



## **Modern Slavery and Human Trafficking**

### **Policy Statement**

Barnett-Hall is an organisation which acknowledges its responsibilities in relation to ethical business activity and in tackling modern slavery within our supply chain or in any other part of our business. Our policies and our interaction with colleagues, as well as suppliers and customers, continue to reflect our commitment to acting ethically in all our operational matters. We strive to ensure that we, and our supply chain, act in compliance with the Modern Slavery Act 2015 and have continued to monitor such compliance.

### **Our Business**

Barnett - Hall is a joint account business comprising of W & R Barnett Trading Limited and R & H Hall Trading Limited. W & R Barnett Trading Limited is a subsidiary of W. & R. Barnett, Limited, and R&H Hall Trading Limited a subsidiary of Origin Enterprises Plc. Barnett and Hall have been leading suppliers to the Irish feed industry of grain and non-grain feed ingredients since 1896 and 1839 respectively.

### **Due Diligence**

We have:

1. undertaken a risk assessment, of areas within our businesses and our supply chains identified by the legislation, with particular focus on child labour, forced labour, health and safety, workers' rights, diversity and minimum pay; and
2. taken steps to assess and manage the risks identified including:
  - a. auditing our supply chain and recruitment agencies we use (as outlined below);
  - b. providing training to members of the team, management and board members;
  - c. complying with our Slavery and Human Trafficking Statement; and
  - d. adhering to our Modern Slavery and Human Trafficking policy.

### **Assessing and managing risk**

Through our risk assessment, we consider that recruitment (direct and indirect) and supply chains are key areas which our business must control in order to limit risk of slavery and human trafficking.

Specifically and in relation to our supply chain, we have used the 2018 Global Index Data to identify high risk countries where our suppliers may operate. We source grains and non-grains from suppliers world-wide and we audit high risk suppliers annually to identify whether they present any concerns regarding modern slavery. To manage this risk and to ensure those within our supply chain are also aware of their obligations, we have rolled out a compliance initiative as part of our Quality Assurance programme and vendor approval process. Our ethical trading risk assessments now form an integral part of the approval process for new vendors; and will include annual spot checks for

approved vendors. In the financial year past, we reviewed our supply chain audit process and expanded the reach of our audit sample.

In relation to recruitment, we complete thorough checks on recruitment agencies we use and on prospective employees. These checks are designed to identify any concerns relating to modern slavery and/or human trafficking and such processes are more specifically outlined in our Slavery and Human Trafficking Policy.

#### **Effectiveness of our procedures**

To measure our effectiveness in ensuring that modern slavery is not taking place in our business or supply chains, we compile the responses received from our audit questionnaire so these can be assessed. This process allows us to identify any concerning responses received, compare these with previous responses, and follow up with any entities, if required. We include these responses in our annual modern slavery report which assists us to assess the measures we have taken to seek to combat modern slavery.

#### **Training**

We continue to train our staff on the issue of modern slavery within our supply chains and across our business, extending the reach deeper into the organisation.

#### **Policies**

We are committed to addressing modern slavery and ensuring ethical compliance, and have developed policies which reflect the values we adhere to as a business. We are currently reviewing our modern slavery and human trafficking policy and we aim to have any changes approved by the board by end of Q2 2021. This will subsequently be incorporated in our employee handbook in and around Q3 2021. We also intend to have managers trained on this new policy so they are aware and refreshed of their responsibilities. These policies have been made available within our staff handbook, and include a provision to address a safe mechanism for whistleblowing. Relevant policies can be made available to third parties on request.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year ending July 2020. This statement was reviewed and approved by the Board on the 4<sup>th</sup> of December 2020.

Ryan McAuley



Chief Executive  
W & R Barnett Trading Limited, R & H Hall Trading Limited  
19<sup>th</sup> January 2021