



the hill company

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#05:014 MODERN SLAVERY ACT POLICY

THE HILL COMPANY

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The Hill Company

MODERN SLAVERY POLICY

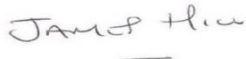
1. DOCUMENT OWNER AND APPROVAL

The Quality Management Team is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the ISO9001:2015 Quality Management System.

A current version of this document is available to all employees on request, it does not contain confidential information and can be released to relevant external parties. When any part of this policy is amended, a record is made in the Version History Log shown below. The policy can be fully revised and re-issued at the discretion of the Quality Management Team.

This policy was approved by the Managing Director and is issued on a version-controlled basis under the signature of the Managing Director.

VERSION HISTORY				
Version	Date	Detail	Author	Authorised
01	31/01/2017	First Edition	TH / SW	
	31/03/2017	Agreed by Managing Director		JH
02	31/03/2018	Reviewed / New layout	TH / SW	
	31/03/2018	Agreed by Managing Director		JH
03	30/09/2019	Reviewed / Changed layout	TH / SW	
	30/09/2019	Agreed by Managing Director		JH
04	01/06/2022	Added section on Supply Chain Management. Added items to supporting documentation. Changed layout.	TH / SW	
	01/06/2022	Agreed by Managing Director		JH

Date	01/06/2022	Position	Managing Director
Name (Uppercase)	JAMES HILL	Signature	

2. RESPONSIBILITIES:

2.1 MANAGING DIRECTOR

- 2.1.1 To ensure the Modern Slavery Act Policy is current and is reviewed.
- 2.1.2 To ensure that all interested parties are adhering to the Modern Slavery Act Policy.

2.2 DEPARTMENT MANAGERS

- 2.2.1 Ensure this policy is communicated to all employees.
- 2.2.2 To investigate and escalate any reports of wrong doings that has been highlighted to them.
- 2.2.3 To ensure frequent audits are conducted on all existing and potential suppliers.

2.3 ALL EMPLOYEES

- 2.3.1 To adhere to Modern Slavery Policy and to highlight any breaches to their supervisor or manager.

3. SUPPORTING DOCUMENTATION

- Whistleblowing Policy
- Risk and Opportunity Matrix
- Supplier Accreditation Log
- Supply Chain management Policy
- Supply Chain management Policy Declaration

4. POLICY STATEMENT

This statement has been created in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Hill Company to prevent modern slavery and human trafficking within its business and supply chains.

5. INTRODUCTION

- 5.1 We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted.
- 5.2 THC has a zero-tolerance approach to Modern Slavery of any kind within our business and supply chain. THC and all its employees have a responsibility to be alert to the risks, however small. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.
- 5.3 We have a Whistleblowing Policy in place, aimed principally at THC employees which encourages them to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated by senior management and appropriate remedial actions taken.
- 5.4 THC ensure the following:
- 5.4.1 Provide employees with good working conditions, fair treatment and reasonable rates of pay.
 - 5.4.2 Respect worker's human rights and comply fully with all applicable laws.
 - 5.4.3 All work is carried out voluntarily and not done under any threat of penalties or repercussions.
 - 5.4.4 All employees are free to leave the company's employment at any time, in conjunction with their contractual obligations with all salary owed being paid.
 - 5.4.5 To comply with our ISO 9001:2015 THC have an established "Risk and Opportunity Matrix" in place which we have highlighted the risks within in the business that are affected by the Modern Slavery Act.

6. COMPLIANCE OF SUPPLIERS AND SUPPLY CHAINS

- 6.1 THC understand that our biggest exposure to Modern Slavery is in our suppliers and product supply chains. To comply with the Modern Slavery Act THC will conduct regular external audits.
- 6.2 The external audit process includes a questionnaire on the suppliers and supply chains policies relating to the Modern Slavery Act, THC will request evidence that they comply with their policies, and all evidence collated will be added to the "Supplier Accreditation Log" which forms part of THC's ISO 9001:2015 and 14001:2015 accreditations.

- 6.3 The “Supplier Accreditation Log” contains our suppliers and supply chains accreditations details, including PDF copies of any certificates and their expiry dates.
- 6.4 Audit findings will be presented during both committee and management meetings, suppliers which THC feel have breached their obligations to the Modern Slavery Act will be contacted with THC’s concerns, if the concerns are not rectified, then appropriate actions will be carried out which could include termination of contract.
- 6.5 As part of our supply chain management, we send a #05:067 Supply Chain Management Policy to our key suppliers. The policy establishes the means with which to assess the risks and opportunities associated with the contracting, procurement, and provision of supplies and services.
- 6.6 The Supply Chain Management Policy details:
- 6.6.1 Supply chain principles.
 - 6.6.2 Action expected of the supply chain.
 - 6.6.3 Code of conduct alignment.
- 6.7 Key suppliers will sign a #05:069 Supply Chain Management Policy Declaration as evidence that they have:
- 6.7.1 Been supplied a copy, read and understood the principles and expectations set out within the policy as a supplier to The Hill Company.
 - 6.7.2 Will inform The Hill Company of any breaches of this policy.
 - 6.7.3 Will work transparently with The Hill Company to resolve any corrective actions or changes to processes that will affect their service provided to The Hill Company.

This document forms part of The Hill Company’s Quality Management Policy and as such, must be fully complied with.