ABP UK
Modern Slavery Statement.

May 2026

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by ABP UK during the year ending **31st March 2026** to prevent modern slavery and human trafficking in its business operations and supply chains.

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1. About ABP UK

ABP has been providing quality meat to thousands of customers for over seventy years. From humble beginnings in the Republic of Ireland, the ABP Food Group has developed a reputation for quality, efficiency and innovation. These values run throughout the portfolio and have been vital in making sure that we are able to deliver in line with customer and consumer expectations.

ABP UK is a division of the ABP Food Group which, for the last 35+ years has grown to become one of the world's leading food production companies. The UK division proudly employs over 7,000 people across 20 operating sites (including primary processing, retail packing and frozen convenience foods sites) in Northern Ireland, Scotland, and England, with its UK support office in Birmingham. The company structure consists of a central core including Finance, IT, Commercial, Technical, and HR who support the Production Operation at each site.

ABP have a vast array of suppliers, from office milk deliveries for tea and coffee to packaging and labels for our products to be displayed in supermarkets. Our most significant suppliers are those who provide our protein ingredients, such as beef and lamb, other edible ingredients and our labour providers who supply temporary and permanent recruitment solutions. ABP do not own the farms that rear our livestock or the lorries that dispatch our products, but we work with the suppliers that provide these and other services such as security and storage to make sure they understand our policies and supplier requirements. We procure livestock from thousands of farmers across the UK, and we sell our products to retail supermarkets, food service, manufacturing and other wholesale distribution markets around the world.

2. Our Policies in Practice

ABP operates several policies across its businesses to combat modern slavery, which are regularly reviewed and approved by senior management.

The polices are based on the following commitments and standards:

- UN Guiding Principles on Business and Human Rights
- ETI Base Code
- Fair Work Agency's GLAA Licensing Standards
- Responsible Recruitment & the Employer Pays Principle
- The Modern Slavery Act

And we ensure our suppliers adhere to the minimum standards:

- Retailer Codes of Practice
- Fair Work Agency's GLAA Licensing Standards
- The Modern Slavery Act
- The ETI Base Code

We assess supplier performance through a robust due diligence programme that includes routine audits, impact assessments and selfdisclosure questionnaires.

Internal policies are:

- **ABP UK Modern Slavery Policy**
- **Ethical Trading Statement**
- **Human Rights Policy**
- **Supplier Code of Conduct**
- **Responsible Recruitment Policy**
- **Accommodation Standards Policy**
- **Whistleblowing Policy**
- Anti Bribery and Corruption Policy
- **Young Workers Policy**
- Our **Employee Handbook** emphasises our values and outlines the rights and responsibilities for our employees.
- We have a **zero-tolerance policy** on discrimination, harassment, bullying and victimisation.

3. Identifying Risk

Risk

The risk of modern slavery and exploitation within the food supply chain is high, and we recognise our duty of care towards our colleagues to mitigate these risks. Only by identifying these risks can we implement measures to reduce them. Our key risk areas include:

- Labour supply, both locally and internationally, across our sites;
- The farms that supply livestock to our abattoirs;
- Any supplier, particularly beyond the first tier where we do not have direct sight of processes and procedures in respect to the supply of products and ingredients.

Mitigation

There are formal industry standard risk assessments used by our business and supply chains in the context of:

- SMETA social compliance audits across all our operating sites;
- Goods and service SAQ completion and monitoring on the SEDEX platform;
- Customer specific ethical audits and engagement;
- Supplier verification process;
- Labour supply chain due diligence and ongoing management programme;
- Our worker interview & colleague welfare programme.

Ensuring that all our colleagues are aware of the risks of modern slavery and exploitation is our first commitment to reducing risk. By providing information on how to “SPOT THE SIGNS” to all staff, everyone is equipped to recognise issues and understand how to escalate them. Our line managers and HR colleagues are provided with robust training on exploitation within supply chains to ensure that all our recruitment and onboarding activity is conducted in line with our standards. We work closely with our labour supply chain to provide training, support and guidance where required to enable them to meet standards.

Our labour supply chain spans several countries, and continues to be identified as one of our main supply chain risks. We conduct all recruitment directly and through our partner labour agencies, both within the UK and overseas. We recognise that the risks of forced labour, child labour and human trafficking across international borders are present in a number of our source countries. New recruitment opportunities create new risk to our colleagues and our business, and we will continue to implement best practice, improve our procedures and ensure our labour partners uphold our commitments in all aspects of their business.

We will ensure we are prepared for any new risks that could develop, as we continue to diversify our recruitment activities to meet our labour needs.

4. Tackling Risk

We continue to see significant challenges in the labour market, due to the end of free movement and an increase in recruitment activity in different geographic locations within our supply chains. These complex and developing risks are influencing our current and future actions, making sure we are equipped to address them.

ABP continues to lead the way in combatting and mitigating the risk of modern slavery and exploitation in its operation. In our eighth year of reporting, ABP commits to drive innovation, resilience and education on the issue as the threats of modern slavery evolve.

We subscribe to the **MINIMUM** expected measures which include:

- Maintaining A/B membership of SEDEX and active participation in working groups, and all sites subject to SMETA auditing;
- Active user of the Fair Work Agency, previously the GLAA;
- Human rights impact assessments;
- Structured internal audits, risk assessments and worker interviews;
- Multilingual, third party independent whistleblowing line Safecall
- Stronger Together training
- Responsible recruitment assessments

We also go a **STEP FURTHER** to include:

- Partnership with ex GLAA consultants used for all internal site and external supplier ethical audits;
- Grocery Aid and Lyra employee assistance programme
- Worker's voice engagement via various feedback mechanisms;
- "Our Voice" employee group survey, two way dialogue and raising issues
- Customer engagement surveys - giving independent workers voices
- Mandatory internal training delivery via a range of internal and external partners
- Employee dashboard to monitor key indicators of risk, such as site turnover, temporary labour usages, working hours, employee demographics, workplace accidents and other key risk indicators

For our **SUPPLY CHAIN**, we are committed to ensuring that:

- Our nonlivestock supply base are linked via the SEDEX platform, complete their SAQ's and audits
- Our labour partners are committed to our ethical standards through our supply terms and can actively demonstrate this at service review meetings, routine audits and via worker interviews
- Our labour partners are fully committed to the Employer Pays Principle and understand that recruitment is a cost to be borne by business and not the worker
- ABP UK applies a formal Human Rights Due Diligence Framework aligned to the UN Guiding Principles on Business and Human Rights. Full details provided in the addendum to this statement

5. Training & Awareness

ABP remains committed to raising awareness of the issue of Modern Slavery via the following learning opportunities:

- Modern Slavery Awareness training for all colleagues during onboarding & induction;
- More in depth Modern Slavery Awareness, Responsible Recruitment and Supply Chain Transparency training for all line mangers, HR colleagues and employee forum representatives;
- Multilingual Modern Slavery Awareness materials, including posters, flyers and business cards
- Supplier training & support at onboarding.

6. Who we Work with

ABP partner with external consultants who possess extensive expertise in this area, to build our own capability and understanding to maintain our focus on intelligence gathering and detection of any concerning practices and trends arising in our business or the wider supply chain.

- Former experienced GLAA enforcement and police officers;
- Industry peers who help build awareness and share best practice and assist other organisations to adopt good practices to mitigate the risk in the UK as a whole;
- ABP maintain an open dialogue with and provide support to the Fair Work Agency (previously the GLAA);
- ABP participate in various Human Rights Working Groups and undergo regular training with organisations such as the ETI, ALP, CIPD, Stronger Together and SEDEX;
- ABP partner with and develop Labour Providers enrolled on our preferred supplier list to ensure they have processes and systems aligned with our own.

7. Key Performance Measures

Aims

Our Modern Slavery agenda is at the front of our People Strategy, and our established aims and measurable KPI's are incorporated in all site and business objectives. These are:

- To embed ABP UK values and policy relating to tackling the threat of modern slavery and exploitation across the business;
- To take a proactive and visible approach to mitigate the threat, risk and harm of modern slavery and exploitation;
- To maintain a framework of risk assessment, compliance and accountability to identify and maintain best practice;
- To support the retention and wellbeing of employees through improving the working and social environment via regular worker interviews, welfare checks and 'worker's voice' mechanisms;
- Improved levels of engagement via a range of channels leading to improved productivity.

Key Performance Indicators

And in doing so implementing an MS strategy with specific key performance indicators to measure progress by for the next 12 months:

- Risk based Modern Slavery Intelligence model & network for each geographical region in the division which allows a deeper dive into the existing worker interview and welfare programme;
- Keep updated to the risks of modern slavery & exploitation due to changing landscape;
- Human rights impact assessments;
- Ongoing modern slavery awareness training;
- Reduction of turnover of direct and indirect employees;
- Improvement of attraction & retention rates.

8. Looking Ahead

ABP is fully committed to continuous improvement across all areas of the business, and applies this to its approach to reducing the risk of modern slavery and exploitation.

ABP will never deem this matter to be fully closed, as continued labour shortages and changing recruitment practices present new risks, challenges and uncertainty. As labour shortages increase, the cost of living crisis continues and supply chain complexities present themselves, it is critical to ensure ABP and the wider industry fully commit to improving standards, implementing best practice and supporting colleagues.

We have further developed our worker communication channels for raising concerns through the creation of a dedicated ABP UK only number and online platform via our whistleblowing partner, Safecall.

This gives our workers the option to communicate in their own language, as well have the option to choose between communicating via the telephone, or via the online platform, improving accessibility to our staff. Our review process found there to be no modern slavery claims in the relevant period.

9. Conclusion

The Modern Slavery agenda at ABP UK is far reaching and involves a significant investment of both time and money. The challenges within the last 12 months continue to grow in complexity, with the wider reach of our recruitment. The postBrexit and postpandemic landscape continues to impact on and decrease labour availability, and accessing labour only becomes more challenging.

We continue to work closely with the GLAA sharing relevant intelligence through our close network.

Any concerns raised are investigated and flagged up to the relevant authorities where appropriate. During the reporting period, no confirmed instances of Modern Slavery were identified within ABP UK's operations or supply chains. Where concerns are raised, our priority is remediation and the protection of workers, rather than disengagement. Our focus when investigating concerns is always to ensure the ongoing welfare of the workers themselves.

Our central HR teams continue to work closely with site operations to support labour initiatives across the business. We do not work with any suppliers whose values and practices are not aligned with our own.

In accordance with Section 54 of the Modern Slavery Act 2015, this statement has been approved by the ABP UK Board of Directors.

Lindsey Buckley
HR Director

Human Rights Due Diligence Framework.

May 2026

FNET Human Rights Due Diligence (HRDD) Assessment Tool

FNET Human Rights Due Diligence (HRDD) - reporting template			
		Date of completion	**Jan-26**
Name	Phil Tilt	Organisation	ABP UK
Name & role of most senior organisational lead for Human Rights/Ethical Trade:	Phil Tilt - Head of HR Compliance and Ethics	Sustainability Reports/Modern Slavery Statement Links:	https://abpuk.com/responsibility/sustainability/ https://abpuk.com/wp-content/uploads/2024/10/ABP-UK-Modern-Slavery-Statement-2024.pdf
What are our human rights priority areas of focus? (by country/ region/ theme or combination)	*ABP UK's human-rights priority areas focus on:* *Labour supply chains — especially UK and international recruitment corridors, where risks of forced labour, recruitment fees, trafficking and exploitation are highest.* *Upstream livestock-supplying farms across the UK, due to scale, visibility challenges, and environmental conditions that may create human-rights impacts.* *Non-livestock goods and services suppliers beyond tier 1, including labour providers, packaging, ingredients, logistics, security, and accommodation providers — where lower visibility and known sector risks elevate human-rights exposure.*		
Summary of key progress made in last 12 months implementing HREDD approach, including KPIs	In the past 12 months, ABP UK has: Strengthened governance through Board-approved policies, expanded internal audits and HRIA activity. Increased worker protection via multilingual Safecall reporting, welfare interviews and modern-slavery training. Improved labour-supply due diligence, enforcing the Employer Pays Principle and monitoring providers via SEDEX and ethical audits. Enhanced supplier oversight through SMETA audits, SEDEX SAQs and onboarding training. Improved transparency through expanded public reporting and investigation of all raised concerns. Deepened linkages between environmental and human-rights risk assessment via PRISM 2030 data. KPIs achieved: 100% site SMETA audits 100% induction training including MS awareness All labour providers audited by 3rd party (ex GLAA employees) All concerns investigated within the year Expansion of PRISM datasets (350+ supplying farms)		
Overall maturity assessment*	Foundation/ Intermediate		
Assessment of HREDD approach	**Individual section rating****	**Overall rating: Below Foundation/ Foundation/ Intermediate/ Advanced**	**Summary of the 3-5 identified actions to close the gaps towards next level in next 12 months*****
Policy & Commitment **Accountability** **Resource Allocation** **Staff Training**	Intermediate Intermediate Intermediate Intermediate	Intermediate	Consider a phased living wage/income roadmap for direct operations and high risk suppliers. (Align to UNGPs/ETI.) Integrate HREDD risks into the corporate risk register and disclose governance oversight in your annual statement. Add a public objective on Employer Pays & zero recruitment fees
Traceability	Intermediate	Intermediate	Look at whether we can publicly disclose our supply chain mapping for high risk raw materials
Risk Assessment	Intermediate	Intermediate	Publish the outcome of your HRIA/salient risks and describe how actions are updated annually
Taking Action	Intermediate Intermediate Intermediate Intermediate Foundation Foundation	Foundation	Improve our policies and hand books around the changes to Trade Union law as confirmed in the Employment Rights Bill Require time bound supplier action plans for high risk sites and disclose progress. Document how worker committees operate at site level and set annual objectives (representation, minutes with outcomes, % of issues resolved).
Tracking performance	Intermediate Advanced	Intermediate	Align site follow ups to SMETA 7.0 'CAR' findings and report collaborative actions taken (e.g., industry initiatives engaged).
Remedy	Intermediate Intermediate Foundation	Foundation	Look at ways that we can publicly report on grievances and corrective action taken
Communication	Intermediate	Intermediate	add a concise HREDD summary (1–2 pages) for colleagues and suppliers; include feedback channels for continuous improvement to the Modern Slavery Policy

FNET Human Rights Due Diligence (HRDD) Assessment Tool - Policy & Accountability

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Policy & Commitment	Has the business made a formal commitment to ethical trade/human rights and developed or adopted policies covering all internationally recognised human rights across its activities? Has the business identified a human rights strategy?	No/ minimal senior level commitment to human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution)	Business commitment to respect all internationally recognized human rights* outlined in basic policies.	Public commitments made to human rights* referencing international standards.	Public commitments to having a positive impact on human rights* in own operations & supply chain e.g. paying Living Income or Living Wages.	Public policies covering human rights and modern slavery (Modern Slavery Policy, Human Rights Policy, Supplier Code of Conduct, Responsible Recruitment), anchored in UN Guiding Principles, ETI Base Code and GLAA licensing standards; annual aims/KPIs set out in the Modern Slavery statement.	Intermediate	Formalise ethical trade requirements for own operations and suppliers and develop buyer-supplier code of conduct. Ensure human rights consistently includes adverse impacts on human rights resulting from environmental harms. Include human rights/ethical trade in contracts. Consider supplementary policies to cover migrant workers, smallholders, gender child labour response to severe human rights violations and remediation. Circulate it internally, including with worker representatives, for input. Share with customers and selected suppliers for their input. Communicate internally and externally. Develop a set of short and long-term objectives that your business would like to achieve through its human rights approach for own operations and your high-risk supply chains	Policies, Emails, Public commitments
		No policies covering human rights*	Expectations for suppliers to respect human rights* via code of conduct	Business has clear human rights* objectives to address adverse human rights impacts* in own operations and supply chains	Human rights* strategy built into business model.				
					Combined environment and human rights* commitments and objectives.				
Accountability	Is there clear accountability for human rights at Board or equivalent leadership level in the organisation?	No Board or senior leadership owner for human rights*	Board/ senior leaders have basic awareness of human rights*	Champion for human rights* and reporting structure to the senior leaders/ Board.	Board/ senior leaders have (access to) skills, competencies and knowledge in sustainability.	Statement is Board approved; signed by the HR Director; modern slavery positioned "at the front of our People Strategy"; ongoing engagement with GLAA.	Intermediate	Ensure Board level awareness of and support for human rights. Over time, formalise this support and allocate specific individuals to lead this work. Use Board support to manage risks and address root causes.	Training records, Board minutes, Governance Committee terms of reference/ Meeting minutes. Role Job descriptions/ objectives/KPI's
			Regular reporting of human rights* risks to Board/ senior leaders	Human rights* are included in business's risk register	Board/ senior leaders owns the development of business's human rights* and environmental due diligence (HREDD) approach.				
					Audit committee, risk functions / departments and internal audit functions or equivalent in place that consider and monitor sustainability-related risks				
Resource Allocation	Has the company allocated sufficient resources to implement its policies and objectives in terms of people, organisational structure and budget?	No staff leading work on ethical trade/human rights*	Company has defined roles and responsibilities and allocated budget for work on human rights*	Senior manager/s accountable for HRDD approach.	Annual strategic plans with allocated budget and policy implementation embedded across organisation.	Central HR teams, ex GLAA investigators engaged for internal/external ethical audits; multilingual, independent whistleblowing (Safecall); mandatory training; "Our Voice" worker voice and welfare interview programme; supplier verification.	Intermediate	Identify a senior manager with sufficient interest and influence to support the development of a human rights due diligence approach. Ensure they have sufficient guidance and training to carry out their role. Over time, embed responsibility across the organisation and build cross-functional groups. Link progress on human rights to performance incentives.	Organisational structure, performance review documents, Document outlining defined roles and responsibility. Workplan/Annual strategic Plan
				Operational lead/s responsible for HRDD implementation part of job description and workplan.	Relevant staff, incl. top management and operational leads have performance linked to implementation of the policies and HRDD.				
				Budget and technical resources are reviewed annually to ensure sufficient to meet HRDD objectives.	Financial planning aligned to human rights* objectives ensuring credible resourcing plans to support implementation.				
				Cross business governance committee is in place to oversee the execution of HRDD policies & procedures and report to senior management on					
Staff Training	Have staff and workers received guidance or training on human rights? Are those staff responsible for implementing the policies sufficiently experienced, trained and accountable to senior management?	Staff have no/minimal awareness about human rights*	Relevant staff have basic human rights awareness and know how to identify and report human rights* risks	Relevant staff including senior managers and operational leads receive regular human rights* training and have performance KPIs or targets linked to the implementation of the policies and HRDD.	All relevant decision makers in other departments beyond company management (e.g., procurement, supply chain) receive targeted refresher training to be aware of emerging risks and expectations	Induction training for all colleagues; deeper modules for line managers, HR and forum reps; multilingual awareness materials; supplier onboarding training.	Intermediate	Draw up a list of high-priority staff and workers to receive guidance and training on human rights. Identify suitable guidance and share it with staff. Identify internal or external training providers and carry out training. Establish some metrics to measure if the training is effective. Identify an Exec or Non-Exec board member to champion the business's human rights approach. Ensure they have sufficient guidance and training to carry out their role and that human rights risks are recognised by the business.	Evidence of staff attendance at a capacity building event, e.g. webinar, workshop, training, or evidence of staff experience in HRDD issues, e.g. staff CVs. Governance Committee terms of reference/ Meeting minutes. Role Job descriptions/ objectives/KPI's
					Culture built that aligns with strategic ambition and transition plan				

*includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution
HREDD - Human Rights and Environmental Due Diligence

FNET Human Rights Due Diligence (HRDD) Assessment Tool - Traceability

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Traceability	Has the business traceability systems for high-risk raw materials that enable it to assess human rights* risks, and to ascertain that the production and processing units of origin comply with the company's commitments and policies, or to determine the extent and nature of issues that must be resolved?	No/minimal documented traceability system in place	Basic traceability of high-risk supply chains and services in place	Business traceability reaches back to the production and processing units of origin for all high-risk raw materials.	Public disclosure of supply chain mapping for high-risk raw materials.	Livestock sourcing in the UK is inherently traceable back to farm; PRISM 2030 evidences farm level datasets and engagement; non livestock suppliers are linked via SEDEX SAQs/audits.	Intermediate	Written traceability policy, plan or statement. Gather names of Tier 1 suppliers and as many tiers of suppliers as you are able to collect down to raw material, farm or vessel level/Location of suppliers/Ownership of suppliers' businesses/Use of labour providers or service providers/Presence of sub-contracting/Use of warehousing and logistics/ rightsholders and their representative organisations	Written traceability policy, plan or statement, Supply list/mapping, Weblink showing public disclosure of supply chain
				Business discloses traceability information to its buyer as required and is progressing towards a complete mapping for high-risk raw materials (at least 50%)	Business traceability reaches back to farm level for high-risk raw materials.				
					Business revisits traceability work on an ongoing basis, especially before key moments in business planning				

*includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution
HREDD - Human Rights and Environmental Due Diligence

FNET Human Rights Due Diligence (HRDD) Assessment Tool - Risk Assessment

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Assessment of actual and potential adverse impacts on people*	Does the business conduct human rights* risk assessments to identify the salient (priority) issues, high-risk commodities, high-risk geographies, and high-risk supply chain tiers and operations?	No, or very basic (i.e. only countries identified and own-operations), risk assessment developed to identify human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution) risks in own operations or supply chains	Basic human rights* risk assessment developed, and used to define salient (priority) issues, high-risk raw materials and high-risk geographies for own operations and supply chains.	Detailed risk assessment of own operations and of supply chain started with Tier 1 and key raw materials. Risks in supply chain are verified using third party audits, engagement with workers or their representatives and consulting with experts.	Detailed risk assessment covers all suppliers and a 'double materiality' approach is used to guide decision making.	Clear salient risk areas (labour supply domestically and internationally; farms; beyond tier 1); SMETA at all ABP sites; SEDEX SAQ monitoring; supplier verification; worker interviews; Human Rights Impact Assessments.	Intermediate	Identify, access, prioritise and mitigate. Map in what you know using internal and external sources of information that indicate the severity and probability of human rights risks. Identify different risks faced by women, minority groups and smallholders in consultation with rights holders and/or their credible proxies (e.g. civil society, IPLC representatives, unions etc. Use tools, for example audits, visits, worker voice technology and worker surveys, to verify your high-risk issues. Prioritise suppliers and raw materials where human rights risks are greatest and where the business has the leverage to act. Review and update Risk assessment every 3-4 years to ensure that emerging salient issues are accounted for (e.g., political unrest, mass migration, war etc.). Use Google alerts, FNET news etc to identify emerging human rights risks for own operations and key high-risk suppliers.	Risk assessment, evidence of a horizon scanning monitoring system for changes in adverse impacts on human rights, Weblink to public risk assessment and list of salient issues, Records of consultations and stakeholder list, OR List of rightsholders, and credible proxies (e.g. IPLC representatives, CSOs, unions etc) engaged with during the risk assessment process, Subsequent assessment reports (every 3-4 years to check if human right issues have shifted).
			Risks are verified using self-assessment questionnaires and audits of own sites and labour providers.	Further in-depth investigations are conducted in high-risk geographies/sectors to verify and develop a deeper understanding of root causes behind salient human rights* issues and identify supply chain tiers which are at high-risk (own operations, Tier 1 supply chain, upstream supply chain).	Company regularly reviews changes in human rights* risks and updates their risk assessment and actions accordingly.				
			Own operations are prioritised		Business includes consultations with rightsholders (in supply chain not just own operations) and makes public outcome of risk assessments and identification of salient human rights* issues.				
					Tools such as human rights* impact assessments are used to understand root causes of adverse human rights* impacts - can be done in partnership with other companies with shared supply chains.				

*includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution
HREDD - Human Rights and Environmental Due Diligence

FNET Human Rights Due Diligence (HRDD) Assessment Tool - Taking Action

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Contracting & business relationships	Does the business take human rights* considerations into account when deciding to engage, renew, expand or terminate business relationships?	Purchasing practices do not include human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution) risks, requirements or performance	Ethical trade/human rights* referred to in Terms and Conditions, new supplier onboarding and at tendering stage	Maturity of the business's Tier 1 suppliers' approach to human rights* risks, considered as part of procurement decisions and evaluated on a regular basis	Procurement decisions factor in the true cost of labour, cost of production and impact on the environment and people.	Ethical standards embedded in supply terms; Employer Pays principle enforced for labour partners; SEDEX linkage across non livestock suppliers.	Intermediate	Consider what specific incentives (e.g. price premiums, increased orders or longer contracts) are offered to business relationships to support adoption of human rights. Does the business ask suppliers for feedback on their buying practices and act on it? Establish champions or leaders in Procurement for this work	Procurement Policy, New supplier onboarding requirements/communication, Supplier Survey and action plan to address issues.
					Feedback gathered from suppliers on impact of business's sourcing decisions				
Supporting suppliers	Does the business actively support Tier 1 suppliers to understand Human Rights Due Diligence requirements and management best practices?	No/minimal communication	Basic guidance provided to suppliers on key human rights* issues through training or toolkits	Business is supporting suppliers with awareness-raising and invests in supplier capacity building to address gaps identified, including training, development of collective networks etc.	Business invests in capacity building of high-risk suppliers to prevent or reduce human rights* risks.	Onboarding support, training, preferred labour provider list with alignment expectations; use of external specialists to build capacity.	Intermediate	Is the business supporting suppliers to understand its expectations through awareness raising communications, events, training, onboarding, sharing of best practice tools and collaborative programs?.	Emails, training, Cascade requirements, records of scale of financial investments, #s of suppliers taking training, training feedback surveys
					Tier 1 suppliers are held accountable for setting up their own HRDD systems and using the outcomes to trigger remediation and mitigation within their operations and supply chain.				
Collaboration	Does the business collaborate with others to prevent and mitigate human rights risks?	No collaboration with industry groups or multi-stakeholder initiatives	Collaboration through collective action projects on human rights issues* for own operations to address risks (no financial investment)	Collaboration with supply chain peers, as well as suppliers and buyers, to achieve impact at pace and scale on priority human rights* risks (financial investment)	Industry collaboration that supports broader systems change across key material issues.	Active member of GLAA User Group; engagement with ETI, ALP, CIPD, RRT and SEDEX working groups; use of Stronger Together training resources.	Intermediate	Collaborations should be identified which fit with your salient risks and which will help to tackle systemic issues that cannot be tackled alone by the business. Consider multi-stakeholder initiatives and partnering with others for leverage	Terms of references, membership records, impact reports
					Industry investment, funding and knowledge sharing				
Action plans	Does the business have a time-bound action plan based on the risk assessment and root cause analysis to address negative human rights* in own operation and supply chain?	No action plan in place.	Company has an action plan for own operations, labour and service providers to demonstrate how they prevent, mitigate, and remediate any high-risk salient human rights* issues and close any gaps identified in their management systems.	Business has time-bound action plan for ongoing steps with its Tier 1 and high-risk suppliers to avoid and reduce adverse human rights* risks with assigned responsibilities and allocated budgets. External expertise used when carrying out human rights due diligence	Action plans to prevent and address (potential) adverse human rights impacts* in own operations or supply chains made public.	12 month MS strategy with KPIs (awareness, HRIA, training, turnover/retention). Time bound supplier action plans aren't publicly detailed.	Intermediate	SMART Action plan is in place to manage identified risks. Given many risks are bigger than one organisation, mitigations should include collaboration with other industry actors too.	Timebound Action Plan, Progress report, Baseline Report of critical gaps, including root cause analysis and list of supply chain actors and external stakeholders identified to reflect on the root causes of the systemic issues, Meeting minutes of decisions taken with local stakeholders, Tier 1 supplier action plans.
		Sole reliance on ethical audits (including third party)			All in-scope Tier 1 suppliers have an action plan in place to demonstrate how they prevent, mitigate and remediate any high-risk salient human rights issues.*				
					Strategy and business model adjusted to align with relevant local, national and global public policy goals e.g. climate transition plans that incorporate a just transition				
Effective workplace representation	Does the business actively support effective workplace representation in own operations and supply chain?	No union meetings take place	Positive attitude towards worker committees and trade unions promoted.	Effective worker representation promoted in own operations and supply chains	Collective Bargaining.	"Our Voice" survey/two way dialogue indicate positive worker representation; public data on union engagement/collective bargaining is limited.	Foundation	All workers are represented including temporary and agency workers, different nationalities, genders, shifts patterns and areas of business. Review minutes for evidence of at least 2 changes made to pay structures and/or working conditions as a result of workers bargaining collectively. Where a worker committee (WC) look for the following; More worker reps than management reps; Role of the committee and reps is defined and understood; All workers know who their WC rep is and how to contact them; Minutes include how and when actions were implemented, changes that happened and how those were communicated to the workforce; WC performance reviewed annually and annual objectives set and reviewed;	Induction training, Worker representative training, Minutes of meetings with Worker representatives, Worker survey, Collective Bargaining agreement.
			All workers in own operations and are informed of their rights as part of induction.	Rightsholder-informed approach taken to prevention and mitigation	Meaningful participation and representation of women and minority groups promoted in worker committees and trade unions				
New Product Development/ Innovation	Does the business include human rights* considerations in new product development/ innovation?	No inclusion of human rights* in product development or innovation	New product development and innovation consider human rights*	Work with supply chain to finance and support the implementation of innovation to reduce adverse human rights* impacts	Working proactively with supply chain to develop and provide products and services that minimize adverse human rights* impacts	ABP communicates innovation in product development, but public material doesn't yet show explicit human rights considerations embedded in gated NPD processes.	Foundation	Build human rights into gated process for NPD and innovation. Support suppliers to understand and implement requirements. Identify quick wines and case studies to share through supplier portals/ events.	Internal procedures, supplier manuals/ procedures/ supplier policies, supplier training records. financial records.

*includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution
HREDD - Human Rights and Environmental Due Diligence

FNET Human Rights Due Diligence (HRDD) Assessment Tool - Tracking Performance

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
System for tracking performance	Does the business have a system for tracking and evaluating human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution) performance and impact?	No measurement of information about workers in own operations or supply chain.	The business is monitoring the implementation of its action plan to address human rights* in its own operations including awareness raising, training and working practices	Information monitored is expanded and broadened to include implementation of actions, outputs and working practices in your high-risk Tier 1 supply chains.	Outcomes and impact of your HRDD approach measured and evaluated through a mix of qualitative and quantitative data.	Employee dashboards (turnover, temp labour, hours, accidents, demographics), SAQ/audit monitoring and worker voice mechanisms; annual KPIs.	Intermediate	Identify what information you are collecting about workers in your own operations including audit findings, health and safety and human resource indicators for example absenteeism, worker turnover, worker satisfaction, number of reported health and safety incidents and accidents, overtime hours. Identify the information you are collecting about workers in your high-risk Tier 1 supply chains for example audit findings and indicators through the Sedex Self-Assessment Questionnaire (SAQ) or your company's SAQ. Identify existing tools used to measure your HRDD activities, for example the Stronger Together Progress Reporting Tool. Identify gaps in the information you have, for example data broken down by gender or outcomes of training activities or action plans to address audit findings. Look at trends in the information you are collecting and ask yourselves what that information is telling you about working practices in your own operations, supply chain and your ethical trade activities. Identify any gaps in the information and what other information you need in order to know that you are achieving your objectives, for example providing decent work in your own operations and not having any adverse human rights impacts or raising awareness of human rights issues	Monitoring Protocols and Tools, Impact measurement progress report
		Sole reliance on ethical audits	Risks are verified using self-assessment questionnaires, worker voice and audits of own sites and labour providers.	Business analyses trends in own operations and supply chain KPIs and reports internally to inform governance decision making on existing and future activities.	Business integrates monitoring information into strategic and long-term planning linked to sourcing decisions, future finance and restructuring of supply chain.				
					Reporting integrated into internal and external annual performance.				
					Tier 1 and high-risk suppliers are supported to monitor the impact of their work on human rights*				
External evaluation	Does the business subject its HREDD management systems to an independent external evaluation?	Sole reliance on ethical audits	The business conducts a self-assessment to validate whether actions in timebound action plan have been implemented in its own operations.	The business is assessed by a second party to validate whether actions in timebound action plan have been implemented in its own operations and supply chain.	The business uses third party independent verification to validate the effectiveness of management systems and implementation in its own operations and supply chain and periodically reviews the continued relevance of objectives, targets and strategies	All sites subject to third party SMETA audits; plus second party/internal audits by ex GLAA experts.	Advanced	Establish internal or externally supported processes for reviewing and validating progress. Align stakeholders internally on process and reporting structure. Ensure assessment generates an action plan. Identify credible third parties to provide support	Self-assessment/Second/ Third party verification report

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FNET Human Rights Due Diligence (HRDD) Assessment Tool - Remedy

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Grievance mechanisms, response and remedy	Have you established effective grievance mechanisms for workers in your own operations and supply chains to access remedy?	No grievance mechanisms or whistleblowing channels	Formal grievance mechanisms and whistleblowing mechanisms in place in own operations.	Formal grievance mechanisms and whistleblowing hotlines in place in own operations and your Tier 1 suppliers.	The grievance mechanism is applicable to all the agricultural commodities that the business sources.	Multilingual, independent Safecall (telephone and online) with ABP UK specific number; investigations escalated to authorities as appropriate.	Intermediate	Are workers aware of their rights and the grievance mechanisms? Is the company's grievance mechanism aligned with the eight effectiveness criteria of the UNGP? Does the company communicate the grievance mechanism to the company's supply chain? Does the company provide a safe and anonymous escalation pathway to raise issue directly by anyone when harm is caused in its own operations or supply chains? Are significant numbers of complaints or grievances being brought in a reasonable period after the grievance process is set up? Are grievances correctly addressed (investigations, follow-up checks, communications to the workers concerned)? Is there evidence over time, of a decrease in the number of grievances of the same or similar nature?	Written grievance procedure and system, Company contract with clause covering grievance mechanism, Evidence of action taken to provide remediation
				Supplier contract/code of conduct has clause covering grievance mechanism.					
Documented procedure	Does your business have a documented procedure on how you will investigate and remediate human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution) issues?	No response plan to deal with adverse issues	Basic response plan developed for how you would deal with severe human rights* violations in your own operations, including remedy, which is written down and communicated to relevant staff.	Remediation plan for severe human rights* violations, in own operations and supply chains.	Business has a responsible divestment/ exit strategy in place which includes engaging with rightsholders. Business analyses cases of adverse human rights* to minimize reoccurrence.	Policies and clear investigation approach evident; a standalone, public severe harm remediation/response plan isn't currently in place.	Intermediate	Conduct internal investigations into any allegations of human rights issues in your operations and supply chain. Consult authorities or contract third parties to investigate allegations where required. Support Tier 1 suppliers to investigate any allegations of human rights issues in their operations. Develop a Response Plan for dealing with severe human rights issues including forced labour which includes the contact details of local authorities and support organisations and trusted interpretation arrangements where necessary. Ensure all staff are aware of the Response Plan and know their roles and responsibilities	Response plan, supplier cascade
			Business has a process to understand its involvement in each (potential) adverse impact: causation, contribution or direct linkage	Business provides for, or co-operates in, addressing adverse impacts as necessary where it has caused or contributed to adverse environmental and human rights* impacts.	Tier 1 suppliers encouraged to develop remediation policies for severe human rights* violations.				
				Business uses its leverage to encourage Tier 1 suppliers and labour providers to develop response plans for severe human rights* violations.	Key raw material suppliers encouraged to develop response plans for severe human rights* violations				
Effectiveness of response	Does your business measure the effectiveness of your response and remediation and identify opportunities for improvement in your due diligence processes?	No grievance log or remediation action status	The business has a grievance log of issues raised and remediation action status	The business reviews the effectiveness of grievance actions and identifies opportunities for improvement in due diligence processes and encourages the supply chain to adopt the same approach.	Effectiveness of grievance mechanisms with workers in your own operations and high-risk Tier 1 supply chains are evaluated and any gaps addressed.	Public reporting of grievance volumes, resolution rates and remedy outcomes is limited; internal case handling is described.	Foundation	Agree corrective actions to resolve issues in own operations raised by workers or third parties e.g. audits. Implement corrective actions within the timeframes agreed with workforce. Gather feedback from workers involved that that issues have been satisfactorily resolved. Where allegation of severe Human rights issues, engage with impacted workers and their representatives where safe and authorised to do so, to determine appropriate remedy. Companies should not undermine investigations by the authorities. Report internally on the frequency by which workers use your operational grievance mechanisms, nature of issues raised and how they are resolved. Use annual worker surveys to understand workers' views on the effectiveness of grievance resolution in your own operations. Where feasible and relevant, gather feedback from victims of severe human rights violations in your own operations about your grievance and remediation processes. Support Tier 1 suppliers to measure and report internally on the frequency by which workers use their operational grievance mechanisms, nature of issues raised and how they are resolved	Grievance log
				Business reports publicly on some grievances and remediation action taken.	The business publicly reports on all grievances and remediation actions taken.				
					Evidence the business takes action, using its leverage and collaborative efforts to remediate harm to people and/or the environment caused by or linked to the company, directly or indirectly				

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FNET Human Rights Due Diligence (HRDD) Assessment Tool - Communication

Criteria	Requirement	Below Foundation	Foundation	Intermediate	Advanced	Rationale for assessment	Self-Assessment	Advice	Evidence
Communication	Does the business publicly reports on its human rights (includes adverse impacts on human rights resulting from environmental harms e.g. heat stress, water scarcity, air pollution) risks, Human Rights and Environmental Due Diligence (HREDD) management systems and progress made?	No public reporting of HREDD approach.	Legal reporting requirements met and progress on HREDD communicated to workers, managers and suppliers	Public facing report developed which summarises business's work on human rights*.	Reporting and communication promotes best practice between suppliers.	Annual Modern Slavery statements; extensive sustainability reporting (PRISM 2030, environmental targets) with clear narrative and metrics; internal channels for workers and suppliers referenced	Intermediate	If required by national law, submit legally required reports on modern slavery and/or human rights due diligence. Communicate the information you think your workers will be most interested in hearing about. Use existing communication channels in your own operations e.g. worker briefings, noticeboards, worker committees. Communicate progress in identifying and tackling human rights issues to colleagues, including technical, procurement, supply chain, legal and human resource colleagues and suppliers. Gather feedback from colleagues and suppliers on the challenges they face supporting the business's human rights due diligence approach. Develop one page document which summarises your work on human rights in your own operations over the last year, what risks you have identified, how you have managed those risks and ongoing challenges and share with customers Develop public facing report (standalone or part of your sustainability or annual report) which summarises your work on human rights in your own operations and your supply chain over the last year, what risks you have identified, how you have managed those risks and ongoing challenges.	Weblinks, public reports
				Reports to external stakeholders as required to help inform industry performance and systems change. Publicly advocates to producer and consumer country/regional governments and authorities for policies and investments e.g., licensing of	Business communicates the results of HREDD to stakeholders and rightsholders with appropriate and accessible content and formats				

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