W&R BARNETT

Financial Year 2022 – 2023 (1st April 2022 – 31st March 2023)

W.&R. Barnett, Limited Modern Slavery and Human Trafficking Statement 2023

Background

W.&R. Barnett, Limited is the parent company of a diversified group of international commodity trading, storage and agribusiness and industrial manufacturing companies and it is a subsidiary of W&R Barnett Holdings Limited (together the **W&R Barnett Group**).

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 "modern 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. The UK Government are proposing the creation of a mandatory reporting period in line with the fiscal year. Therefore, as a Group we have voluntarily moved to that reporting period in preparation.

This is our eighth year of producing modern slavery statements for entities within our group, with the most recent statements being prepared for signature on 29th September 2023 for the reporting period of April 2022 to March 2023. These statements are published in accordance with the Modern Slavery Act 2015 and they set out the steps and measures taken by the W&R Barnett Group during the financial period ending 31st of March 2023 to seek to prevent modern slavery in its business and to the greatest extent possible, in that of its supply chains.

Group Divisions of the W&R Barnett Group

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

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

Policy Statement

W.&R. Barnett, Limited acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within our business and, to the best of our ability, in our supply chain. 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.

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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, we are aware that 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 the payment of a minimum wage in accordance with national standards. These risk areas were identified using the latest data published on the **2023 Global Slavery Index**.

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 a regular 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 their compliance to the W&R Barnett Group. This is based upon their own internal audit and risk assessment, which seeks iterative improvement year on year, specific to their business.

Effectiveness of our procedures

For the financial year April 2022 to March 2023, all group divisions within the W&R Barnett Group have confirmed their compliance with section 54 of the Modern Slavery Act 2015 UK and have published statements in their own right.

Training

We have developed training for our staff on the issue of modern slavery and human trafficking within our business and supply chain and have delivered enhanced training to the Senior Executive and Senior Management team already. 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.

Policies

We are committed to addressing modern slavery and ensuring ethical compliance and have developed policies that reflect the values that we adhere to as a business. We are giving consideration to the connection between Environment, Social and Governance ('ESG') policies with modern slavery. Our Anti-Slavery and Human Trafficking Policy and Whistleblowing policy are fully implemented within our staff handbook and this is issued to all staff members either through training for existing staff, or at induction to all new start employees. These policies seek to demonstrate our commitment to acting ethically and with integrity in all our business dealings and relationships. The provision of these policies reinforce the need for effective systems and controls and 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.

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W.&R. Barnett, Limited acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within own supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year and reporting period of 1st April 2022 – 31st March 2023. This statement was reviewed and approved by the Board of W&R Barnett Limited on 22nd August 2023.

William B Barnett
CEO
W.&R. Barnett, Limited
29th September 2023