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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 is reviewed in line with the requirements of the ISO9001:2015 Quality Management System.

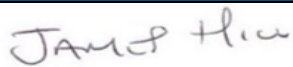
A current version of this document is available to all employees on request, it does not contain confidential information and can be released to relevant external parties. When any part of this policy is amended, a record is made in the Version History Log shown below and the Version No: and Issue Date is amended in the header of this document. The policy can be fully revised and re-issued at the discretion of the HR Department or 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 |
|---------|------------|---|---------|
| 01 | 31/01/2017 | First Edition | TH / SW |
| 02 | 31/03/2018 | Reviewed / New layout | TH/SW |
| 03 | 30/09/2019 | Reviewed / Changed layout | TH/SW |
| 04 | 01/06/2022 | Reviewed / Added Supply Chain Management. Added items to supporting documentation. Changed layout. | TH/SW |
| 05 | 09/10/2023 | Reviewed / Added sign off, scope, objectives, communication, monitoring & review and enforcement. Removed the supporting documentation section. | TH/SW |

SIGN OFF AND REVIEW DATE

| | | | |
|---------------|---|--------|------------------------------|
| Sign Off |  | Name | James Hill |
| Position | Managing Director | Date | 09/10/2023 |
| Last Reviewed | 09/10/2023 | Name/s | Terry Hunt Simon Williams |

2. RESPONSIBILITIES:

We have a responsibility to ensure that this policy is managed. Different employees have different roles in relation to this policy and these responsibilities are detailed below:

2.1 MANAGING DIRECTOR

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

2.2 DEPARTMENT MANAGERS

- To ensure the Modern Slavery Act Policy is communicated to all employees.
- To investigate and escalate any reports of wrong doings that has been highlighted to them.
- To ensure frequent audits are conducted on all existing and potential suppliers.

2.3 QUALITY MANAGEMENT TEAM

- To carry out internal audits to ensure the controls are being implemented and compliance is maintained.
- To ensure the Modern Slavery Act Policy is reviewed regularly.

2.4 ALL EMPLOYEES

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

3. POLICY INTRODUCTION

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.

The Hill Company has a zero-tolerance approach to Modern Slavery of any kind within our business and supply chain. The Hill Company and all its employees have a responsibility to be alert to the risks, however small. Employees are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

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.

We have a Whistleblowing Policy (listed within the employee handbook) in place, aimed principally at The Hill Company 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. SCOPE

This policy applies to all employees, contractors, and suppliers of The Hill Company. It encompasses all aspects of our operations, including recruitment, employment, and supply chain management.

6. OBJECTIVE

The Hill Company is dedicated to preventing modern slavery and human trafficking in all its business activities. This policy outlines our commitment to acting ethically and the steps we will take to ensure slavery and human trafficking are not taking place in our business or supply chains.

The Hill Company ensure this by adhering to the following:

- Provide employees with good working conditions, fair treatment and reasonable rates of pay.
- Respect worker's human rights and comply fully with all applicable laws.
- All work is carried out voluntary and not done under any threat of penalties or repercussions.
- All employees are free to leave the companies employment at any time, in conjunction with their contractual obligations with all salary owed being paid.
- To comply with our ISO 9001:2015 The Hill Company 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.

7. SUPPLIER ENGAGEMENT:

The Hill Company will work with our suppliers to ensure they share our commitment to preventing modern slavery. This may include audits, contractual obligations, and collaboration on improvement plans.

7.1 COMPLIANCE OF SUPPLIERS AND SUPPLY CHAINS

The Hill Company understand that our biggest exposure to Modern Slavery is in our suppliers and product supply chains. To comply with the Modern Slavery Act, The Hill Company will conduct regular external audits on our key suppliers.

7.2 SUPPLIER EXTERNAL AUDIT PROCESS

The external audit process includes a questionnaire on the suppliers and supply chains polices relating to the Modern Slavery Act, The Hill Company will request evidence that they comply with their polices, and all evidence collated will be added to the "Supplier Accreditation Log" which forms part of The Hill Companies ISO 9001:2015 Quality Management System.

7.3 SUPPLIER ACCREDITATION LOG

The "Supplier Accreditation Log" contains our suppliers and supply chains accreditation details, including the certificate expiry dates. The log is formatted so it highlights when certification is 30 days from their expiry date, so we are aware that we will need to request new certificates. PDF copies of the certificates are kept within the related supplier's file.

7.4 REVIEW OF SUPPLIER AUDITS

The supplier audit findings will be presented during management meetings, any suppliers which The Hill Company feel have breached their obligations to the Modern Slavery Act will be contacted with The Hill Company's concerns, if the concerns are not rectified, then appropriate actions will be carried out which could include termination of the contract.

7.5 SUPPLY CHAIN MANAGEMENT POLICY

As part of our supply chain management program, The Hill Company send out the #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.

The Supply Chain Management Policy details:

- Supply chain principles.
- Action expected of the supply chain.
- Code of conduct alignment.

Key suppliers will sign the #05:069 Supply Chain Management Policy Declaration as evidence that they have:

- Been supplied a copy, read and understood the principles and expectations set out within the policy as a supplier to The Hill Company.
- Will inform The Hill Company of any breaches of this policy.
- 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.

8. COMMUNICATION

This policy will be communicated to all employees, contractors, and suppliers. It will also be made available to the public through our website.

9. POLICY MONITORING AND REVIEW

Ongoing monitoring of compliance with this policy will be undertaken on a regular basis by the Quality Management Team. This policy will be reviewed annually in line with scheduled date listed within The Hill Companies "Document Log". Unscheduled reviews will take place in the event of significant change or failure to a procedure.

Internal Audits are carried out by the Quality Management Team to ensure this policy is being adhered too.

10. ENFORCEMENT

The Hill Company will take appropriate measures to remedy any breach of this Policy through the relevant framework in place. In the case of an employee, then the matter may be dealt with, under The Hill Company's disciplinary process. In the case of a supplier see section 7.4 within this policy.

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