

Save for information which relates to the ordinary course of business of an Operating Company, which may be authorised for release at the local level, the following types of information should only be released with the **prior written approval of the Group Chief Executive Officer or Group Chief Finance Officer**:

- any financial, trading or commercial information about the Operating Company, the Group, or any business transaction or contract with customers or suppliers which is not in the ordinary course of the Operating Unit’s business; and/or
- any other potentially sensitive matters that arise and are therefore, high profile in the press or news media (such as environmental incidents; personnel related matters; health & safety incidents/prosecutions; or which have reputational consequences for the Operating Company or the Group).

No press releases on any other matters affecting an Operating Company or site should be released without approval from the Group Chief Executive Officer and/or Group Chief Finance Officer who will liaise with the Group’s appointed Public Relations advisors. Interviews which would risk an operating company spokesperson deviating from an approved text must have the **prior approval of the Group Chief Executive Officer and/or Group Chief Finance Officer**.

Individual operating companies who are asked to provide information about their business or that of the Group as a whole should inform and seek **the approval of the Group Chief Finance Officer** and must not divulge information about the Operating Company or the Group without such prior approval.

Other Contacts

- Group President
- Group Chief Financial Officer
- Group Company Secretary Tel: +44 (0)121 704 7430