

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Financial year 2025/2026

Hillcrest Structural Ltd

Document No. HSL-POL-C-68 | Version V1.00



Our commitment

A concise statement of purpose and reporting basis

Hillcrest Structural Ltd is committed to preventing modern slavery and human trafficking within our own operations and across our supply chain. We recognise that responsible sourcing, fair working practices and transparent business relationships require continued attention, evidence and improvement.

This statement focuses on the actions taken, the controls in place and the work still in progress. It does not claim that all supply-chain risks have been eliminated.

Reporting basis

Prepared with reference to section 54 of the Modern Slavery Act 2015 and current UK Government transparency guidance.

Reporting period

Financial year 2025/2026.
Reporting period 01/04/2025-31/03/2026.

Status

Voluntary statement produced to meet client expectations and demonstrate responsible business practice.

Our business and supply chain

Where our activities and principal exposures sit



Structural steel | specialist contracting | UK operations

Organisation

One UK office in the south of England, with approximately 30 employees, including a small site-based workforce.

Company No. 01625831

Activities

Design, supply and erection of structural steel and ancillary items. Fabrication is undertaken through external supply-chain arrangements.

Supply chain

Suppliers and subcontractors support steel supply, design, fabrication, erection, transport and corporate services. Most direct suppliers are UK-based.

Principal exposure

Risk can sit beyond the immediate UK supplier, particularly in steel manufacture, raw-material origin, labour provision, subcontracting and international sourcing routes.

Governance and policy framework

Clear ownership supported by established controls

Managing Directors

Provide strategic oversight, review progress and approve the annual statement.

Finance Director

Designated HR contact responsible for employment and contractual arrangements.

Compliance Manager

Coordinates supply-chain compliance, due diligence, risk assessment and annual reporting.

Supporting framework

Modern Slavery Policy

Supplier Code of Conduct

Ethical Trading

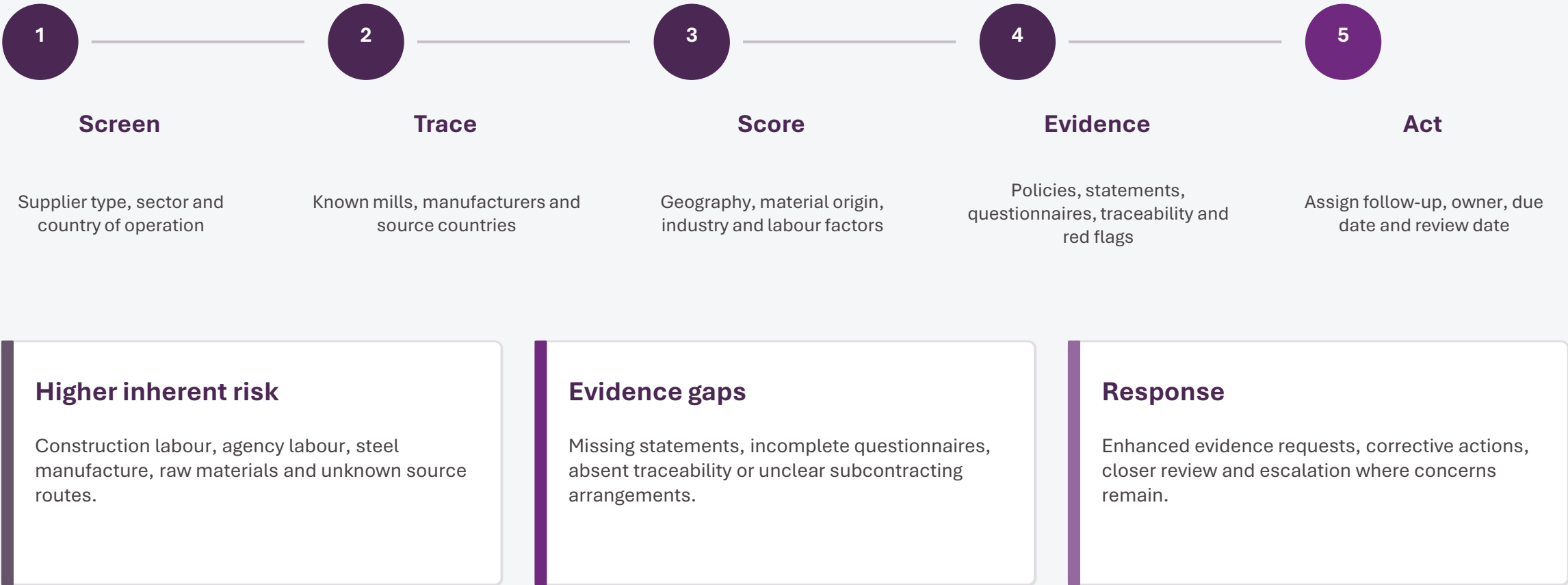
Whistleblowing

Recruitment, Right to Work & Fair Employment

Supplier Approval

Understanding our risk

A risk-based approach rather than a policy-only review



Progress and current position

Transparent about what has been achieved and what remains underway

	No known incidents reported	During FY 2025/2026, no reports were received that raised known concerns of modern slavery or human trafficking.
	Risk assessment framework established	A structured supplier risk-assessment spreadsheet and source-mills register have now been introduced, and initial assessments are underway.
	Traceability approach strengthened	The assessment records known mills, intermediaries, source countries and supporting evidence such as mill certificates.
	Supplier controls retained	Supplier statements, relevant policies, Supplier Code of Conduct requirements and supporting evidence form part of Hillcrest’s supplier approval and due-diligence arrangements.

Due diligence in practice

A proportionate route from onboarding to escalation

ONBOARD	Confirm supplier identity, service, labour route and contractual expectations.
ASSESS	Apply risk scoring and capture source-country and sector exposure.
VERIFY	Collect statements, policies, questionnaires, traceability and assurance evidence.
FOLLOW UP	Assign actions, owners and dates where evidence is incomplete or risk is elevated.
ESCALATE	Increase monitoring, seek contractual remedy or disengage where concerns are unresolved.
TRAINING & AWARENESS	Modern slavery requirements are communicated through company policies and supplier requirements, with further role-specific awareness planned.

Concerns may be raised through established reporting and whistleblowing channels. Retaliation against anyone raising a concern in good faith is not tolerated.



Measuring effectiveness

KPIs are being implemented, not presented as established results

The new risk-assessment register creates the foundation for practical, evidence-based measures. Baselines and targets should only be published once sufficient data has been captured and reviewed.

Supplier coverage Number and percentage of relevant suppliers assessed	Evidence coverage Suppliers providing policy, statement or due-diligence evidence	Action control Open actions with an owner and due date
Risk exposure Suppliers by risk level and overdue review status	Awareness Employees receiving appropriate awareness information	Concerns Concerns raised, investigated and resolved

During the reporting period, Hillcrest continued to develop its approach to measuring effectiveness. Formal KPI reporting will be implemented as the supplier risk assessment is progressively completed and reliable baseline data becomes available.

Priorities for FY 2026/2027

Focused actions that can be evidenced and reported

- | | | |
|-----------|--|---|
| 01 | Complete risk-based assessments | Prioritise steel suppliers, labour providers, site subcontractors and other higher-risk categories. |
| 02 | Close evidence gaps | Request missing statements, questionnaires, source information and supporting assurance. |
| 03 | Embed practical KPIs | Set a baseline, define proportionate targets and review progress through management reporting. |
| 04 | Strengthen awareness | Provide role-appropriate information for procurement, management, office and site personnel. |
| 05 | Review and report | Evaluate outcomes, record any concerns and report progress in the next annual statement. |

Ownership: Compliance Manager, supported by the Finance Director and reviewed by the Managing Directors.

Approval and publication

The statement will be communicated internally and reviewed annually to reflect changes in risk, legislation and business activities.

Approved by	Gary Fry
Position	Managing Director
Signature	
Date approved	22/10/2026
Statement period	2026 to 2027
Document number	HSL-POL-C-68
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Website

A link to be published from the company website when approved.

Government registry

Following approval, Hillcrest will consider submitting the statement to the UK Government Modern Slavery Statement Registry.

Annual review

Retain previous statements and review progress against commitments each year.