

Slavery and Human Trafficking Disclosure Statement

INTRODUCTION

This statement is made on behalf of Hilton Food Group's UK operations comprising Hilton Foods UK Ltd. and the recently acquired Seachill UK Ltd. (collectively referred to as 'Hilton' in this statement). We are publishing this statement as a demonstration of our commitment to anti-slavery practices and an affirmation of the values we hold and adopt across our business. This statement is in connection with the financial year ending 31 December 2017.

Hilton is committed to ensuring that the way we conduct our business and deal with our suppliers reflects our commitment to working in an honest, open and ethical manner. We recognise our social, ethical and environmental responsibilities arising from our operations as well as our responsibilities towards the welfare of our employees, customers, suppliers and the communities in which we operate. We aim to ensure that the way we run our business prevents and deters any form of modern slavery and human trafficking from occurring anywhere in our business and supply chain.

The Hilton Food Group is headquartered in the United Kingdom and is a leading specialist food packing business supplying major food retailers. Hilton's business model is to source meat, fish and seafood from a local and global base of quality suppliers, which it then processes and packs for onward distribution.

Hilton Foods UK Ltd. operates a meat processing factory in Huntingdon employing approximately 1,200 staff.

Hilton now incorporates Seachill UK Ltd. who reported as Icelandic Group UK Ltd. in the 2016 financial year. Seachill UK Ltd. are based in Grimsby, where there are three operating factories producing chilled and frozen fish and seafood, employing approximately 1,400 staff. Seachill UK Ltd. also produce the globally distributed brand "The Saucy Fish Co.".

This statement describes the work of both companies to address the risk of modern slavery during the 2017 financial year. Going forward these work streams are being combined.

OUR ORGANISATION

Hilton is dedicated to maintaining a fair and ethical workplace for all of our staff and prohibits the use of all forms of forced labour and human trafficking. We ensure compliance with all applicable employment legislation relating to employee recruitment and terms and conditions, including obtaining right to work evidence and guaranteeing that no staff working in the UK are paid less than the national living wage. We provide equal opportunities for employment, training and career development regardless of age, sex, race, religion, ethnic origin or other minority groups. Where practicable, a flexible approach is adopted to assist employees to manage a successful work/life balance. We also work to achieve continual improvements in health and safety. Hilton requires all its subsidiaries to

achieve high health and safety standards within their individual operations and to conduct regular formal health and safety reviews. Hilton's managers and employees review policies, processes and procedures in order to ensure that risks are properly assessed, with appropriate actions taken in order to protect the health and safety of employees. Formal reporting procedures are in place at every site so that Hilton can monitor safety performance at a local level.

OUR SUPPLY CHAINS

Hilton Foods UK Ltd. sources raw materials comprising mostly beef, lamb and other food ingredients. The majority of our meat is sourced from within the UK and the Republic of Ireland but we can also source meat from further afield such as New Zealand.

The fish and seafood for Seachill UK Ltd. is procured from a global supply chain which heightens the risk of purchasing from countries where slavery may be taking place. With this in mind, we take all reasonable steps to ensure we source responsibly.

Both operations procure plastic trays, film, labels and other packaging in addition to production line and automated storage equipment. We source these mainly from long established suppliers who are predominantly based in Europe.

CORPORATE SOCIAL RESPONSIBILITY

Hilton is developing a central CSR strategy and allocating responsibilities across the companies since the acquisition of Seachill UK Ltd. This includes the development of a broad Hilton social and environmental programme with aspects of Environmental Sustainability, Ethics and Authenticity.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to a process of upholding practises against modern slavery or human trafficking in our supply chains or in any part of our business. We commit to acting ethically and with integrity in all of our business relationships. Our commitment is also supported by our ETI (Ethical Trade Initiative) based policies on Whistleblowing, Equal Opportunities & Dignity at Work, Bribery & Corruption, Ethical Trading, Preventing Hidden Labour Exploitation and Modern Slavery.

ASSESSING AND ADDRESSING THE RISK OF SLAVERY AND HUMAN TRAFFICKING, TRAINING AND DUE DILIGENCE

Since our last statement we have continued to work with "Stronger Together" (a multi-stakeholder initiative to reduce modern slavery, by providing guidance, resources, training and a network to employers, labour providers, workers and their representatives) to support and aid the implementation of our Modern Slavery awareness training programme. Key representatives from our operational, supply chain and support function departments have attended Stronger Together workshops.

Modern Slavery awareness training has been included as a section within our New Starter Induction and forms part of our Employee Refresher Inductions. All new employees watch the Stronger Together video.

Our internal recruiters have attended Stronger Together training specifically for recruiter roles. We have introduced welfare questioning into our recruitment process.

During 2018, we commit to successfully conducting Modern Slavery awareness training with our operational management teams and our senior leaders and measuring our progress as a company KPI.

Auditing of our external labour providers takes place on a regular basis and we commit to having Modern Slavery as a key agenda at all service review meetings. Our commitment to eliminating Modern Slavery forms an integral part of our Service Level Agreement.

Employee awareness of Modern Slavery has been supported by the utilisation of our apps 'MyHFG' and 'TheSaucyFishCo' using regular news features.

We expect all our suppliers and other business partners to adopt the same high standards as we do, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment. We work to identify, assess and monitor any potential areas of risk in relation to our business and supply chains and carry out regular quality audits of our meat and fish suppliers that includes awareness of safety standards. Following on from our risk assessments we are increasingly requiring third party social audits for high risk supply chains and will measure progress as a business KPI. Our senior technical and commercial teams engage with their peers within our suppliers to raise awareness of modern slavery and to ensure that legal and responsible recruitment, legal and fair terms and high welfare standards for the workers in our supply chains is their first priority.

In addition, Seachill UK Ltd. has been involved in initiating and currently chair the new Seafood Ethical Action Alliance (SEAA) alongside many of the leading retailers and processors in the UK. Seachill UK Ltd. also co-funded the development of a global fishing vessel welfare questionnaire within the SEDEX (Supplier Ethical Data Exchange) platform.

To assist our risk assessments, we have joined the Food Network for Ethical Trade (FNET) and utilised their protocols within our seafood supply chains. We have also taken a role in helping develop the risk assessment process within FNET and hope to integrate it with the SEDEX platform.

MEASURING OUR PROGRESS

Hilton are currently developing performance indicators which include the following:

- The proportion of suppliers that are risk assessed to the FNET protocol
 - We have mapped our supply chains and all our fish and seafood suppliers have been ethically assessed against the FNET protocol

- The proportion of higher risk supply chains that are registered on SEDEX and have completed self-declarations and audits
 - All higher risk suppliers are registered on SEDEX and linked to Hilton with completed Self Audit Questionnaires
 - All higher risk suppliers have completed SMETA (SEDEX Members Ethical Trade Audit) or equivalent audits with agreed action plans
- The proportion of employees and senior managers who have been trained in Modern Slavery awareness
 - All senior managers and directors have undergone Modern Slavery awareness training
 - 74% of the permanent employees at Seachill UK Ltd. and 51% of the permanent employees at Hilton Foods UK Ltd. have completed Stronger Together Modern Slavery awareness training. All our agency staff receive this training as part of their induction

LOOKING AHEAD

Hilton will continue to take a lead in a collaborative approach to tackling Modern Slavery, working with organisations to raise awareness and to ensure fair and safe working conditions throughout our supply chains and to raise standards within our industry in general.

This statement is published in compliance with section 54 of The Modern Slavery Act 2015 and was approved by the Board of Directors of Hilton Food Group plc and signed on their behalf by:



Robert Watson OBE

Chief Executive

22 June 2018