

NORTH WEST SILOS LIMITED

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Modern Slavery and Human Trafficking

Policy Statement

North West Silos Limited is an organisation owned by W. & R. Barnett, Limited. North West Silos Limited 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

North West Silos Limited is a dormant holding company, which has two trading subsidiary companies; McCaughey Russell and Baird Limited (the principle activity of which is the trading of proteins and cereals) and DT Russell and Baird (Ireland) Limited (the principle activity of which is operating its stores, stevedoring and receiving of goods).

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

We have 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. North West Silos Limited has not itself traded or manufactured within the period of August 2019 through July 2020 and thus no audit has been necessary. However we remain committed to compliance with the Modern Slavery Act 2015, and will ensure if trading recommences, those within our supply chain are also aware of their obligations, as within group activities we continue to roll out a compliance initiative as part of our Quality Assurance programme and vendor approval process. Any new trading activity will take account of our ethical trading risk assessments, which now form an integral part of the approval process for new vendors across our businesses. Additionally, we are continuing to review and update our audits annually and include annual spot checks for approved vendors.

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, including our Modern Slavery and Human Trafficking Policy. 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 4th of December 2020.

Claudine Heron



Chief Executive of Commodity Trading Division
North West Silos Limited
15th January 2021