



HILTON FOODS

2024 MODERN SLAVERY ACT STATEMENT

Hilton Food Group plc (Hilton Foods) and other relevant subsidiary Group companies*. The Statement details the steps taken to identify, assess, mitigate, and remediate modern slavery and human trafficking risks during the financial year ending on 29 December 2024, as required by section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth). *The scope of this statement includes the following subsidiaries of Hilton Food Group plc: Hilton Foods UK Limited, Seachill UK Limited (Trading as Hilton Seafood UK), Fairfax Meadow Europe Limited, Foods Connected Ltd, Hilton Food Solutions Limited, Evolve 4 Group Limited, Agito Global Limited, and Hilton Foods Australia Pty Limited ABN 60 613 035 500.

Statutory guidance on reporting criteria for section 54(1) of the UK Modern Slavery Act 2015

MSA Guidance	Reference in this statement
Organisation structure, its business and supply chains	Pg. 5 - 7
Policies in relation to slavery and human trafficking	Pg. 6
Due diligence processes in relation to slavery and human trafficking in its business and supply chains	Pg. 8-11
Risk assessment and management	Pg. 8-11
Key performance indicators to measure effectiveness of steps being taken	Pg. 13
Training and capacity building on modern slavery and human trafficking	Pg. 11

Mandatory reporting criteria of the Australia Modern Slavery Act 2018 (Cth)

This statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below identifies where each criterion of the Act is disclosed within the sections of this statement.

MSA Criteria	Reference in this statement
Identify the reporting entity	Pg. 5
Describe the reporting entity's structure, operations and supply chains	Pg. 5-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pg. 5-11
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pg. 8-11
Describe how the reporting entity assesses the effectiveness of these actions	Pg. 13
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Pg. 5
Provide any other relevant information	

This statement, which will continue to be subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Board of Directors of Hilton Food Group plc on 27th June 2025.

A LETTER FROM OUR CEO

At Hilton Foods, our commitment to human rights is unwavering and absolute. Our business has been operating for over thirty years, and I am confident that our purpose and values are not just words; they form the foundation of everything we do. We do not merely acknowledge the risks of modern slavery; we actively confront and eradicate them wherever they appear in our operations and supply chains.

The realities of 2024, again marked by global conflict and instability, only deepen our commitment. These challenges create environments where exploitation can take root, but we refuse to let that happen. Our priority is to protect every individual who contributes to our products, from fishing vessels and abattoirs to our own sites, ensuring they are treated with dignity, respect, and fairness.

Our approach is clear and purposeful. We have further embedded a cross-functional governance structure led by our senior leadership and supported by our Quality, Sustainability, Procurement, and Risk teams. Our Global Supplier Ethical Approval and Risk Assessment processes are consistently applied across the business, supported by internal oversight and audit mechanisms.

Over the past year, we have:

- **Gained third-party assurance of labour standards:** All our sites have now completed SMETA audits.
- **Expanded our assurance visits:** Our internal teams continue to increase the number of on-site visits focused on direct worker engagement and confidential interviews. These visits serve as frontline intelligence, enabling us to identify issues that may be hidden below the surface and build trust with workers.
- **Strengthened our investigation practices:** We have partnered with Slave-Free Alliance to improve our internal processes for investigating modern slavery allegations, ensuring timely action and remediation.
- **Enhanced our risk insight and collaboration:** Through our ongoing partnerships with the Food Network for Ethical Trade, the Seafood Ethics Action Alliance, and the Slave-Free Alliance, we're deepening our understanding of emerging trends, structural vulnerabilities, and risk drivers across our global supply chains by working jointly with our peers and customers.

We continue to report jointly on behalf of both our UK and Australian businesses, reflecting a global human rights strategy grounded in shared values and collective responsibility.

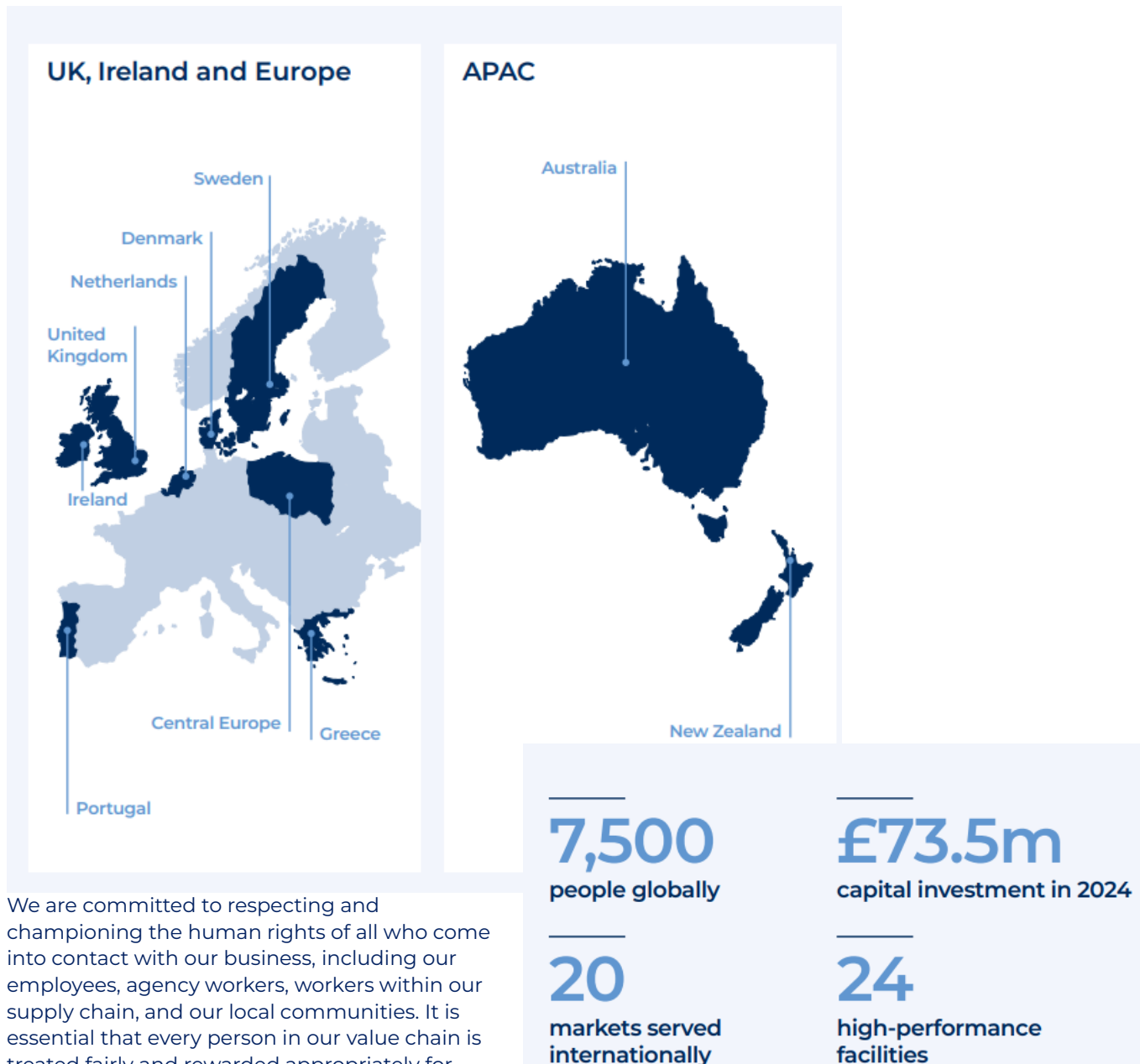
As this statement sets out, we have taken decisive steps in 2024 to address modern slavery risks and make tangible change for rightsholders connected to our business. Yet we recognise this is a continual journey, and we will never be complacent in this area. We will persist in building robust systems, deepening engagement, and nurturing transparency, so that everyone involved in making our products is treated with dignity, fairness, and respect.

“At Hilton Foods, protecting human rights is not optional, it is integral to who we are. We will continue to lead with integrity, hold ourselves accountable, and drive lasting change wherever we operate.”

Steve Murrells CBE, Group Chief Executive Officer



Hilton Food Group plc and its subsidiary businesses (Hilton Foods) build and operate large-scale, highly automated food processing, manufacturing and logistics services for leading international retail and food service customers. We are dedicated to serving our customers and their millions of consumers across the world with high quality meat, seafood, vegetarian and vegan foods, and ready-to-eat meals. Through our services division, we work with our partners to provide consultancy in supply chain, logistics, automation, and digitalisation. We operate in 19 markets around the world, operating 24 technologically advanced processing facilities to supply customers through our partnership approach.



We are committed to respecting and championing the human rights of all who come into contact with our business, including our employees, agency workers, workers within our supply chain, and our local communities. It is essential that every person in our value chain is treated fairly and rewarded appropriately for their work, whether on farm, fishing vessel, abattoir, factory, or distribution centre.

At Hilton Foods, we are guided by a shared purpose and a core set of values in everything we do. We work to be responsible corporate citizens and a resilient business that is building a sustainable future where all have an opportunity to thrive.

MODERN SLAVERY IS UNACCEPTABLE WITHIN OUR BUSINESS AND SUPPLY CHAIN.

We know that globally the risk of forced labour has remained high and, in many contexts, has worsened over the past year. Global conflict, economic volatility, and accelerating climate change continue to displace millions, driving vulnerable populations into precarious work. At the same time, the tightening of migration regimes and weakened enforcement of labour standards in some regions have further increased the risk of exploitation. These overlapping pressures, from disrupted labour markets to global supply chain fragmentation, create conditions in which modern slavery can flourish.

Women, children, and migrant workers remain disproportionately affected, but patterns vary by context. In the UK, male migrant workers in logistics, warehousing and food processing continue to face heightened risks. In Australia, the Global Slavery Index findings reaffirm that temporary migrant workers in agriculture, horticulture, and meat processing remain particularly vulnerable, with systemic issues around recruitment and working conditions. Addressing these risks requires vigilance not only in our global supply chains, but also across our direct operations and labour sourcing practices.

Further information regarding our Group-wide human rights commitments and achievements can be found within our [2024 Annual Report](#). The following statement outlines the steps we have taken to identify and mitigate modern slavery and human trafficking in our own operations and supply chains for the financial year ending on 31 December 2024. This statement is made on behalf of the following in-scope Hilton Foods subsidiaries:

Hilton Foods UK Limited	Huntingdon, UK
Seachill UK Limited, trading as Hilton Seafood UK	Grimsby, UK
Hilton Food Solutions Limited	Huntingdon, UK
Fairfax Meadow Europe Limited	Derby, Enfield, Milton Keynes, and Eastleigh UK
Foods Connected Ltd	Londonderry, UK
Agito Global Limited	UK
Evolve 4 Group Limited	UK
Hilton Foods Australia Pty Limited	Bunbury, Western Australia, Heathwood, Queensland, Truganina, Victoria,

GOVERNANCE AND POLICY FRAMEWORK

Accountability for human rights and modern slavery at Hilton Foods is embedded in our 2025 Sustainable Protein Plan and overseen by our Board and Sustainability Committee, with regular updates to our Sustainability Committee provided quarterly at minimum.

Overall responsibility lies with our Chief Quality and Sustainability Officer for supply chains and our Chief People and Culture Officer for our own operations. Our Sustainability team leads implementation across sites, working closely with senior management and teams including Procurement, Operations, People and Culture, and Quality to embed our commitments and manage risk across the business. For a more detailed review of our governance processes, please refer to page 11 of our [2024 Sustainability Report](#), where you can see how we built a governance structure to ensure sustainability is part of every conversation and that all employees a part to play in achieving our targets.

In 2022, we announced specific sustainability targets in the Hilton Foods Long-Term Incentive Plan (LTIP) as part of our ambition to embed sustainability within our business strategy. Last year, we introduced LTIP measures that have an increased weighting around our People pillar. To ensure leadership are held accountable, we introduced quantifiable people metrics to drive progress across all three pillars of our strategy. More detail on our ESG embedded LTIPs can be found on page 101 of the [2024 Annual Report](#).

At Hilton Foods, our policies apply to all our global operations. Our policies are underpinned by our adherence to several internationally recognised standards and codes, including:

The UN Universal Declaration of Human Rights	The UN Guiding Principles on Business and Human Rights
The International Labour Organization (ILO)	The Base Code of the Ethical Trading Initiative (ETI)
Declaration on Fundamental Principles and Rights at Work	The United Nations Convention on the Rights of the Child

The following policies underpin our commitment to respecting human rights and tackling modern slavery, available publicly on our website:

Policy	Description	Applies to	Reference to Modern Slavery	Communication and Engagement
Human Rights Policy	Sets out our commitment to respect human rights in line with the UN Guiding Principles on Business and Human Rights	All workers working on Hilton Foods sites	<ul style="list-style-type: none"> • Sets out our prohibition of forced labour and child labour in our business operations • Explains our commitment in relation to our other salient human rights issues 	Shared publicly on our website
Supply Chain Social Responsibility Policy		All workers employed within our global supply chains		
Supplier Social Responsibility Code of Conduct and Compliance Requirements	Sets out the minimum expectations of suppliers to Hilton Foods, and the methods they can demonstrate compliance to our Human Rights standards	All protein suppliers to Hilton Foods as a condition of supply	Includes expectations on freely chosen employment, child labour, freedom of association and collective bargaining, wages and working hours, non-discrimination, working conditions, grievance mechanisms and reporting concerns	Communicated via Foods Connected to all suppliers All protein suppliers receive and are expected to adhere to these requirements prior to supply, all Hilton sites are responsible for ensuring that suppliers understand and comply.
Hilton Foods Agency Labour Standard	Sets out the baseline expectations for all labour providers supplying workers to Hilton Foods sites	All labour providers utilised by Hilton Foods	Focuses on key modern slavery risk areas such as recruitment practices, licencing, temporary worker management and health and safety	All labour providers are audited annually against this standard
Children's Rights and Child Labour Remediation Policy	Communicates the expectations regarding the prohibition of child labour across all Hilton Foods sites and minimum expectations for remediation	All Hilton Foods businesses	Focus on preventing child labour and establishing the conditions suitable for young workers	Communicated to all Hilton businesses
Hilton Foods Accommodation Standard	Communicates the baseline and best practice expectations for the use of worker accommodation	All accommodation arranged or contracted by Hilton Foods	Focus on worker safety and security	Communicated to all Hilton businesses

Other policies across our business which address the multifaceted elements of modern slavery are:

- Anti-Bribery and Corruption Policy ([here](#))
- Whistleblowing Policy ([here](#))
- Operational-level Grievance Policies and Mechanisms

OUR EMPLOYEES

In 2024, we employed 2,936 people across our businesses in the UK, 1,622 in Australia and over 7,500 globally. Our people are at the heart of our success and their health, safety and wellbeing is our priority. We are an inclusive organisation built on respect, with equal opportunities for skills and career development.

We work to create an enabling environment which allows for all workers on our sites to speak up about the issues that matter most to them. We have implemented tools and systems that allow any employee, both permanent and temporary, to raise concerns related to their personal and professional wellbeing. These tools allow the prompt and effective notification of issues to leaders across our business. In 2024, 94% of our employees participated in our annual engagement survey, reporting back about their experiences at work.

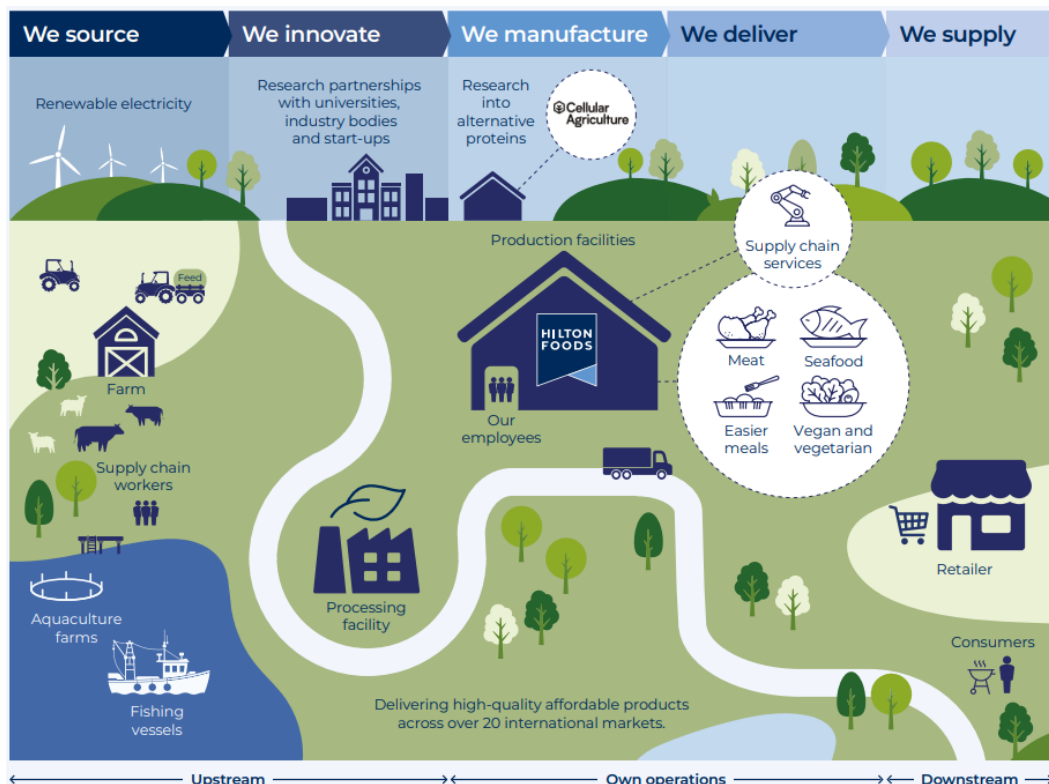
Fairfax Meadow introduced several impactful programmes, one of which was the 'It's OK Not to Be OK' wellbeing campaign, which promotes mental health awareness and encourages open conversations. Across our APAC business, informal staff forums have been established to allow employees at all levels to meet with senior leaders where no topic is off the table. The most successful example of this is the 'Coffee with the General Manager' at our Heathwood site.

AGENCY WORKERS

Our businesses across the UK and Australia engage with labour providers to supply agency workers across our sites. In 2023, we piloted our new Agency Labour Standard and audit methodology, to ensure that all employment agencies we work with adhere to the same ethical employment and business competency standards. This process enables us to complete suitable due diligence assessments on their competency, financial resilience, and ethical behaviour of our labour providers. 89% of our UK and APAC manufacturing businesses successfully completed their agency labour audit against the renewed standard in 2024.

OUR SUPPLY CHAIN

Raw materials are sourced, in conjunction with our retail partners, from a combination of local sources and a wide international base of suppliers that are carefully and thoroughly assessed for quality and ethical business practices. It is then processed, packed, and delivered to our customers distribution centres or stores depending on the market where we operate.



We partner with suppliers that share our commitment to human rights standards, quality, food safety, animal welfare and sustainability. We are committed to ensuring the integrity and traceability of the raw materials we use in our products, which includes meat, seafood, ingredients, and packaging. We have developed our own supplier standards for each raw material group.

Hilton Foods closely works with our subsidiary, Foods Connected, an end-to-end software solution, that allows us to manage our supply chains, food safety and quality standards, and corporate social responsibility effectively and efficiently. Foods Connected enables the direct engagement with our suppliers to securely request and store quality, food safety and corporate social responsibility data and records.

RISK ASSESSMENT AND DUE DILIGENCE

In 2024, Hilton Foods conducted a salient human rights risk assessment to better target areas requiring heightened attention and support. This assessment aligned with the UN Guiding Principles on Business and Human Rights, considering severity, scale, remediability, and likelihood, based on internal insight, consultation with internal and external stakeholders, and reputable third-party data. The assessment identified four key risk areas across our operations and supply chains:

Focus Area	Key Risk Themes	Our Next Steps
Own Operations (UK, Australia, Europe)	Insecure/irregular employment, agency worker vulnerability, service provider oversight (e.g. catering, cleaning, security)	<ul style="list-style-type: none"> Expand monitoring of agency labour practices across all sites Strengthen due diligence on service providers with revised contract terms
UK & European Abattoirs	Irregular hours, health & safety risks, especially for agency and migrant workers	<ul style="list-style-type: none"> Conduct reviews with selected abattoirs Align wage and hours monitoring with Sedex/SMETA expectations
South American Beef Supply Chains	Forced labour, excessive hours, low wages, health & safety	<ul style="list-style-type: none"> Engage strategic suppliers in due diligence and capability-building Prioritise third-party social audits for selected high-risk sites
Global Fisheries & Aquaculture	Forced labour, poor working conditions, excessive hours, wage-related issues, especially among migrant workers	<ul style="list-style-type: none"> Expand traceability tools for vessel-to-plate mapping Participate in pre-competitive initiatives (e.g. SEAA)

These findings are helping shape our prioritisation, capability-building, and mitigation efforts across sites and sourcing regions. We are building out how we will directly target these areas and will form a core element of our 2030 Sustainable Protein Plan which we will release next year.

Our greatest opportunity to manage the risks of modern slavery and labour exploitation lies within our own operations and global food supply chains. Hilton Foods maintains long-term, strategic relationships with many suppliers, enabling deeper visibility and stronger influence on working conditions. Our processes for identifying and addressing risk are well established and integrated into how we source. When onboarding new suppliers, our Quality and Procurement team supported by our Sustainability team assess supplier capability to manage human rights risks, particularly in higher-risk categories. This early engagement helps us mitigate potential issues from the outset while promoting continuous improvement among our existing partners.

All Hilton Foods protein suppliers must commit to our Supplier Social Responsibility Code of Conduct and register on Sedex. New and existing suppliers complete a self-assessment covering labour rights, health and safety, environment, and ethics. We assess modern slavery risks using Sedex RADAR and our internal Supplier Ethical Approval & Risk Assessment process, supported by external risk data from trusted global sources. As of end 2024, 60% of in-scope suppliers had been risk assessed and ethically approved. High-risk sites must provide further evidence and may require an independent SMETA audit. Where issues are identified, we expect corrective actions and worker remediation. If a supplier fails to engage, we will re-audit, re-train, or end the contract, in line with the UN Guiding Principles on Business and Human Rights.

Assessment Element	Description
Code of Conduct Commitment	All suppliers must sign the Supplier Social Responsibility Code of Conduct.
Sedex Registration	Mandatory for all protein suppliers; includes a Self-Assessment Questionnaire (SAQ).
Sedex RADAR Risk Tool	Uses global risk data (e.g. ILO, UNDP, World Bank) to assess country and sector-level risks.
Supplier Ethical Risk Assessment	Hilton's internal process (via Foods Connected) for detailed, site-specific due diligence.
Risk Factors Considered	Country risk, sector risk, workforce profile, labour intensity, known NGO/media allegations.
High-Risk Supplier Actions	Must submit additional evidence; independent SMETA audit required.
Non-Compliance Response	Re-audit, re-train, or terminate supplier if corrective action/remediation is not delivered.
Remediation Commitment	Aligned with the UN Guiding Principles on Business and Human Rights (UNGPs).

OUR PROGRESS IN 2024

100% OF HILTON FOODS MANUFACTURING SITES ETHICALLY AUDITED



All our manufacturing sites have now been successfully audited against the ETI Base Code using the SMETA methodology in 2024. As a major employer, ensuring all workers are treated with dignity and respect, in safe and fair workplaces, is a fundamental priority.

SMETA, one of the world's leading ethical audit frameworks, comprehensively covers labour standards, health and safety, environmental practices, and business ethics.

This achievement underscores our commitment to enabling a fair and safe workplace. Implementing an ethical audit standard across our own business has helped us understand areas of improvement. It has validated worker contracts, hours and pay across all levels of our workforce, including employees, security services, agency workers, canteen and cleaning staff. Crucially, despite the variations in labour laws across our global operations, we now maintain a consistent, golden thread of standards that all workers at Hilton Foods' sites can expect and rely upon. Some findings revealed issues with contractual terms and working hours related to agency workers and service providers across our business, we are working to strengthen our processes to manage labour providers aligned with our Sustainable Protein Plan.

The SMETA audit process also includes interviews with a diverse range of workers from each site, offering them a platform to candidly share their experiences with an impartial third party. This has been invaluable for our senior leadership teams across our sites, who have engaged wholeheartedly with implementing their feedback, taking proactive steps to implement necessary changes. We will continue to run ethical audits as a core element of our human rights programme, ensuring our commitments are met with rigour and transparency.

DEVELOPING MODERN SLAVERY ESCALATION PLANS AT OUR SITES IN THE UK AND IRELAND

The Centre for Social Justice estimates that there may be up to 100,000 people living in situations of modern slavery across the UK. We recognise our responsibility to intercept and mitigate third-party exploitation which could occur within our business, as the manufacturing sector remains a destination of choice for some exploiters.

We also know that migrant workers can be more vulnerable to modern slavery, therefore it is crucial that we continue to respond and adapt our systems to ensure that no one is subjected to this crime.

Last year, we announced our partnership with Slave-Free Alliance to accelerate our work in this area. We ran an interactive workshop with our People and Culture team and Senior business leaders across the UK and Ireland, inviting a former detective inspector to deliver scenario-based training.

The output of this work was a step-by-step modern slavery escalation plan for all businesses in the UK and Ireland. This resources our People and Culture and Operations teams with a clear plan to deal with any 'flags' of modern slavery on site, in a sensitive manner. We will continue to enhance this work with specialised training for our teams handling incidents in 2025.

GLOBAL FISHERIES AND AQUACULTURE

One of our priority human rights risks is our seafood supply chains. Transparency is the first step towards human rights due diligence and therefore we voluntarily report publicly on all the seafood we source across our business through the [Ocean Disclosure Project](#). In 2022, in response to well-evidenced academic reports regarding labour abuses and restrictive visas in UK fisheries, we worked collaboratively via the Seafood Ethics Action (SEA) Alliance to co-develop an action plan with Producing Organisations, representatives of UK vessel owners, and key welfare organisations to address and remedy the issues faced by UK fishers. Credible reports involving in-depth worker interviews indicated flags of labour abuse.



Advocacy to strengthen labour standards in source countries can be a valuable tool to leverage change. Through our participation in the SEA Alliance, we have advocated for the ratification of the International Maritime Organization Cape Town Agreement on fishing vessel safety. All work at sea should be safe.

In parallel, we continue to be interested in the development of Worker-Driven Social Responsibility (WDSR) initiatives in seafood supply chains. These models place workers and their representatives at the centre of governance and grievance mechanisms, helping shift beyond audit-only approaches. As part of this shift, we have extended our own due diligence in high-risk supply chains, including worker interviews conducted in Vietnam to gain deeper insight into recruitment practices, contract terms, and working conditions.

We are aware of ongoing international reporting and studies into forced labour risks in seafood processing. We continue to review our due diligence processes relating to seafood sourcing from high-risk regions, informed by third-party data and supplier engagement. This included reviewing audit coverage, labour recruitment practices, and our traceability systems. We are also engaging with industry peers through pre-competitive initiatives to support shared transparency and responsible sourcing practices in fisheries and aquaculture. We have initiated confidential engagement with selected suppliers in higher-risk geographies to verify labour standards and reinforce our expectations. Where appropriate, we are also working to strengthen traceability and visibility into upstream supply chains, including at vessel level.

EFFECTIVENESS OF MEASURES PUT IN PLACE

We recognise that identifying and responding to issues is a critical test of whether our systems are working. In 2024, one of our UK businesses reported a potential incident involving the payment of illegal recruitment fees by a worker on site. This concern was investigated jointly by our Group Sustainability Team and on-site People and Culture colleagues using a combination of worker interviews and documentary review. The allegation was substantiated and referred to the relevant UK authorities.

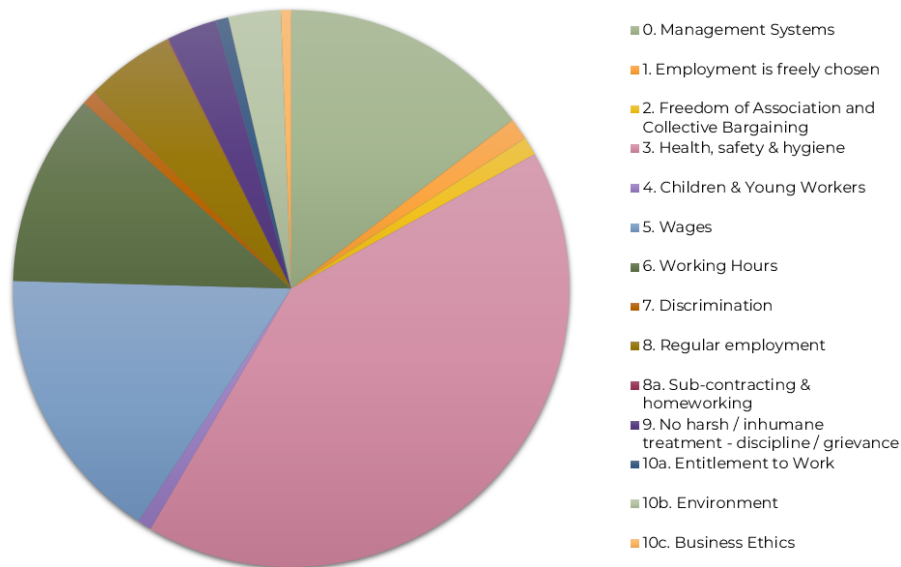
Remediation has since been completed, including support provided to the affected worker. To prevent recurrence, we reviewed and updated the new starter onboarding process with the labour provider involved and strengthened pre-employment screening procedures for agency workers at the site.

In 2024, 26.6% of our in-scope protein suppliers conducted a SMETA audit. Non-conformances were identified across all sourcing regions through third-party audits. The highest concentration of issues

related to audits conducted in the United Kingdom and the Republic of Ireland, this is particularly around health and safety. This reflects the volume of sites audited in these regions and the maturity of our Sedex engagement.

South American beef and Southeast Asian seafood supply chains presented recurring issues relating to wages, working hours, and subcontracted labour, aligned with our prior risk assessments. These findings are now informing targeted supplier engagement, capacity-building initiatives, and the design of deeper due diligence measures in 2025.

Results of our 2024 Supplier SMETA Audit Program by ETI Base Code Area



We continue to review the effectiveness of our grievance channels, supplier engagement processes, and audit responses as key mechanisms to surface and resolve issues. Where recurring themes emerge, they inform our risk prioritisation and capacity-building focus.

WHISTLEBLOWING AND GRIEVANCE MECHANISMS

At Hilton Foods, we are committed to ensuring that every worker, whether directly employed, agency-supplied, or working within our supply chain, has access to a safe and confidential way to raise concerns.

We provide an independent external reporting hotline, accessible 24/7 and in multiple languages, enabling workers to report concerns related to human rights, working conditions, modern slavery, or any other ethical breach. Callers may remain anonymous, and all call handlers are trained to manage sensitive, complex issues.

The hotline is introduced to employees and agency staff during induction, promoted via the Hilton Foods mobile app, and signposted through posters in discreet but visible locations across all sites.

We recognise that speaking up can be difficult. Hilton Foods has a strict non-retaliation policy: any concern raised in good faith will be treated seriously and sensitively, and no action will be taken against those who report malpractice. In addition to the hotline, we encourage open engagement through site-level People and Culture teams and informal staff forums, which can also surface concerns or early warning signs.

Concerns raised through the hotline or other grievance channels are reviewed by trained internal teams and, where appropriate, escalated through our Group-level remediation framework. This framework sets out a clear process for triage, investigation, decision-making, and follow-up, including where referral to external authorities may be required. Corrective actions and outcomes

are tracked, and where risks are systemic or recurring, they inform wider supplier engagement and risk prioritisation efforts.

As we strengthen our approach to worker voice, we continue to review the effectiveness of our grievance mechanisms and explore opportunities to expand access to trusted channels across our supply chain.

PARTNERSHIPS

The eradication of forced labour cannot be achieved by one business alone, collaborative action from government and civil society is essential. At Hilton Foods, we collaborate with several third parties to safeguard labour rights, improve working conditions, and strengthen our ability to identify and address risk.

We have strengthened our commitment to the Food Network for Ethical Trade through engaging in its governance by becoming an elected Board Member.



**SLAVE-FREE
ALLIANCE**
Working Towards a
Slave-free Supply Chain



We are a founding member of the Seafood Ethics Action Alliance, a collaborative forum to ensure human rights are respected in seafood supply chains. In 2024, we continued to serve as Chair of their Steering Committee.

In 2024, we continue our membership of the Slave Free Alliance, who will act as a 'critical friend' to help us enhance our work within this area. As an international social enterprise, they have the knowledge and expertise to support us to prevent exploitation across our value chain.

TRAINING

We continue to put awareness raising and training at the core of our human rights and modern slavery strategy. We want our employees, supervisors, and managers to be confident about the actions they need to take should they suspect a case of modern slavery.

We continue to roll out Modern Slavery training to all our employees and we have made awareness training part of employee induction.

We have continued to utilise training from both Responsible Recruitment Toolkit and Stronger Together to deliver best-practice training to our People and Culture colleagues.

In 2024, we extended our human rights training to our PLC Board, our Executive leadership teams and to the leadership teams at our manufacturing sites.

Modern slavery and human rights training was also delivered to the senior management teams across our subsidiary businesses in 2024 and forms part of our core compliance training modules.

EFFECTIVENESS OF MEASURES IN PLACE

Alongside our new policies, our human rights strategy has been refreshed and endorsed by senior management within Hilton Foods. We plan to accelerate the work we are doing on human rights to 2026, by extending its scope and enhancing our commitments within our 2030 Sustainable Protein Plan.

The following Group-level targets have been set across our business to comprehensively track our progress and enable us to assess our effectiveness against them.

2025 Goal	Progress	Progress
Functioning governance structure in place	Achieved	Integration into key risk processes, read more on page 11 of our Sustainability Report and the Human Rights section of our GRI Report
100% of Hilton Foods production facilities ethically audited	Achieved	100% of Hilton Foods production sites have had an independent ethical audit
Train all Hilton Foods employees on human rights	On track	Training provided in 2024 to the Board and Executive Leadership Team and Site Sustainability Leads. Human Rights training material has been developed for all employees and will be integrated into our induction training in 2025
Modern slavery awareness training extended to all managerial colleagues	On track	Training materials in development to be accessible on our new online learning system
100% of labour and service providers audited to Hilton Foods Agency Labour Standard	On track	Our Agency Labour Standard has launched across all sites, and all labour and service providers independently audited as part of our SMETA roll out
100% of primary suppliers signed up to Hilton Foods Supplier Social Code of Conduct	On track	All Hilton Foods businesses have engaged their primary suppliers on this requirement
100% of new primary suppliers screened using Hilton Foods Social Criteria	On track	Ethical screening integrated into new supplier approval for protein suppliers
100% of high-risk primary suppliers audited	On track	SMETA audits for high-risk primary suppliers have been initiated

This Statement was approved by the Hilton Food Group Plc Board of Directors on 27th June 2025 and signed on its behalf by:



Steve Murrells CBE, Group CEO