

**HILTON FOODS**  
**2023 MODERN SLAVERY ACT**  
**STATEMENT**

**This Statement details the steps taken by Hilton Foods plc (Hilton Foods) and other relevant subsidiary Group companies\* to identify, assess, mitigate and remediate modern slavery and human trafficking risks during the financial year ending on 31 December 2023, as required by section 54(1) of the UK Modern Slavery Act 2015, and the Australian Modern Slavery Act 2018 (Cth).**

\*The scope of this statement includes the following subsidiaries of Hilton Foods plc: Hilton Foods Limited, Hilton Foods UK Limited, Seachill UK Limited (Trading as Hilton Seafood UK), Fairfax Meadow Europe Limited, Foods Connected Ltd, Hilton Food Solutions Limited, and Hilton Foods Australia Pty Limited ABN 60 613 035 500

**Statutory guidance on reporting criteria for section 54(1) of the UK Modern Slavery Act 2015**

MSA Guidance	Reference in this statement
Organisation structure, it's business and supply chains	Pg 5-6
Policies in relation to slavery and human trafficking	Pg 7
Due diligence processes in relation to slavery and human trafficking in its business and supply chains	Pg 9-10
Risk assessment and management	Pg 9-10
Key performance indicators to measure effectiveness of steps being taken	Pg 12
Training and capacity building on modern slavery and human trafficking	Pg 11

**Mandatory reporting criteria of the Australia Modern Slavery Act 2018 (Cth)**

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

MSA Criteria	Reference in this statement
Identify the reporting entity	Pg 5
Describe the reporting entity's structure, operations and supply chains	Pg 5-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pg 5-6
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pg 9-10
Describe how the reporting entity assesses the effectiveness of these actions	Pg 12
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Pg 7-8
Provide any other relevant information	

This statement, which will continue to be subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Board of Directors of Hilton Food Group plc on 20 June 2024.

## A letter from our CEO

**Hilton Foods is a unique business. This is my first year as Chief Executive, but my connection to Hilton Foods now dates back almost thirty years. All through that time, the purpose and values of the company have always stood out. Lots of people talk about making a difference, but this is a business that delivers.**

We are committed to addressing the risk of modern slavery throughout our operations and supply chain and are focused on ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces. Modern slavery is absolutely contrary to who we are, to our Purpose and to the Compass that guides us, and we continue to strengthen our policies and activity to prevent and tackle it.

I am encouraged by the steps the business has taken to embed our values into our daily operations, particularly our Global supplier ethical approval and risk assessment process, which has been taken on by our Quality and Procurement teams across our business.

In 2023, we sharpened our focus on modern slavery and exploitation by joining forces with Slave-Free Alliance, a social enterprise wholly owned by global

anti-slavery charity Hope for Justice, who act as a critical friend to us as a business. In a rapidly changing geopolitical environment, where weak state governance, corruption and wider criminality can allow exploitation to thrive, we must remain poised to take decisive action to protect our people and those within our supply chains.

This 2023 statement marks the first year of joint reporting between our UK and Australian businesses, representing a uniting of our global human rights strategy and shared value towards our people.

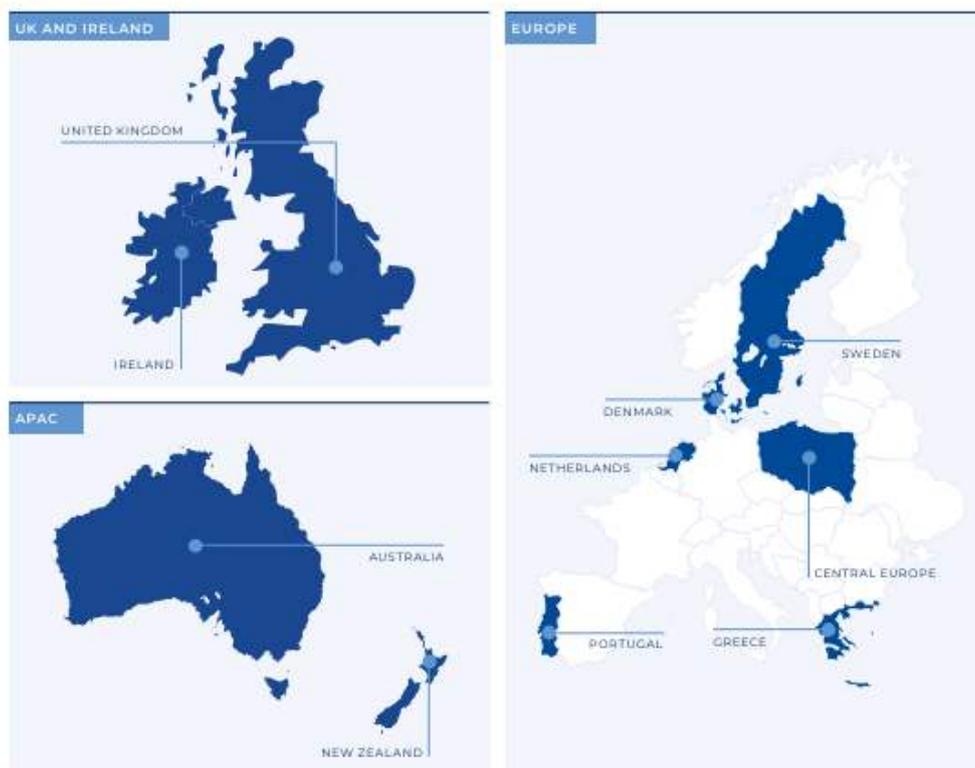
Our statement sets out the steps we've taken to manage the risks of modern slavery and outlines how we diligently check both our own internal operations and supply chains, ensuring robust processes are in place to minimise and eliminate issues in this area.



**“We are focused on ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces.”**

**Steve Murrells CBE**

Hilton Foods and its subsidiary businesses build and operate 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 ready-to-eat 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.



OUR PEOPLE

7,000

GLOBALLY

SERVING OVER

20

MARKETS  
INTERNATIONALLY

CAPITAL INVESTMENT

£58.6m

(2022: £56.5M)

WE OPERATE FROM

24

HIGH PERFORMANCE  
FACILITIES

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.

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.**

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. In Australia, workers who are migrants or hold temporary employment status in agriculture, horticulture and meat processing have been identified within the [2023 Global Slavery Index](#) as being more at risk. 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 2023 Annual [Report](#). This statement is made on behalf of the following in-scope Hilton Foods subsidiaries:

<b>HILTON BUSINESS</b>	<b>LOCATION</b>
<b>Hilton Foods Limited</b>	Huntingdon, UK
<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
<b>Foods Connected Ltd</b>	Londonderry, Northern Ireland UK
<b>Hilton Foods Australia Pty Limited</b>	Bunbury, Western Australia, Australia Heathwood, Queensland, Australia Truganina, Victoria, Australia

### **OUR EMPLOYEES**

In 2023, we employed 2,778 people across our businesses in the UK, 1,317 in Australia and over 7,000 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.

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 have implemented tools and systems that allow any employee, both permanent and temporary, to raise concerns related to their wellbeing. These tools allow the prompt and effective notification of issues to leaders across our business. We know that where trust is built and our employees understand their rights at work, our employees are empowered to speak up about their wellbeing concerns and allow us to take robust action in response. The trust we have built and the supporting tools and systems we have to address any issues identified, are central in the preventive nature of our approach to identifying and managing any modern slavery risks.

In 2023, we initiated an internal audit program aligned to the SMETA standard. This is conducted by the Group Ethics & Social Sustainability Senior Manager, who is a SA8000 trained lead auditor with training in investigative interview skills.

### **AGENCY WORKERS**

Our businesses across the UK and Australia engage with labour providers to supply agency workers across our sites. In 2023, we piloted our new Agency Labour Standard and audit methodology, to ensure that all employment agencies we work with adhere to the same ethical employment and business competency standards. This process enables us to undertake suitable due diligence assessments on their competency, financial resilience, and ethical behaviour. All labour providers will be internally audited against this standard in 2024.

### **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 suppliers that are thoroughly assessed for quality and ethical business practices. It is then processed, packed, and delivered to our customers distribution centres or stores depending on the market where we operate.

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.

Hilton Foods closely works with our subsidiary, Foods Connected, an end-to-end software solution, that allows us to manage our supply chains, food safety and quality standards effectively and efficiently. Foods Connected enables direct engagement with our suppliers to securely request and store quality, food safety and corporate social responsibility data and records.

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### **POLICY FRAMEWORK**

At Hilton Foods, our policies apply to all our global operations. Our policies are underpinned by our adherence to several 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 outline 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
- Hilton Foods Agency Labour Standard
- Supplier Social Responsibility Code of Conduct and Compliance Requirements

The Supplier Social Responsibility Code of Conduct and Compliance Requirements forms part of our global supplier onboarding process and is a condition of supply. Our Supplier Social Responsibility Compliance Requirements outline 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.

Where national law and international frameworks such as the Ethical Trade Initiative (ETI) Base Code are in conflict, we will work to ensure the highest standard is offered to workers.

## **GOVERNANCE**

The management of modern slavery risks across our operations and supply chain falls within our broader approach to human rights as outlined in our 2025 Sustainable Protein Plan. Hilton Foods has developed and implemented 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, carry accountability for 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.

## **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 Sustainability 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 Sustainability team leads the implementation of our strategy alongside the Site Sustainability 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 risks 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 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 2023, we expanded this program to include our largest packaging and ingredient suppliers by volume.

We 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. Suppliers found to be high-risk are required to provide additional supporting evidence to manage the risks identified, 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 needed end the contract in question. Our policies and procedures detail the processes to manage situations where we may be directly linked to adverse human rights impacts. In such situations, 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. Transparency is the first step towards human rights due diligence and therefore we voluntarily report publicly on all the seafood we source across our business through the [Ocean Disclosure Project](#). In response to well-evidenced academic reports regarding labour abuses and restrictive visas in UK fisheries, we have 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.

In 2023, Hilton Foods undertook a project to promote awareness of core human rights for migrant fishers in the UK, as well as how to raise grievances at sea. In collaboration with the Transport Workers Federation, a democratic, affiliate-led federation recognised as the world's leading transport authority, and Stella Maris, the largest ship visiting network in the world, resources were developed, translated and disseminated to fishers across the UK. These resources provided crew with information on their rights and how to raise grievances, together with employers' information on their responsibilities. In the medium-term, this work forms the basis for developing networks between migrant groups who can educate each other. In the long-term, these materials could be developed for other situations internationally. This was funded through the Seafood Ethics Action Alliance (SEAA) Change on the Water Fund, with contributions from Hilton Seafood UK, Tesco and Morrisons.

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.

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.

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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 mobile phone app and posters are displayed in prominent and private locations throughout our sites. 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 Foods 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.

## 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.

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 2023, we continued to serve as Chair of their Steering Committee and continued to lead their human rights due diligence and UK Action Plan workstreams.

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.

## 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 in the UK.

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.

In 2023, we extended our human rights training to our PLC Board, our Executive leadership teams and to the leadership teams at our manufacturing sites in the UK and Australia.

Modern slavery and human rights training was also delivered to the senior management teams across our subsidiary businesses in the UK in 2023 and forms part of our core compliance training modules.

## 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 beyond 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.

<b>RESPECTING HUMAN RIGHTS</b> Safeguarding the welfare and just treatment of all workers and communities engaged with our business and supply chains	– Functioning governance structure in place	<b>Achieved</b>	– Integration into key risk processes is shown on page 50
	– Train all Hilton Foods employees on human rights	<b>On track</b>	– Global induction video on key rights at work to be delivered in 2024
	– Modern slavery awareness training extended to all managerial colleagues	<b>On track</b>	– Began our partnership with Slave-Free Alliance to accelerate our progress in protecting human rights in our supply chain
	– 100% of labour and service providers audited to Hilton Foods Agency Labour Standard	<b>On track</b>	– Annual audit schedule for all labour providers now in place
	– 100% of primary suppliers signed up to Hilton Foods Supplier Social Code of Conduct	<b>On track</b>	– Hilton Foods sites in process of onboarding their suppliers
	– 100% of new primary suppliers screened using Hilton Foods Social Criteria	<b>On track</b>	– Fully integrated into new supplier approval in 2024
	– 100% of high risk primary suppliers audited	<b>On track</b>	– 100% of currently identified high risk suppliers hold valid audit

This Statement was approved by both the Board of Hilton Foods Australia and Hilton Food Group plc Board of Directors on 20 June 2024 and signed on its behalf by:



**Robert Watson OBE**, Chairman