

Statement of use	Hilton Food Group plc has reported in accordance with the GRI Standards for the period 31 December 2022 until 31 December 2023.	
GRI 1 used	GRI 1: Foundation 2021	
Applicable GRI Sector Standard(s)	N/A	
GRI Standard		
GRI 2: General Disclosures 2021	2-1 Organisational details	Annual report page 162
	2-2 Entities included in the organisation's sustainability reporting	Annual report page 89
	2-3 Reporting period, frequency and contact point	The Annual report is published annually in April, the reporting period is 31 December 2021 to 31 December 2022. This is in alignment with financial reporting. Publication date and point of contact are detailed on page 101
	2-4 Restatements of information	Annual report page 89
	2-5 External assurance	Annual report page 89
	2-6 Activities and workers	Annual report page 12
	2-9 Governance structure and composition	Annual report page 110
	2-10 Nomination and selection of the highest governance body	Annual report page 114
	2-11 Chair of the highest governance body	Annual report page 114
	2-12 Role of the highest governance body in overseeing the management of impacts	Annual report page 115
	2-13 Delegation of responsibility for managing impacts	Annual report page 115
	2-14 Role of the highest governance body in sustainability reporting	Annual report page 50
	2-15 Conflicts of interest	Annual report page 120
	2-22 Statement on sustainable development strategy	Annual report page 43
	2-25 Processes to remediate negative impacts	Hilton Foods Whistleblowing Policy (https://www.hiltonfoods.com/media/dulnIntq/hilton-foods-whistleblowing-policy-jan24) Modern Slavery Statement (https://www.hiltonfoods.com/media/kfajiga2/hilton-foods-modern-slavery-act-statement-2023.pdf)
	2-26 Mechanisms for seeking advice and raising concerns	Hilton Foods Whistleblowing Policy (https://www.hiltonfoods.com/media/dulnIntq/hilton-foods-whistleblowing-policy-jan24)
	2-27 Compliance with laws and regulations	Hilton Foods have no significant instances of non-compliance with laws and regulations or received any fines during the reporting period.
	2-28 Membership associations	Sustainability report on our website
	2-29 Approach to stakeholder engagement	Annual report page 36
	2-30 Collective bargaining agreements	Annual report page 94
Material Topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Annual report page 49, details our double materiality process.
	3-2 List of material topics	Annual report page 49

GRI REPORT continued

Biodiversity

GRI 3: Material Topics 2021	3-3 Management of material topics	Annual report page 49
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Hilton Foods New Zealand's facility at 11 Puaki Drive, Wiri, Auckland 2104 is 2km from Puhinui Reserve, Wiri, Auckland 2025 which has considerable historic, conservation and cultural amenity value and is protected under local law. No other site is adjacent to a protected area.
	304-2 Significant impacts of activities, products and services on biodiversity	<p>Hilton Foods is using certification to mitigate exposure to biodiversity risk.</p> <p>100% of palm oil, timber and directly sourced soy products are certified as deforestation free by RSPO, FSC, PEFC and soy respectively. Soy is a key ingredient in feed consumed by livestock in our supply chain. We are working to eliminate deforestation in our supply chain by the end of 2025. This includes deforestation in the production of directly purchased ingredients as well as the production of feed and livestock in our supply chain.</p> <p>We are also committed to ensuring the sustainability of wild capture fisheries. 98% of the wild capture fish in our products is sourced from Marine Stewardship Council (MSC) certified fisheries, with the remainder from a comprehensive Fishery Improvement Project (FIP).</p> <p>We are also working to develop novel intervention measures for biodiversity to facilitate biodiversity improvement activities based on output measures. This is detailed further in the Nature Positive section.</p>

Emissions

GRI 3: Material Topics 2021	3-3 Management of material topics	Annual report page 49
GRI 201: Economic Performance	305-1 Direct (Scope 1) GHG emissions	<p>a) Annual report page 90</p> <p>b) All gases are included in the calculation; CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃</p> <p>c) We do not produce any biogenic CO₂ emissions</p> <p>d) 2020</p> <p>i) 2020 was chosen as baseline as it was the first year for which detailed data was available. An assessment was conducted at sites where data was available for prior years to understand the impact of COVID-19, but it was determined that there was not a significant anomaly in energy use.</p> <p>ii) 2020 = 19,020 tCO₂e</p> <p>iii) There are no significant changes in emissions that triggered recalculations of base year emissions</p> <p>e) Australian National Greenhouse Accounts Factors, IEA, UK Government Greenhouse gas reporting: conversion factors 2023 and Supplier Data</p> <p>f) Equity share</p> <p>g) Our calculation model is aligned to ISO14044 and the Greenhouse Gas Protocol</p>
	305-2 Energy indirect (Scope 2) GHG emissions	<p>a) Annual report page 90</p> <p>b) All gases are included in the calculation; CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃</p> <p>c) We do not produce any biogenic CO₂ emissions</p> <p>d) 2020</p> <p>i) 2020 was chosen as baseline as it was the first year for which detailed data was available. An assessment was conducted at sites where data was available for prior years to understand the impact of COVID-19, but it was determined that there was not a significant anomaly in energy use.</p> <p>ii) Equivalent scope group location based Scope 2 emissions were 75,728 tCO₂e and market based Scope 2 emissions were 56,557 tCO₂e</p> <p>iii) There are no significant changes in emissions that triggered recalculations of base year emissions</p> <p>e) Australian National Greenhouse Accounts Factors, IEA, UK Government Greenhouse gas reporting: conversion factors 2023 and Supplier Data</p> <p>f) Equity share</p> <p>g) Our calculation model is aligned to ISO14044 and the Greenhouse Gas Protocol</p>
	305-3 Other indirect (Scope 3) GHG emissions	<p>a) Annual report page 90</p> <p>b) All gases are included in the calculation; CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃</p> <p>c) We do not produce any biogenic CO₂ emissions</p> <p>d) 7. Employee commuting – Teleworking</p> <p>e) 2020</p> <p>i) 2020 was chosen as baseline as it was the first year for which detailed data was available. An assessment was conducted at sites where data was available for prior years to understand the impact of COVID-19, but it was determined that there was not a significant anomaly in energy use.</p> <p>ii) 2020 = 19,020 tCO₂e</p> <p>iii) There are no significant changes in emissions that triggered recalculations of base year emissions</p> <p>f) Ecoinvent, Hestia, FAO, Dalhousie University Seafood CO₂ Database, Australian National Greenhouse Accounts Factors, IEA, UK Government Greenhouse gas reporting: conversion factors 2023, collated literature and Supplier Data</p> <p>g) Our calculation model is aligned to ISO14044 and the Greenhouse Gas Protocol</p>
	305-4 GHG emissions intensity	Annual report page 90 (All gases are included)
	305-5 Reduction of GHG emissions	Annual report page 90
	305-6 Emissions of ozone-depleting substances (ODS)	<p>a) Our direct footprint of ozone depleting substances is zero</p> <p>b) All emissions of fluorinated gases</p> <p>c) https://www.gov.uk/guidance/ozone-depleting-substances-ods</p>

GRI REPORT continued

Employment

GRI 3: Material Topics 2021	3-3 Management of material topics	Annual report page 49
GRI 401: Employment	401-1 New employee hires and employee turnover	Annual report page 94
	"401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees"	Annual report page 94
	401-3 Parental leave	Annual report page 94

Occupational health and safety

GRI 3: Material Topics 2021	3-3 Management of material topics	Annual report 49
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	<p>a) Hilton Foods implements a Safety Framework Management System, consisting of Global Standard, Global Procedures and Global Key Requirements. Local flexibility is obtained by development of local procedures by each facility detailing how they meet the Global Key Requirements.</p> <p>i) The Safety Framework was implemented to bring a global standard to the way Hilton Foods manages health, safety and wellbeing.</p> <p>Global Standards</p> <ul style="list-style-type: none"> – HFG/GS/001 - Leadership, Commitment, Accountability and Planning. – HFG/GS/002 – Hazard and Risk Management. – HFG/GS/003 – Legal Compliance and Records Management. – HFG/GS/004 – Training, Communication and Consultation. – HFG/GS/005 - Emergency Management and Incident Investigation. – HFG/GS/006 - Health, Wellbeing and Injury Management. – HFG/GS/007 - Performance Monitoring, Measurement and Reporting. – HFG/GS/008 - Assurance, Corrective Action and Management Review. <p>ii) The framework consists of Global Standard, Global Procedures and Global Key Requirements. The Safety Framework was implemented to bring a global standard to the way Hilton Foods manages health, safety and wellbeing.</p> <p>b) This Framework is implemented in all facilities.</p>

Occupational health and safety

403-2 Hazard identification, risk assessment, and incident investigation	<p>a) Hilton Foods implements a Global Hazard and Risk Management process across all its facilities. Hazards reports can be raised by anyone in the business and the processes used to record hazards range from using electronic reporting systems, Hazard T Cards, or populating Excel Spreadsheets. The global procedure is based on and promotes the methodology of the Hierarchy of Controls.</p> <p>i) All hazards reported are reviewed by the local Safety team and allocated to the appropriate Department Manager for action. They are logged and monitored by the local safety team. Hazards can be raised by any employee, contractor, visitor or member of the public, the responsibility for the action is with the relevant Department Manager where the hazard was identified.</p> <p>ii) Hazard Reports raised, closed, and the Hazard Close Out Rate are three of a suite of health and safety performance key performance indicators used in all of Hilton Foods facilities. These are reviewed locally via Daily Review Meetings with Operations and Management Teams. They are reported on via weekly Senior Management Team Meetings, and also are included in monthly Executive and Board reports.</p> <p>b) All employees, contractors, visitors are encouraged to raise or report all hazards if and when they observe them, as stated in Hilton Foods Health and Safety Policy. Hilton Foods run several employee forums where employees are invited to attend and participate in open discussion on any topic. These range from Safety Committee meetings through to open discussion forums (your voice). Hilton Foods also promotes a whistleblowing service for employees and investigates any calls to this service thoroughly.</p> <p>c) At Hilton Foods, all employees permanent and temporary are encouraged to stop the operation if they feel something is not safe or is an imminent risk to health. The use of emergency stops under these situations is actively encouraged and is communicated via inductions and safety discussions. Employees are also encouraged to report any unsafe processes, equipment or actions to their immediate supervisor, who will take the necessary action and stop the operation if required.</p> <p>d) Hilton Foods has a documented Global Procedure for Incident Investigation that is implemented in all of its operational facilities as standard. The team during the investigation will use one or more incident causation models to ascertain the root cause (iCAM, 5 Why's, Fishbone or Tripod method). All corrective actions raised from incident investigations are entered into a shared action tracker and reviewed weekly against progress to close out.</p>
403-3 Occupational health services	<p>Hilton Foods facilities partner with an Occupational Health provider who provide services such as management referrals, health surveillance, job/task risk assessments and general advice on a range of health, safety and wellbeing topics. Where facilities do not have on site Occupational Health Services, they partner with a local medical practice and encourage employees to take advantage of this service.</p>
403-4 Worker participation, consultation, and communication on occupational health and safety	<p>a) Hilton Foods have a number of forums where employees participate and are consulted on health and safety. Health and Safety Representatives are in place in all facilities, part of their role is to consult with employees on health and safety issues.</p> <p>b) We have Safety Committees chaired by the Safety Manager and attended by a cross section of employees and the safety representatives at all facilities. There is also a management of change process implemented as part of the safety framework, and this invites employees who may be affected by a proposed change whether process, procedural, operational or a new piece of machinery / equipment to be part of the change process and put forward their points.</p>
403-5 Worker training on occupational health and safety	<p>Basic health and safety is covered during induction, all employees permanent and temporary receive this induction. Contractors receive a contractors induction which also covers the basic health and safety requirements. Safety is also included within operational SOPs and these are trained out to employees appropriate to their roles and activities. Employees working with chemicals undergo safe-use of chemicals training, whilst engineers are where possible multiskilled and competent in both mechanical and electrical engineering. All Health and Safety Managers and advisors (27 across all sites) receive specific training on health and safety, this will be to Nebosh certificate and Diploma level or similar depending on local legislative requirements in different geographies.</p>

GRI REPORT continued

Occupational health and safety

403-10 Work-related ill health	<ul style="list-style-type: none"> a) No fatalities as a result of work-related ill health or cases of recordable work-related ill health were reported for all employees. b) No fatalities as a result of work-related ill health or cases of recordable work-related ill health were reported for workers who are not employees but whose work and/or workplace is controlled by the organization. c) No hazards reported within the period have contributed to high consequence injuries. d) No workers have been excluded. e) We measure Hazard Reporting performance via a close out rate taking the total number closed, divided by the total number raised and multiplying by 100. This gives us our percentage close out rate.
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Forced or compulsory labor

GRI 3: Material Topics 2021	3-3 Management of material topics	The description of management approach for forced or compulsory labour is included under GRI 414: Supplier Social Assessment.
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p>Hilton Foods take a zero tolerance approach to forced labour. Forced or compulsory labour can be influenced by third party exploitation, or in some cases in-country practices.</p> <p>Our risk assessment methodology enables us to prioritise areas of highest risk to rights holders, these are:</p> <ul style="list-style-type: none"> ii) Asia, South America and in some cases Europe b) Our multi-faceted approached to protect all workers from the risks of forced labour, and those within our international supply chains can be viewed in GRI 414: Supplier Social Assessment (page 109).

Supplier social assessment

GRI 3: Material Topics 2021

3-3 Management of material topics

- a) 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 or fishing vessel, abattoir, factory, or distribution centre. Hilton Foods runs a human rights program across its global businesses, addressing risks to rights holders within its own operations and supply chains. The saliency of human rights as a material topic within our ESG risks is presented on page 56 of our Annual report. Adjacent topics held within our human rights response, as demonstrated within our materiality matrix, include the wellbeing, diversity and inclusion of our employees, health and safety, talent development and availability, and traversing both our own operation and the supply chain, responsible recruitment. Respect of human rights forms a core element of our 2025 Sustainable Protein Plan, see page 56 of our Annual report.
- b) Globally the risk of forced labour has increased in the past 12 months, influenced by the continuing economic impact of the Covid-19 pandemic, increased migration due to climate degradation, coinciding with growing political instability and conflict. The adverse impacts of economic instability, forced migration, and fluctuating labour market dynamics create overlapping crises which can increase the risk of exploitation for vulnerable groups. Hilton Foods human rights program works proactively to identify potential negative impacts, and work collaboratively with suppliers, stakeholders, and rights holders where they are identified to provide remediation and remedy where possible.
- c) Our Human Rights Policy and Supply Chain Social Responsibility Policy underpin our commitment to respecting human rights and tackling modern slavery, available publicly on our website at www.hiltonfoods.com. Human Rights Policy ([here](#)) This policy describes our commitment to all workers employed to work within our own operations available on our website at www.hiltonfoods.com
- These policies outline our commitment to following; the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the Ethical Trade Initiative Base Code. As full participants of the UN Global Compact (UNGC), we are committed to supporting their 10 Principles. We are committed to respecting the human rights of workers on our sites and those engaged within our supply chains by complying with our legal human rights requirements at a national, and international level. Where national law and international frameworks such as the Ethical Trade Initiative (ETI) Base Code are in conflict, we will work to ensure the highest standard is offered to workers. In 2023, we initiated an internal audit program aligned to the SMETA standard in 2022. This is conducted by the Group Ethics and Social Sustainability Senior Manager, who is a SA8000 trained lead auditor with training in investigative interview skills.
- In 2023, a new Agency Labour Standard was introduced to ensure the competency of all labour providers supplying Hilton Foods, with particular attention to the operational controls needed to mitigate the risks of modern slavery and hidden third party exploitation. It ensures the competency, financial resilience and ethical behaviour of our labour providers. In addition to this, a Hilton Foods Accommodation Standard is in operation to provide assurance of the quality and safety of housing or accommodation where offered. To further our action on human rights, Hilton Foods became a corporate member of the Slave-Free Alliance to engage in business-specific improvements related to reduce modern slavery, particularly forced labour, labour trafficking and other hidden third party exploitation of workers.

Supplier social assessment

GRI 3: Material Topics 2021	3-3 Management of material topics	<p>Our Supplier Social Responsibility Code of Conduct, which describes the labour standards we expect within our supply chain, ensuring working conditions are fair and safe and that all workers are treated with dignity and respect. This document forms part of our new global supplier onboarding process and is a condition of supply. Our Supplier Social Responsibility Compliance Requirements outlines the steps suppliers must take to demonstrate observance of the code. All our business units are responsible for ensuring that suppliers understand and comply with these requirements.</p> <p>Our Children’s Rights and Child Labour Remediation Policy describes our responsibility to respect children’s rights and support the human rights of children. We will contribute towards the elimination of child labour in all our business activities and business relationships. None of our direct operations hold any significant risk of child labour, however, child labour can be hidden in more complex global agricultural supply chains. We commit to provide decent work for young workers, parents, and caregivers, and will ensure the protection and safety of children in all business activities and facilities. We work to ensure that all employees understand their statutory obligations with respect to children and young people, from apprentices to work experience candidates.</p> <p>d) Hilton Foods holds an overarching human rights strategy, with timebound goals and targets that traverse our global operations. We seek to address human rights and modern slavery in line with our commitment to the United Nations Guiding Principles on Business and Human Rights to respect human rights by; identifying, preventing, mitigating, and accounting for how we address our impacts on human rights, and enabling processes for remediation. Our commitments and public actions on human rights can be viewed on page 56 of our Annual report.</p> <p>Our Human Rights Policy sets out the standard for our commitments and public actions on human rights can be viewed on page 56 of this report. In 2023, we initiated an internal audit program aligned to the SMETA standard. This is conducted by the Group Ethics and Social Sustainability Senior Manager, who is a SA8000 trained lead auditor with training in investigative interview skills.</p> <p>All protein suppliers are required to agree to the Code of Conduct and register on Sedex, an ethical data platform. Suppliers are required to complete a self-assessment questionnaire, covering labour rights, health and safety, the environment and business ethics. High risk sites are required to conduct a SMETA audit. Supplier sites with open critical non-conformances are not approved to supply until closed and reviewed by third party auditor. Where risks or impacts are identified and a supplier refuses to remediate, a cease of supply will be considered. We work collaboratively with all suppliers to remediate where issues arise and identify root causes. In situations of low leverage, for example at a fishery level, we will work collaboratively with a wide range of stakeholders to remedy or advocate for systemic change.</p> <p>We work to identify potential human rights and modern slavery risk within our own operations and supply chains primarily through utilisation of the Sedex RADAR risk assessment tool. Sedex is an internationally recognised supply chain transparency platform, to monitor labour standards and gain insight into working conditions in supplier sites. All our risk assessment work utilises publicly available sources of risk data, which are robust in nature, e.g. UN agencies such as the UNDP and the ILO, the World Bank, the US Department of State, specialist research agencies and commercial risk data providers. We also consider the nature of the work or activity being undertaken, i.e. labour intensity, workforce skill level, etc., and reporting on any known human rights risks from NGOs or media. This sits alongside our Supplier Ethical Approval and Risk Assessment process, which is housed in our supplier management system, Foods Connected. We piloted this system in 2021 and launched it across our business in 2022. We conduct supply chain due diligence as a function of assessing the effectiveness of our human rights commitments. In-scope suppliers are required to complete the Sedex Self-Assessment Questionnaire, which allows us to hold a detailed site-specific risk assessment. We continue to onboard new suppliers onto Sedex and complete the retrospective action of connecting with our existing supply base.</p>
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Supplier social assessment

GRI 3: Material Topics 2021	3-3 Management of material topics	<p>e) Our management of modern slavery risk across our operations and supply chain falls within our broader approach to human rights, which is included within our 2025 Sustainable Protein Plan. Please refer to page 49 of our Annual report for further information on our governance process for human rights.</p> <p>f) 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 and improve working conditions.</p> <p>We have strengthened our commitment to the Food Network for Ethical Trade through engaging in its governance by becoming an elected Board Member. We also act as Board sponsor for their Empowering Work working group, delivering training on in-work poverty, worker engagement and improving access to worker representation.</p> <p>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 2022, we were elected as Chair of their Steering Committee and continued to lead their human rights due diligence workstream.</p> <p>In 2023, we are pleased to announce 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.</p>
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	a) All protein suppliers are currently in the process of being taken through our new Supplier Ethical Approval and Risk Assessment process.

Customer health and safety

GRI 3: Material Topics 2021	3-3 Management of material topics	Annual report 49
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	SASB Report page 99

APPROVAL OF THE STRATEGIC REPORT

Pages 6 to 109 of this Annual report comprises a Strategic report which has been drawn up and presented in accordance with applicable English company law, in particular Chapter 4A of the Companies Act 2006, and the liabilities of directors in connection with this report shall be subject to the limitations and restrictions provided by such law.

It should be noted that the Strategic report has been prepared for the Group as a whole, and therefore gives greater emphasis to the Company and its subsidiaries when viewed in its entirety.

Approved by order of the Board of Directors

Neil George
Company Secretary

2 April 2024