



# GROUP MODERN SLAVERY POLICY

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*Hill & Smith PLC and its operating companies (the 'Group') has a zero-tolerance approach to Modern Slavery. We are committed to implementing effective systems and controls to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.*

## Basis

Modern slavery is a crime and a violation of fundamental human rights, and refers to situations of exploitation, where a person cannot refuse or leave because of threats, violence, coercion, abuse of power or deception.

All Group employees, directors, consultants, contractors, casual workers, agency employees and all others who are acting for the Group (collectively referred to as 'employees' in this Policy) should be able to recognise when instances of modern slavery are taking place and act in accordance with this Policy.

## Principles

We accept that Modern Slavery, because of its worldwide prevalence, could exist in our businesses and supply chains globally and so operating companies must ensure that they deploy preventative steps, introduce detection mechanisms, create a modern slavery awareness culture, and ensure that opportunities exist to report concerns about modern slavery without fear of reprisal or employment disadvantage.

We are committed to compliance with the Universal Declaration for Human Rights and the UK Human Rights Act 1998 and to complying with the UK Modern Slavery Act 2015.

## Adoption

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

## Implementation

The Board of each operating company is responsible for the detailed oversight of the operation of the Policy and reporting to the Group's Board as and when any matters arise.

## Our Commitment

The Group is committed to transparency in its approach to tackling Modern Slavery:

### Operating Companies' Duties

Our operating companies will work with our **key suppliers** to ensure:

- they are familiar with, and comply with, this Policy and all associated requirements as outlined during the Group's due diligence process and in the Group's Procurement Standards;
- they certify their compliance and permit Group employees to audit their business for compliance with this Policy and associated processes;
- they have their own programmes to eradicate modern slavery in all its forms from their business and their supply chains; and
- they advise the Group immediately of any signs or suspicions of modern slavery in their business or supply chain.

Our operating companies will work with their **employees** to:

- ensure they are familiar with, and comply with, the Policy and associated processes;
- complete any required training and proactively update their knowledge; and
- report any signs or suspicions of modern slavery in their business or supply chain immediately to their manager, the Group Company Secretary or via the Whistleblowing Hotline.



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## Other Roles & Responsibilities

The **Group Board** will maintain overall responsibility for the effective operation of this Policy and for approving the Group's annual Modern Slavery Statement.

The **Audit Committee** will support the Group Board through its assurance remit, by highlighting to the Group Board any material information arising from internal or external sources of assurance relevant to the operation of the Policy or compliance with the Act.

The **Group Company Secretary** will ensure the Modern Slavery Statement and this Policy is reviewed each year and recommended to the Group Board for approval and that the Statement is published on the Group's website.

The **Executive Committee** will ensure each operating company has effectively embedded the Policy and that all staff receive appropriate training and that any incidents of modern slavery arising in their business or supply chain to the PLC in a timely manner.

## **Violation of this Policy**

Employees are required to avoid any action or behaviour which violates or could be construed as violation of this Policy.

Employees are required to report any signs or suspicions of modern slavery in our business or our supply chain immediately either via your Managing Director, or Group Company Secretary, or report using the Group's our online 'SPEAK UP' portal, provided by Navex Global EthicsPoint at <https://hsgroup.ethicspoint.com>.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result.

Third parties found to have committed a violation of this Policy or the Act will be subject to the remedies outlined in the contract or other arrangement with the Group.

## **Associated Documents**

- Group Whistleblowing Policy

## **Helpful Document**

- Modern Slavery Guidance

## **Other Contacts**

- Group President
- Group Company Secretary
- Email: [compliance@hsgroup.com](mailto:compliance@hsgroup.com)

**Approved by the Board of Directors of Hill & Smith PLC**

**6 March 2025**