

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2026



This Modern Slavery and Human Trafficking Statement is made by Hill & Smith PLC ('**Hill & Smith**' or the '**Group**'), on behalf of all companies within its group ('**H&S/H&S Group**')<sup>1</sup>, pursuant to s.54 of the Modern Slavery Act 2015 ('**MSA 2015**'). This statement describes the steps that H&S has taken in the financial year ending 31 December 2025, towards seeking to ensure that slavery and human trafficking is not taking place in its operations or its supply chains.

Hill & Smith has a zero-tolerance approach to the fundamental violation of an individual's basic human rights that modern slavery and human trafficking represents. We expect the same high standards from our suppliers. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems to prevent slavery and human trafficking in our corporate activities. We will not knowingly trade with companies that have been shown to employ or utilise slavery or servitude, forced and compulsory labour, child labour or are complicit in human trafficking activities.

### **Group Structure, Business and Supply Chains**

Hill & Smith is an international group providing solutions that increase the resilience of vital infrastructure and the built environment. Supplying to and located in global markets, we serve customers from facilities in India, Republic of Ireland, the UK, and the USA. We employ approximately c. 4,600 people worldwide and, in the period covered by this statement, we had annual revenues of £868.8m. Hill & Smith PLC is listed on the London Stock Exchange's Main Market and you can find out more about the products and services we provide at: <http://www.hsgroup.com>.

Due to the varied nature of our manufactured products and markets served, we have a complex and geographically diverse range of suppliers. However, our main supply chains are in respect of the supply of raw materials (e.g., steel, zinc and FRP resins), metallic components and other services that support our international operations.

### **Risk Assessment**

Since our last statement we have refreshed our Modern Slavery Risk Assessment. While the risk of modern slavery in the Group operations is considered to be generally low, areas of elevated risk include a) our Indian operations (c. 2% Group revenue), b) the Group's core sectors it operates in (particularly the construction sector and its complex multi-tiered supply chain), c) the engagement of flexible workforce, third-party subcontractors and third-party intermediaries, d) the sourcing of lower-cost materials from India and China and the supply of construction-based raw materials (such as steel and zinc), e) . Recognising this risk, we maintain a focus on these areas in our annual audit programme and have not identified any of the 'red flags' associated with modern slavery.

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<sup>1</sup> including Hill & Smith Infrastructure Ltd and Joseph Ash Ltd.

**Geographical Presence:** Hill & Smith has subsidiaries located in the UK, Republic of Ireland and USA, which the Global Slavery Index<sup>2</sup> identifies as having low modern slavery prevalence rates. The Group's modern slavery risk is, however, increased by its presence in India, which the Global Slavery Index identifies as having a higher modern slavery prevalence rate.<sup>3</sup>

**Indian Operations:** We have a subsidiary manufacturing facility in India which operates in a regulated work environment serving end markets which are themselves highly regulated. The Global Slavery Index estimates that India has the largest total number of people living in modern slavery globally. Our Indian subsidiary mitigates modern slavery risk by holding all necessary state and central licences and permits required to operate a manufacturing facility and is regularly audited internally, and by local authorities to ensure that the facility meets the requisite standards to continue to operate. All employees have identity and age checks undertaken prior to commencing employment and original identity documents are only used for this purpose. The terms of employment for our Indian employees grant rights for them to cease employment at will, subject to reasonable contractual notice being served.

**Construction Sector:** The construction sector is consistently identified as a high-risk for forced labour, due to complex, multi-tier supply chains; heavy reliance on raw materials sourced from high-risk countries; the use of subcontracting and temporary labour and low-wages. Hill & Smith mitigates sector exposure through a robust Group Supply Chain Policy, which mandates supplier due-diligence, annual performance reviews, and the requirement for all key suppliers to complete Compliance Certificates confirming adherence to anti-slavery and human-rights standards.

**Temporary / Flexible Work Force:** A number of our subsidiaries periodically employ temporary workers during peak periods of demand or in order to address specific short-term skill set shortages. To the extent that recruitment agents are used to source such labour, they are regularly vetted, and only reputable agents engaged. Right to work, age and identity checks are undertaken, and contracts allow such workers to cease employment at will, subject to contractual notices being served.

**Commercial Intermediaries:** A number of our subsidiaries engage with a series of third-party sales representatives, distributors and agents to facilitate primarily overseas sales. The use of intermediaries (particularly in higher risk jurisdictions such as the Middle East) introduces an increased modern slavery risk, as they may not have the same governance standards embedded within their businesses as Hill & Smith. All intermediaries undergo denied parties screening and due diligence and are required to confirm they will comply with Hill & Smith's Code of Business Conduct and policies.

**Lower-Cost Sourcing:** A small number of our subsidiaries source componentry and raw materials from higher risk jurisdictions such as India and China. We believe that these audits help us identify any risks of modern slavery within this part of our supply chain. Such suppliers are also subject to performance evaluations at regular intervals.

**The Supply of Construction and Major Raw Materials:** Some of our subsidiaries do business with the construction sector and traceability of raw materials in this sector is known to be challenging. We also import metals and resins to use in our operations. We monitor the countries that provide us with these types of materials and compare them with the Global Slavery Index. Supplier Compliance Certificates also provide annual assurance from key suppliers and embed Code of Conduct and Hill & Smith policy compliance, mandates reporting of breaches and lowers residual supply chain risk. It is recognised that greater transparency throughout the supply chain will help reduce modern slavery risk.

Taking the risk assessment's findings into account alongside our existing policies and practices (as

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<sup>2</sup> Walk Free Global Slavery Index 2023. <https://www.globalslaveryindex.org/>

<sup>3</sup> Global Slavery Index Prevalence Rates (per 1,000 people): Ireland – 1.1, UK – 1.8, USA – 3.3 and India – 8.0.

described below), we feel that the Group's overall modern slavery risk is low to medium. The increase in identified risk from 2024, is due to a more detailed Modern Slavery Risk Assessment in 2025.

### **Organisational safeguards**

We have a number of compliance controls to help combat modern slavery and human trafficking within our organisation. The Group Company Secretary oversees compliance in this area.

**Group Modern Slavery Policy** (the 'Policy'): The Policy sets out our approach, outlines the steps being taken to prevent and detect modern slavery, identifies red-flag warnings in respect of the signals of modern slavery and publicises the formal reporting mechanisms available to persons who suspect that modern slavery is occurring in our operations or supply chain.

**Code of Business Conduct ('CoBC')**: Our companies are committed to maintaining high standards of ethics and integrity in the conduct of their business activities. To the extent practicable, we have deployed UK ethical standards in our international operations. The CoBC reflects our zero-tolerance stance to modern slavery and human trafficking, re-emphasizing our position on respecting all individuals' basic human rights. We are committed to compliance with all applicable wage and working-time laws and the right of employees to participate in collective bargaining. It is mandatory for all employees and those engaged by the Group to adhere to the CoBC.

**Group Supply Chain Policy**: Our companies are committed to having appropriate systems in place to ensure that our supply chains comply with, or exceed, our required standards in respect to human rights, working conditions and the environment. This policy is periodically reviewed and updated to reflect best practice and ensure it is relevant, workable and user friendly. Compliance by our companies with this policy is subject to internal audit review and assessment.

**Whistleblowing Policy & Hotline**: Our Whistleblowing Policy describes the mechanism for reporting of unlawful or unethical activity, including matters related to modern slavery and human trafficking. The Speak Up hotline is an externally hosted service to ensure that matters can be raised anonymously, where the reporter feels unable to report matters directly to management. The Group experienced an increase in whistleblowing reports during 2025 largely due to greater awareness. No modern slavery or human trafficking matters have been raised during the 12-month period to 31 December 2025.

**Acquisition Integration**: Mergers & acquisitions remain a modern slavery risk, as the target companies may not have the same governance standards required by Hill & Smith. Due diligence and professional service advice is obtained prior to acquisition from leading & reputable consultants and legal suppliers. New business acquisitions are subject to a detailed integration plan that contain several actions to integrate the organisational and supply chain safeguards including adoption of relevant policies, due diligence of suppliers & customers, employee training, whistleblowing hotline rollout and circulation of the CoBC.

### **Supply Chain Safeguards**

**Group Supply Chain Policy**: Our Group Supply Chain Policy promotes robust supplier selection, effective due diligence, commercial best practice. Key suppliers (defined as suppliers who provide or perform an essential function, service, product or component, or who could not be easily replaced) are required to describe their own supply chain due diligence, furnish copies of their own Modern Slavery Statements (if applicable), and provide an assessment of the modern slavery risk in the sector in which they operate. Key suppliers are required to adhere to local laws and regulations and certain Hill & Smith standards, including the CoBC and the Modern Slavery Policy. Key suppliers are also reviewed annually and are required to sign an annual compliance certification confirming compliance. Our belief is that this

approach increases transparency within our supply chains, and suppliers who do not meet the requirements of the Supply Chain Policy will not become or continue to be regarded as H&S Approved Suppliers.

**Standard Contractual Commitments:** Our standard terms and conditions of sale and purchase require our customers and suppliers to comply with our policies in respect of modern slavery. Violations of these commitments serve as grounds for contract termination.

**Commercial Intermediaries Policy:** All commercial intermediaries are required to undergo continual due diligence and monitoring using both sanctioned party screening and annual compliance certification. Commercial Intermediaries are appointed using Hill & Smith standard agreements, that contain compliance provisions requiring intermediaries to comply with CoBC, the Modern Slavery Policy and provide annual compliance certification.

### **Training and Guidance**

**Board and Senior Management Training:** The Board of Hill & Smith reviews its Modern Slavery Policy on an annual basis and receives updates on our work monitoring the likelihood of modern slavery occurring. In addition, through our risk assessment work, senior managers continued to be engaged and upskilled in this area.

**Groupwide Training:** Hill & Smith's modern slavery training focus areas are consistent with ILO indicators – i.e. red flags associated with modern slavery and the actions they should take should they suspect its existence in our supply chain. All UK, US, Ireland and Indian employees with access to a work email are automatically assigned online modern slavery and/or human trafficking training when they join the Group, which is renewed on an annual basis. Copies of the training materials are provided to subsidiaries to deliver to the employees without access to a work email - i.e. factory workers.

During the year, over 1,700 colleagues completed the online training course. We are committed to ensuring that all colleagues required to perform the training, do so and completion rates are monitored centrally and via the line managerial route.

**Human Resources Guidance:** In general, and taking into account our policies outlined above, we consider that our permanent workforce is unlikely to be, or to become, victims of modern slavery or human trafficking but we are nonetheless alert to the possibility. We recognise that modern slavery can happen anywhere.

We are cognisant of the fact that victims of modern slavery and human trafficking are likely to be living in circumstances of fear and, therefore, may not actively seek help. The Group follows employment best practices, and all employees receive mandatory training in the key red-flag behavioural warnings known to be exhibited by victims of modern slavery and human trafficking to enable victims to be more easily identified and assisted.

### **Effectiveness of Procedures**

We have a zero-tolerance approach to the existence of modern slavery and human trafficking in our supply chain. Through the steps we are taking as outlined above and the annual confirmation from our subsidiaries that they have applied our Modern Slavery Policy and that the Group Company Secretary has been informed of any suspected or actual violations of the policy, we believe that the risk of exposure to modern slavery or human trafficking is low.

### **Looking ahead**

In addition to continuing to evaluate the risk landscape and review procedures and controls, we aim to

pilot a risk based modern slavery supplier audit (for higher risk raw materials suppliers).

The Board is committed to opposing modern slavery in all forms and hereby approves this statement.

Approved by the Board of Directors on 6 March 2026  
and signed on its behalf by

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Rutger Helbing  
Chief Executive Officer