

# Modern Slavery Statement

## July 2022

### 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
- 

### Our Organisation

Our Organisation, P D Hook (Group) Ltd comprises of a Group of Companies

P D Hook (Rearing) Ltd  
P D Hook (Breeders) Ltd  
P D Hook (Hatcheries) Ltd  
P D Hook (Turkeys) Ltd  
Hook2Sisters Ltd

We operate throughout Great Britain and are involved 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).

### 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 totally 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 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 September 2021 and passed with one non-conformance which will be addressed during Annual Audits from external source.
- Our Disclosures Helpline is advertised prominently on each of our sites along with Modern

Slavery advisory information.

- We work with 'Preferred Suppliers' to engage Agency staff. We have and will continue to check that they hold a GLAA Licence.
- 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 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 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 (update from 2021 – present)**

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 including all legal obligations. We will monitor usage of Sub Contractors 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 for usage.
- The Mental Health support partnership with Farming Communities Network (FCN) will continue to be monitored. Training module to be delivered to Senior staff in September
- Inconsistencies within normal day to day staffing of operations and potential Staff welfare issues

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 maintain:**

- Our presence on SEDEX to our supply chain partners have 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 2022.

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**  
**Managing Director**  
**For and on behalf of P D Hook Group**  
**March 2021**