

HILTON FOODS

# Modern Slavery Statement

JUNE 2026

# LETTER FROM OUR EXECUTIVE CHAIR

**At Hilton Foods, our commitment to respecting human rights continues to guide how we grow and how we work with the people and partners who shape our business. As we expand into new markets and new areas of expertise, these values remain central to our decisions and help us navigate the responsibilities that come with operating a global business.**

The past year has brought both opportunity and challenge as our business continued to evolve, welcoming new colleagues and customers while operating in an increasingly unpredictable global context. Climate related events, geopolitical tensions and disruption across major transport routes have affected supply chains worldwide, underscoring how quickly risks can shift. At the same time, conflict related displacement, economic instability and tightening migration routes have pushed more people into precarious work and increased vulnerability to exploitation.

These overlapping pressures, combined with fragmented labour markets and supply chain disruption, continue to create conditions in which modern slavery can emerge.

Throughout 2025, we have continued to strengthen the foundations that support our approach to human rights and modern slavery. Our cross functional teams across Quality, Sustainability, Procurement, People and Culture and Risk play an important role in helping us identify issues, encourage transparency and support a culture where concerns can be raised safely. Their work remains integral as our business continues to grow.

We have also taken time to reflect on our progress and consider where further development is needed.

Hilton Foods continues to report jointly on behalf of our UK and Australian businesses, reflecting our shared commitment to maintaining consistent expectations across our global operations. Addressing modern slavery risks is an ongoing journey and we remain focused on learning, collaboration and steady improvement.

Our purpose is strengthened when we act with integrity and work together to support safer and fairer conditions for everyone connected to our value chain. This Statement represents our continued commitment to that aim as we enter the next phase of our growth.



**At Hilton Foods, our commitment to respecting human rights continues to guide how we grow and how we work with the people and partners who shape our business.”**

**Mark Allen OBE**  
Executive Chair



# DOCUMENT GUIDANCE

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

<b>MSA Guidance</b>	<b>Reference to this statement</b>
Organisation structure, its business and supply chains	Page 6-9
Policies in relation to slavery and human trafficking	Page 7
Due diligence processes in relation to slavery and human trafficking in its business and supply chains	Page 11-14
Risk assessment and management	Page 11-14
Key performance indicators to measure effectiveness of steps being taken	Page 19
Training and capacity building on modern slavery and human trafficking	Page 17

## 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.

<b>MSA Criteria</b>	<b>Reference to this statement</b>
Identify the reporting entity	Page 6
Describe the reporting entity's structure, operations and supply chains	Page 6-9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 11-14
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	Page 12-14
Describe how the reporting entity assesses the effectiveness of these actions	Page 19
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)	Page 4
Provide any other relevant information	-

This statement is reviewed annually, including by senior management, and was reviewed and approved by the Board of Directors of Hilton Food Group plc on 19 May 2026.

---

## CONSULTATION WITH ENTITIES OWNED OR CONTROLLED BY HILTON FOODS

In preparing this joint Modern Slavery Statement, Hilton Foods undertook a structured consultation process with each of the UK and Australian entities covered by the statement, in line with the requirements of the Australian Modern Slavery Act 2018 (Cth).

### APPROACH TO CONSULTATION

We engaged directly with operational leads across in scope subsidiaries.

Consultation took the following forms:

- Each entity provided information about its operations, workforce profile, use of labour providers, audit findings and local modern slavery risks. This included local insights from Australian operations in Bunbury, Heathwood and Truganina and UK operations in Huntingdon, Grimsby and Derby.
- Draft sections of the statement were shared with subsidiary leadership and relevant operational teams. Feedback was incorporated to ensure the statement accurately reflected the circumstances, actions and risk profiles of each entity, as required under the Australian Modern Slavery Act.
- Hilton Foods' Group Sustainability team consolidated the input from each entity to ensure consistency of reporting while also reflecting specific risks and actions relevant to the UK and Australian businesses. This process ensured that the statement represents the actions taken by all owned and controlled entities during the reporting year.

*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 28 December 2025, as required by section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth). We are committed to continuous improvement in line with the UNGPs and OECD due diligence guidance.*

*\*The scope of this statement includes the following subsidiaries of Hilton Food Group plc: Hilton Foods UK Limited, Hilton Foods Limited, Seachill UK Limited, Hilton Food Solutions Limited and Hilton Foods Australia Pty Limited ABN 60 613 035 500. On 18 September 2025, the Group disposed of its 65% interest in Foods Connected Limited and on 28 September 2025, the Group disposed of its 100% interest in Fairfax Meadow Europe Limited the scope of this statement covers these entities until these respective dates.*

A photograph of a food processing facility. In the foreground, a woman wearing a white hairnet, a white lab coat, and a bright green apron is smiling as she works. She is wearing blue gloves and is assembling burgers on a stainless steel conveyor belt. In the background, another worker in similar attire is visible, also working on the line. The environment is clean and industrial, with various pieces of machinery and equipment visible. The text "1. STRUCTURE, GOVERNANCE AND POLICIES" is overlaid on the left side of the image in a bold, dark blue font.

# 1. STRUCTURE, GOVERNANCE AND POLICIES

---

# STRUCTURE, GOVERNANCE AND POLICIES

Hilton Foods is an international food business supplying retail and foodservice partners in the United Kingdom, Australia and other markets. This statement covers the activities of the following in scope subsidiaries:

- **Hilton Foods UK Limited**, Huntingdon, UK
- **Hilton Foods Limited**, Huntingdon, UK
- **Seachill UK Limited**, Grimsby, UK
- **Hilton Food Solutions Limited**, Huntingdon, UK
- **Fairfax Meadow Europe Limited**, Derby, Enfield and Eastleigh, UK (until 28<sup>th</sup> September 2025)
- **Foods Connected Ltd**, Derry, UK (until 18<sup>th</sup> September 2025)
- **Hilton Foods Australia Pty Limited**, Bunbury, Western Australia, Truganina, Victoria and Heathwood, Queensland

These entities encompass food manufacturing, processing and packing operations, supported by procurement, commercial, logistics and supply chain management activities. Certain non-core site services, such as cleaning and some logistics functions, are delivered through approved third-party service providers. Temporary labour is utilised to accommodate production peaks across some sites and is supplied through approved labour providers.

The nature of these operations and labour models shapes how modern slavery risks may arise, influencing which workers are most exposed and how vulnerabilities can manifest across different geographies and roles. Patterns of vulnerability vary by context, but women, children and migrant workers remain disproportionately affected. In the UK, risks persist for male migrant workers in logistics, warehousing and food processing, sectors where complex labour structures and high turnover can obscure indicators of exploitation. In Australia, recent findings from the Global Slavery Index highlight heightened risks for temporary migrant workers in agriculture, horticulture and meat processing, including systemic challenges linked to recruitment practices and working conditions.

Across both countries, these risks underscore the need for sustained vigilance not only in our global supply chains but also within our own operations, including the recruitment and management of temporary labour. Our due diligence approach reflects this dual focus, recognising that risks can arise at any point along a supply chain or labour route and that effective prevention depends on understanding how wider structural pressures shape the experiences of workers.

## GOVERNANCE AND POLICY FRAMEWORK

Accountability for human rights and modern slavery at Hilton Foods is anchored in our Sustainable Protein Plan. Throughout 2025, delivery of the Sustainable Protein Plan has been overseen by our Board through the Sustainability Committee, which receives updates at least quarterly. The conclusion of our 2025 Sustainable Protein Plan is reported in our 2025 Sustainability Report and in 2026 we will launch our updated Sustainable Protein Plan, which builds on the foundations established over the past five years and sets a more ambitious pathway for the time ahead.

Overall responsibility for modern slavery and human rights is shared across both our supply chains and our direct operations. The Global Executive Director - Quality & Sustainability holds accountability for risks and due diligence across supply chains, while the Chief People and Transformation Officer oversees these responsibilities within our own operations. Our Group Sustainability team leads day-to-day implementation across sites, working closely with senior management and colleagues in Procurement, Operations, People and Culture and Quality to integrate our commitments and manage risks across the business.

In 2022, we strengthened accountability by linking specific sustainability targets to our Long-Term Incentive Plan (LTIP). In 2024, we introduced further LTIP measures with increased weighting around our People pillar, alongside quantifiable people-related performance indicators to drive progress across all three pillars of our strategy. To enhance the progress of embedding our human rights program across the business, a percentage of our LTIP is directly built against this, related to the percentage of ethically audited high-risk suppliers, further detail on how ESG is embedded in our LTIP can be found on page 111 of our 2025 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 International Labour Organization (ILO)**
- **Declaration on Fundamental Principles and Rights at Work**
- **The UN Guiding Principles on Business and Human Rights**
- **The Base Code of the Ethical Trading Initiative (ETI)**
- **The United Nations Convention on the Rights of the Child**

<b>Policy</b>	<b>Description</b>	<b>Applies to</b>	<b>Reference to Modern Slavery</b>	<b>Communication and Engagement</b>
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.	Sets out our prohibition of forced labour and child labour in our business operations.	Shared publicly on our website.
Supply Chain Social Responsibility Policy		All workers employed within our global supply chains.	Explains our commitment in relation to our other salient human rights issues.	
Supplier Social Responsibility Code of Conduct and Compliance Requirements	Sets out the minimum expectations of suppliers to Hilton Foods and the methods used to 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 Foods 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 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 Foods businesses.
Hilton Foods Accommodation Standard	Communicates the baseline and best practice expectations for the use of worker accommodation.	All.	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](#)**

We develop and review our human rights and modern slavery policies collaboratively across the business, with People and Culture and Procurement functions playing a central role in shaping requirements and ensuring that policies are grounded in operational reality. We also work with external experts, including the Slave-Free Alliance, who provide independent insight and challenge to strengthen our approach and support effective implementation across our sites and supply chains. The above policies not only represent our commitments but also illustrate the range of activities we are undertaking to build strong foundations of compliance across our business and supply chain.

## **OUR OWN OPERATIONS**

### **OUR EMPLOYEES**

In 2025, we employed 2,782 people across our businesses in the UK, 1,989 in Australia and over 7,000 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 2025, 78% of our employees participated in our annual engagement survey, reporting back about their experiences at work. Broader reporting on our work to engage and empower our people can be found in our 2025 Sustainability Report.

### **AGENCY WORKERS**

All our UK and APAC sites work with approved labour providers, who are audited against our Agency Labour Standard and relevant local regulations. Labour providers supplying temporary workers to Hilton Foods do not engage in cross border recruitment for roles on our sites; workers are recruited domestically within the UK or within Australia. Colleagues in production roles are recruited directly by Hilton Foods through our in-house recruitment teams and some join through a temporary to permanent route conducted in line with our internal recruitment policy.

We hold an 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. 86% of our UK and APAC manufacturing businesses successfully completed their agency labour audit against the renewed standard.

### **SERVICE PROVIDERS**

Certain non-core site services, such as cleaning, some logistics functions, security or canteen operations, are delivered through approved third-party service providers. These arrangements vary between sites depending on local operational needs.

## **OUR SUPPLY CHAIN**

### **OUR SOURCING MODEL**

Our approach to sourcing varies by region and product area.

- In APAC, our customer retains responsibility for the majority of procurement activities, small volumes of specialised lines are purchased through our APAC procurement teams.
- In the UK, we work both collaboratively with our retail partners to source raw materials and manage our procurement function ourselves to purchase directly from approved suppliers.
- Across both regions, we may also work with specialist sourcing agents for selected product categories where this supports effective local sourcing or provides additional category expertise.

Raw materials are supplied by a mix of local and international suppliers who are assessed for quality, food safety and ethical business practices. Following sourcing, products are processed, packed and distributed either to customer distribution centres or directly to stores or restaurants, depending on the market.

### KEY RAW MATERIAL SOURCING REGIONS & SUPPLY CHAIN STRUCTURE

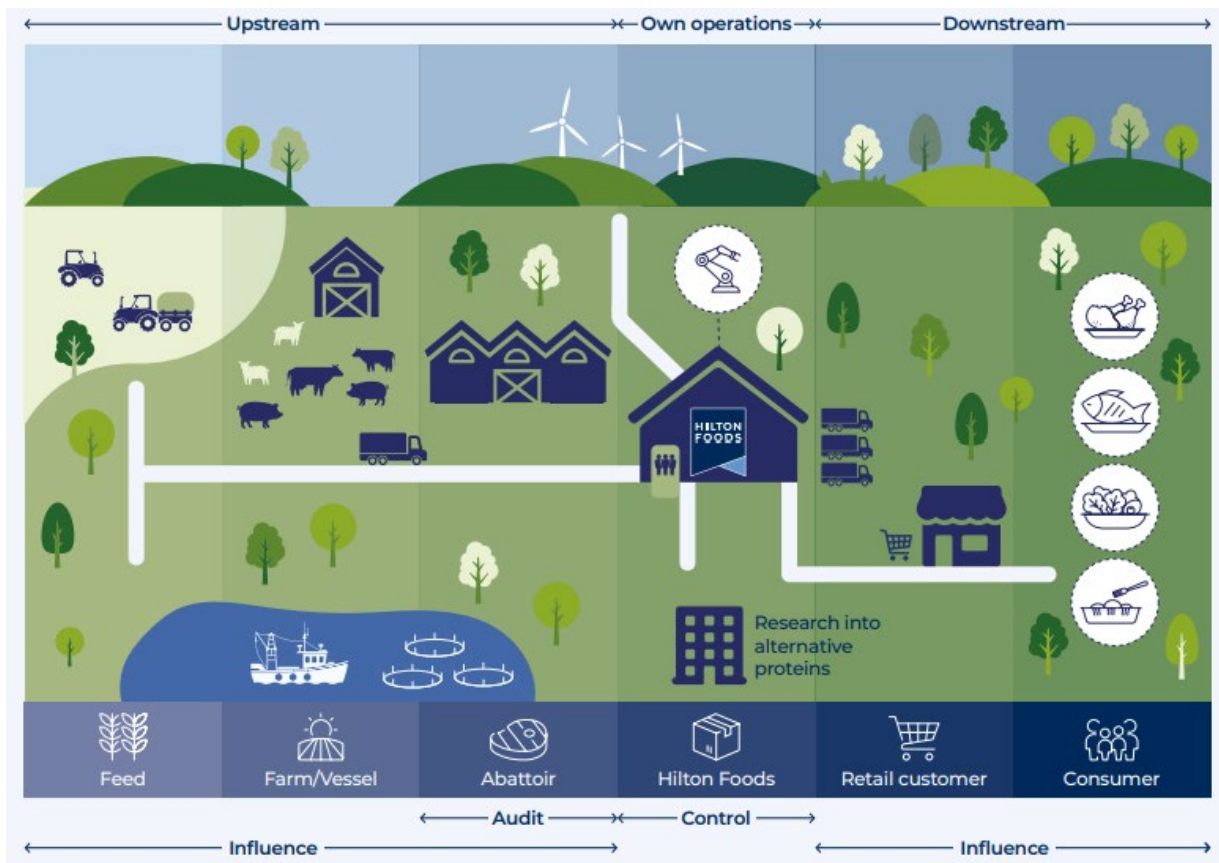
Our production sites source from a range of regions depending on the category and customer requirements. Core sourcing areas relevant to this statement include:

- UK beef & lamb
- Australian and New Zealand beef and lamb
- South American beef
- European beef and poultry
- Fish and aquaculture products sourced globally and listed on the Ocean Disclosure Project (ODP)

These reflect the global nature of our supply base and the differing risk profiles across categories. Our tier-one suppliers are in most cases abattoirs, butchery operations or primary seafood processing sites.

Our supply chain includes suppliers of primary proteins, seafood, ingredients, packaging, logistics and other goods and services. Suppliers vary in size and structure, from large integrated processors to specialist or seasonal providers.

We have detailed visibility of all tier-one suppliers where Hilton Foods holds the procurement relationship. Hilton Foods works closely with Foods Connected, an end-to-end software solution that supports the management of our supply chains, food safety and quality standards and corporate social responsibility requirements. The platform enables direct engagement with our suppliers and provides a secure way to request, exchange and store quality, food safety and corporate social responsibility data and records. Visibility beyond tier-one is more developed in some categories than others and we continue to strengthen this in higher risk areas.



Above: how we work through the value chain - from farm and fishery to fork

## **2. RISK ASSESSMENT AND DUE DILIGENCE**



# OUR RISK ASSESSMENT AND DUE DILLIGENCE

We take a structured and ongoing approach to assessing and managing human rights risks across both our own operations and our supply chain. Our risk assessment process is led by Group Sustainability and is aligned to recognised frameworks including the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

We use multiple sources to identify and assess risk, including country and sector indicators such as the Global Slavery Index and other international reporting, Sedex SAQs and Sedex RADAR analytics, supplier documentation collected via Foods Connected, third-party audit findings, site visits and insights from industry platforms. We also consider worker related information from our sites and supplier engagements and we monitor credible NGO and media reports.

We conducted a human rights risk saliency assessment in 2024 and continue to report on the issues raised within that assessment. We also maintain an individual risk assessment per primary protein supplier.

Our saliency assessment is reviewed every three years and updated when material changes occur, such as new sourcing geographies, changes in labour models or emerging external risk signals. We prioritise risks by considering both the likelihood of occurrence and the potential severity of harm to workers.

## RISKS IN OUR DIRECT OPERATIONS

Risks in our own operations primarily relate to labour models, the use of temporary labour and oversight of sub-contracted services.

## RISKS IN OUR SUPPLY CHAINS

Beyond our own sites, the more significant exposure to forced labour risk remains within upstream supply chains where vulnerability is shaped by the nature of production, recruitment models and country conditions. We identify elevated inherent risk in regions with limited labour enforcement capacity, weak worker protections or informal recruitment systems. These include:

- East Asia and Southeast Asia
- Selected regions of South America with high reliance on informal labour
- Certain areas of sub-Saharan Africa with limited state oversight
- Areas of Europe and the United Kingdom with high demand for agency workers



## An update on our salient human rights risks and 2025 actions:

Focus areas	Key Risk Themes	2025 Actions
Own Operations	Insecure/irregular employment, agency worker vulnerability, service provider oversight (e.g. catering, cleaning, security)	<ul style="list-style-type: none"> <li>• Further UK sites have undertaken internal audits of their agency labour providers and services such as security and canteen.</li> <li>• We have begun work to revise contractual terms with both agency labour providers and service providers in the UK, through the development of new pro-forma service level agreements.</li> <li>• Maintain 100% of our manufacturing sites with valid SMETA audits, covering both the UK and Australia.</li> <li>• We continue to listen to our employees and improve mechanisms to hear from them. In 2025, 100% of our own operations have a functioning employee forum, allowing free discussion between our Senior Management Teams and wider colleagues.</li> <li>• We ran a Modern Slavery Awareness Week for the first time in 2025 across all our UK sites. This provided short video content, posters and infographics on 'spotting the signs' of exploitation and how to raise issues at site.</li> <li>• In collaboration with Slave-Free Alliance, we have created a bespoke 'Spot the Signs' of Labour Exploitation e-learning. This will be rolled out in 2026 in our UK and APAC operations.</li> </ul>
UK & European Abattoirs	Irregular hours, health & safety risks, especially for agency and migrant workers	<ul style="list-style-type: none"> <li>• We have expanded our direct engagement with abattoirs on human rights topics in 2025 as outcomes from our ethical audit program have been shared. This has had a particular focus on common issues such as responsible recruitment, regular employment, health and safety and harassment.</li> </ul>
South American Beef Supply Chains	Forced labour, excessive hours, low wages, health & safety	<ul style="list-style-type: none"> <li>• In 2025, we initiated a human rights impact assessment in Uruguayan beef with Ergon Associates to better understand the potential positive and negative impacts of our supply chain on workers. We are completing this in partnership with a strategic supplier in the region.</li> <li>• We have continued to roll out our ethical audit requirement amongst our South American supply base as a condition of supply.</li> </ul>
Global Fisheries & Aquaculture	Forced labour, poor working conditions, excessive hours, wage-related issues, especially among migrant workers	<ul style="list-style-type: none"> <li>• Conducted targeted site visits to Turkey and Namibia to support on implementation of our ethical requirements, enhancing our knowledge in both wild capture and aquaculture. This also included a fleet visit.</li> <li>• Supported our supply chain in Vietnam to conduct a living wage assessment.</li> <li>• We have continued to maintain our end-to-end SMETA requirement for all seafood supply chains in high-risk countries. This has required repeated engagement on issues such as working hours, the use and recruitment of agency labour and health and safety.</li> </ul>

## HOW WE RESPOND TO RISK IN OUR SUPPLY CHAIN

Where elevated risks are identified, we implement measures proportionate to the risk level, including targeted audits, deeper contractual requirements on recruitment, working hours and wage assurance, on-site worker interviews by independent auditors where appropriate, site level escalation plans and structured corrective action processes with follow up verification. We are committed to securing the best outcomes for workers. Where engagement does not prove successful, we follow a responsible exit process.

All Hilton Foods protein suppliers must commit to our Supplier Social Responsibility Code of Conduct and register on Sedex. New and existing suppliers must annually complete a Sedex self-assessment questionnaire covering labour rights, health and safety, environment and business ethics.

Over the past two years, all primary protein suppliers have been asked to participate in this process as a condition of supply. Today, 95% of these suppliers hold completed risk assessments and are linked with us on Sedex, a global ethical data platform, giving us deeper visibility of our supply chain risks and helping to identify recurring risks in certain geographies.

Among suppliers identified as high-risk, 82% have now completed independent ethical audits, providing valuable insight into their performance and opportunities for improvement.

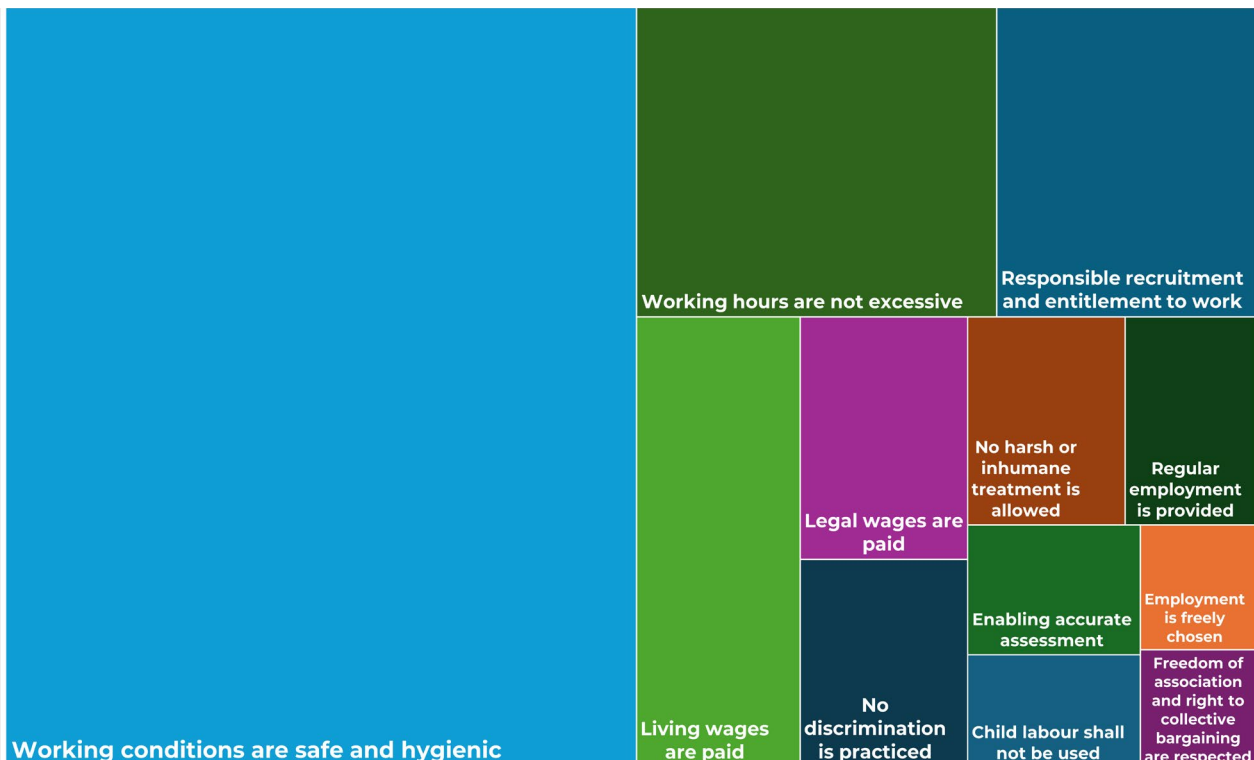
This represents a significant step towards building a supply chain that not only delivers quality but also respects the dignity and rights of the people behind it.

We will continue to work towards full compliance, with this requirement becoming a core, ongoing element of our due diligence process.

The highest concentration of issues arose from audits conducted in the United Kingdom and the Republic of Ireland, particularly in relation to 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 2026.

Results of our 2025 Supplier SMETA Audit Program by ETI Base Code Area:



Above: non-compliances by finding category raised in 2025

Findings show strong repetition of the same systemic issues across regions and years, indicating structural rather than site specific weaknesses. The most common finding is related to health and safety, however, this reflects the nature of traditional social audits where visible health and safety issues are easier to spot than more nuanced human rights problems. 70% of issues raised in 2025 are closed or have a corrective action plan in place.

Due to higher inherent risks associated with our seafood supply chain, we require end-to-end SMETA audits, this includes from feed mills, hatcheries, nurseries, aquaculture farm and processing sites. In other categories, ethical visibility beyond tier-one varies and we are working to enhance this through improved data sharing and deeper supplier engagement. We will continue to onboard our ingredients and packaging suppliers on a risk assessed basis.

We continue to build supplier capability through training and engagement and through participation in collaborative initiatives including the Food Network for Ethical Trade and the Seafood Ethics Action Alliance.

## 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 on our sites. 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.

Human rights concerns raised through the hotline or other grievance channels are reviewed by trained internal teams and, where appropriate, escalated through our Group-level human rights 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.



### Case study: embedding human rights into our Group Transition Plan

As part of our ongoing collaboration with the University of Lincoln, we worked with a cohort of undergraduate and postgraduate students to better understand potential human rights risks associated with implementing our Transition Plan.

Rising temperatures and heat stress threaten worker safety, crop failures undermine food security and incomes and the extraction of critical minerals for solar panels raises risks of exploitation in mining communities. Ensuring a just transition to net zero requires a holistic assessment of potential unintended consequences of mitigation activity.

The project challenged students to assess risks arising from the mitigation measures within our Group Transition Plan, helping to ensure that our approach to sustainability is grounded in respect for people.

Aligning our assessment with the UN Guiding Principles on Business and Human Rights, the University of Lincoln team evaluated the nature, likelihood and severity of each risk, identified Hilton Foods' role and proposed potential remediations across our global operations, packaging and agricultural supply chains.

Key Achievements:

- Comprehensive risk mapping across global operations and supply chains
- Alignment with UN Guiding Principles, ensuring international best practice
- Identification of priority risks and remediation pathways to strengthen due diligence

This work enables us to proactively engage with the highest risk supply chains, reducing risks to people and to our business. It represents the first step in delivering a just transition to a net zero business, ensuring that climate action and human rights progress go hand in hand. In 2026, we will work to respond to these recommendations.



# 3. PARTNERSHIPS AND TRAINING



---

## 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 are members of the Food Network for Ethical Trade (FNET) and serve as an elected Supplier Director on their Board. Through its collaborative work, FNET aims to improve labour conditions in agriculture and food processing, both in the UK and internationally, by setting industry-wide expectations and ensuring they are communicated and supported throughout supply chains.

Being members of the Food Network for Ethical Trade enables us to work alongside at least 80 suppliers and retailers to use our collective leverage to bring about positive change in global food supply chain working conditions by providing guidance, resources, training and opportunities for collaboration. Hilton Foods participated in 2025 in the Responsible Recruitment working group, which supports advancing our implementation of responsible business practices.



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 2025, we continued to serve as voluntary Chair of their Steering Committee.

In 2025, 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.

In collaboration with Slave-Free Alliance, we have created a bespoke 'Spot the Signs' of Labour Exploitation e-learning. This will be rolled out in 2026 in our UK and APAC operations.

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

## 4. EFFECTIVENESS OF MEASURES IN PLACE



# EFFECTIVENESS OF MEASURES IN PLACE

We recognise that identifying and responding to issues is a critical test of whether our systems are working. In 2025, one of our UK businesses reported a potential incident involving an agency worker who was experiencing signs of coercion within their home. This concern was initially raised by the worker to their line leader. This matter was investigated jointly by our Group Sustainability Team and on-site People and Culture colleagues, with support from Slave-Free Alliance. The business worked to meet immediate needs and provide support for the affected person to take steps to exit the situation. The appropriate authorities were informed and we engaged a local charity able to provide ongoing and specialist support.

This case demonstrated the value of team leaders on our factory floors who know and understand their people and are adept at recognising changes to wellbeing amongst their teams. It has also strengthened our understanding of the overlap between indicators of modern slavery and other forms of harm that can affect colleagues, including domestic abuse and financial coercion.

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 the next phase of the 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 Target	Progress	Detail
Functioning governance structure in place	Achieved	Integrated into key risk processes.
100% of Hilton Foods production facilities ethically audited	Achieved	100% of Hilton Foods production sites have had a third-party ethical audit.
Train all Hilton Foods employees on human rights	On track	Global materials in production for distribution on our new online learning system.
Modern slavery awareness training extended to all managerial colleagues	On track	Co-designed with Slave-Free Alliance and in production, to be accessible on our new online learning system. This will be rolled out throughout 2026.
100% of labour and service providers audited to Hilton Foods Agency Labour Standard	On track	86% of our sites have successfully conducted full internal audits of their agency labour providers.
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	82% of high-risk primary suppliers audited using SMETA audits.

---

This Statement was approved by the Hilton Food Group plc Board of Directors on 19 May 2026 and signed on its behalf by:



Mark Allen OBE  
Executive Chairman

Hilton Food Group plc  
The Interchange, 2-8 Latham Rd,  
Huntingdon,  
PE29 6YE