

MODERN SLAVERY STATEMENT

This statement applies to Hillswood Services Ltd (HS) and all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, volunteers, interns, agents, contractors, and external consultants. The information included in the statement is reviewed annually and is in line with Section 54 of the Modern Slavery Act 2015.

DEFINITIONS

HS considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

HS acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. HS understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

HS does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to HS in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. HS strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

SUPPLIERS

HS operate a Supplier Policy and maintains a Preferred Supplier List. HS conducts due diligence on all suppliers and supply partners before allowing them to become a Preferred Supplier. This due diligence includes completion and passing of a bespoke Pre-Qualification Questionnaire, online search to ensure that particular organisation has not been convicted of offenses relating to modern slavery and onsite audits which include a review of working conditions. Our Anti-Slavery Policy, forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this Policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees any prevailing minimum wage applicable within their country of operations.
4. We may terminate the contract at any time should any instances of modern slavery come to light

POLICIES

HS has the following policies which further define its stance on modern slavery and ethical conduct:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

| | | |
|---------------------------------|-----------------------|-------------------------|
| Owner: SMT | Issue Date: 01/04/25 | Reviewer: Megan O'Brien |
| Title: Modern Slavery Statement | Review Date: 01/04/26 | Version: HS051 |

2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

ASSESSING & MANAGING RISK

In general, HS considers its exposure to slavery/human trafficking to be low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

DUE DILIGENCE

HS carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

TRAINING

HS regularly conducts training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

KPIs

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This Policy is the direct responsibility of Operations Director Megan O'Brien. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date: 1st April 2025

Name: Megan O'Brien

A handwritten signature in black ink, appearing to read 'Megan O'Brien', is positioned above the signature label.

Signature:

| | | |
|---------------------------------|-----------------------|-------------------------|
| Owner: SMT | Issue Date: 01/04/25 | Reviewer: Megan O'Brien |
| Title: Modern Slavery Statement | Review Date: 01/04/26 | Version: HS051 |