



GROUP ANTI-SLAVERY POLICY

Modern slavery is a crime and a violation of fundamental human rights. We have a zero-tolerance approach to Modern Slavery and 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. We will be transparent in our approach to tackling Modern Slavery to meet our obligations under the Modern Slavery Act 2015.

Hill & Smith PLC and its operating companies (the “Group”) have a zero-tolerance approach to Modern Slavery

Principles

Modern slavery refers to situations of exploitation, where a person cannot refuse or leave because of threats, violence, coercion, abuse of power or deception. For example, their passport might be taken away if they are in a foreign country, or they may experience violence, or their family may be threatened.

Basis

The basis of this policy is that 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.

Adoption

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

Implementation

The Policy will be implemented across all Group Operating Units. The boards of each Operating Unit are responsible for the detailed oversight of the operation of the Policy and reporting to the Group’s Board as and when appropriate matters arise.

Our Commitment

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.

We accept that Modern Slavery, because of its worldwide prevalence, could exist in the UK and 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.

Forms of Modern Slavery

Modern slavery as defined under the Act is a term for the criminal activity associated with certain human rights abuses. It includes:

- **Slavery** – the deprivation of freedom of a person by another.
- **Servitude** – the forced provision of services, activities or behaviours from one person by another through
 - coercion. This often includes the perpetrator imposing on the victim the obligation for them to live at a particular address against their will/preference.
- **Forced or compulsory labour** – where a person forces another to undertake work or provide services under
 - the threat of the imposition of a penalty if they do not.
- **Human trafficking** – where the perpetrator arranges travel for the victim with the intention of exploiting them. Often victims are so desperate to leave a location that they consent to the travel, without full



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comprehension as to the deception involved by the perpetrator.

- **Forced or servile marriage** – where a person:
 - without the right to refuse, is promised or given in marriage on payment of any kind of consideration;
 - is transferred by their partner, family or clan against their will on payment of any kind of consideration; or
 - on the death of their partner is inherited by another person

Given the illegal nature of the above aspects of Modern Slavery, it is often difficult to identify as perpetrators are increasingly sophisticated and able to disguise their illicit activities. In addition, victims often live in fear of the perpetrators and so do not report.

'Red Flag' Warnings

The following should be noted as 'red flags' to the potential occurrence of modern slavery. If a person:

- Is unpaid, paid very little, or paid only through tips.
- Works excessively long and/or unusual hours.
- Is not allowed breaks or suffers under unusual restrictions at work.
- Owes a large debt and is unable to pay it off.
- Was recruited through false promises concerning the nature and conditions of work.
- Has high security measures in their work and/or living location.
- Is not free to come or go as they please.
- is fearful, anxious, depressed, submissive, tense, nervous or avoids eye contact.
- is reluctant to engage in discussions about law enforcement agencies.
- lacks health care.
- exhibits poor personal hygiene.
- appears malnourished.
- shows signs of physical and/or sexual abuse, physical restraint, confinement or torture.
- has few or no personal possessions.
- is not in control of their own money, financial records or bank account.
- is not in control of their own identification documents.
- is not allowed or able to speak (a third party insists on interpreting or being present).
- is unable to clarify their address or whereabouts.
- has a loss of sense of time.
- has numerous inconsistencies in their back story.

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;
- Certify their compliance and permit Group employees to audit their business for compliance with this Policy and associated processes;
- Have their own programmes to eradicate modern slavery in all its forms from their business and their supply chains;
- Advise the Group immediately of any signs or suspicions of modern slavery in their business or supply chain.



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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;
- 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.

Other Roles & Responsibilities

The **Group Board** will maintain overall responsibility for the effective operation of this Policy and for approving Group's the 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 Board** will ensure each operating company is effectively embedding 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 all action, inaction 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.

Any employee who is found to have committed a violation of this Policy or the Act will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal.

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

Other Contacts

- Group President
- Group Company Secretary
- Email: compliance@hsgroup.com

Approved by the Board of Directors of Hill & Smith PLC
2 March 2023