



Modern Slavery & Human Trafficking Policy	Version V1.1	
	Reviewed – 1 st December 2023	Next Review – 30 th November 24

Introduction

The Modern Slavery Act is an Act brought into the United Kingdom as a law in 2015. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery.

The statement sets down Hillstreet UK Ltd's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management are expected to act upon them.

As a professional construction company, we always work to the highest professional standards and comply with all laws and regulations applicable to our business, both national laws and local laws. We offer all staff a contract of employment and this will include the rights of the individual, fe. Freedom of movement, prohibits discrimination, overtime choices, freedom to terminate employment. Whilst we check identification original documents of all staff, we return the originals to them personally and not through a third party. We do not employ child labour. We need to check whether they have a right to legally work in this country. We expect the same high standards from those parties we engage with and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or within any part of our operation. Gov.uk have set up a website that you can check whether foreign nationals are eligible to work in the UK.

Structure and supply chains

This statement covers the business activities of Hillstreet UK Ltd which are as follows:

Construction and Civil Engineering.

The following is the process by which Hillstreet UK assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking.

High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking:, concrete finishing, unskilled laborers.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: Christine King, Company Secretary is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practices and changing and creating new policies as and when necessary whether it is through new legislation or by experience.
- 1.2 Risk assessments: Christine King and Sean King are responsible for risk assessments in respect of human rights and modern slavery.
- 1.3 Due diligence: Christine King and John King are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to undergo training at the induction process before they commence work. Supervisors and foreman are trained to look out for signs of modern slavery in their day to day working day.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

- 2.1 **Whistleblowing Policy** - Hillstreet UK encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Hillstreet UK Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners **AND** evaluating the modern slavery and human trafficking risks of each new supplier. Each new supplier fills in a questionnaire and we verify their policy on Slavery and human trafficking.

Performance indicators

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Hillstreet UK endorses this policy statement and is fully committed to its implementation.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy and associated documentation is made known to all employees and will be reviewed on a regular basis. All staff are inducted and given a copy of all of our policies including the one on Modern Slavery.

Should we identify slavery and human trafficking in our company, we would provide help to the individual, compensation and support for justice for the victim

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:



John King
Director

1st December 2023