

Modern Slavery Statement



This statement relates to the financial year ended 31 December 2020.

As a responsible and caring business, we strive to ensure the human rights of those who produce our ingredients are upheld to the best of our ability. We know that we need to constantly monitor human rights and this report sets out how we will achieve this.

Published in accordance with the Modern Slavery Act 2015, this statement outlines the steps taken by The Bart Ingredients Co Ltd (The Company) to prevent modern slavery and human trafficking throughout our business and our supply chains.

- The Company commits to providing customers with goods that have been produced in safe working conditions, lawfully and without exploiting the people who made them.
- We believe that our biggest potential exposure to modern slavery is in our product supply chains, where we will continue to undertake due diligence to minimise this risk.
- Our Code of Conduct has been formally documented and is shared with our suppliers to demonstrate our commitment to responsible ethical management and encourage likewise behaviour from our suppliers.
- We encourage our suppliers to work to the principles of the Ethical Trading Initiative (ETI) Base Code and to monitor and report their status on the SEDEX portal.
- Our Food Defence and Supply Chain teams will continue to visit our main suppliers and factories to further our working relationship and involvement within our supply base. We will continue to prioritise visits to factories based on higher risk areas and are committed to increasing the transparency within our supply chain. In addition, we ask our suppliers to provide updates on their performance and compliance status and monitor responses. Supplier performance reviews are reported to the most senior level in The Company and are used to drive continuous improvement.
- We have a weekly review of food safety risks which includes consideration of ethical concerns and the potential impact on consumer concern. Controls and improvement strategies are shared in response to changing risk and best practice measures are shared with relevant suppliers. Trending of risk information is undertaken to understand and enable forward improvement plans to be developed.
- Within our own sites, The Company provides Modern Slavery Awareness training to those who manage high numbers of employees. Awareness posters, guidelines and ways to report any modern slavery or trafficking concerns are displayed around the premises and highlighted to employees during induction.

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- The Company carries out third party SMETA ethical audits of our sites on a bi-annual basis and an annual independent audit of Company financial accounting is also conducted. Additionally, customer and third-party audits of our Company operations and facilities are regularly undertaken and are openly and faithfully assessed. Local and national authority audits also take place on demand and are fully supported and embraced. These audits are used as a framework for continuous improvement of ethical performance.
- The Company is committed to continuing to address and minimise the risk of modern slavery and human trafficking within our business and supply chain. We will continue to review our policies and processes throughout the next financial year.

This statement was approved by the Board of Directors of The Bart Ingredients Co. Ltd on 18 March 2021.

Signed: David Collard, CEO

Date: 18.03.2021