

Introduction

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by The Bart Ingredients Co Ltd during the financial year ending 31st December 2025 to prevent and mitigate modern slavery and human trafficking in its 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 statement sets out how we will achieve this.

About Bart Ingredients

Bart Ingredients was founded in 1963 and was acquired by Fuchs Gruppe, Europe's largest privately owned spice company, in 2017. We are a cooking ingredient manufacturer, and we operate out of two manufacturing sites and two office locations based in Bristol and Newbury. The Company employs over 220 people and works 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 membership of Sedex and participation in the Sedex Members Ethical Trade Audit (SMETA).
- In 2025 we also joined the Food Network for Ethical Trade, a member-led initiative which is committed to improving the lives and livelihoods of workers in food supply chains. FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions.
- Our Code of Conduct has been formally documented and is shared with our suppliers to demonstrate our commitment to responsible ethical management and to encourage likewise behaviour from our suppliers.
- Our Food Defence and Supply Chain teams visit and audit our main suppliers and factories to further our working relationship and involvement within our supply base. We continue to prioritise visits to factories based in higher risk areas and we are committed to increasing the transparency within our supply chain.
- We adhere to the principals of the Ethical Trading Initiative (ETI) Base Code, and this is communicated to our employees via the employee 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 two years, and an annual independent audit of Company financial accounting is conducted.

- 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 human rights, modern slavery, human exploitation or forced labour.
- Our Sedex self-assessment questionnaire is reviewed and updated every six months for both sites and is visible to our customers and suppliers.
- At both sites we have employee ‘Champions’ who are instrumental in developing our Company culture and enabling our workforce to adopt shared values, beliefs, and behaviours. Our Champions inform and consult employees on matters that affect their work and working lives, and they represent the views of our workforce. We also have an anonymous suggestions box at each site.
- The Company has robust grievance and whistleblowing policies which are available to view in the employee handbook and on our noticeboards. An external confidential whistleblowing hotline is available for all employees to access along with a secure confidential whistleblowing box at each site.
- The Company has committed to the Stronger Together Business Partnership for 2025 and 2026.
- 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, Domestic Abuse 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 be 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.
- To date, there have been no identified instances of modern slavery or human trafficking at either site.

Training and awareness

The Company recognises the importance of ensuring employees understand human trafficking and labour exploitation and how to report it. Modern slavery and human trafficking awareness training is carried out by all 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 risks have been identified. We understand we have a duty to ensure the health, safety and welfare of our employees.

During the induction process employees, including agency workers and permanent contractors, are provided with modern slavery & human trafficking awareness training and guidance. All employees have annual refresher training on modern slavery and human trafficking awareness. We are committed to continuing to build on our employee awareness and understanding of modern slavery and human trafficking.

Awareness posters, guidelines and ways to report any modern slavery or trafficking concerns are displayed around the premises and highlighted to employees during induction.

We have a dedicated member of the HR team who completes the 'Stronger Together' Modern Slavery awareness training, both standard and advanced sessions.

Temporary labour providers

Although we believe that employing 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 uses select agencies who are a registered member of the Gangmasters and Labour Abuse Agency (GLAA).
- 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.
- Licence certification is checked on a six-monthly basis.
- We ensure that no recruitment fees are paid by any temporary worker.
- We review agency policies and procedures to ensure compliance with human rights and ethical standards, and to confirm alignment with our high standards.
- We ensure agency workers have access to their own ID documents, and they are not withheld from them.
- We ensure that no unauthorised deductions are made from wages, and that all workers are paid accurately and on time.
- We ensure that workers are not subjected to forced or excessive hours against their will, nor coerced through physical threat. We also verify that workers are free to return to their home country when they wish.
- Both the agency and the Company carry out rigorous right to work checks to confirm all employees are legally able to work in the UK and to safeguard employees from abuse.

Actions & Commitments for 2026


As part of our on-going initiatives in the prevention of modern slavery and human trafficking, The Bart Ingredients Co Ltd has committed to the following actions during 2026:

- **Training:**
 - Identify a candidate at the Newbury site to complete the *Stronger Together* standard training course to strengthen our internal awareness.

- **Engagement:**
 - Expand our welfare process by increasing agency welfare interviews to 70% of workers.
 - Participate in the FNET Due Diligence and Empowering Work working groups which support advancing our implementation of responsible business practices.

- **Performance monitoring - KPIs:**
 - Introduce KPIs to track our progress in the following areas;
 - Completion rate of annual awareness training per site.
 - Percentage of agency workers interviewed as part of our ongoing due diligence.

This statement has been approved by the board of directors.

Signed: 
[Adam Sims \(May 26, 2026 10:49:49 GMT+1\)](#)

Dated: May 26, 2026





Modern Slavery Statement 2026

Final Audit Report

2026-05-26

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