SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

P D Hook / Hook2Sisters understands that slavery, forced labour, servitude and human trafficking (Modern Slavery) are issues that pose an increasing threat to workers and their employers. Throughout our operations, we have a responsibility to be alert and vigilant to the risks, however small, in our Business and our supply chain, and to react immediately to any reported concerns to the Gangmasters and Labour Abuse Authority (GLAA).

In accordance with Section 54 of the Modern Slavery Act 2015, we set out below the steps that have been and are currently being taken by the organisations to actively ensure that we prevent slavery and/or trafficking in our Business. We acknowledge and understand that Modern Slavery risk 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
- Responsibility for the execution of this Policy resides with everyone involved in our Business

Our Organisation

Our Organisation comprises a Group of Companies operating throughout the United Kingdom, 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 have completed and distributed updated Employment and 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 and have updated and re-issued Memorandums of Understanding (MOUs) to our Contract Growers 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.

Commitments to Anti-Modern Slavery

- 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.
- Processes and Procedures relating to Sourcing, Recruitment, and Worker Placement include our full commitment to detecting and preventing Modern Slavery. These processes are carried out by, and are under the control of, trusted and competent Managers and Employees to enable them to identify possible signs of exploitation in our own Workforce as well as in the Workforces of our Supply Chain Partners.
- We have completed a SMEAT audit with no non-compliances in 2017.
- As part of the British Poultry Council (BPC) we are working with the GLAA to produce a Code of Practice which will outline the commitment to Modern Slavery. This will be launched to Retailers once complete.
- We work with Preferred Suppliers to engage Agency staff. We have and will continue to check that they hold a GLAA Licence.
- Monthly Management Meetings and Quarterly Farm and Hatchery Meetings reinforce our commitment to encourage Employees to report such possible exploitation, and investigate and act on reports appropriately, sensitively and urgently. An agenda with supporting information is sent to regions for discussion at relevant meetings.
- 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 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.
- Our Existing Contractors who are part of our Approved Contractor Scheme are contacted annually to advise of any changes in their circumstances that may affect our Business.
- 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 with our Contract Growers to ensure compliance with the (BPC) Poultry Supply Chain Ethical Compliance Code of Practice (BPC CoP) and our MOU.
- Together with the BPC and GLAA we have organised and delivered regional meetings to advise our Supply Chain Partners how to adopt similar systems and procedures and advise on how to sign up to the BPC CoP.
- We will continue to work to the standards of the 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.
- We have set up a Disclosures HypeLine which is advertised prominently on each of our sites, and have posted Modern Slavery advisory information posters prominently on each of our sites.
- We will again undertake face to face audits with Catchers and other high risk Contractors e.g. with Washers and Muckers and Staff Agencies.
- We will continue to work with the GLAA and have committed to hold 6 monthly meetings with the Catchers. We will extend these meetings to include the high risk Contractors i.e. Washers and Muckers.
- We are a Stronger Together Business

Modern Slavery Training

We will continue to provide our Employees, Managers, Directors and Supply Chain Partners with the necessary tools and training, as well as support, guidance and information based on current advice from the GLAA to equip them with the skills required to identify and prevent Modern Slavery and Human Trafficking by:

- Employees: Tool Box Talks and Poultry Passport Training – We have been instrumental in having a Modern Slavery module added to the Poultry Passport Training Scheme – minimum standards of training provided for the Poultry Industry.
- Managers: Engage with them in Monthly Management Meetings
- Directors: Updates from weekly HR report
- Supply Chain Partners: face to face meetings and MOU.

We will maintain:

- Our commitment to the attendance of relevant personnel at Stronger Together and ETI Modern Slavery Workshops.
- Our support of Stronger Together
- Maintain our presence on SEDEX - (Retailer recognised database)

Principal Risks

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.

High risk activities will be monitored and reviewed on a regular basis. Any undesirable issues discovered within our Contractor base will be immediately highlighted to the GLAA. Any issues involving people will be notified to the appropriate authorities.

Whistleblowing

We encourage consistently 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.

This Policy applies to all individuals working at all levels within the Organisation, including Senior Managers, Officers, Directors, Employees, Consultants, Contractors, Trainees, Homeworkers, Part-Time and Fixed-Term Workers, Suppliers, Casual and Agency Staff.

Key Performance Indicators

As part of the Audit Process referred to above, we will employ primary KPIs, remedial actions, timescales and steps for completion, for the following:
The outcomes of internal and external compliance audits we undertake, including all legal obligations.
- The ongoing monitoring of payroll systems for warning indicators i.e. checking for anomalies in Bank Accounts or Employee addresses
- We have implemented a Probationary Welfare Review which encourages employees to address and report any issues.
- Our Anti Slavery hotline has not been accessed but we will continue to monitor for usage.
- 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.

**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 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 2017/18.

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 our Board of Directors.

James W Hook
Managing Director
For and on behalf of P D Hook Group & Hook2sisters Ltd.
October 2018

- Bird Welfare
- Tax Strategy
- Slavery and Human Trafficking Statement
- Privacy Statement