

Introduction

Bart Ingredients is committed to minimising risks of human trafficking and modern slavery within our business supply chain. 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 minimise modern slavery and human trafficking throughout our business and our supply chains.

Our business and supply chain

The Company is a cooking ingredient manufacture and has sites in Bristol and Newbury.

- 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 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.
- Our Food Defence and Supply Chain teams visit our main suppliers and factories to further our working relationship and involvement within our supply base. We 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.
- We adhere to the principals of the Ethical Trading Initiative (ETI) Base Code.
- 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.
- Both our sites are required to have a third party SMETA ethical audit 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. To date none of these audits have flagged any modern slavery or human trafficking issues.
- Both our sites have a workers committee which provides people to have a platform to speak along with an anonymous suggestions box.

- The Company has a whistleblowing policy which is available in the employee handbook and noticeboards.
- 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 on an ongoing basis.

Training

The Company recognises the importance of ensuring employees understand human trafficking and how to report it. Modern Slavery Awareness training is carried out by those who manage employees. During the induction process new employees are provided with human trafficking awareness and guidance. Awareness posters, guidelines and ways to report any modern slavery or trafficking concerns are displayed around the premises and highlighted to employees during induction.

Going forward we will continue to build on our employee awareness of Modern Slavery.

Temporary Labour Providers

Although we believe that permanent employees limits the risk of human trafficking the Company needs to use agency workers to fill short term requirements. The Company is aware that this could bring a higher level of risk. To mitigate this, we work closely with our carefully selected agencies who are registered members of the Gangmasters Licencing Authority. Both the agency and the Company carry out rigorous right to work checks. Regular audits are completed with the agency and interviews carried out with the agency staff to detect any cases of modern slavery or human trafficking.

This statement has been approved by the board of directors.

Signed:



Dated: 30/06/2023