

# Modern Slavery Statement

## Hook2Sisters Ltd

November 2024

### **Introduction**

P D Hook (Group) and its associated group of companies are key suppliers 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 robustly and adaptively mitigate this risk.

- 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**

Our Organisation, Hook2Sisters (H2S) Limited is a joint venture with 2 Sisters Food Group (2SFG).

We operate throughout Great Britain and are involved in the collection of chicken and turkeys from farms and delivery to 2SFG factories for processing. H2S works to the same policies, procedures etc. as P D Hook (Group).

### **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 - is not permitted, and 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 working for them also adhere to those same principles 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 concluded by VWA Auditors, in November 2023. A further Human Rights Impact Assessment (HRIA) was conducted in September 2024 – results of which are awaited.
- Our Disclosures Helpline is positioned prominently on each of our sites along with Modern Slavery advisory information.
- We work with 'Preferred Suppliers' to engage Agency staff. We have and have checked that they hold a GLAA Licence. A full audit of our Catching Companies is underway and should be completed by the end of 2024.

- We have a system in place to ensure new Contractors comply with our Approved Contractor Scheme to carry out work in our Business, regardless of whether they do or do not require a GLAA Licence, 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, are removed from the Supply Chain.
- We will continue to work to the standards of the GLAA and BPC (CoP) which incorporate the Ethical Trading Initiative (ETI) Base Code and will continue to 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 High 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 Incident Response Plan on each site which includes a 'what to do' plan if Modern Slavery is suspected which is updated as necessary.

Effective and honest communication is essential if malpractice and wrongdoing will 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 helpline for whistleblowing which is promoted on site noticeboards.

### **Measuring Effectiveness (update from 2022 – present)**

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

- 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.
- 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. 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.

We will work with JAUPT – (driver CPC Compliance Organisation) during 2024 to ensure the Modern Slavery Module is included within CPC training.

**We will maintain:**

- Our presence on SEDEX to provide our supply chain partners with 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.

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

**James W Hook**  
**Director**  
**For and on behalf of Hook2Sisters**  
**November 2024**