



President's Statement

2 Sisters Food Group, the trading name for Boparan Holdings Limited and its subsidiaries, recognises that all businesses have an obligation to prevent slavery and human trafficking.

We all have a responsibility to be alert to the relevant risks and are committed to acting ethically and with integrity and transparency in all business dealings.

The Board of 2 Sisters Food Group is committed to delivering high standards of corporate governance and a key element of this is managing the Group in a socially responsible and ethical way.

The Group aims to employ the highest ethical and professional standards and to comply with all local laws and regulations applicable to our business; it follows that 2 Sisters Food Group is absolutely committed to preventing Modern Slavery in its corporate activities and its supply chain. This commitment is emphasised in our employee training programmes and company policies, which promote ethical behaviours. 2 Sisters Food Group expects the same high standards which we set for ourselves from those parties with whom we engage, in particular our suppliers and customers.

This statement relates to actions and activities during the financial year 1 August 2023 to 31 July 2024 and actions that we plan to take over the next 12 months.

A handwritten signature in black ink, appearing to read "Ranjit Singh", is positioned below the text. The signature is fluid and cursive, with a large initial 'R' and 'S'.

Ranjit Singh, President

2 Sisters Food Group



Modern Slavery Statement 2023/24

Introduction

Following the introduction of the Modern Slavery Act in 2015 by the UK Government, Boparan Holdings Limited and all members of its UK corporate group, trading collectively as 2 Sisters Food Group, produces an annual Modern Slavery Statement setting out the steps we have taken to ensure Modern Slavery does not take place in our own businesses or our supply chains.

This Modern Slavery Statement applies to the following legal entities:

Legal Entity	Trading Name(s)/Sites
Boparan Holdings Limited	Holding company for all legal entities set out below
2 Sisters Food Group Limited	Site B*, Site D, Site E, Flixton, Scunthorpe, Willand, Thetford, Coupar Angus, Sandycroft
Northern Foods Limited	Holding company/employer for: Solway Foods Ltd, FW Farnsworth Ltd, Convenience Foods Ltd, Cavaghan & Gray Ltd.
Convenience Foods Limited	Gunstones Bakery, Grimsby Soups
Solway Foods Limited	Rogerstone
Cavaghan & Gray Limited	Cavaghan & Gray – Carlisle
FW Farnsworth Limited	The Pizza Factory

*Formerly Amber Foods Limited

2 Sisters Food Group is a food manufacturing business employing 13,600 people in the UK and supplying both retail and food service sectors. The legal entities set out above are organised into the following Divisions for operational purposes:

1. UK Poultry: Producing whole and portioned chicken and added value protein
2. Meal solutions: Producing pizzas, chilled and frozen ready meals, soups, sauces, ready to cook products, hot cross buns and morning goods

2 Sisters Food Group is one of the largest customers of the UK agricultural sector, sourcing protein and produce from UK farmers. Poultry supply chains in the UK are significantly aligned and integrated with the business. We source a large range of additional raw materials for our products from around 600 manufacturers, processors and producers based in the UK and overseas.



Policy Statement

2 Sisters Food Group (2SFG) recognises the risk of, and need to combat, Modern Slavery in all its forms. Our operations impact workers both within 2SFG sites and throughout our supply chains. We will work with colleagues, suppliers, customers and other stakeholders to achieve a high standard of care and ethical behaviour.

Our [Ethical Trading & Human Rights Policy](#) is built on the Ethical Trading Initiative (ETI) base code. It sets out what 2SFG sites are required to do, as a minimum, to prevent modern slavery and protect the rights of workers. Further to this, the [2SFG Prevention of Hidden Labour Exploitation Policy](#) provides clarity to all line managers, colleagues, trade unions, agency workers and agency labour providers on the Group's standards and processes and the actions that it commits to take in order to protect workers from the threat of labour exploitation.

2SFG colleagues are expected to comply with our Code of Conduct. This describes how 2SFG employment practices aim to ensure that people work together in a fair and respectful way in an environment free from bullying, victimisation and harassment. Copies of the Code of Conduct are available at sites and on our intranet. Our UK Poultry Division has a Colleague Charter that sets out what we will do to support new colleagues during onboarding and how we will continue to engage with them to promote dialogue and feedback.

We recognise that we share a responsibility with our suppliers to operate ethically. The ethical and environmental standards expected of suppliers are set out in our [Supplier Sustainability Code of Practice](#).

2 Sisters Food Group operations

2SFG aims to achieve a high ethical standard across its own operations. We continue to be an AB member of Sedex, the Supplier Ethical Data Exchange, and to share information on our performance with our customers.

All of our processing and manufacturing sites are Sedex registered and have completed the Sedex Self-Assessment Questionnaire (SAQ), providing a risk rating. This year, Sedex updated their SAQ requiring all sites to complete the new format. All sites are independently ethically audited to the SMETA standard (2 Pillar). Actions to correct any non-conformances resulting from the audits are detailed by the site in a corrective action plan. Our aim is to achieve zero non-compliances from our ethical audits through site action plans targeted to address key areas.

2SFG is a member of the Association of Labour Providers (ALP) and we follow ALP guidance to promote responsible recruitment by labour providers. Our policy on labour providers sets out our requirements on health and safety, food safety and quality, and ethical compliance. Labour providers are audited by our Group Technical team as part of our supplier approval process. The process ensures that all labour providers supplying 2SFG meet our standards. It has also enhanced communication between 2SFG and our labour providers, and improved oversight of any issues.

In addition to the Group Technical labour provider audit, site HR teams audit the labour providers for their sites on a regular basis. This is measured and reported in our Modern Slavery statement as one of a set of Key Performance Indicators (KPIs). Reports from labour provider audits carried out by



sites in our UK Poultry Division are shared on an internal portal to allow non-conformances to be tracked.

Our processing and manufacturing sites are encouraged to become business partners with Stronger Together, a multi stakeholder initiative aimed at tackling modern slavery. Stronger Together provides resources to help deter, detect and address forced labour and hidden labour exploitation. Stronger Together materials are displayed at sites to provide details on signs of modern slavery that colleagues should be aware of, and to signpost ways to report concerns. In addition, site HR teams use Stronger Together tools to carry out a modern slavery risk assessment and develop action plans to address the risks identified. Stronger Together Business Partnerships, modern slavery risk assessments and modern slavery awareness training are among the KPIs we report annually (see below).

In 2023 we launched our business sustainability strategy, the Better For All Plan, which included "Better for our People" as one of its six pillars. Human rights in our operations formed one of the areas of focus within this pillar, while Human Rights in our Supply Chain was a priority area for the "Better for Sourcing" pillar. As we approached the end of the 2023/24 financial year, we completed a review of our sustainability strategy which will be updated to our new food system transformation plan "Doing the Right Thing". Human rights both in our own operations and supply chain will form part of the foundations of this new strategy.

We continue to use our colleague app, launched in the previous financial year, to help to distribute information to colleagues by site, Division or Group. The app is available to colleagues in 14 different languages.

Whistle blowing

We have a free, anonymous and confidential whistleblowing hotline that enables all employees, including agency workers, to raise any potential concerns in relation to employment standards or ethics. Information on how to contact the whistleblowing hotline is prominently displayed at all sites.

The 2SFG Whistle Blowing policy is available to colleagues through the company intranet and information can also be accessed through the colleague app. The policy provides information on how to use the hotline and the process that follows a complaint being made. We have also set up a dedicated inbox compliance@2sfg.com managed by the legal team as another route for people to raise grievances.

All whistle blowing reports are managed through Group Internal Audit to assure timely and robust investigation of any reports and, where required, ensure that preventative action is completed.

A grievance procedure is also available to colleagues on the company intranet providing information on how to raise a formal complaint.

Modern Slavery Risk within our Supply Chain

2SFG sources from a range of suppliers based in the UK and overseas.

It is our policy to ensure that the ethical standards that apply within our own production sites are also adhered to in our supply chain. The identification of risk within our large and complex supply



chain is a key initial step to understanding what is required and prioritising the actions which flow from this.

Our requirements are set out in our [Supplier Sustainability Code of Practice](#). 2SFG requires all direct ingredient and packaging suppliers, and suppliers of certain categories of goods not for resale, to be members of Sedex and linked to 2SFG on the platform. Suppliers are required to complete the Sedex SAQ in order to be risk assessed. Suppliers assessed as high risk are required to have an independent ethical audit.

A cross functional team of colleagues meets regularly to help identify where there is a lack of full compliance with ethical trading requirements and to highlight emerging or potential risks of modern slavery and labour exploitation.

Over the last two years we have worked to understand the use of recruitment fees in the supply chain. We have previously adjusted our labour provider onboarding process to include measures to reduce the risk of workers paying recruitment fees. Where we have identified non-conformances related to payment of recruitment fees by a small number of raw material suppliers in their ethical audits, we have contacted the suppliers and kept under review.

Collaboration

We recognise that the leverage we have within our supply chain is often limited and that to initiate meaningful and sustainable change we need to collaborate with our supply chain partners to develop initiatives which improve working conditions.

We work with supply chain partners, labour providers, customers, industry bodies, the GLAA and other enforcement bodies to ensure the risk of modern slavery is minimised. We are a founding member of the Modern Slavery Intelligence Network (MSIN), a group of food businesses supported by NGO Stop The Traffick. MSIN has developed an information sharing mechanism which members use to detect, prevent and disrupt modern slavery and labour exploitation activity in the food industry.

2SFG is a member of the Food Network for Ethical Trade (FNET). This is a collaboration between suppliers and retailers with the aim of delivering a consistent approach to risk assessment and managing ethical trade along food supply chains. We participate in working groups on raw material supply chains, recruitment and due diligence processes.

Training and Awareness

Training is a fundamental way of raising awareness and ensuring that people understand what modern slavery is and what they need to do if they encounter something that raises concerns.

On joining the business, members of our site Human Resources (HR) teams attend workshops on tackling modern slavery through the Stronger Together initiative, to ensure they are aware of the issue. Sites also deliver in-house training for managers and employee representatives to build awareness of modern slavery, including front line manager training for dignity at work, conflict



management and communication. Modern slavery awareness is part of site induction programmes for new starters.

Colleagues in both the central Technical team and site HR teams have undergone training on responsible recruitment practices to increase understanding of recruitment practices on vulnerable workers.

Anti-Slavery Day on 18th October is recognised through information posted on the employee app, intranet and at sites. This reminds colleagues of the risk of modern slavery and who to contact if they have concerns.

Performance Measures & Actions

It is important for 2SFG to be transparent and accountable to all stakeholders including colleagues, suppliers, customers, investors, consumers and the wider public who are affected by our business activities. We have therefore identified a set of KPIs which we report annually within our Modern Slavery statement that enable us to identify risk across our business and through our supply chain, and drive improvement.

This year, our Internal Audit team completed a review of our reported Modern Slavery KPIs. Recommendations included more regular tracking and internal reporting on progress throughout the year. Following the review, the description of the KPIs has been expanded to provide greater clarity. In addition, a further KPI has been added specifically related to training of site leadership teams on Modern Slavery awareness. Divisional HR teams now provide quarterly updates on KPIs relevant to 2SFG operations, while the Sustainability team produce a quarterly review of supplier performance against requirements for Sedex registration.

KPIs and performance against them are shown in Table 1. Following introduction of the KPI on Modern Slavery awareness training for site leadership teams, courses are to take place in the 2024/25 financial year, with limited training during FY2023/24 as reflected in this initial score. The majority of sites have at least one senior manager who has attended StrongerTogether training in the last 3 years.

We continue to use the Stronger Together Good Practice Implementation checklists to risk assess sites and determine where actions are required to improve our modern slavery prevention measures. Actions are taken at site or divisional level as appropriate.

Having identified the need to progress their skills and understanding of Modern Slavery risk management and good practice, HR Managers from our UK Poultry sites attended the StrongerTogether Advanced training programme. This builds on experience to date to advance implementation of Modern Slavery due diligence measures and give confidence in management of incidents where Modern Slavery is suspected. These sites went on to gain Advanced StrongerTogether Business Partner status, recognising the progress made in management of Modern Slavery risk.

Modern Slavery risk assessments also flagged the need for a Group remediation policy. This was completed during the year by the Group Sustainability team, together with a review of policies related to ethical trading and prevention of hidden labour exploitation. A new central policy library was established on the colleague intranet to improve access to information.

The Internal Audit team review of Modern Slavery KPIs flagged the need for consistency around site labour provider audits. These are completed at least every six months and now use a standardised



template. The Group Technical team continue to audit labour providers at on-boarding and on a two-yearly cycle as part of the supplier due diligence programme.

The 2SFG Supplier Sustainability Code of Practice was updated as part of our wider policy review and communicated to suppliers. This states the requirement for suppliers to register on Sedex and complete the SAQ, enabling them to be risk assessed. Following changes to the Sedex SAQ earlier in the year, the majority of suppliers have now completed the new format. Those that do not complete the SAQ are automatically assessed as high risk and require an independent ethical audit. We continue to achieve good compliance on Sedex registration, with 97% of suppliers meeting our requirement.

Looking ahead to the next year, we anticipate the introduction of the SMETA 7.0 audit standard against which our sites and suppliers will be audited after September 2024. This will bring in a new type of non conformance which if raised will require collaborative action between suppliers and customers. Our membership of the Food Network for Ethical Trade will be a valuable support as we navigate the requirements of the new standard.

At a site level, we plan training to upskill site leadership teams on modern slavery awareness. We will continue to strengthen controls through additional monthly checks on modern slavery flags and use key dates such as global anti slavery day to raise awareness and keep modern slavery risk front of mind.



Table 1. Key Performance Indicators and targets

Key Performance Indicator	Requirement	2023/24	Target 2024/25
% of 2SFG sites with a Senior Manager who has completed Stronger Together training on Modern Slavery.	At least one Senior manager has attended the Stronger Together “ Tackling Modern Slavery in UK Businesses” workshop within the last 3 years.	85%	100%
% of 2SFG site Senior Leadership Teams that have received refresher training on modern slavery	Site Leadership teams have received refresher training on modern slavery, delivered by the trained 2SFG colleague or an external trainer, within the financial year.*	8%	100%
% of 2SFG sites that are Stronger Together Business Partners	The site is a Stronger Together Business Partner or Advanced Stronger Together Business Partner for the current calendar year.	92%	100%
% of 2SFG sites that have completed the Modern Slavery Risk Assessment (Stronger Together)	Sites have completed the StrongerTogether Employer Good Practice Checklist from the current calendar year.	100%	100%
% of 2SFG sites that have completed the Modern Slavery Risk Assessment with an action plan.	Sites have completed the StrongerTogether Employer Good Practice Checklist from the current calendar year and created an action plan from the results. Actions are shared and tracked at Divisional level with time frames and milestones. Actions can be collective where appropriate.	92%	100%
% of 2SFG sites that have completed a labour provider ethical audit every 6 months.	All sites using Labour Providers complete an ethical audit every 6 months as a minimum. Records of audits are maintained with minimum of date, number of records checked and any non conformances raised. A standard audit form has been agreed.	100%	100%
% of Whistleblower cases relating to Modern Slavery issues.	Of total whistleblowing incidents, the percentage related to modern slavery.	0%	0%
% of total Whistleblower cases closed out.	Of the whistleblower cases related to modern slavery, % closed out.	N/A	N/A
% of tier 1 suppliers registered on Sedex	Includes registration on Sedex of strategic supplier sites, new supplier sites since Jan 2024 and sites supplying via agents.	97%	95%

*New KPI. Training for senior leadership teams is scheduled for early FY24/25