

Introduction

The Bart Ingredients Co Ltd is committed to minimising risks of human trafficking and modern slavery within our business and supply chain. As a responsible, ethical 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.

Overall responsibility for our human rights and modern slavery due diligence sits with our board of directors.

About Bart Ingredients

Bart Ingredients was founded in 1963 and was acquired by Fuchs Gruppe, Europe's largest privately owned spice company, in 2017. Bart's is a home cooking ingredient manufacturer and operate out of 2 manufacturing sites and 2 office locations based in Bristol and Newbury. The Company employs over 230 people and work with over 125 approved ingredient and packaging suppliers.

The raw materials for our products are carefully sourced by our skilled procurement team based at our Bristol site.

Our business and supply chain

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 have well established programmes in place to ensure that workers are safeguarded and treated fairly. The following steps are taken.

- 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 through audit and certification requirements, (including Sedex/SMETA).
- 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. Quarterly 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. 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, and this is communicated to our employees via handbook, induction and information on our notice boards.
- 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 sites have a third party SMETA ethical audit every 2 years, and an annual independent audit of Company financial accounting is 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.
- SMETA audit history – to date none of our audits have raised any concerns or non-conformances' on modern slavery, human exploitation or forced labour.
- Our SEDEX self-assessment questionnaire is reviewed and updated every 6 months for both sites and is visible to our customers and suppliers.
- At both sites we have a workers committee which provides people to have a platform to speak along with an anonymous suggestions box. During these meetings the committee is encouraged to discuss any concerns around modern slavery.
- The Company has robust grievance and whistleblowing policies which are available to view in the employee handbook and noticeboards. An external confidential whistleblowing hotline is available for all employees to access along with a secure confidential whistleblowing box.
- Stronger Together workplace posters are on display in the noticeboards and leaflets are available in the canteen areas.
- A Stronger Together/Modern Slavery Champion has been appointed to promote reporting channels and the signs of labour exploitation.
- We have established a range of policies to protect the wellbeing of those who work for us. These include Human Rights, Diversity & Inclusion, Labour Exploitation, Agency Workers, Anti-Harassment, Equal Opportunities, Flexible Working, Ethical Trading, Grievance and Eligibility to Work Policies.
- We recognise that good pay plays a part in responsible recruitment as it can reduce the need for employees to seek secondary employment. For this reason we are proud to have signed up as a Living Wage Employer which applies to both direct and indirect employees.
- The Company is committed to continuing to address and minimise the risk of modern slavery, forced labour and human trafficking within our business and supply chain. We will continue to review our policies and processes on a regular basis.

Training and awareness

The Company recognises the importance of ensuring employees understand human trafficking and labour exploitation and how to report it. Modern slavery awareness training is carried out by all of our employees. This training includes highlighting responsibilities to address hidden labour exploitation risks, how to spot the signs of forced labour and how to act appropriately where any risks have been identified. We understand we have a duty to ensure the health, safety and welfare of our employees.

During the induction process new employees, including agency workers, are provided with human trafficking awareness training 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.

All employees have annual refresher training on modern slavery and human trafficking awareness. We are committed to continue to build on our employee awareness and understanding of modern slavery and human trafficking.

On each site we have a dedicated member of staff who will complete the 'Stronger Together' Modern Slavery awareness training, both standard and advanced sessions.

Temporary labour providers

Although we believe that permanent employees limits the risk of human trafficking the Company sometimes 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 only approved for use by the HR Manager.

Agency workers are recruited for periods of high demand and are offered permanent employment when a position becomes available.

Labour providers compliance & monitoring

We ensure our approved labour providers follow our own strict due diligence to maintain our high standards and the following steps are taken.

- The Company only use select agencies who are a registered member of the Gangmasters and Labour Abuse Agency (GLAA).
- Licence certification is checked on a six monthly basis.
- We ensure that no recruitment fees are paid by any temporary worker.
- We ensure all agency workers have access to their own ID documents and they are not withheld from them.
- Both the agency and the Company carry out rigorous right to work checks to ensure all employees are legally able to work in the UK and to safeguard employees from abuse.
- Regular robust audits are completed with the agency and one on one interviews carried out with agency staff to detect any cases of human rights issues, modern slavery or human trafficking.
- Six monthly compliance review meetings are carried out between labour provider and the Company to discuss due diligence measures and service level.

This statement has been approved by the board of directors.

Signed: A.D.Sims
A.D.Sims (Jun 24, 2024 15:31 GMT+1)

Dated: Jun 24, 2024