

# Safe and Responsible Governance

## The Organisation

Hillfoot Steel Limited is an independent steel stockholder with one UK based operation.

It employs over 50 people, servicing customers over a wide range of sectors including Motorsport, Defence, Mining, Oil & Gas, Off-highway.

## **Our Supply Chain**

Hillfoot Steel Limited procures goods and services directly from over 100 suppliers, primarily sourced from within the UK and Europe.

We have contractual relationships with our key suppliers and a dedicated procurement department to oversee the instruction of supplier agreements and provide adequate procedures, including vendor approval, to ensure our products are sourced from ethical and socially responsible routes.

#### Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

## 1. Equal Opportunities Policy:

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give their best.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.



#### 2. Whistleblowing Policy

Hillfoot Steel Limited operate a whistleblowing policy so that all employees know that they can raise any concerns relating to how colleagues are treated or about practices within our company or supply chain without fear of reprisal.

#### 3. Code of Conduct

Our Code of Conduct serves as a guiding framework for all employees, contractors, and stakeholders of Hillfoot. It outlines the fundamental principles, values, and standards that we uphold in our day-to-day operations. This policy is designed to ensure a work environment that fosters professionalism, respect, integrity, and accountability. By adhering to this Code of Conduct, we cultivate a culture of excellence, ethical behaviour, and continuous improvement.

# 4. Zero Tolerance Statement/Dignity at Work Policy/Sexual Harassment Policy

Here at Hillfoot Steel, the health, safety and wellbeing of our colleagues is extremely important to us.

To make sure that every colleague thrives, we believe that everyone should be treated with dignity and respect and be free from any form of bullying, harassment, or discrimination. This extends to our contractors, suppliers and visitors.

Behaviour such as verbal abuse, harassment, threats, intimidation or violence towards any member of our staff will not be tolerated and may in some cases be reported as a criminal offence. This also applies to online abuse or harassment by use of text, email or social media.

Our Dignity at Work policy sets out the Company's commitment to create a working environment free from hostility in which individuals are valued for their contribution and can develop to their full potential.

We deplore all forms of sexual harassment and seek to ensure that the working environment is safe and supportive to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our Organisation. Our Sexual Harassment policy sets out the Company's commitment to preventing sexual harassment and outlines how we will deal with complaints of this nature.

# 5. Bribery Act Policy

The purpose of this policy is to provide support and guidance to employees where their position or role/responsibility could place them in a position where there is the potential to fall foul of Bribery legislation.



### 6. Anti-Slavery:

Hillfoot Steel Limited is committed to ensuring that its business operations are free from

involvement with slavery and human trafficking and acting ethically and with transparency in all our business dealings within the company or our supply chain.

Hillfoot Steel Limited does not knowingly deal with any business involved in slavery or human trafficking. Direct communication with suppliers ensures that they are made aware of our commitment to tackling the issue of modern slavery and of their obligations.

## 7. Training

All of the policies shown above are supported by online training for employees during their induction and refreshed as required during their continued employment.