

Modern Slavery Act 2021 Statement

25 June 2021



Introduction

Hill is an award-winning 5 star housebuilder, and one of the top 15 housebuilders in the United Kingdom. We specialise in developing distinctive new homes across London and the South East and currently directly employ over 680 people in these locations. We are a privately owned limited group of companies who are committed to working alongside other organisations, suppliers and sub-contractors who equally support the aim of reducing modern slavery across the UK. This statement therefore covers the following group companies - Hill Holdings Limited and subsidiaries. It sets out the actions we have taken to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our group companies or supply chain.

As part of the construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. We remain committed to preventing slavery and human trafficking in our activities and those of our supply chain.

We recognise that our people are integral to what we deliver and fundamentally key to our success. Our modern slavery and human trafficking statement is published on our website and can be accessed via this [link](#).

Training and Awareness

We have a Group wide policy for our staff confirming that Hill has a zero tolerance approach to any form of modern slavery and human trafficking. This is reviewed annually and published on our internal website, so is available at all times. All new members of staff attend an induction event where we raise awareness of modern slavery. We continue to check that directly employed staff are eligible to work in the UK, using the appropriate and approved government checklist of documentation. Further mandated training is available, via our online training provider, for all our staff, which includes awareness of the Modern Slavery Act. We will also raise awareness through our internal communication channels of the basic principles of the Modern Slavery Act 2015, how employers can identify and prevent slavery and human trafficking and the external help that is available, for example the Modern Slavery helpline.

Due Diligence

We will not tolerate or condone any form of exploitation and will act promptly where any breach of the Act has been identified. We will take appropriate steps against suppliers who do not meet the required standard for example by asking them to take action to improve or terminating the business relationship if the required improvement is not forthcoming. Our Whistleblowing Policy provides a mechanism for our employees to report any breach of our legal obligations, including those contained in the Act.

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Supply Chain

Our Supply Chain includes the procurement of trade subcontractors, material & plant suppliers, consultants and other service providers to meet our business requirements.

Whilst we have thorough due diligence processes in place for managing both new and existing supply chain relationships, we continue to regularly review these to ensure that the intention and requirements of the act are addressed. Working with our supply chain partners we ask that they provide us with the assurance that, modern slavery is understood and not present in their company and wider supply chain. We want to make sure that safe and fair working conditions are provided and we require that those in our supply chain have policies, procedures, practices and contracts within their organisations and with their own suppliers to equally reflect this.

Hill regularly reviews its trading partners as part of our supply chain management, focusing closely on those we consider to be at the greatest risk, including suppliers; who operate by employing casual or temporary labour, manufacture or trade in raw materials, particularly outside the UK / EU. They need to demonstrate to us, full compliance with our policy and this statement.

We have reviewed the standard order documents that we use to engage with our supply chain to assess and manage any risk, as far as is reasonably practicable. To support our approach further all of our subcontract orders and purchase orders have an appropriate paragraph included as standard, regarding the Modern Slavery Act.

Hill has a database, which facilitates both the on boarding of potential new supply chain partners and the maintenance of existing ones. We link our prequalification question sets to those of Constructionline (PAS91). By using Constructionline as our preferred data validator, we capture the provisions for modern slavery within the existing questions. Our requirements and a copy of this statement are communicated directly to our existing supply chain and via our website and supplier portal for potential new supply chain partners to reinforce our approach.

Continuous Improvement

During our current financial year ending 31 December 2021, we continue to monitor the effectiveness of our actions against modern slavery and human trafficking and review the risks within our own business and across our supply chain. We continue to provide further guidance and support to all employees and Supply Chain Partners to raise awareness within our industry.

We will set Key Performance Indicators:-

All staff to complete online training on Modern Slavery by 31 March 2022

Carry out an bi-annual audit on our supply chain verification system

Review our existing Supply Chain and ensure that they sign up to our new and revised Supply Agreement by 31 December 2021

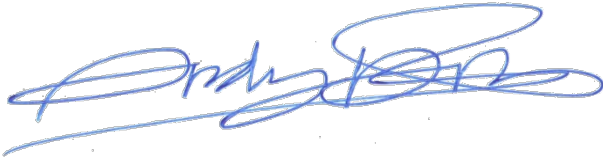
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This statement is made and published in accordance with section 54 of the UK Modern Slavery Act 2015 and constitutes Hill's modern slavery and human trafficking statement for the financial year ending 31 December 2020. The Hill Holdings Limited Board of Directors approved it on 07 May 2021 and will review and update it annually.

Signed by



Andy Hill MCIQB
Group Chief Executive
Hill Group Services Limited

May 2021