



Hain Daniels Group

Anti-Slavery and Human Trafficking Statement 2019

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Hain Daniels has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. Hain Daniels has a zero-tolerance approach to modern slavery. We explicitly prohibit abuse, slavery, servitude, forced labour, human trafficking and exploitation in our own businesses and our supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Hain Daniels Group

Hain Daniels is a leading manufacturer in the food industry. Its portfolio of brands and businesses include Orchard House®, New Covent Garden Soup Co.®, Yorkshire Provender®, Clark's™, Linda McCartney's™ (under licence), Hartley's®, Farmhouse Fare™ and Cully & Sully®, amongst others.

Hain Daniels employs nearly 2,400 people between its 10 sites in England.

We adhere to the Ethical Trading Initiative (ETI) Base Code and we encourage all our suppliers to adhere. As a business, we want to ensure that working conditions are safe and hygienic, child labour is not used, employment is freely chosen, living wage is paid, working hours are controlled and that there is no discrimination or harsh or inhumane treatment.

Hain Daniels is committed to responsible procurement. Our worldwide supply base provides us with thousands of raw materials, ingredients, packaging items and pieces of equipment. Hain Daniels uses around 1,100 different fruit suppliers from 35 different countries, while ingredients and packaging supplies come mainly from within the UK and Europe.

Steps for the prevention of Modern Slavery

1. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect

the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

2. The steps we have already taken include:

- (i) We have conducted risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) We have engaged with certain of our suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses or their supply chains;
- (iii) We have introduced into our Supplier Code of Conduct principles around anti-modern slavery;
- (iv) We require all recruitment and employment agencies that we use (and that our suppliers use) to hold a GLAA (Gangmasters and Labour Abuse Authority) Licence;
- (v) Training has been and continues to be provided to key management. This consists of training on the Ethical Trading Initiative Base Code, raising awareness and ensuring that people understand the importance of modern day slavery issues. The training provides tools to use in tackling modern slavery in the supply chain.
- (vi) The cost of the recruitment for Hain Daniels is a business cost and no fee for recruitment is charged to workers, directly or indirectly.
- (vii) We undertake regular desktop and physical audits of suppliers to ensure ethical practice.
- (viii) We have recently retrained our supplier compliance team on stronger together principles against modern slavery and continue to attend ethical supply forums overseas with our fruit growers.
- (ix) We have a confidential Whistleblowing hotline and issue confidential staff engagement questionnaires.
- (x) We assess suppliers before engaging with them in business. Suppliers are required to produce copies of their accreditations. Suppliers are asked to complete a self-assessment ethical compliance questionnaire. This consists of questions around working hours, freedom of association, recruitment, accommodation, extended social accountability and health and safety - covering aspects of the Ethical Trading Initiative Base Code. SMETA (Sedex Member Ethical Trade Audits) are carried out on suppliers based upon their risk rating.
- (xi) We are an A/B Member of Sedex and we require suppliers to become members of Sedex (thereby complying with the Ethical Trading Initiative Base Code) and to link to us on the Sedex platform so that we have

- visibility of their ethical status and can better understand compliance, development and risk from an ethical trading perspective.
- (xii) Anti modern slavery posters and leaflets are displayed and accessible to employees on all sites.

3. We intend to implement the following measures:

- (i) Continue to conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) Continue to further evolve our depth of understanding of our supply chains and our suppliers' activities as they relate to ethical trade practices, forced labour and human trafficking;
- (iii) Continue to engage with our suppliers to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses or their supply chains;
- (iv) Continue to introduce contractual provisions in our contracts with our suppliers, obliging them to adhere to anti modern slavery principles and to accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion;
- (v) Continue to require suppliers to become members of Sedex and to link to us on the Sedex platform;
- (vi) Actively and positively support our suppliers' efforts to build strong ethical trade and anti-slavery practices within their own operations, and encourage the development of the necessary resources to make these sustainable;
- (vii) Write and implement an internal company policy on preventing hidden labour exploitation;
- (viii) Work collaboratively with employees on a programme to identify, tackle and report hidden labour exploitation. Continue to equip our people with the necessary skills and resources to assess and recognise the risk of forced labour when forming business relationships and when interacting with our suppliers;
- (ix) Work towards including recognising and reporting human trafficking and other third party hidden labour exploitation in induction training;
- (x) Work in collaboration with our customers to further define common standards and assessments within our supply base that will actively promote a leading standard approach to ethical trade and worker welfare;
- (xi) Revise our Whistleblowing Policy to include reference to modern slavery.
- (xii) Investigate sponsorship of overseas ethical forums to further enable a space to share best practices with our supplier base as well as other exporters and professionals.

Hain Daniels has a zero-tolerance approach to modern slavery and this will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This statement has been put together as part of our commitment to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of directors of Hain Daniels, who will review and update it annually.

Signed: James Skidmore, CEO Hain Daniels Group



Date: 16 January 2020