



The Prevention of Hidden Labour Exploitation Policy

November 2021

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Foreword

Robust ethical policy and management is a fundamental of good business practises within the food industry. Growing legal, customer and social expectations, reducing resources and increasing commodity costs are some of the challenges we face. In order to be a trusted supplier to retailers the Group must ensure it is effective in managing ethical and human rights issues.

This policy is intended to inform 2 Sisters Food Group (2SFG) sites of the minimum expectations placed on them for Ethical Management in relation to the prevention of hidden labour exploitation.

The Scope of this policy does not currently include 2SFG sites based in Holland or Poland, but should they wish to implement the policy full support will be provided to help them to do so.

Summary

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

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1.0 Policy Statement

- 1.1 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.
- 1.2 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.

2.0 Purpose

- 2.1 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.

3.0 Responsibilities

- 3.1 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 'Speak Up', the company's confidential whistle blowing service is the responsibility of the Group Internal Audit team.

4.0 Procedure

- 4.1 Site HR teams will undertake the StrongerTogether (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.
- 4.2 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 by signing the 'Recruiter Compliance Principles Form' (Appendix 2).
- 4.3 All recruitment, including sourcing through labour providers and training placement processes will be carried out in compliance with this policy .
- 4.4 Job applicants will never be charged fees of any kind or expected to provide gifts/other

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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.

- 4.5 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.
- 4.6 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 suspected cases of hidden labour exploitation and how to report concerns.
- 4.7 A confidential whistle blower reporting service, 'Speak Up', is provided so that workers can raise concerns without fear. Response to this is managed by Group Audit.
- 4.8 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 licenced where required.

5.0 Protocol

- 5.1 Due to the potential for criminal involvement and/ or criminal prosecution the following protocol must be followed.
- 5.2 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.
- 5.3 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.
- 5.4 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.
- 5.5 As part of the investigation process the "Record of Potential Third Party Exploitation Questionnaire" (Appendix 3) must be completed and supplemented with comprehensive meeting notes.
- 5.6 Investigators will ensure that as a minimum standard the questions attached in Appendix 4 are addressed.
- 5.7 Where the GLAA request attendance at a meeting this will be permitted only with the

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express consent of the complainant / victim.

- 5.8 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

6.0 Policy Revisions

Version	Details	Date
1	Version 1 Original Policy Issued	25.03.2014
2	Our Policy Commitments, wording amended at 4.1 to reflect GLA approved training course. 4.6 Amended to Include Consultative Bodies	08.04.2014
3	Signed by Chief Executive Officer	23. 02.2015
4	Review and re format of procedure	March 2016
5	Revision of policy	02 11 2021

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Appendix 1

Monitoring “Alert Flags” that may indicate potential worker exploitation

Below are a range of monitoring measures and flags that employers and labour providers may use to deter and identify situations of exploitation:

Monitor Area	Alert Flag	Tick if Monitored
Recruitment	The individual with control over workers may seek to befriend the labour provider or frontline staff and offer to find them workers, often at short notice	
Recruitment	A number of workers are introduced to the labour provider by a particular individual, usually of the same nationality, with good English language skills. This individual may claim he is a friend, relative, uncle, cousin etc., or just helping out but speaks for the other individuals and controls the conversation. S/he waits whilst the individuals are being interviewed.	
Recruitment	Externally completed registration documents are in a significantly better standard of English than the applicant possesses.	
Recruitment	A number of externally completed registration documents are brought in by one individual on behalf of his “friends” or “family”.	
Recruitment	A number of externally completed registration documents are brought in having been completed in the same handwriting.	
Recruitment	Applicants appear frightened, agitated or secretive and act as if they are instructed by another.	
Workplace	A third party rings in to book a friend or family as available for a work shift.	
Workplace	Workers say they rent from a landlord who works for the labour provider or labour user.	
Workplace	Registered workers keep turning up to see if work is available and appear to be accompanied by individual(s) who stay in the background.	
Workplace	Workers are delivered in minibuses or people movers, particularly where such transport is not licensed and/or the driver is not part of the permanent or agency work force.	
Workplace	One worker supplies food in the workplace for a number of the agency workers.	
Workplace	Workers physical appearance may show signs of injury and malnourishment and their general appearance may be unkempt with inappropriate clothing.	
Workplace	A rise in the number of non-English speaking workers of a certain nationality where they are organised by a particular labour provider consultant or labour user supervisor of the same nationality.	

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Workplace	A particular individual may stay close to a group of workers when anyone from authority is present.	
Workplace	A pattern where migrant workers of the labour providers or labour users workforce stop working suddenly for no particular reason.	
Records	Checking addresses shows high occupancy of particular houses of agency workers.	
Records	Checking addresses shows shared high occupancy of particular houses between permanent and agency workers.	
Records	Checking bank accounts shows a number of unrelated workers paid into one account.	
Records	Checking mobile phone numbers shows a number of unrelated workers contactable through one number.	
Records	Checking emergency contact numbers shows a number of unrelated workers contactable through one number.	
Records	Check documents for same next of kin and /or same place of origin/location in home country.	



Appendix 2 Recruiter Compliance Principles

Recruiters must:

- 1 Sign this document before interviewing any applicants.
- 2 Only interview applicants in an approved location.
- 3 Not allow applicants to complete registration documents on behalf of others.
- 4 Not accept money, favours or any gifts at all from applicants or workers.
- 5 Not loan any personal money to temporary workers.
- 6 Notify a manager when informed by an applicant or worker that they have paid money or provided financial incentives to be introduced to the Company.
- 7 Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- 8 Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- 9 Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers paid directly to themselves.
- 10 Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- 11 Not force or coerce temporary workers to work against their will.
- 12 Not threaten or subject workers to physical or mental mistreatment.
- 13 Treat applicants and workers with dignity and respect.
- 14 Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

I confirm that I understand and will comply with the above principles and that any breach of these principles may result in disciplinary action up to summary dismissal.

Recruiter's Name (Print).....

Recruiter's Signature: Date:

I have checked and confirm that the Recruiter understands the above principles.

Manager's Name (Print).....

Manager's Signature: Date:

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Appendix 3 Record of Potential Third Party Exploitation Questionnaire

This form is a summary record for when it is suspected that an applicant or job holder is a victim of trafficking, forced labour or other third party work related exploitation. Investigation notes will supplement this.

<p>Personal Details (Items with an asterisk should be supported by documentary evidence, where available.)</p> <p>*Last name: *First name(s):</p> <p>*D.O.B:/...../..... Age: Sex: *Nationality:</p> <p>Language(s) spoken: Any English spoken?: Good / Basic / Minimal / None</p> <p>Interpreter needed: Y / N If Yes, details of individual/service used:</p> <p>Safe contact details to use: Personal mobile number:: Email.....</p> <p>UK current address:.....</p> <p>Can address be used for correspondence relating to investigation and support? Y or N (delete as appropriate)</p> <p>Please detail any other safe means of contacting the individual:</p>				
<p>Contact details of person making record</p> <p>Name: Job title:</p> <p>Organisation: Unit or area.....</p> <p>Tel: Mobile:</p> <p>Email: Signature: Date:/...../.....</p>				
<p>Suspected Types of Third Party Exploitation</p> <p>1. Has paid an agent (internal or external) for the work introduction <input type="checkbox"/></p> <p>2. Is still paying an agent (internal or external) for work placement <input type="checkbox"/></p> <p>3. Is in debt to an agent and must make regular payments <input type="checkbox"/></p> <p>4. Another person is in control of their passport or ID documents <input type="checkbox"/></p> <p>5. Another person is in control of their bank account <input type="checkbox"/></p> <p>6. The individual has been brought to the UK under false promises of work <input type="checkbox"/></p> <p>7. Another person forces them to work under threat of a penalty <input type="checkbox"/></p> <p>8. The individual states they have an exploitative landlord who holds them in debt <input type="checkbox"/></p> <p>9. Physical signs of exploitation</p> <p style="margin-left: 20px;">a. Expression of psychological trauma, fear or anxiety <input type="checkbox"/></p> <p style="margin-left: 20px;">b. The person acts as if instructed or controlled by another <input type="checkbox"/></p> <p style="margin-left: 20px;">c. Visible injuries potentially a result of assault or controlling measures <input type="checkbox"/></p> <p style="margin-left: 20px;">d. Dishevelled, dirty, unkempt appearance <input type="checkbox"/></p>				

Cont. overleaf.

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Details of encounter:

Circumstances or details of the encounter or contact, providing background to how the information was provided:

Date:/...../..... Where was the victim encountered?

Details.....

Name, description and any information regarding agent, exploiter or trafficker (if known)

Other relevant information including movements in or to the UK with dates; suspected place of exploitation (if known) etc;

Consent - I consent to or I do not consent to my details including name and date of birth being submitted to the competent authority to assist in the investigation process.

Signed: Date:/...../.....

Where indicators of force or coercion are present - Request for support (optional) – I request that my details are passed to a First Responder for the purpose of assessing my support needs.

Signed: Date:/...../.....

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Appendix 4

Sample Investigation Interview Questions

. Below are a range of sample questions as a basis for use by the investigating manager in face to face interviews with workers

RECRUITMENT
<p>How well do you speak English?</p> <p>What agencies/employers do you work for?</p> <p>How did you find out about the work?</p> <p>Were you promised a job?</p> <p>How was the job described to you?</p> <p>Was the job how it turned out to be – e.g. pay rate, number of hours?</p> <p>Did you have to pay a fee for the job?</p> <p>What have you paid to get this job?</p> <p>Did you have to pay any money for other services such as translation or travel?</p> <p>How did you travel to the UK?</p> <p>Who arranged and paid for the travel?</p> <p>How much did the journey cost?</p> <p>Where in the UK did you travel to?</p> <p>Who met you?</p> <p>Where were you taken?</p> <p>Where is your ID?</p> <p>Is your ID usually held by someone else? Who?</p>
PAY
<p>Do you owe anyone any money? - (If the answer is yes then ask who and how much and what they have to pay back and how)</p> <p>Does anyone owe you any money?</p> <p>How much were you paid last week? How many hours had you worked?</p> <p>Was the pay correct?</p> <p>Do you receive a payslip?</p> <p>What deductions are made from your wages</p> <p>Have you been withheld pay for work you have performed?</p> <p>Have you had any money unfairly deducted from your wages?</p> <p>Are you free to open and be paid into the bank account of your choice?</p> <p>How many bank accounts have you opened?</p> <p>What are the names of the banks?</p> <p>Have you got the bankcard and PIN number? (if the answer is no, ask where they are)</p> <p>When you opened that bank account, who went with you?</p> <p>Who told you to go to this bank (or these banks)?</p> <p>Examine the bankcard if in possession (Is the PIN number written on the rear if it is may be an indication of forced labour so ask the Q: What is this number on the rear of the card?)</p> <p>Does anyone else use your bank account?</p>
TREATMENT AT WORK

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Since you have been working here, how have you been treated?
 What do you like about working for the LP/LU?
 What do you not like about working for the LP/LU?
 Have you been subject to verbal or physical abuse by anyone in LP/LU? By this we mean things like being shouted or sworn at, being pushed, kicked or having things thrown at you?
 What hours do you normally work?
 How are the hours allocated amongst workers?
 Are you happy with the hours that you are asked to work?
 If you didn't want to work the hours allocated what would happen?
 Have you ever been forced to work long hours, overtime or on any days when you didn't want to by anyone in LP/LU?
 What breaks do you take when you are working?
 How many days do you have off each week?
 How do you book holiday leave?
 Have you taken any holiday?
 Were you paid?
 Have you taken any sick leave?
 If you had to take sick leave would you be paid?
 What training were you provided with?
 Did you have to take a test after the training?
 What help was given to you during the test?
 What risks are there in your work?
 Have you been provided with PPE (may need explaining)?
 How much did this cost you?
 If you lose the equipment or damage it what will happen?
 Have you been prevented from joining a trade union or been penalised for doing so?

ACCOMMODATION AND FOOD

What address did you provide to the agency?
 How did you find your accommodation?
 Who is the landlord?
 How much rent do you pay?
 What happens if you can't pay the rent?
 Who collects the money?
 If you wanted to leave the house can you?
 How many people live in the house?
 How many people share your room?
 Are the other people related to you?
 Which family members are you here with?
 Do you have a written agreement with the landlord?
 If you wanted to leave the house what notice do you have to give to the landlord.
 Do you rent your accommodation from anyone who works for or who is linked to LP/LU?
 If you left the house, would you lose your job?
 If you left your job, would you have to leave the house?
 What is the condition of the house like?
 Is your accommodation safe and well maintained?
 How many smoke alarms are in the house
 Does the heating work?
 How many bathrooms are there?
 What is the condition of the house like?
 What are the rules of the house?
 Are you threatened by your landlord for unpaid rent?

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Are you or have you been threatened with immediate eviction?
 Are you free to buy and prepare food of your choice?
 Who provides your food?
 If provided with food, ask: What did you eat yesterday? Is this normally what you would eat?
 If purchase own food: Where do you shop for food?
 Do you have enough money to buy food? (If the answer is no explore what they do for food – some may go into dropin centres)

TRAVEL

Are you free and able to return home to your country of origin when you wish?
 Have you been in contact with your friends and family since you came to the UK?
 When was the last time you spoke with them?
 Are you free to travel to and from work using the transport method of your choice?
 How do you travel to work?
 How much does this cost you?
 Do you have to use this transport (If answers yes ask Why)?

RAISING PROBLEMS

If there was a problem at work what would you do about it?
 Do you feel your complaints are dealt with properly?
 Have you made any complaints about work? If yes ask: How did you feel about the way it was dealt with?
 How have you been treated since making the complaint?
 If you wanted to report an issue but did not want anyone to know it was you reporting how would you report it?

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