

## UK Slavery and Human Trafficking Disclosure Statement – 2019



### Hilton Foods UK, Hilton Seafood UK and Hilton Food Solutions

The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Hilton Food Group is fully committed to playing our part in eradicating modern slavery. We firmly support transparency and collaboration to eliminate the risks of modern slavery. This statement refers to the financial year ending 29<sup>th</sup> December 2019 and sets out the steps we have taken to prevent modern slavery and human trafficking in our own operations and supply chains.

Since we published our first statement in June 2017 we have built a better knowledge of risk and practical actions we can take relating to modern slavery and have improved our assessments and plans.

We have given training to more of our managers and supervisory teams to give them the tools to identify and take action to prevent the risk of modern slavery. We have also expanded our due diligence within our supply base including commissioning our first detailed independent review of human rights risks, which is being carried out in a prawn supply chain.



This statement, in compliance with section 54 of the Act, is made on behalf of the following in scope Hilton Food Group UK operations.

1. Hilton Foods UK Ltd.
2. Seachill UK Ltd. (rebranded in 2020 as Hilton Seafood UK)
3. Hilton Food Solutions Ltd.

The three companies above are part of the Hilton Food Group, which has global operations and an associated world-wide supply network, often made up of many supplier tiers.

Details of the Group's history, operations and current business ventures can be found at the following link:

<http://www.hiltonfoodgroupplc.com/about-us/history>

The UK business model is to source meat, fish / shellfish and vegan products from high quality and approved suppliers, and then process and pack both natural and added value product for the UK retail market.

Our human rights strategy is led by the Group CSR Director who reports to the Chief Quality and CSR Officer.

## Policies

Our new Ethical Trade Policy was launched in April 2020. Each site also has local policies covering the following topics:

Equal opportunities and dignity at work	Procurement	Grievance
Supplier requirements/codes of conduct	Responsible recruitment	Ethical trading
Human trafficking and forced labour	Health & Safety	Whistleblowing
Bribery and corruption		

## Due diligence and risk management

Starting with our own operations and then our global supply chains, we work to identify actual or potential risks of modern slavery and help ensure remediation where any cases are identified.

To look after the wellbeing of our own people we have robust assurance of our recruitment process, train our managers and supervisors to look for signs of modern slavery, and provide anyone who has been a victim the means to report this safely and receive support. We were proud to support the UK Modern Slavery Helpline, which provides access to information and support on a 24/7 basis.

We follow GLAA procedures for recruitment, all our labour providers must be GLAA/ALP licenced and approved, and they must follow the ILO guidelines for responsible and fair recruitment. All of our people have access to our trained HR personnel for support, we share details of the Modern Slavery Helpline, and if required they can follow our grievance mechanisms.

Our supply chain due diligence processes are based on a comprehensive risk assessment that is updated on a regular basis to identify new and emerging risks and improve supply chain transparency.

We are members of the global Sedex ethical data exchange platform (<https://www.sedex.com/>) so that we can manage multi-tier, responsible sourcing data and provide detailed assessments to our customers about our own sites. Our A/B membership status brings us visibility of the standards in our suppliers' sites and the tiers below them where they have also registered on Sedex, which increasing numbers have.



All of our suppliers into the UK are risk assessed prior to approval. We are active members of FNET (the Food Network for Ethical Trade <https://foodnetworkforethicaltrade.com/>) where we sit on the Strategic Advisory Group. We are incorporating their ethical risk guidance into these assessments. This allows evidence building for approval, but also indicates key areas that might require further investigation such as through an independent social compliance audit.

Our supplier assessments, audit reports and third party certification evidence is housed within an online supplier management portal. This is used in synergy with the Sedex ethical data exchange system. We are exploring how to integrate these systems to show supplier ethical risk status alongside other assessments.

## Assessed Effectiveness

During 2019 we made progress towards our previously stated objectives:-

1. Mapping and risk assessment all of our supply chains
2. High risk supplier assessments and audits
3. Training our leadership team, managers and supervisors in awareness of modern slavery, and all our people in how they can obtain support
4. Engaging in industry collaborative forums to share and build best practice

We are pleased to report progress against these objectives

1. Mapping and Risk Assessment of our supply chains
  - We have built ethical risk assessments using FNET protocols and we are integrating these into the online portal approval system.
  - At our specialist Seafood factories, all of our seafood suppliers have been risk assessed, including some multi-tier assessments back to fishing vessels and farms. All of our high risk seafood suppliers are registered on Sedex and have completed a Self-Assessment Questionnaire (SAQ). We have also utilised our own SAQ for collecting compliance data from suppliers that are not on Sedex.
  - We are continuously engaging suppliers to join Sedex and have increased the numbers of high and lower risk suppliers that are registered.
2. High Risk Supplier Assessments and Audits
  - We have actioned annual social compliance audits for our high-risk supply chains.
  - We have been integral in helping develop the new global Responsible Fishing Vessel Scheme (RFVS) as members of the oversight board and technical committee, and by funding pilot audits.
  - We commissioned a Human Rights Impact Assessment of one of our key supply chains in Vietnam. This study covers several tiers behind our direct suppliers and was commissioned in partnership with a major UK retailer and two supplier partners to Hilton Seafood.
3. Training our leadership team, managers, and supervisors in awareness of modern slavery, and all our people in how they can obtain support
  - Most of our senior managers have had training in Modern Slavery utilising materials supplied by Stronger Together. As an example at Hilton Foods UK, in January 2019, all the senior managers undertook the Tackling Modern Slavery in UK Business and Global Supply Chain course. We will continue to update and improve this training material and deliver refresher training.
  - Modern Slavery awareness training, using Stronger Together materials, is now part of the induction course at all UK sites.
  - A more comprehensive Stronger Together training in Modern Slavery awareness is given to permanent employees. Hilton Foods UK had trained 96% of permanent staff and Hilton Seafood 59% at the end of 2019 (due to recent rapid business growth and staff changes). A new online training system is being used in 2020 to address this gap.



4. Engaging in industry collaborative forums to share and build best practice
  - We maintained engagement in the governance of FNET and participated in their Recruitment Fees and Supplier Engagement working groups.
  - We chaired the Seafood Ethical Action Alliance (SEA Alliance) from its inception until mid-2019.
  - We co-funded the development and launch of the Sedex fishing vessel Self-Assessment Questionnaire.
  - Within Seafood we are actively involved as members of Global Gap, GAA and Marin Trust to influence and shape increased ethical components of assurance schemes.

#### Looking Ahead

We are continuing to learn about best practice from our collaborative engagement and ethical assessments. Our actions are guided by our ethical strategy and plan within Quality Naturally and will include the following -

- Continuing to build and utilise a global ethical risk assessment system that integrates our own online portal approval processes and Sedex.
- Supporting the governance and strategy development of FNET, and participate in their Recruitment Fees and Supplier Engagement working groups.
- Engagement in the SEA Alliance steering group, promoting the take up of Sedex based fishing vessel questionnaire by its members.
- Engaging in the governance of the Global RFVS standard.
- Building transparency tools based on global interoperable traceability systems integrated with ethical assessment criteria.
- Advocacy for improved regulation and enforcement alongside our customers and suppliers.

We will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chain and ensure our strategy is responsive to changing risks. We will act immediately to address any concerns identified.

**Robert Watson OBE**  
Executive Chairman

29 June 2020