

Modern Slavery Statement

August 2023

Introduction

Hook2Sisters is a key supplier of Poultry to major retailers. The following is an update on how we continue to ensure that Modern Slavery does not penetrate the business.

We acknowledge and understand that Modern Slavery risks can vary, and will, in collaboration with our Supply Chain Partners, continue our approach to mitigate this risk robustly and adaptively.

- Responsibility for the maintenance of this Policy resides with the Head of HR + H&S
 - Responsibility for the execution of this Policy resides with everyone involved in our Business.
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Our Organisation

Hook2Sisters operate throughout Great Britain and participate in each stage of the production of eggs, chick, chicken and turkey, working in conjunction with Contract Growers, Contractors and Labour Agencies (our Supply Chain Partners). We supply chicken and turkey to our main customer 2SFG.

Procedural Policies and Contractual Controls

We continue to update and distribute relevant Policies which make clear that any form of Modern Slavery – including coercion, trafficking, payment for work-finding, and other related exploitation are deemed unacceptable within our Business.

We will continue to operate the signed Service Level Agreements (SLAs) process with our Supply Chain Partners which set out the Ethical Standards expected of our Partners, together with an express statement of expectation that any Sub-Contractors collaborating with them also adheres to those same principals and rules.

Processes and Procedures relating to Sourcing, Recruitment, and Worker Placement include our full commitment to detecting and preventing Modern Slavery.

Due Diligence Processes

Our Anti-Slavery Human Trafficking Policy details our requirements to ensure there is total transparency throughout our Business and in our approach to tackling and eradicating Modern Slavery throughout our supply chains.

- SMETA Audit was undertaken in November 2023 and passed with five non-conformances.
- Our Disclosures Helpline is advertised prominently on each of our sites along with Modern Slavery advisory information.
- We have a system in place to ensure new Contractors comply with our Approved Contractor Scheme in order to carry out work in our Business, regardless of whether they do or do not require a GLAA License, and that those who require one, do have a current GLAA Licence in place at all times. We have signed up for Active Checks on the GLAA website.
- Contractors and Suppliers who do not commit to implementing anti-slavery policies in potentially high-risk scenarios, or covertly operate outside of Policy Guidelines, will be removed from the Supply Chain.

- We will continue to work to the standards of the GLAA and BPC (CoP), which incorporates the Ethical Trading Initiative (ETI) Base Code and will strive to adhere to and maintain these Standards in our Business.

Risk Assessment

We will continue to undertake internal audits as a means of identifying the principal risks relating to slavery and human trafficking in our Business and Supply Chain Partners and will, if identified as considerable risk, request external assistance. Areas of highest risk are those involving manual, unskilled, repetitive activities and have not been identified as intrinsically geographical.

We have an Emergency Procedure Plan on each site which includes a 'what to do' plan if Modern Slavery is suspected and is updated, as necessary.

We encourage an open culture in all our dealings between Employees and people with whom we come into contact. Effective and honest communication is essential if malpractice and wrongdoing are to be dealt with effectively. Our Whistleblowing Policy sets out guidelines for individuals who feel they need to raise certain issues in confidence, which could include forced labour concerns. We provide an independent confidential channel of communication for whistleblowing.

Measuring Effectiveness

As part of the Audit Process referred to above, remedial actions, timescales, and steps for completion, for the following:

- The outcomes of internal and external compliance audits that we undertake include all legal obligations. We will monitor usage of Subcontractors to ensure they are compliant as they are part of our Supply Chain. Throughout 2024 we will be undertaking Ethical Audits in line with GLAA requirements for high-risk Contractors and Recruitment Agencies
- The ongoing monitoring of our payroll system for warning indicators i.e., checking for anomalies in Bank Accounts or Employee addresses.
- Our Anti-Slavery hotline has not been accessed but we will continue to monitor usage.
- The Mental Health support partnership with Farming Communities Network (FCN) will continue to be monitored. We are now engaged with The Royal Agricultural Benevolent Institution (RABI), who offer professional counselling sessions to employees when required.
- Inconsistencies within normal day to day staffing of operations and potential staff welfare issues
- We have identified a high-risk area where we have night-time contractors i.e., Catchers on site. Our Live Haul LGV Class 1 drivers will have the modern slavery module added to their CPC training in 2024 as they see contractors on site.

These will be constantly reviewed and modified where appropriate for inclusion in future versions of this statement.

Modern Slavery Training

We will continue to provide our Employees, Managers, Directors and Supply Chain Partners with the necessary tools and training. The British Poultry Training (Poultry Passport) has included a module solely for Modern Slavery. Every Farm and Hatchery worker is required to undertake this training.

We will maintain:

- Our presence on SEDEX with our supply chain partners gives an overview of our status.

Board Approval

We are confident that by taking these steps we will be successful in identifying and reducing, with the aim of eradicating, the risk of there being slavery or trafficking in our Business and our Supply Chains.

As a responsible Employer we are committed to identifying and implementing improvements in our Processes, Procedures and Systems.

This amended Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Organisation's Slavery and Human Trafficking Statement for the financial year 2023-2024.

Our current and future endeavours remain the identification and eradication of actual / potential slavery and human trafficking issues, and I confirm that the Board of Directors has approved the contents of this statement.



James W Hook
Managing Director
For and on behalf of Hook2Sisters