



## **Pilgrim's Food Masters Modern Slavery Statement 2023**

As a values-led business we believe the sustainability of our company starts with the success of our people. We focus on providing a safe and well-managed workplace that provides the best opportunity for our colleagues to thrive.

Our vision is to become the best and most respected company in our industry, creating the opportunity of a better future for our team members.

We have a zero-tolerance approach to Modern Slavery and are committed to behaving responsibly and respectfully and will take the required steps to protect human rights in our own operations and across our supply chain.

This Statement sets out the actions we have taken to understand potential modern slavery risks across our own operations and supply chains, as well as the measures we have put in place to mitigate the possibility of occurrences of slavery and human trafficking. We regularly review and improve our practices through effective due diligence and risk assessments, raising awareness of Modern Slavery and collaborating to protect the most vulnerable groups.

### **Organisation structure and supply chains**

For the purposes of this statement, Pilgrim's Food Masters Group includes Pilgrim's Food Masters UK Limited, Pilgrim's Food Masters Ireland Limited, Oakhouse Foods Limited and Rollover Limited. Reference to Pilgrim's Food Masters or we/our/us are to any and/or all of the companies within the Pilgrim's Food Masters Group.

With 4,500 people across facilities in Northern Ireland, England and Ireland, Pilgrim's Food Masters is a market leader in a number of added value categories in the UK, including meats, chilled and frozen ready meals.

Pilgrim's Food Masters sources from global suppliers who are broadly categorised as meat, ingredients, packaging and indirect suppliers. This includes purchasing raw materials through to finished factored goods ready for further redistribution.

### **Scope**

This statement sets out the steps taken by Pilgrim's Food Masters to prevent Modern Slavery and human trafficking in our own operations and across our supply chains.



## **Policies in relation to slavery and human trafficking**

Pilgrim's Food Masters is committed to protecting human rights in our business activities, including our own operations and supply chain. This includes our commitment in relation to slavery and human trafficking.

We operate our business in compliance with the Ethical Trading Initiative base code which derives from the core conventions of the International Labour Organisation, and from the United Nations Universal Declaration of Human Rights. We have a number of policies to ensure that we are conducting business in an ethical and transparent manner.

Our approach to human rights starts with understanding how our products, business activities and operations may impact our team members and our supply chain, both positively and negatively. Our human rights values can be traced to our Code of Conduct, adopted by our Board of Directors. Our Code of Conduct sets high standards for our team members, including our officers and directors.

Our Human Rights Policy applies to all Pilgrim's Food Masters team members, including part-time, agency and temporary workers. Our commitment to respecting human rights extends throughout our supply chain, and we not only encourage and promote this in our supply chains, but it is an important part of our supplier's contractual obligations to us.

We expect our diverse set of suppliers to meet or exceed our high standards when conducting business with us. Our Supplier Code of Conduct reinforces this commitment and encompasses minimum standards in respect of human rights, use of slave labour, freedom of association and collective bargaining, minimum age for employment, equal employment opportunities, employment practices, health and safety, environmental issues and business integrity, which includes anti-corruption and bribery.

## **Our approach to Modern Slavery**

We recognise that the food industry is one of the sectors that might be vulnerable to modern slavery risks and human rights violations and especially in businesses with a global supply base.

Our commitment to respecting human rights includes to proactively avoid human rights infringements within our sphere of influence. However, where we have unknowingly or unwittingly caused or contributed to adverse human rights impacts, we are committed to remedying the

infringements and ensuring our systems, procedures and processes are updated so as to try and prevent such infringements from occurring in the future.



Pilgrim's Food Masters Human Resources department, in collaboration with our senior leadership, works directly to drive improvement in working conditions and ensure compliance with applicable laws and regulations. Our Human Resources department also runs training courses for our team members focusing on topics including workplace health and safety and Code of Conduct compliance.

We believe that these training courses promote a workplace culture that acknowledges the importance of all human rights.

We require our industry partners, including our suppliers, to comply with all local, national and European Union regulations applicable to their operations; and we expect them to operate their businesses in a manner promoting ethical behaviour and focuses on managing the impacts of their operations on their workers and the communities in which they operate. Our Procurement and Supplier Assurance teams actively engage across our supply base to ensure compliance with our Supplier Code of Conduct.

### **Risk assessment and due diligence**

We conduct due diligence throughout our business to proactively assess, identify, prevent and mitigate potential adverse human rights impacts across our value chain. Due diligence tools we rely on include, but are not limited to, vendor and customer compliance screening and monitoring. If adverse human rights impacts are revealed due to our business activities or from linkages to our operations, Pilgrim's Food Masters is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UN Guiding Principles on Business and Human Rights.

Across our own operations, we have engaged an independent third party to maintain an "Ethics Hotline" through both a free phone number and a web-based reporting platform for team members to anonymously report suspected violations of our Code of Conduct and/or the law. The Ethics hotline is available to every team member in every country where we operate and is provided in 11 languages to accommodate our diverse workforce. It is an effective tool for gauging the effectiveness of our Code of Conduct, and we continuously monitor and respond to all reported matters.

We continue to be an active Buyer/Supplier member of SEDEX (Supplier Ethical Data Exchange). SEDEX is one of the world's leading ethical trade service providers working to improve working conditions in global supply chains. They provide tools, services and resources to help members working towards a more responsible supply chain.

We map our manufacturing sites on the SEDEX platform, all of which have a completed Self-Assessment Questionnaire (SAQ), which they update annually. This provides each site with a SEDEX risk score and management control score.



We are regularly audited by third parties who publish our audit results on SEDEX. In 2023, 25% of our manufacturing sites have undergone a SMETA (SEDEX Members Ethical Trade) audit. SMETA is the most common standard of ethical audits. This is based on the International Labour Organisation's core conventions. Once complete, the audit results are shared with our customers. Our policy, introduced in 2022, is that our sites will be subject to an independent 3<sup>rd</sup> party audit at least every 2 years. In 2024, we will focus on having our remaining manufacturing sites be audited.

We use the Supplier Risk Assessment Tool ("Radar") in SEDEX which allows us to assess risk by site, country, sector and product area. In our Supplier Code of Conduct, it is a requirement for all raw materials, ingredients and packaging suppliers to be linked with Pilgrims Food Masters on SEDEX. Our priority in 2022 was to begin the process of linking our suppliers with our new Pilgrim's Food Masters account following our split from our previous owners. In 2023, we now have the vast majority of our suppliers engaged via SEDEX and have a clear plan to close remaining gaps in 2024. This will allow us to further identify high risk suppliers and form an audit plan for the year for both new and existing suppliers.

In 2022, we created our first sustainability questionnaire, which is used (amongst other things) to review the status of suppliers' ethical standards. This questionnaire was sent to our raw materials, ingredients, and packaging suppliers in Q4 2022. In early 2023, we were able to use the results of this survey to further explore where we can embed risk assessments and due diligence in our business, triggering an end-to-end review of our Responsible Sourcing approach. Using the results and data from this questionnaire, plus the Radar Tool in SEDEX and other industry tools, we will look to create a supply chain risk assessment score in 2024 for our suppliers across several sustainability topics. We acknowledge that many sustainability risks are intrinsically linked, and a combined risk approach will allow us to work with our high-risk suppliers across a number of sustainability topics important to us.

In 2023, we validated our materiality matrix as a business using a leading external sustainability consultancy. This piece of work included assessing and identifying relevant human rights, environmental and governance areas important to our business. The scope of the work included peer and competitor reviews, stakeholder interviews, country level commodity assessments on 7 key commodities, internal workshops and reviewing relevant regulatory and market frameworks. The results of the materiality and commodity risk assessments have further supported Pilgrim's Food Masters to understand how these could impact us through the lens of financial, reputational, transitional and physical risks and how we can better mitigate these risks moving forwards. We are working to build on the commodity risk screening in 2024 to bring more commodities into scope.

We are members of the Food Network for Ethical Trade, an initiative to use collective leverage of suppliers and retailers to bring positive change to global supply chains by working collaboratively. We will continue to use the risk assessment tool to assess human rights risks within our business and work as part of the collaborative working groups to tackle issues within our supply chains.



In addition, we are a member of the Association of Labour Providers (ALP). ALP is a specialist trade association promoting responsible recruitment and good practice for organisations that supply the workforce to the food processing, agricultural and wider consumer goods supply chain.

We support the Stronger Together initiative, which is a multi-stakeholder, business-led initiative aiming to reduce Modern Slavery, particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance, training and resources for employers, labour providers, workers and their representatives to work together to reduce exploitation. We have been utilising some of their Modern Slavery training videos within our training.

We are currently reviewing the governance process in place for our Labour Providers. This process includes SLAs, labour management controls, 6 monthly audits including worker interviews and Stronger Together training and implementation.

Our focus over the next year is to continue to identify and mitigate risks in our own operations and supply chain and build on the systems we have in place to:

- Identify and assess potential risk areas in our own operations and supply chains
- Monitor potential risk areas in our own operations and supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Encourage and protect whistle blowers

### **Key performance indicators to measure effectiveness of steps being taken**

Although we believe our actions have proven effective to date, there is no room for complacency, and we remain vigilant to potential threats.

We measure the effectiveness of our ethical trading initiatives through the number of incidents reported through the confidential whistleblowing hotline, performance of third-party audits and outcomes from labour provider audits. These will continue to be monitored through 2024.

Throughout 2024 we will continue to strengthen our approach to managing the risks of modern-day slavery within our business and supply chains, adapting our approach in response to any changing risks. We will act immediately to address any issues raised.

Our priorities in 2024 will be on the following key areas:

- Continue to maintain 100% compliance with our Modern Slavery eLearning
- Complete the independent ethical audits on our identified manufacturing sites
- Continue to increase the number of suppliers linked to us on SEDEX
- Redevelop our Responsible Sourcing strategy further embedding human rights due diligence within any new policies and processes
- Continue to expand the internal audit scope for suppliers and partners across Oakhouse Foods Limited and Rollover Limited



### **Training on modern slavery and trafficking**

Our Modern Slavery eLearning forms an important part of our overall mandatory training programme and helps to ensure a high level of understanding of the risks of Modern Slavery and human trafficking in our supply chains and our business.

Modern Slavery eLearning covers an overview of modern slavery, how to prevent and spot signs of modern slavery and includes resources from Stronger Together. Since its launch at the end of 2022, 98.8% of identified colleagues have completed the training with the remaining 1.2% on track for completion within their allocated training window.

Other mandatory training includes our Code of Conduct training. By December 2023, 100% of all colleagues had received training on this.

In addition to our mandatory training, across April and May 2023, we rolled out sustainability training across the business, inviting colleagues to understand more about key sustainability topics including human rights and also better understand our sustainability strategy including the commitments we have made around human rights and the targets we measure ourselves to. We aim to continue this engagement throughout 2024, providing further training on key topics.

Information on our policies and Ethics line are displayed in a visible position across all of our sites and offices.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023. This statement, which is subject to annual review, has been reviewed by senior management and has been reviewed and approved by the Board of Directors of each of the entities covered under the Act.

Signed:

A handwritten signature in black ink, appearing to read "N. Robinson".

Nick Robinson

CEO for Pilgrim's Food Masters UK Ltd and Pilgrim's Food Masters Ireland Ltd.