



Ethical Trading Policy

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Hilton Food Group is committed to ethical trading and socially responsible business practices. It is our responsibility to make sure that the Human Rights of workers in our supply chain and factories are respected and protected.

To accomplish this, we take a Non-Negotiable Ethics stance, setting high ethical values and supporting our suppliers to further develop their own standards. We will take all reasonable steps to ensure that our products are sourced only from those suppliers who maintain satisfactory working conditions, pay a fair wage, comply with the producer country's labour, health and safety laws, and, as a minimum, conform to the following principles.

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour is not be used
- Wages are paid in accordance with local employment legislation and markets
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

We also collaborate with industry stakeholders and our customers to bring about long-lasting advances in supply chain working conditions.

Our policies and practices are developed in line with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work, and the Ethical Trade Initiative Base Code of Labour Standards.

We also take into consideration other global initiatives such as:

UK Modern Slavery Act (2015), Stronger Together – Reducing Modern Slavery, The Commonwealth Modern Slavery Act 2018 (Australia) and guidance from organisations such as Anti-Slavery International.

In implementing this Ethical Trading Policy, we will actively work towards achieving the following actions:

- Undertake risk-based assessments to identify potential adverse impacts on human rights and worker welfare both in our supply chains and in the recruitment of our people. We will utilise the best available advice and will actively collaborate in developing tools to evaluate risks and listen to the voices of workers. Where we identify potential adverse impacts, we will make every effort to prevent them and ensure those affected are protected
- Communicate our expectations and standards to our direct suppliers and work with them to communicate the requirements to their suppliers

- Provide support and guidance to suppliers where required
- Provide training for our people to raise awareness of potential worker welfare issues (in recruitment of our own people and in our supply chains)
- Audit compliance with these policies and processes across our supply chain, where required by our risk assessment
- Monitor and report on our progress within our modern slavery statement
- Work to eliminate the payment of fees to recruiters by workers, and the fair treatment of migrant workers with regard to travel and accommodation costs
- Undertake appropriate investigations and mitigation if modern slavery is reported or suspected in our supply chain



Signed by
Philip Heffer
Hilton Food Group Chief Executive Officer

April 2020
Date: