



Hill Human Rights Policy

Promoting Human Rights

At Hill, we hold each other and ourselves to the highest standards of ethics as we meet the expectations of our employees, suppliers, customers, shareholders, and communities where we live and work. Our [Code of Ethics and Business Conduct](#) articulates these standards, guided by our longstanding values of integrity, respect, responsibility, safety, performance, and engagement. We see these values and our adherence to them as our corporate responsibility; we see them among the universal, inherent values that protect our dignity and freedom as human beings.

We are committed to sustaining long-term value growth in our company through continuously improving performance and an intense focus on delivering excellent results. We uphold our obligations in part through disciplined, transparent governance.

As with any responsibility, adherence to values implies certain rights. The following policy represents Hill's Human Rights standards, based on the [Universal Declaration of Human Rights](#). This policy is also informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs). We at Hill are committed to respecting human rights across our operations and stakeholders, as described here.

Our Employees

We are committed to a work environment of respect for all employees, where we all engage in our work with a responsibility to demonstrate integrity, safety, and ethics and the expectation that we will receive the same. We encourage employees to raise concerns and report suspected misconduct without fear of retaliation. Our employees demonstrate their integrity, dedication, and commitment to quality in their daily work and are committed to improving performance and creating success.

Hill maintains a robust, broad-based ethics and compliance program that stresses values, leadership, training, audits, inspections, certifications and accountability. This broad-based program is intended to facilitate Hill's compliance with all applicable laws and maintains a culture committed to ethics and integrity – and support our authentic actions to live up to our shared commitments.

We maintain corporate procedures to educate employees and ensure that they do not engage in human trafficking or forced labor practices.

At Hill, employees are required to conduct internal and external business fairly and ethically while maintaining the highest standards of ethical behavior—to do the right thing even when no one is looking. Hill's [Code of Ethics and Business Conduct](#) is a statement of the company's commitment to integrity and defines the conduct expected of employees. In accordance with this statement, our ethics and compliance program provides employees with guidelines for daily work life and defines and



describes the values that serve as the foundation for how Hill conducts business. These are tangible ways in which we ensure our employees are treated with the dignity and respect all humans have the right to expect. The program includes the following components:

Equal opportunity: A workforce made up of employees who bring a wide variety of skills, abilities, experiences, and perspectives is essential to Hill's success. We are dedicated to providing equal opportunities during recruitment and hiring, and to creating work environments in which all employees have the opportunity to perform quality work. Through fair treatment of every employee, we foster an environment of respect that values our employees as our most important resource.

Harassment and Discrimination: Consistent with our values, including Respect, and following applicable laws, we have zero tolerance for discrimination, harassment, or bullying based on race, color, religion, sex, sexual orientation, gender identity, age, national origin, disability, military status, veteran status, marital status, citizenship status, or any other categories protected under applicable laws. Employees are expected to act with honesty and integrity in all company dealings, comply with policies and laws that govern our business, and maintain an ethical and professional work environment. Behavior found to violate ethical standards will be subject to disciplinary action, up to and including termination. Hill offers an anonymous and confidential means to voice concerns through OpenLine, which is available 24 hours a day, seven days a week. All allegations reported are investigated and remedial actions are taken as appropriate.

Security and privacy: We prioritize the security of all personal employee information to ensure it is not accessed by persons inside or outside of the company except for legitimate business purposes. Information is only disclosed in accordance with applicable laws, legal processes, and company policies and procedures. To ensure proper management of sensitive information, all employees are required to complete cybersecurity/insider threat awareness training and participate in routine audits.

Health, safety, and wellbeing: Hill is committed to cultivating a safe work environment for all employees and meeting our environmental responsibilities. We mandate comprehensive safety training to ensure shipyard employees can properly navigate higher-risk work areas. Company policies require the immediate reporting of any safety hazard to a supervisor, safety office, or the OpenLine. Additionally, we promote accessible health services across our divisions to encourage the mental and physical wellbeing of employees.

Freedom of association: We are dedicated to being a visible and positive corporate citizen in every community where we do business. In accordance with our corporate policy on Employee Political Activity, Hill respects the rights of individuals to organize and participate in the political process through activities that do not interfere with employees' responsibilities, create a conflict of interest, or reflect negatively on Hill. We respect employees' rights to organize, engage in collective bargaining or join any lawful organizations, such as labor unions, of their own choosing. Where applicable, we aim to negotiate constructively and reach positive agreements.



Prohibition of child/forced labor: All human beings should be treated with dignity and respect. Hill prohibits conduct that is specifically restricted by applicable laws, regulations, and policies, such as the use of child labor, forced, bonded or prison labor and human trafficking. Hill regularly updates its training for employees to ensure they are aware of current laws and the company's policies regarding human trafficking and slavery, as well as the various safeguards that we have implemented to detect and prevent these activities.

Our Suppliers

We are committed to engaging with our suppliers, which are an integral part of our team and essential to our ability to achieve our business objectives. We value their contributions and expect them to uphold the same levels of integrity and respect for humans as we expect of ourselves.

Supply chain management is critical to business and sustainability success. We are committed to building strong relationships with our suppliers and partners around the country whose products, services, and niche capabilities help us serve our stakeholders and support our human rights objectives. Through strategic supplier development and strong partnerships, we maintain an agile supply chain organization dedicated to world-class performance.

Our supply chain processes often involve onsite inspections at our supplier facilities by either our supplier quality organizations or the U.S. Government. All suppliers and employees have access to our toll-free OpenLine, which enables them to raise questions and concerns and report violations of our standards of conduct. Employees and suppliers who fail to adhere to our standards are subject to termination, financial penalties, or debarment from U.S. Government work.

Ethics and integrity: Hill encourages the highest standard of ethical conduct in all suppliers' endeavors. As stated in our [Supplier Code of Ethics](#), we expect our suppliers to abide by the laws and regulations that apply wherever our suppliers operate. Suppliers are also encouraged to be active and responsible citizens in their communities.

Health and safety: Our baseline expectation is that our suppliers will fully comply with all applicable laws and regulations associated with the health and safety of their employees and community. We also encourage suppliers to develop and implement programs or mechanisms to enforce and monitor compliance with health and safety requirements, including occupational safety, emergency preparedness, and occupational injury and illness. When in Hill facilities, suppliers shall follow all company health and safety requirements.

Security: Security is paramount in all aspects of doing business with Hill. We work with suppliers to develop and implement processes and programs designed to protect all technical, NOFORN, NNPI, CUI, personnel, and other sensitive data. When visiting Hill, suppliers must abide by all access requirements.



People: Hill values its people and expects the same of its suppliers. Suppliers must abide by all laws and regulations, specifically including the protection of workers from modern slavery, child labor, forced labor, and other forms of discrimination, as outlined in laws such as the California Transparency in Supply Chains Act of 2010 and the U.K. Modern Slavery Act of 2015.

As stated in our [Supplier Code of Ethics](#), we expect our suppliers to adhere to regulations prohibiting human trafficking, including applicable U.S. laws, and comply with all applicable local laws in the country or countries in which they operate. The Code requires that suppliers educate their employees on prohibited trafficking activities, uphold disciplinary action to those that violate laws or rules, and maintain open communication with Hill about violations and action taken against employees.

Environment: Suppliers are expected to adhere to all applicable environmental laws and regulations. Policies and procedures must be in place to protect the air, water, and land at the suppliers' facilities and its communities. Suppliers contracted to perform work on Hill premises must follow all Hill environmental, health, and safety requirements.

Conflict minerals: Hill is committed to sourcing components and materials from suppliers that share its ethical values and that support compliance with SEC regulations on conflict minerals. Hill seeks to avoid obtaining conflict minerals from sources that could result in aiding, directly or indirectly, armed groups operating in the Democratic Republic of the Congo ("DRC") or its adjoining countries when doing so does not conflict with contractual obligations with the U.S. Government. Hill does support the sourcing of conflict minerals from the DRC and its adjoining countries through smelters and refiners that have been independently verified as having systems in place that ensure the minerals are responsibly sourced.

Our Customers

We take our commitment to supporting our customers very seriously, and we are intently focused on meeting customer expectations. The safety of our customers, and the vital importance of their mission, demands our best work, ethics, and performance.

At Hill, we conduct our business in an open and transparent manner to provide products and services that conform to customer requirements. Our policies, procedures, and practices are designed to prevent even the appearance of improper influence. We are committed to assessing the human rights risks of our products prior to sales and reducing such risks across the lifecycle of our products by working with customers who uphold our values of integrity and respect.

Our Communities

In the regions where we do business, we positively impact the local economy and build stronger communities through our giving and engagement efforts. Our Code of Conduct and governance reinforce our adherence to our values – especially to nourish and protect strong and resilient relationships with the communities in which we work and live. Our employees and our neighbors must be treated with dignity, fairness,



safety, and respect. Our adherence to our values nourishes and protects the strong, stable, and resilient relationships on which our future growth and success depend.

In addition to ethical decision-making, and creating a healthy, respectful workplace, we also adhere to all applicable environmental laws and regulations to ensure our impact on our neighborhoods and communities is positive. Policies and procedures are maintained to protect the air, water, and land at our facilities and nearby communities.

As with every category of our stakeholders, we hold ourselves accountable to demonstrate our ethics and values every day, in big and small ways.

More Information

- Detailed reporting and updates to further demonstrate our deep sense of responsibility and commitment to living up to our values in service of our stakeholders is maintained on the Hill website at hill.com/who-we-are/sustainability. The reports also provide an overview of our sustainability governance structure including oversight for human rights.
- [Hill Code of Ethics and Business Conduct](#)
- [OpenLine & Contact Information](#)