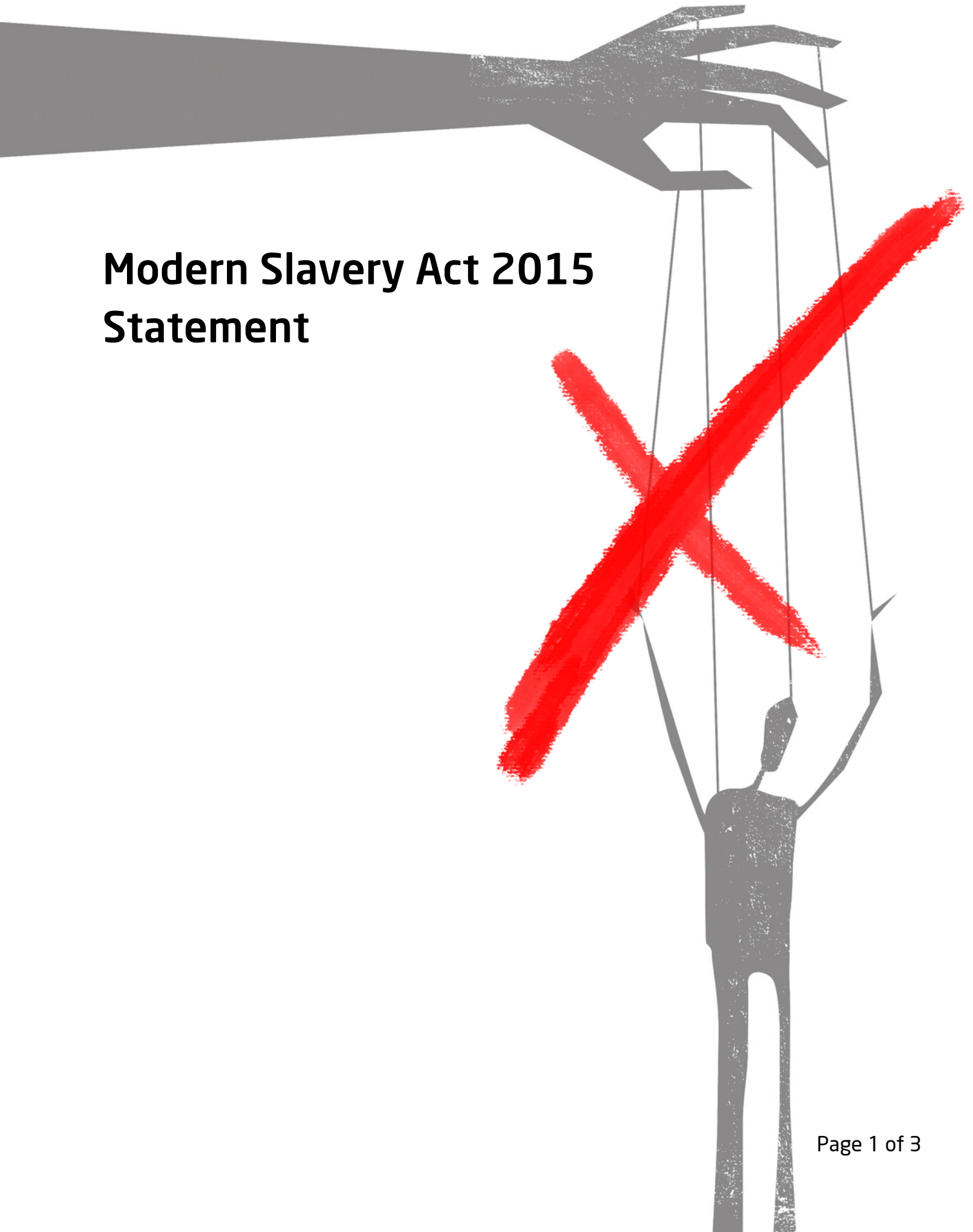


Modern Slavery Act 2015 Statement



Modern Slavery Act 2015 Statement

Established in 1900 Hills UK Limited and its subsidiaries (Hills) is a privately-owned family business whose activities include recycling and waste management; quarrying of aggregates and production of ready-mixed concrete; and building new homes.

Hills believe that slavery, the exploitation of workers and the use of child labour should play no role in the operation of modern-day business. Hills is committed to ensuring that acts of modern slavery and human trafficking are not present within its own operations, or those of its suppliers, contractors and business partners.

Hills' main operations are centred on the County of Wiltshire and we employ 648 people (2020/21-680 people) at 26 sites (2020/21 – 26 sites) located in the South and South West of England. All our business operations are located in the United Kingdom with the majority of our suppliers and business partners being UK based. In the financial year under review, by value, our supply chain was 95% UK based and 5% from within Europe (2020/21 - 95% UK based and 5% within Europe).

Hills operates a Responsible Purchasing Policy and approval process that seeks to ensure that Hills only does business with like-minded suppliers, contractors and business partners that uphold the same standards of business ethics. This requires confirmation of compliance with relevant UK legislation and industry standards and where applicable evidence of supporting policies and processes including those addressing the risk of modern slavery. Where identified suppliers, contractors and business partners are not able to provide us with adequate assurances on compliance we will cease to trade with them in accordance with our terms and conditions of purchase, unless they can clearly demonstrate that they are taking verifiable action towards compliance. During the financial year the application of the Responsible Purchasing Policy continues to be the main control used by the company in its risk management of modern slavery and it is a requirement for modern slavery compliance to be verified where approval is required for expenditure above a set limit.

The company continues to focus on the potential risk of slavery and human trafficking in business sectors supplying goods and services to our operations and the supply of temporary labour remains identified as the main area of risk.

Hills requires all employees to adhere to its Code of Conduct, which sets out the standards of workplace behaviour expected of them. This includes their behaviour towards each other, contractors and suppliers. All employees are expected to act with dignity and respect, while upholding the highest standards of business ethics. The Code of Conduct Policy is supported by Equal Opportunities and Fair Employment policies and practices to ensure the company complies with UK employment legislation and employee rights at work are maintained.

Employees are kept informed and updated on policies through a number of internal communication channels and training is conducted to support the company's culture and strong business ethics.

Hills operates a Whistleblower Policy which provides employees with a confidential method of reporting suspected wrongdoing if they believe it to be taking place within the business. Any reported concerns are taken seriously and are appropriately investigated.

The company has developed its own employee awareness material on identifying the signs of modern slavery. During the financial year the company continued to raise awareness on this issue

amongst our existing workforce and how to report suspected instances of modern slavery either via the company's whistleblower phone line or national Modern Slavery helpline.

In the current year the company is reviewing its training and awareness material to promote the wider issues associated with Modern Slavery to our employees.

The company are still considering the best measures by which to establish targets and key performance indicators to evaluate the effectiveness of the organisation's actions and progress over time. During the year, to inform this process, the Group's largest employing division, Waste Solutions participated in the Indirect Procurement Human Rights (IPHR) Forum Waste & Recycling Working Group welfare survey of waste sector employees. The company is therefore not in a position to report any KPIs in this statement.

Hills is committed to reviewing its policies and procedures to maintain an ethical and legally compliant culture within its business and those it does business with.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Hills' Anti-Slavery and Human Trafficking statement for the financial year ending 30 April 2022.

This statement is a group statement and covers Hills UK Limited and its subsidiary trading operations Hills Waste Solutions Limited; Hills Quarry Products Limited; Hills Home Developments Limited; Hills Municipal Collections and The Hills Group Limited and is approved by the executive board of directors.



Michael P Hill, Chief Executive

Dated: 29 September 2022