



**HILTON FOODS**  
**2022 MODERN SLAVERY ACT**  
**STATEMENT**

## HILTON FOODS AT A GLANCE

Hilton Food Group plc and its subsidiary businesses (Hilton Foods) builds and operates large scale, highly automated food processing, manufacturing and logistics services for leading international retail and food service customers. 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. Through our services division we work with our partners to provide consultancy in supply chain, logistics, automation, and digitalisation. We operate in 19 markets around the world, operating 24 technologically advanced processing facilities to supply customers through our partnership approach.



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 our local communities. It is essential that every person in our value chain is treated fairly and rewarded appropriately for their work, whether on farm or fishing vessel, abattoir, factory, or distribution centre. Protecting human rights is about building a fairer society and food system for all. Ensuring communities and workers across our value chain receive fair treatment and are safeguarded is a moral, regulatory, and strategic imperative.

At Hilton Foods we are guided by a shared purpose and a core set of values in everything we do. We work to be *responsible corporate citizens* and a resilient business that is building a sustainable future where all have an opportunity to thrive. To learn more about Hilton Foods' purpose and values, please [see here](#).

## MODERN SLAVERY IS UNACCEPTABLE WITHIN OUR BUSINESS AND SUPPLY CHAIN.

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We know that globally the risk of forced labour has increased in the past 12 months, influenced by the continuing economic impact of the Covid-19 pandemic, increased migration due to climate degradation, coinciding with growing political instability and conflict. The adverse impacts of economic instability, forced migration, and fluctuating labour market dynamics create overlapping crises which increase the risk of exploitation for vulnerable groups. Women, children, and migrant workers remain those most susceptible to modern slavery globally, however, we know that in the UK, migrant men are also particularly vulnerable. Mitigating the risk of modern slavery means that we must look within our own operations as well as throughout our value chains.

Further information regarding our Group-wide human rights commitments and achievements can be found within our 2022 Annual Report, [here](#). The following statement outlines the steps we have taken to prevent slavery and human trafficking in our own operations and supply chains for the financial year ended 1<sup>st</sup> January 2023. This statement is made on behalf of the following in-scope Hilton Foods UK businesses, and is made in accordance with Section 54, Part 6 of the UK Modern Slavery Act (2015).

HILTON BUSINESS	LOCATION
<b>Hilton Foods UK Limited</b>	Huntingdon, UK
<b>Seachill UK Limited, trading as Hilton Seafood UK</b>	Grimsby, UK
<b>Hilton Food Solutions Limited</b>	Huntingdon, UK
<b>Fairfax Meadow Europe Limited</b>	Derby, Enfield, Milton Keynes, and Eastleigh UK
<b>SV Cuisine Limited</b>	Huntingdon, UK



In July 2022, Foods Connected became a subsidiary of Hilton Foods. Foods Connected will report separately under the UK Modern Slavery Act for 2022. However, in the future we will provide a joint statement as we integrate our human rights functions going forward.

## OUR EMPLOYEES

We employ 2778 people across our businesses in the UK, and over 7000 globally. Our people are at the heart of our success and their health, safety and wellbeing is our 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 with regards to our people is that we are a fair, safe, and inclusive employer, who engages and empowers our people.

We work to create an enabling environment which allows for all workers on our sites to speak up about the issues that matter most to them. We know that where trust is built, our employees are able to 'spot the signs' of modern slavery, recognise poor behaviour and wellbeing concerns, and allow us to take robust action in response. Knowing that our colleagues understand their rights at work 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 our customers distribution centres or stores.

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 code we expect our suppliers to operate to.

Hilton Foods works with our subsidiary 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 can engage directly with our suppliers to store data throughout our value chain. Relevant policies and procedures are communicated to suppliers through Foods Connected.

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## **POLICY FRAMEWORK**

At Hilton Foods, our policies are underpinned by our adherence to several important internationally recognised standards and codes including:

- The UN Universal Declaration of Human Rights
- 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 10 Principles
- The Base Code of the Ethical Trading Initiative (ETI)
- The United Nations Convention on the Rights of the Child

The following policies underpin our commitment to respecting human rights and tackling modern slavery, available publicly on our website:

- Human Rights Policy ([here](#)) *This policy describes our commitment to all workers employed to work within our own operations*
- Supply Chain Social Responsibility Policy ([here](#)) *This policy outlines our commitment to protect the rights of workers employed within our supply chains*

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

- Anti-Bribery and Corruption Policy ([here](#))
- Whistleblowing Policy ([here](#))
- Operational-level Grievance Policies and Mechanisms
- Children's Rights and Child Labour Remediation Policy
- Hilton Foods Accommodation Standard

Last year, we announced the development of our new Supplier Social Responsibility Code of Conduct, which describes the labour standards we expect within our supply chain, ensuring working conditions are fair and safe and that all workers are treated with dignity and respect. This document now forms part of our new global supplier onboarding process and is a condition of supply. Our

Supplier Social Responsibility Compliance Requirements outlines the steps suppliers must take to demonstrate observance of the code. All our business units are responsible for ensuring that suppliers understand and comply with these requirements.

In 2022, we underlined our commitment to protect children's rights by developing a Children's Rights and Child Labour Remediation Policy. We are committed to meet our responsibility to respect children's rights and support the human rights of children. We will contribute towards the elimination of child labour in all our business activities and business relationships. None of our direct operations hold any significant risk of child labour, however, child labour can be hidden in more complex global agricultural supply chains. We commit to provide decent work for young workers, parents, and caregivers, and will ensure the protection and safety of children in all business activities and facilities. We work to ensure that all employees understand their statutory obligations with respect to children and young people, from apprentices to work experience candidates.

This year we also developed a new Agency Labour Standard and audit methodology, to ensure that all employment agencies that Hilton Foods has contracts with to supply temporary workers adhere to the same minimum employment and business competency standards. This will be piloted at several sites in 2023. In addition to this, we developed and implemented a Hilton Foods Accommodation Standard, so that whenever housing is provided by one of our businesses, we can be assured of its quality and safety.

In 2022, we have continued to progress against the goals and targets set out in our 2025 Sustainable Protein Plan. We are aligning our business to deliver long-term benefits to both people and planet, using our scale and reach to drive transformative change. Further information on our progress can be found within our 2022 Annual Report.

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## **GOVERNANCE**

Our management of modern slavery risk across our operations and supply chain falls within our broader approach to human rights, which is included within our 2025 Sustainable Protein Plan. Hilton Foods holds an overarching human rights strategy, with timebound goals and targets that traverse our global operations. We seek to address human rights and modern slavery in line with our commitment to the United Nations Guiding Principles on Business and Human Rights to respect human rights by; identifying, preventing, mitigating, and accounting for how we address our impacts on human rights, and enabling processes for remediation.

## **HILTON FOODS BOARD**

The Hilton Foods Board is formally updated on the progress of the 2025 Sustainable Protein Plan every six months and together with the Sustainability Committee have oversight over the implementation of Hilton Foods' sustainability strategy throughout the business.

## **SUSTAINABILITY COMMITTEE**

The Committee is accountable for the delivery of our long-term social and environmental strategy and progress. It approves formal corporate sustainability reporting and supports the Senior Management Team in its delivery. It is formally updated on progress throughout the year and to ensure the ongoing resilience of Hilton Foods, it assesses human rights risks and modern slavery in collaboration with the Audit and Risk Management Committees. Management of human rights risks and modern slavery is included within the scope of discussions. The Committee is chaired by Non-Executive Director Rebecca Shelley.

## **EXECUTIVE LEADERSHIP TEAM**

The Executive Leadership Team is updated monthly, alongside the Group CEO, on the progress of our 2025 Sustainable Protein Plan, and relevant collaborative projects and customer requirements. Our Chief Quality and Sustainability Officer is responsible for human rights risks and modern slavery as they relate to our supply chain, whilst our Chief People and Culture Officer is responsible as they relate to our own operations.

## **SENIOR MANAGEMENT TEAMS**

The Corporate Social Responsibility team is led by the Chief Quality and Sustainability Officer. It supports our site-level senior management teams to achieve our targets, supply chain engagement and progress global reporting. Progress against our sustainability targets is shared across different functional areas, from People and Culture, to Quality, Operations, Finance and Procurement. The CSR team lead the implementation of our strategy alongside the Site CSR Leads. Individual business units take responsibility for implementing our human rights and modern slavery strategy; however, a central resource is provided to support sites with understanding human rights.

## **UK & ROI MODERN SLAVERY WORKING GROUP**

In 2022, we established a cross-functional group within our UK and ROI businesses to enable candid conversations about the challenges of detecting and disrupting modern slavery within their own businesses and offer opportunities to drive best practice through the creation and provision of shared resources.

A monthly meeting is also held with our Group Internal Audit and Risk Director and our human rights function to ensure ongoing visibility of emerging risks and challenges with human rights and modern slavery. Key topics from this meeting may be escalated to the Audit and Risk Committees.

## **RISK ASSESSMENT AND DUE DILIGENCE PROCESSES**

Our approach is informed by Principle 15 of the UN Guiding Principles on Business and Human Rights (UNGPs), which makes clear that companies must “know and show” that they respect human rights.

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. Sedex is an internationally recognised supply chain transparency platform, to monitor labour standards and gain insight into working conditions in supplier sites. All 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. This sits alongside our Supplier Ethical Approval & Risk Assessment process, which is housed in our supplier management system, Foods Connected. We piloted this system in 2021 and launched it across our business in 2022. We conduct supply chain due diligence as a function of assessing the effectiveness of our human rights commitments. In-scope suppliers are required to complete the Sedex Self-Assessment Questionnaire, which allows us to hold a detailed site-specific risk assessment. We continue to onboard new suppliers onto Sedex and complete the retrospective action of connecting with our existing supply base.

In 2022, we utilised the Food Network for Ethical Trade Human Rights Risk Assessment tool to conduct a risk assessment of both our tier 1 supply chain and our raw materials. This enables us to identify areas of highest risk, through which to prioritise our work.

We always seek to work collaboratively with our suppliers, providing resources, training, and developing shared workstreams to align within the supply chain, through our Food Network for Ethical Trade and Seafood Ethics Action Alliance memberships. Where suppliers are found to be high-risk, they are required to provide additional due diligence, up to and including an independent ethical audit. Our preferred methodology for ethical audits is the Sedex Members Ethical Trade Audit (SMETA). If a supplier is unwilling to engage on corrective actions or provide remediation to workers, Hilton Foods will re-audit, re-train and, if we have to, end the contract in question. Where we are directly linked to adverse human rights impacts, we will use our position to enable remedy in-line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

One of our priority human rights risks is our seafood supply chains. In 2022, we integrated the Seafood Ethics Action Alliance’s Fishery Risk Tool into Hilton Seafood UK’s seafood supplier risk assessment process. This allows us to have visibility of the areas of highest risk in our wild-capture seafood supply chains and take appropriate steps to conduct further due diligence where risks are identified. Transparency is the first step towards human rights due diligence, we report publicly on all the seafood we source across our business through the [Ocean Disclosure Project](#). In 2022, in response to well-evidenced academic reports

regarding labour abuses and restrictive visas in UK fisheries, we worked collaboratively via the Seafood Ethics Action Alliance to develop an action plan with Producing Organisations, representatives of UK vessel owners, and key welfare organisations to address and remedy the issues faced by UK fishers. Credible reports involving in-depth worker interviews indicated flags of labour abuse. We are funding a project led by the International Transport Workers Federation and Stella Maris to provide essential rights information to fishers.

Advocacy to strengthen labour standards in source countries can be a valuable tool to leverage change. Through our participation in the SEA Alliance, we have advocated for the ratification of the International Maritime Organization Cape Town Agreement on fishing vessel safety. All work at sea should be safe.

Hilton Foods co-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 has focussed on three case studies: Maldivian tuna, Scottish nephrops and the Peruvian anchoveta industrial fishery.

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## **WHISTLEBLOWING AND GRIEVANCE MECHANISMS**

At Hilton Foods we provide an independent external reporting hotline, which allows all our employees to report, in the language of their choice, any concerns related to human rights, working conditions, modern slavery, or any other substantive breach of ethics. Employees and agency staff are made aware of our whistleblowing hotline during their inductions, have access via the Hilton Foods app and posters are displayed in prominent and private locations throughout our sites. All calls are reported to our Company Secretary, are investigated appropriately and independently. Any caller to our hotline can choose to stay anonymous if they wish, all call handlers have experience of dealing with sensitive issues.

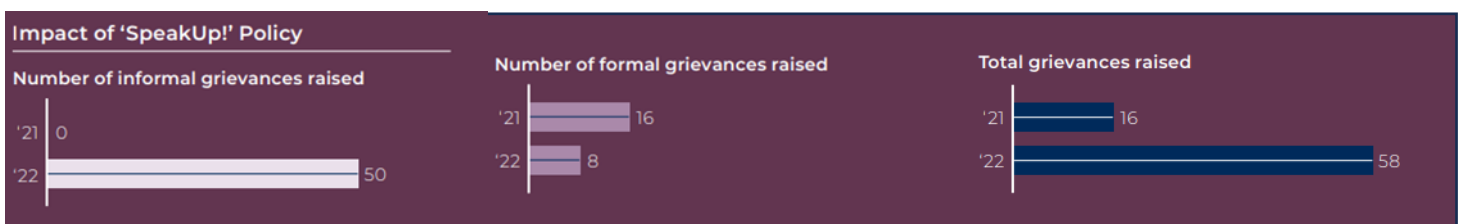
We appreciate that the decision to raise a concern can be difficult as there may be a fear of reprisal from those who may be committing malpractice or others who may be involved. Hilton has a non-retaliation policy where a genuine concern has been reported in good faith. No action will be taken against any individual who reports such concerns.

Hilton will not tolerate victimisation of any person who raises a concern in good faith, even if it transpires that no malpractice has occurred, or is likely to occur, and will take appropriate steps to protect them, including taking disciplinary action, against anyone who is found to be pursuing any form of retaliation or has threatened to do so.

Speak Up! Was developed in partnership with our customer Tesco, Reckitt, and the Oxfam Business Advisory Service. It was also driven by the work and input of our employees. The project focused on implementing an operational-level grievance mechanism aligned with the United National Guiding Principles



(UNGP) key effectiveness criteria. At Hilton Foods UK, an employee taskforce was formed to analyse the user experience of raising concerns, complaints, and new ideas. This taskforce rebuilt the site's grievance policy, producing a new procedure making clearer the routes to engaging meaningfully with site management. Disaggregated data is now shared both with the site's senior management team and their Your Voice Committee, to deliver transparency and drive accountability on response times from the business. Since implementing this project, HFUK has seen a positive increase in employees speaking candidly about their experience of work. This coincides with an overall decrease in employees raising formal grievances. All formal grievances are investigated fully, and disciplinary action is taken if proven. In 2022, the impact of the implementation of this can be clearly demonstrated. We have developed a Speak Up! Framework for the rest of our business and plan to extend at further sites.



## PARTNERSHIPS

The eradication of forced labour cannot be achieved by one business alone, collaborative action from government and civil society is essential. At Hilton Foods, we collaborate with several third parties to safeguard labour rights and improve working conditions.

This includes working with the Red Tractor, a key farm assurance standard in the UK, within their Technical Working Group on the development of their Worker Welfare Module. This looks at labour standards on farms across the UK.

We have strengthened our commitment to the Food Network for Ethical Trade through engaging in its governance by becoming an elected Board Member. We also act as Board sponsor for their Empowering Work working group, delivering training on in-work poverty, worker engagement and improving access to worker representation.



We are a founding member of the Seafood Ethics Action Alliance, a collaborative forum to ensure human rights are respected in seafood supply chains. In 2022, we were elected as Chair of their Steering Committee and continued to lead their human rights due diligence workstream.

This year we have also participated in the Technical Advisory Council for Sedex's SMETA, the evolution of their ethical audit methodology. The new version of the standard seeks to improve supplier understanding of the application of the ETI

Base Code and streamline the audit process to enable auditors to focus better on serious issues.

In 2023, we are pleased to announce our membership of the Slave Free Alliance, who will act as a 'critical friend' to help us enhance our work within this area. As an international social enterprise, they have the knowledge and expertise to support us to prevent exploitation across our value chain.

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## TRAINING

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.

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.

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## 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.

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.

### RESPECTING HUMAN RIGHTS

Safeguarding the welfare and just treatment of all workers and communities engaged with our business and supply chains

- Functioning governance structure in place
- Train all Hilton Foods employees on human rights
- Modern slavery awareness training extended to all managerial colleagues
- 100% of labour and service providers audited to HFG Agency Labour Standard
- 100% of primary suppliers signed up to HFG Supplier Social Code of Conduct
- 100% of new primary suppliers screened using HFG social criteria
- 100% of high risk primary suppliers audited
- Launched new global Supplier Social Responsibility Code of Conduct and accompanying Compliance Requirements. Implementation and onboarding has begun
- Creation of cross-functional Modern Slavery Working Group and development of site-level action plans
- Implemented best-practice grievance procedure at Hilton Foods UK, and guidance for all sites

This Statement was approved by the Hilton Food Group plc Board of Directors on 16 June 2023 and signed on its behalf by:

**Robert Watson OBE**, Chairman  
16 June 2023