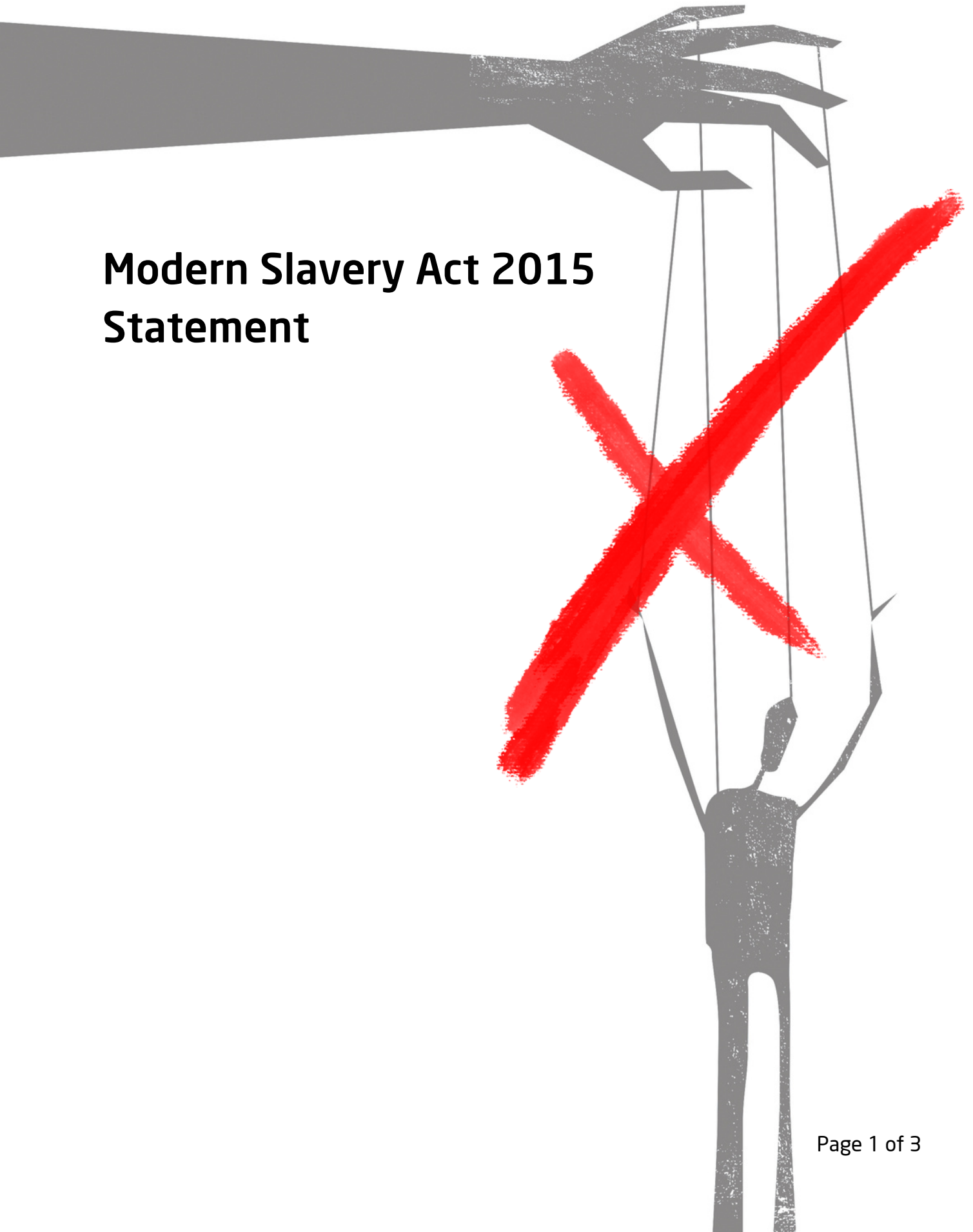


Modern Slavery Act 2015 Statement



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 687 people (2021/22-648 people) at 26 permanent sites (2021/22 – 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 96% UK based and 4% from within Europe (2021/22 - 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 review compliance of its supplier base on a rolling basis.

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.

During the year, the company has introduced a modern slavery awareness and training course within our e-learning management system. To date, this training course has been completed by 219 employees: 95.63% of those employees with administrative and financial duties and managers and directors with procurement authority. Over the next two years the company is targeting for all employees to have completed this training and will report on our progress against this target. The company continues to promote to all our employees the wider issues associated with modern slavery

and awareness on spotting the signs of modern slavery and how to report it internally and via the national Modern Slavery reporting line.

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 2023.

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.

A handwritten signature in blue ink, appearing to read 'M Hill', is positioned above the name of the Chief Executive.

Michael P Hill, Chief Executive

Dated: 02 October 2023