



Modern Slavery Statement

for the fiscal year 2021

Introduction to Hilton Foods

Hilton Foods is a leading international multi-protein food producer. We are dedicated to serving our customers and millions of consumers across the world with high quality meat, seafood, vegetarian and vegan foods, and meals.

As we reflect on another year marked by continued disruption from the Covid-19 pandemic, the vulnerabilities of our food system have become ever more apparent. Respecting human rights by enabling the provision of fair and safe workplaces and ensuring employees' voices are heard throughout our value chains is essential to building back better. We are committed to working collaboratively to ensure the best outcomes for workers across our value chain.

We are committed to respecting and championing the human rights of all who come into contact with our business, including; our employees, agency workers, workers within our supply chain, and local communities. It is essential that every person in our own operations and supply chains is treated fairly and rewarded appropriately for their work, whether on farm or fishing vessel, abattoir or distribution centre. Protecting human rights is about building a fairer society and food system for all. Modern slavery is unacceptable within our business and supply chain. Our management of modern slavery risk across our operations and supply chain falls within our broader approach to human rights.

Hilton Foods operates from a shared purpose and core set of corporate values. At Hilton Foods we work with non-negotiable ethics, a resilient business is one where we are building a sustainable future where all have an opportunity to thrive. To learn more about Hilton Foods' purpose and values, [please see here](#).

Hilton Foods holds an overarching human rights strategy, with timebound goals and targets which traverse our global operations. We seek to address human rights and modern slavery in line with our commitment to the United Nations Guiding Principles (UNGPs) to respect human rights by; identifying, preventing, mitigating and accounting for how we address our impacts on human rights, and enabling processes for remediation. Further information regarding our Group-wide human rights commitments and achievements can be found within our 2021 Annual report, [here](#).

The following disclosure covers our in-scope UK operations and describes the actions they are taking to ensure that modern slavery is not taking place in their operations or supply chains. This statement is made in accordance with the UK Modern Slavery Act 2015, referring to the financial year ending 2nd January 2022.

Alignment with the UN Sustainable Development Goals (SDGs)

5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

8.8 Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment



Our Organisational Structure

This statement is made on behalf of the following in-scope Hilton Food Group businesses:



Hilton Foods UK Limited
Huntingdon, UK



Seachill UK Limited
trading as Hilton Seafood UK
Grimbsy, UK



Hilton Foods Solutions Limited
Huntingdon, UK



Fairfax Meadow Europe Limited*
Derby, Enfield, Milton Keynes and Eastleigh UK



SV Cuisine Limited
Huntingdon, UK

*Fairfax Meadow Europe Limited was acquired by Hilton Foods in October 2021.

Our Employees

Our people are at the heart of our success and their health, safety and wellbeing is our first priority. We are an inclusive organisation built on respect, with equal opportunities for skills and career development. The fundamental principle on which Hilton Foods operates on with regards to our people is that we are a fair, safe and inclusive employer, who engages and empowers our people.

We work together to keep our business resilient for the future, bringing the diversity, creativity and entrepreneurial skills of our people to the fore. Our people are at the core of how we do business and they bring our culture to life within our factories, offices and communities. We are working towards an ambitious future, one we want to build together with all our employees. Creating spaces where our employees can speak freely about contributing to that future and how to participate in it is vital. We work to create an enabling environment which allows for all workers on our sites to speak up about the issues that matter to them.

We know that where trust is built, our employees are most able to 'spot the signs' of modern slavery, recognise poor behaviour, and allow us to take robust action. Knowing that our colleagues understand their human rights, and are empowered to speak up about their experiences is key to our prevention strategy.



Our Supply Chain

Raw materials are sourced, in conjunction with our retail partners, from a combination of local sources and a wide international base of proven suppliers. It is then processed, packed and delivered to the retailers' distribution centres or stores. Our own operations are highly automated and use advanced robotics for the storage of raw materials and finished products.

We partner with suppliers that share our commitment to quality, food safety, animal welfare and sustainability. We are committed to ensuring the integrity and traceability of the raw materials we use in our products, which includes meat, seafood, ingredients and packaging. We have developed our own supplier standards for each raw material group

which clearly state the standards we expect our suppliers to operate to.

We recognise our responsibility to workers throughout our value chain, and seek to work collaboratively with our suppliers to assess and address the risks of modern slavery.

Hilton Foods works with Foods Connected, an end-to-end software solution for data capture with regards to our supply chains, food safety and quality standards, and corporate social responsibility. Through Foods Connected, we are able to engage directly with our suppliers to store data throughout our value chain. Relevant policies and procedures are communicated to suppliers through Foods Connected.



Policy Framework

At Hilton Foods, our policy framework is based upon the following foundational declarations, standards and codes:

- **The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.**
- **The UN Guiding Principles on Business and Human Rights.**
- **The UN Global Compact.**
- **The Base Code of the Ethical Trading Initiative (ETI).**

The following policies underpin our commitment to respecting human rights and tackling modern slavery:

Human Rights Policy ([here](#))

Supply Chain Social Responsibility Policy ([here](#))

Other policies across our business which address the multifaceted elements of modern slavery are:

Anti-Bribery and Corruption Policy

Operational-level Grievance Policies and Mechanisms

Whistleblowing Policy

Group Health and Safety Framework



Governance

At Hilton Foods we have embedded sustainability throughout our governance structure and decision-making processes, so that we remain accountable and ensure we apply our influence for benefit of both people and planet.

The governance of human rights and modern slavery within the in-scope UK Hilton Foods subsidiaries is managed within the overarching governance structure provided by the Board of Hilton Food Group plc. The Board is focused on the ongoing success, overseeing and engaging with both the Sustainability Committee and Executive Leadership Team on the direction and values of the Group, including the integration of corporate social responsibility objectives.

The Board is updated on sustainability objectives and strategy progress every six months. The Sustainability Committee, chaired by Non-Executive Director Rebecca Shelley, approves formal reporting on corporate sustainability and provides integral support to the Senior Management Team, while evaluating both opportunities and risks alongside the Audit and Risk Committee.

The Executive Leadership Team are updated monthly alongside the CEO on customer and corporate social responsibility targets and objectives. Under our 'People' pillar of the Sustainable Protein Plan, this includes our progress on imbedding respect for human rights and the prevention of modern slavery.

The CSR team (led by the Chief Quality and Sustainability Officer and the CSR Director) coordinate our supply chain engagement and global reporting. Hilton Foods has a dedicated Ethical CSR Manager who manages the overall human rights and modern slavery strategy implementation, and provides support to both People and Culture and Technical teams in their respective OpCos.

Respecting human rights and preventing modern slavery concerns both our own operations and our supply chain, accordingly responsibility sits across two members of our Executive Leadership Team. Our Chief People Officer is responsible for human rights and modern slavery across our own operations, and our Chief Quality and Sustainability Officer is responsible across our supply chain.

Hilton Foods takes any breaches of our policies or values extremely seriously. In 2021, we revised our Group-level Whistleblowing Policy, which is available on our website. This policy ensures the confidentiality of any employee using this line and our commitment to non-retaliation in relation to their concern. Our revised policy now offers employees the option to whistle blow anonymously to a qualified, independent and impartial third party, should they require it.

In addition, we have developed a new Supplier Social Code of Conduct, which sets out the behaviours and standards we expect from our suppliers. We have consulted a number of internal stakeholders in the development. This Code of Conduct will launch in 2022.

In 2021, Hilton Foods operated under the corporate social responsibility strategy 'Quality Naturally', for further information please refer to our 2020 Annual Report here. During 2021, we consulted across our business to develop a new 2025 Sustainable Protein Plan with robust targets, built around improved transparency and action re-focused to three pillars: People, Planet and Product. We are aligning our business to deliver long-term benefits to both people and planet, using our scale and reach to drive transformative change. Our 2025 Sustainable Protein Plan was publicly released in our 2021 Annual report [here](#).

Risk Assessment and Due Diligence processes

Hilton Foods follows a robust human rights due diligence process, developed in line with our commitments to the UN Guiding Principles on Business and Human Rights (UNGPs). In 2021, we made a renewed commitment to the implementation of UNGPs through the publication of our first Group-wide Human Rights and Supply Chain Social Responsibility Policies. This sets out our commitments to all workers engaged across our own operations and value chain. This includes all agency, temporary or migrant workers.

We work to identify potential human rights and modern slavery risk within our own operations and supply chains primarily through utilisation of the Sedex RADAR risk assessment tool. All of our risk assessment work utilises publicly available sources of risk data, which are robust in nature e.g. UN agencies such as the UNDP and the ILO, the World Bank, the US Department of State, specialist research agencies and commercial risk data providers. We also consider the nature of the work or activity being undertaken, i.e. labour intensity, workforce skill level etc. and reporting on any known human rights risks from NGOs or media. In the past 12 months this has had a particular focus on changing labour dynamics post COVID and Brexit in the UK.

In 2021, we created a new Supplier Ethical Approval & Risk Assessment process which is housed on our supplier management system, Foods Connected. We piloted this system in 2021, and it will launch across our business in 2022.

We gather intelligence from a variety of sources both to inform our risk assessment and understand emerging and current risks affecting our own employees and those within our supply chains. Our participation in the Food Network for Ethical Trade plays a pivotal role in our understanding of modern slavery risks and best practice for the prevention and mitigation of human rights risk.

Where areas of high risk are identified, we work with our suppliers to gather further information and act where required. This can include; SMETA audits, supplier visits, and human rights impact assessments. Supplier engagement is key to improving working conditions and identifying modern slavery risks. Hilton Foods recognises the role of multi-stakeholder collaboration to effect change within complex supply chains, where influence can be more effectively leveraged through collective voices.



We are a founding member of the Seafood Ethics Action Alliance (SEAA), a pre-competitive collaboration platform that works to ensure human rights in wild-capture fish supply chains are respected. We sit on the steering group of the SEAA, and have participated in the development of a new desk-based risk assessment tool in 2021, with the purpose of enabling businesses to identify potential human rights risks in their wild-capture seafood supply chains. In 2021, this work covered 297 fisheries supplying the UK market.

We have continued to support the outcomes of the independent Human Rights Impact Assessment, in collaboration with one of our customers and local supply chain partners in our Vietnamese prawn supply chain. We are committed to understanding the impacts of our business activities on rightsholders, and working to address and enhance livelihoods.

Hilton Foods part-funds a three-year PhD at Heriot-Watt University, which aims to map the social responsibility tools available to the fishing industry. The purpose of this project is to provide academic rigour to the various tools utilised by the fishing industry to understand human rights, and thus to enhance and improve their use. In 2022, this work will focus on three case studies; Maldivian tuna, Scottish nephrops and the Peruvian anchoveta industrial fishery.

Within our own operations, we look to identify actual and potential risks of modern slavery and to ensure remediation where any cases are identified. At the time of writing this statement we have recorded zero cases within our business. To ensure the wellbeing of our people we have robust recruitment processes and train our managers and supervisors to look for signs of modern slavery and forced labour. We provide a safe means, and actively encourage our people to report any issues with their recruitment, transport or accommodation providers.

All of our people have access to our trained People & Culture personnel for support, and we share details of where to get help and advice, anonymously if preferred. All of our employees including temporary and agency staff can, and are, encouraged to utilise our grievance and whistleblowing mechanisms.

In 2021, we conducted a worker-led review of our grievance mechanism at our Huntingdon site. The project focussed on implementing an operational-level grievance mechanism aligned with the UNGPs key effectiveness criteria. The UNGPs define effective grievance mechanisms as 'legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and (in the case of operational-level mechanisms) based on dialogue and engagement.' As a result of this a new 'Speak Up Policy' has been released across both Hilton Foods UK and SV Cuisine, built in collaboration with employees at Huntingdon.



The policy encourages employees to raise concerns from; ideas and innovations, to interpersonal issues, through to formal grievance.

Training and Capacity Building

We continue to put awareness raising and training at the core of our human rights and modern slavery strategy. We want our employees, supervisors, and managers to be confident about the actions they need to take should they suspect a case of modern slavery.

We continue to roll out Modern Slavery training to all our employees and we have made awareness training part of employee induction. Senior managers and supervisors receive detailed training including instruction on what to do if they suspect modern slavery is taking place at their site.

In 2021, we extended our in-house modern slavery and human rights standards training to our Group auditors. We see the value in empowering those working with our suppliers most frequently with the tools to speak up when they see something amiss.



We have continued to utilise training from both Responsible Recruitment Toolkit and Stronger Together to deliver best-practice training to our People and Culture colleagues.

Effectiveness of measures in place

Alongside our new policies, our human rights strategy has been refreshed and endorsed by senior management within Hilton Foods. We plan to accelerate the work we are doing on human rights to 2025, by extending its scope and enhancing our commitments.

2025 Strategic Goals

Assess and address human rights impacts across our business activities

Extend our modern slavery strategy and awareness training to colleagues to all Hilton Foods sites

Improving access to grievance procedures across Hilton Foods

Establishing future-ready standards for agency and service staff on our sites

Hold robust due diligence on our primary (protein, ingredients and indirect) 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 mistreatment or non-conformances in safety or welfare standards. Where we identify instances of modern slavery, we will ensure remediation and address the cause.

The following Group-level targets have been set across our business to comprehensively track our progress and enable us to assess our effectiveness against them. We will report publicly against these targets in future years.

2025 Targets

Have a functioning governance structure in place which addresses human rights risks and opportunities.

Train all Hilton Foods employees on human rights.

Modern slavery awareness training extended to managerial colleagues.

Development and roll-out of core HFG Agency Labour Standards.

100% of labour and service providers audited to HFG Agency Labour Standard.

100% of primary suppliers agreed to HFG Supplier Social Code of Conduct.

100% of new primary suppliers screened using social criteria.

100% of high-risk primary suppliers audited.

This Statement was approved by the Hilton Food Group plc Board of Directors on 21st June 2022 and signed on its behalf by:

Robert Watson OBE, *Chairman*
21st June 2022