

Modern Slavery Policy

Tackling Modern slavery within the Food Industry





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Contents

| | |
|----------------------------------------|---|
| MODERN SLAVERY POLICY PRINCIPLES | 4 |
| WORKING WITH THE POLICY..... | 5 |
| RESPONSIBILITY AND COMMUNICATION | 6 |
| CONTACTS FOR FURTHER INFORMATION..... | 7 |





MODERN SLAVERY POLICY PRINCIPLES

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labour, compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Zero Tolerance Approach

We are working towards elimination of Modern Slavery within our workplace and the wider food industry. We are committed to act with integrity in all our business dealing and relationships as well as implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place within our business and our supply chains.

Transparency within our Business

We are also committed to ensuring there is full transparency within our business and that our approach to tackling modern slavery in our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We will take measures to ensure that the same high standards are maintained by all our contractors, suppliers, labour providers and other business partners. As part of our contracting process, we include specific provisions around forced and compulsory labour, and we expect our suppliers will in turn hold their suppliers to the same high standards. We also reserve the right to audit our supplier's processes and procedures to ensure compliance.

This policy applies to all companies within the Pilgrim's Europe family. This policy applies to all persons working for us or on our behalf in any capacity, including all employees at any level, directors, agency workers, seconded workers, interns, agents, contractors, external consultants and business partners. This policy does not form part of any employee's contract of employment and may be amended at any time.

Kirsty Wilkins

Chief People Officer

Pilgrim's Europe

11th September 2024





WORKING WITH THE POLICY

The prevention, detection and reporting of modern slavery in any part of our business or our supply chains is the responsibility of all of those working for us and under our influence.

Responsibilities of all employees

- You must notify a trusted colleague, Manager, or use the independent **Speak Up – Ethics Line 0808 234 9445**, [Pilgrim's Ethics Line](#) or use the QR code, if you spot or have any suspicions of any form of Modern Slavery occurring within our business or supply chain. You can also report via the **Modern Slavery Helpline 0800 0121 700**.
- If you are unsure if a particular act, treatment of workers or working conditions within our business or supply chain constitutes any of the forms of modern slavery, raise it with your Manager, HR Team, the Social Sustainability Manager, the anonymous Stronger Together helpline, 0800 297 0100 or 0800 297 0101 or the independent confidential **Speak Up – Ethics Line 0808 234 9445**, [Pilgrim's Ethics Line](#) or QR code above.
- Any employee who breaches this policy will face disciplinary action which could result in dismissal.



Pilgrim's Europe Commitment

We want to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment because of reporting their suspicion that modern slavery is taking place in any part of our own business or our wider supply chain. Detrimental treatment includes dismissal, disciplinary action, threat of any kind, or other unfavourable treatment.

We reserve the right to terminate our relationship with individuals or other organisations working with us or on our behalf if they breach this policy. We also reserve the right to audit any of our contractors, partners or suppliers, including their employee records, under the terms of this policy to ensure they have the correct policies and procedures in place to deal with modern slavery.





RESPONSIBILITY AND COMMUNICATION

- I** The **Executive Team** has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- II** The **Social Sustainability Manager** has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with queries and auditing our internal systems and procedures to ensure they are fit for purpose.
- III** **Managers** at all levels are responsible for ensuring that those reporting to them understand and comply with this policy.
- IV** **All employees** are responsible for ensuring that this policy is followed and report any concerns that they may have either within the business or using our confidential independent Speak Up – Ethics Line – 0808 234 9445, [Pilgrim's Ethics Line](#)
- V** **HR teams** will ensure that all staff are trained in relevant aspects of modern slavery and Stronger Together during inductions. Our HR Teams and agency recruitment partners are also trained to spot the signs of modern slavery during the recruitment process. Additional training will be provided to managers, HR Teams, and other staff as needed.
- VI** . We will also encourage our Suppliers to participate and undertake relevant training in addition to reviewing their own processes and procedures. We will continue to work as part of Stronger Together in conjunction with other suppliers and retailers to stamp out all forms of modern slavery. We will also support the work of the Gangmasters & Labour Abuse Authority. We will request that all suppliers share their Modern Slavery Statements with us on an annual basis. Where suppliers are not required to report under the terms of the Modern Slavery Act 2015, we expect them to have a plan in place to tackle Modern Slavery within their business.
- VII** We will raise awareness on our sites and within our supply chain of the measures we are taking to ensure there is no modern slavery and will report on the progress of these measures on an annual basis, as required in the Modern Slavery Act 2015 legislation.





CONTACTS FOR FURTHER INFORMATION

For more information on tackling Modern Slavery within Pilgrim's Europe or our supply chain, firstly please contact - Andy York, Social Sustainability Manager
andy.york@pilgrimseurope.com or 07585 995552.



Stronger Together - <http://stronger2gether.org/>

Speak up – Ethics Line

Independent confidential reporting line – 0808 234 9445 or [Pilgrim's Ethics Line](#)



Gangmasters & Labour Abuse Authority

GLAA (Gangmasters and Labour Abuse Authority) - <http://www.gla.gov.uk/>

