

# The Prevention of Hidden Labour Exploitation Policy

This policy addresses the potential issue of hidden labour exploitation, which is a real and present risk in the food supply chain. It should be read and implemented with the 2SFG Ethical Trading & Human Rights Policy.

Hidden labour exploitation covers the exploitation of job applicants and/or workers (agency workers, colleagues or contractors) and can include such practices as forced labour, human trafficking for labour exploitation, payment for work-finding services and work-related exploitation such as forced use of accommodation.

HR teams and Labour Providers are responsible for implementing controls and training at sites, and making sure reporting and awareness raising systems are in place.

## Definitions

Wording	Definition
Divisional HR Leads	The senior HR person for a Division of 2 Sisters, which may be a Head of HR, a HR Director or a Head of Learning and Development.
Recruiter	Person whose role is to source, interview and hire entry level positions at 2SFG processing and manufacturing sites

## 1. Why Was This Policy Developed?

The purpose of this policy is to provide clarity to all line managers, colleagues, trade unions, agency workers and agency labour providers on the company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

## 2. Who Does This Policy Apply To?

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interims.

## 3. How Do I Ensure I Comply with This Policy?

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2 Sisters Food Group will not tolerate any form of labour exploitation of job applicants, colleagues, agency workers or contractors by any individual or group of individuals. The company is committed to working with all relevant organisations including the Gangmasters and Labour Abuse Authority (GLAA), unions and the police to eradicate such practices and to protect workers.

Hidden labour exploitation is defined as the exploitation of job applicants and/or workers (agency workers, colleagues, or contractors) and can include such practices as forced labour, human trafficking for labour exploitation, payment for work-finding services and work-related exploitation such as forced payment of fees for accommodation or transport.

### RESPONSIBILITIES

The Divisional HR Leads are responsible for the deployment of this policy and accompanying procedures to line managers, union representatives, colleagues, labour providers and the HR team.

Divisional HR Directors are responsible for liaising with the relevant agencies to investigate and resolve any alleged cases of potential labour exploitation involving the company. Management of the company's confidential whistle blowing service is the responsibility of the Group Internal Audit team.

### REQUIREMENTS

Site HR teams will undertake the StrongerTogether ([www.stronger2gether.org](http://www.stronger2gether.org)) initiative's Tackling Modern Slavery in UK Businesses training to ensure the appropriate level of competence to identify and highlight risk of hidden labour exploitation.

All recruiters for entry level positions at 2SFG processing and manufacturing sites will be briefed on the company's policy and procedures and will confirm their understanding. A 'Recruiter Compliance Principles Form' is available in the reference document "StrongerTogether Tackling Modern Slavery in Businesses: A Toolkit for UK Employers and Labour Providers".

All recruitment, including sourcing through labour providers and training placement processes will be carried out in compliance with this policy.

Job applicants will never be charged fees of any kind or expected to provide gifts/other incentives in connection with their job application, whether for a temporary or permanent position. Any complaints of hidden labour exploitation, including 'cash for jobs', will be dealt with in accordance with the company's Disciplinary Policy & Procedure. If an employee or agency worker is placed at risk as a result of a complaint of hidden labour exploitation the police should be informed.

The company will work with the police and the GLAA in dealing with such complaints including providing access to documents and facilities that may be relevant in pursuing a criminal prosecution.

A range of communication channels will be used to work proactively with trade unions and employee consultative bodies to educate and raise the awareness of the importance of reporting

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suspected cases of hidden labour exploitation and how to report concerns.

A confidential whistleblower reporting service, is provided so that workers can raise concerns without fear. Response to this is managed by Group Audit.

The company will only trade with providers of temporary agency and permanent workers that have policies and procedures in place that are consistent with this standard and correctly licensed where required.

### **PROTOCOL**

Due to the potential for criminal involvement and/ or criminal prosecution the following protocol must be followed.

Local HR teams must report all complaints of hidden labour exploitation to the Divisional HR Director before taking any steps to investigate the matter. Investigations will be conducted by an appropriate company representative nominated by the HR Director and after consultation with a GLAA officer where appropriate.

Suspected victims of labour exploitation and/or complainants will be treated with sensitivity and confidentially maintained at all times. Meetings with complainants and/or victims may be conducted off site and outside normal working hours as necessary to maintain confidentiality.

In cases where it is believed that the complainant or the alleged victim of the hidden labour exploitation is at risk of violence or harm the HR Director will report the case to the police.

As part of the investigation process the “Record of Potential Third Party Exploitation Questionnaire” in the reference document “StrongerTogether Tackling Modern Slavery in Businesses: A Toolkit for UK Employers and Labour Providers” should be completed and supplemented with comprehensive meeting notes.

Where the GLAA request attendance at a meeting this will be permitted only with the express consent of the complainant / victim.

Detailed notes (including the date, time and the full name and job title of interviewers) and case meetings will be maintained throughout the process in order to assist the police and GLAA in the event of a criminal prosecution.

## **4. RELEVANT DOCUMENTS**

2SFG Ethical Trading & Human Rights policy

StrongerTogether Tackling Modern Slavery in Businesses: A Toolkit for UK Employers and Labour Providers

[https://www.stronger2gether.org/resources/?\\_sft\\_resource\\_theme=forced-labour&sf\\_paged=2](https://www.stronger2gether.org/resources/?_sft_resource_theme=forced-labour&sf_paged=2)

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### 5. Contacts

<https://www.2sfg.com/betterforall/people/HumanRightsOperations>

### 6. Policy Details

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