Period 2022-23 (1st April 2022 – 31st March 2023)

Barnett-Hall Modern Slavery and Human Trafficking Statement

Policy Statement
Section 54 of the United Kingdom's Modern Slavery Act 2015 ('the Act') encourages increased transparency within businesses and supply chains. Section 54(1) of the Act places a statutory obligation on commercial organisations, in any part of a group structure, that supply goods or services with an overall turnover of £36 million or more to produce a "slavery and human trafficking statement" for each financial year. Such an organisation has an obligation to produce a statement within 6 months of their financial year-end, indicating their position, policies and due diligence in relation to modern slavery and human trafficking.

Barnett-Hall is an organisation that acknowledges our 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 is a subsidiary of Origin Enterprises Plc. Both 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
As part of our modern slavery due diligence, this past year has seen an increased focus on ensuring a coherent understanding of modern slavery legislation across Senior Management. In addition, we have taken the following steps:

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 the payment of the minimum wage in accordance with national standards. The risk areas were identified using the latest data published on the **2023 Global Slavery Index**; 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. Continuing training with our internal online training presentation, which provides training to new staff members and is also available for re-fresher training to all current staff members including management and members of the Board;
    c. Issuing a new Environmental, Social and Governance ('ESG') Policy and establishing an ESG Committee to manage risks;
    d. Complying with our Modern Slavery and Human Trafficking Statement;
    e. Adhering to our Modern Slavery and Human Trafficking policy; and
    f. Ensuring that modern slavery and our response to such is a regular agenda item for the Board's consideration.

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

Specifically in relation to recruitment, we complete thorough checks on the recruitment agencies we use and on prospective employees through diligent right to work checks. Our Human Resources department and/or Recruiting Managers ensure that we only use a small number of agreed reputable recruitment agencies that are local and based in the United Kingdom and/ or Ireland. These checks are designed to identify and mitigate any concerns relating to modern slavery and/or human trafficking and such processes are more specifically outlined in our Slavery and Human Trafficking Policy.

In relation to our supply chain, we have used the 2023 Global Index Data to identify high risk countries in which 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 period from 1st April 2022 to 31st March 2023, we reviewed our supply chain audit process and expanded the reach of our audit sample. We covered this year's audit with an easily accessible online questionnaire for our suppliers at risk and also included any new suppliers.

Effectiveness of our procedures

To measure our effectiveness in ensuring that, as far as practicable, modern slavery is not taking place in our business or our supply chain, 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. In the past year, we ensured that our updated online training was included in the induction process and delivered to all new start staff members. The purpose of this training is to ensure that our employees have an understanding of modern slavery which may occur in our business or supply chain.

Our training presentation and polices are made available on the company's intranet on SharePoint, where staff can easily access information and training as required. We will continue to monitor training for staff going forwards and update the presentation as required.

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. This includes an ESG Policy, Whistleblowing Policy, an Anti-Slavery and Human Trafficking Policy and online training on such policies. These policies are made available within our staff handbook and provide both an explanation of our obligations in regard to modern slavery, as well as a safe reporting mechanism for whistleblowing. The provision of these policies reinforce the need for effective systems and controls which seek to ensure as far as possible that modern slavery is not taking place anywhere within our own business. Relevant policies can be made available to third parties on request.

Barnett-Hall acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within our supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the year ending March 2023. This statement was reviewed and approved by the Board on the 7th of September 2023.



Ryan McAuley
Chief Executive
W & R Barnett Trading Limited, R & H Hall Trading Limited
25th September 2023