



W&R Barnett Holdings Limited Modern Slavery and Human Trafficking Statement 2022

Background

W&R Barnett Holdings Limited is the holding company of W. &R. Barnett, Limited (the parent company of a diversified group of international commodity trading, storage and agribusiness and industrial manufacturing companies) and its subsidiaries (whether direct or indirect) (together the **W&R Barnett Group**).

Under section 54 of the Modern Slavery Act 2015 UK there is statutory obligation for increased transparency in supply chains, and a requirement that any organisation, in any part of a group structure that supply goods or services with a turnover of £36 million or more; produce a "Slavery and Human Trafficking statement" in each reporting period. Such an organisation has an obligation to make a statement within 6 months of their year-end, indicating their position, policies and diligence in relation to Modern Slavery. The UK Government are proposing creation of a mandatory reporting period in line with the fiscal year, and as a group we are moving voluntarily to that reporting period in preparation. The statements published reflect the transitional period for our business.

This is our seventh year of producing Modern Slavery statements for entities within our group, with the most recent statements being prepared for signature on 29th September 2022 for the period August 2021 to March 2022. These statements are published in accordance with the Modern Slavery Act 2015 and they set out the steps taken by the W&R Barnett Group during the financial period ending 31st of March 2022 to seek to prevent Modern Slavery in its business and to the greatest extent possible, in that of its supply chains.

Policy Statement

W&R Barnett Holdings Limited acknowledges their responsibilities in relation to ethical business activity and tackling Modern Slavery within their supply chain and 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 continue to review our approach annually, striving to ensure that we act in compliance with the Modern Slavery Act 2015 and have and will continue to monitor such compliance.

Group Divisions of the W&R Barnett Group

- **United Molasses**
- **John Thompson and Sons**
- **Barnett – Hall (including Precision Liquids)**
- **Logson**

All companies outlined above are responsible for producing their own annual modern slavery report, which is entirely separate from the W&R Barnett Holdings Limited and W.&R. Barnett Limited report.

Due Diligence

As part of our modern slavery due diligence, the past year has seen an increased focus on ensuring a coherent understanding of Modern Slavery legislation across the various Senior Management and Director groups. In addition each of the group divisions (as identified above) have taken the following steps:

1. Undertaken a risk assessment of areas within the business and the various supply chains 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 their supply chain and recruitment agencies used;
 - b. providing training to members of their team, management and board members, and in particular reviewing the induction for new employees;
 - c. complying with their Slavery and Human Trafficking Statement;
 - d. adhering to their Anti-Slavery and Human Trafficking policy; and
 - e. ensuring that Modern Slavery and our response to such is an agenda item for each Board's consideration

Assessing and managing risk

Each group division is responsible for producing an annual Modern Slavery statement, report, and reporting compliance to the W&R Barnett Group. This is based upon their internal audit and risk assessment of their business, which seeks iterative improvement year on year, specific to their business.

Effectiveness of our procedures

For the financial period August 2021 to March 2022, all group divisions have confirmed their compliance with section 54 of the Modern Slavery Act 2015 UK and have published their statements.

Training

The purpose of the training is to ensure that our employees have an understanding of modern slavery which may occur in our business or supply chains. Enhanced Modern Slavery training has been developed, and rolled out across the group to Senior Management and Directors. This knowledge basis has and will continue to be used to cascade the risk management principles down through the divisions.

Policies

Our Anti-Slavery and Human Trafficking Policy and Whistleblowing policy are fully implemented within our handbook and issued to all staff members either through training for existing staff or at induction to all new starters. These policies seek to demonstrate our commitment to acting ethically and with integrity in all our business dealings and relationships. It also reinforces the need for effective systems and controls which seek to ensure, to the greatest extent possible, that modern slavery is not taking place anywhere in our own business or in that of our supply chain.

W&R Barnett Holdings Limited acknowledge their responsibilities in relation to ethical business activity and tackling modern slavery within their supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial period ending July 2022. This statement was reviewed and approved by the Board of W.&R. Barnett, Limited on 16th August 2022.



William B Barnett
CEO, W&R Barnett Holdings Limited
29th September 2022