



## CEO's Statement

2 Sisters Food Group, the trading name for Boparan Holdings Limited and its subsidiaries, as more particularly outlined in the wider statement, recognises that all businesses have an obligation to prevent slavery and human trafficking. We all have a responsibility to be alert to the risks and are committed to acting ethically and with integrity and transparency in all business dealings.

2 Sisters Food Group Board 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 always 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, such as our suppliers and customers.

This statement relates to actions and activities during the financial year 1 August 2020 to 31 July 2021 and actions that we plan to take over the next 12 months.

A handwritten signature in black ink, appearing to read 'R. Kers', is positioned above the name of the CEO. The signature is stylized and fluid.

**Ronald Kers**  
CEO, 2 Sisters Food Group



## Modern Slavery Statement 2020/21

### Introduction

Following the introduction of the Modern Slavery Act in 2015 by the UK Government, Boparan Holdings Ltd and all members of its 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 and 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 D, E, Flixton, Scunthorpe, Willand, Thetford, Sunderland*, Derby*, Coupar Angus, Llangefni, Sandycroft,
Amber Foods Limited	Amber Foods – Site B
Northern Foods Limited	Holding company/employer for: Northern Foods Grocery Group Ltd, Solway Foods Ltd, FW Farnsworth Ltd, Convenience Foods Ltd, Portumna Pastry Ltd**, Cavaghan & Gray Ltd.
Northern Foods Grocery Group Ltd	Fox's Biscuits Batley (sold October 2020), Kirkham (sold October 2020), Elkes Biscuits, Uttoxeter
Convenience Foods Limited	Gunstones, Convenience Foods - Grimsby
Solway Foods Limited	Rogerstone
Cavaghan & Gray Limited	Cavaghan & Gray – Carlisle
FW Farnsworth Limited	The Pizza Factory, Holland's Pies
Portumna Pastry Limited	Portumna

\*Ownership transferred to Amber Real Estate Investments (Industrial) Limited in October 2021

\*\*Changed name from Green Isle Foods Ltd on 25 September 2020

2 Sisters Food Group is a food manufacturing business employing 15,000 people 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
3. Bakery: Producing pies and pastry products



#### 4. Biscuits

Producing a variety of household favourite biscuits

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 over 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 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 company's standards, 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.

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

2 Sisters Food Group 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. Additionally, most 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.



The novel Coronavirus outbreak began in the UK at the midpoint of our 2019-20 financial year and interrupted our ethical audit programme. Measures in place to reduce the risk of Coronavirus at operating sites meant that we were unable to admit visitors, including auditors, until the second half of the reported year. Since then, our ethical audit programme has resumed, and sites have been able to complete audits.

2 Sisters Food Group is a member of the Association of Labour Providers and we work with the ALP to promote responsible recruitment for labour providers. This year we implemented a new policy on labour providers, setting out our requirements on health and safety, food safety and quality, and ethical compliance. Labour providers are now audited by our Group Technical team as part of a revised supplier approval process. This has enabled the business to react promptly to requirements for new labour providers at our processing and manufacturing sites. The process has also ensured that all labour providers supplying 2SFG meet our standards. It has 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 have continued to 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).

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 an action plan to address the risks identified. Within the last year, we have developed an online portal for these modern slavery risk assessments and action plans to help site colleagues to monitor completion and progress.

Within our central team we use the Stronger Together Progress Reporting Tool to measure our development in addressing modern slavery risks and to highlight the steps we need to take next. The Progress Reporting Tool contains a detailed series of questions framed against the UN Guiding Principles on Business and Human Rights. Self-assessment takes place annually and informs our plans for the next 12 months.

Stronger Together Business Partnerships, modern slavery risk assessments and modern slavery awareness training (see below) are among the KPIs we report annually.

## 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 provides information on how to use the hotline and the process that follows a complaint being made.



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.

## Modern Slavery Risk within our Supply Chain

2 Sisters Food Group sources from suppliers ranging from small independent farmers to large multi nationals 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 link to 2SFG. 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.

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.

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

This year we have begun working with our labour providers to explore potential risk of recruitment fees and mitigation measures. We plan to expand this work to other elements of our supply chain.

## Collaboration

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 participated in a project with the GLAA to develop the worker checklist, a poster which can be displayed at sites and farms to inform people of their rights as a worker in the UK.

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 and on recruitment.

## 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.



We collaborated with FNET to develop and deliver human rights due diligence training to 2SFG technical and procurement colleagues. This has helped highlight modern slavery in the context of broader human rights that could potentially be impacted by businesses, and the processes in place to mitigate risks.

Members of our site Human Resources teams attended a workshop on tackling modern slavery through the Stronger Together initiative. Sites have also delivered 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.

To support colleagues in developing site action plans to help reduce the risks of modern slavery, an online risk assessment portal has been developed. By completing the risk assessment, site teams can identify where action is required and generate targeted plans.

## Performance Measures & Actions

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

Our KPIs and performance against them are indicated in Table 1. We are pleased to see a marked improvement in our KPI scores compared to last year when Covid 19 caused disruption to normal activities. In particular, training and use of Stronger Together resources has increased, and more sites became Stronger Together Business Partners during last year. We aim to maintain the momentum into the new financial year with a focus on labour providers and regular site assessments. Actions will include development of a central repository for audit reports so that trends can be identified and addressed as early as possible.



**Table 1.** Key performance indicators and targets

<b>Key Performance Indicator</b>	<b>Result FY19/20</b>	<b>Result FY20/21</b>	<b>Target 2021/22</b>
% of 2SFG sites that have completed Stronger Together training on Modern Slavery.	86%	90%	100%
% of 2SFG sites that are Stronger Together Business Partners	64%	80%	100%
% of 2SFG sites that have completed the Modern Slavery Risk Assessment (Stronger Together)	77%	90%	100%
% of 2SFG sites that have completed the Modern Slavery Risk Assessment with an action plan	45%	90%	100%
% of 2SFG sites that have completed a labour provider ethical audit every 6 months	63%	66.7%	100%
% of Whistleblower cases relating to Modern Slavery issues.	0	0	N/A
% of total Whistleblower cases closed out.	100%	100%	100%
% of tier 1 suppliers registered on SEDEX	95.8%	97.4%*	95%

\* Based on strategic supplier sites, new supplier sites since Jan 2021 and suppliers via agents

