



ABP Anti-Slavery and Human Trafficking Policy

1. Introduction

As a Group, ABP Ireland maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. In the light of Irish, Polish & UK general law on employment and human rights, and, more specifically, the UK Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

2. Purpose of this Policy

Modern Slavery is a broad term used to encompass the offences of slavery, servitude and forced or compulsory labour and human trafficking.¹ While varied in nature, all involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.²

ABP Ireland has adopted a number of policies and practices across the business with the aim of preventing modern slavery and human trafficking e.g Code of Conduct.

This policy governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all or who have, or seek to have, a business relationship with ABP Ireland and/or any member of our Group, to familiarise themselves with our anti-slavery values and policy and to act at all times in a way which is consistent with our anti-slavery values and policy.

This document sets out the policy of ABP Ireland with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

3. Anglo Beef Processors Ireland Anti-Slavery Value

As part of our culture of good governance for good business, at ABP Ireland we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and team members.

We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

We are dedicated to combatting and mitigating the risk of modern slavery and exploitation in our business operation and the wider supply chain.

Our attitude to modern slavery is: zero tolerance. We at ABP Ireland, continue to collaborate with our customers, suppliers and external partners to drive a leading approach to this issue. We are committed to acting ethically and with integrity in all our business dealings and relationships and to

¹ See OHCHR Abolishing Slavery and its Contemporary Forms – David Weissbrodt and Anti-Slavery International.

² For a model definition of terms see Article 5. UNODC Model Law against Trafficking in Persons.



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

4. Tackling Risk in Anglo Beef Processors Ireland

4.1 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 Irish employment law. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and continually 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.

4.2 We are active members of The Supplier Ethical Data Exchange (Sedex). Sedex is a not-for-profit membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains. Sedex was founded in 2001 by a group of UK retailers to drive convergence in social audit standards and monitoring practices. All of our sites are subject to SMETA (Sedex Members Ethical Trade Audit) auditing.

4.3 ABP Ireland is an active member of the GLAA licensing group. The Gangmasters and Labour Abuse Authority, is the foremost investigative agency for labour exploitation in the UK. Its role is to work in partnership with police and other law enforcement agencies to protect vulnerable and exploited workers.

4.4 ABP Ireland provide a Whistleblowing Hotline which is available 24/7 and publicised in all of our sites. This hotline provides a confidential line for employees to raise any concern that they may have. You should call this line in any of the following circumstances:-

- You suspect a person acting on behalf of ABP Ireland or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of ABP Ireland or one of our businesses who has invited you to participate in acts which could result in offences under Irish and Polish law being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of ABP Ireland or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of Irish law. Reports to the Whistleblowing Hotline are kept in confidence, subject to the need for ABP Ireland to act responsibly and within the law.

4.5 The Company encourages members of the public or people not employed by us to write, in confidence, to the Company Secretary or the Company's Head of Human Resources at 14 Castle Street, Ardee, Co. Louth to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

4.7 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4.8 All of our stakeholders have an obligation to familiarise themselves with our procedures and policy to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all stakeholders obligations under their contract of employment.

5. Action Plan on Tackling Risk

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- (i) 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) Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- (iii) Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- (iv) Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.



6. Responsibility for the Policy

- 6.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 6.2 Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

