Modern Slavery 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 are being taken by the organisations to actively ensure that we prevent slavery 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 in the year ahead.

- 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, chicks and chicken, turkey, working in conjunction with Contract Growers, Contractors and Labour Agencies (our Supply Chain Partners).

Procedural Policies and Contractual Controls

We have reviewed and updated Employment Contracts for our Employees, Recruitment and Induction Policies along with other Policies and Procedures 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 operate with signed Service Level Agreements (SLAs) with our Supply Chain Partners and are in the process of updating our Memorandums of Understanding (MOUs) with 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 adhere 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 trained 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.
- Monthly Management Meetings and Quarterly Farm and Hatchery Meetings reinforce our commitment to encourage Employees to report any 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 undertake 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.
- Our Existing Contractors who are part of our Approved Contractor Scheme are contacted 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 commit to work with our Contract Growers to ensure compliance with the British Poultry Council (BPC) Poultry Supply Chain Ethical Compliance Code of Practice (BPC CoP) and our MOU
- Together with the BPC we will organise 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. Retailers and GLAA will be invited to take part.
- 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 Helpline which is advertised prominently on each of our sites, and have posted Modern Slavery advisory information posters prominently on each of our sites.
- We have updated our Induction and Probationary Process to ensure it follows Stronger Together Guidance.
- We are a member of the Association of Labour Providers (ALP), and use its Complexy Agency Labour Auditing tool throughout our Business utilising our own trained Staff.
- We are a Stronger Together Business Partner.

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.

Relevant staff undertake agency audit tool, Stronger Together and ETI training courses.

We will maintain:
• Our Membership of the ALP Association of Labour Providers and utilise its training courses, guidance leaflets and bulletins as appropriate.
• Our commitment to the attendance of relevant personnel at Stronger Together and ETI Modern Slavery Workshops.
• Our support of Stronger Together

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.

We will

• Maintain our presence on SEDEX – [Retailer recognised database].
• Undertake a full audit, using the Association of Labour Providers audit tool, on the Catcher, Washer and Muck Out processes identified as potential high risk areas.
• Work with our Contractor base to secure their inclusion on SEDEX

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, Trainers, 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.
• 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 2016/17.

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 2016

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