



FEEDING INNOVATION

Modern Slavery and Human Trafficking

For the year ending 31 March 2025

Our Business

John Thompson & Sons Limited ("**the Company**" / "**we**") is a trading subsidiary of BHH Limited with operations in Northern Ireland only. The Company's principal activities are the manufacture and sale of compound animal feeds and the sale and distribution of fertilisers.

It continues to be a priority for the Company that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our business and supply chain to the best of our ability. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our business and supply chain.

Our Supply Chain

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

The Company's main raw material suppliers are W&R Barnett Trading Ltd and R&H Hall Trading Limited, which are group companies within the wider W&R Barnett group who provide their own independent Modern Slavery Report.

Our raw material suppliers have a local base with supply chains which operate on a global scale. Our non-raw material suppliers are mainly locally based and include contractors, contract hauliers and suppliers of agency

labour.

Policies

The Company acknowledges its 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, reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls aiming to ensure slavery and human trafficking is not taking place in our business or supply chains. 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.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Anti-Slavery and Human Trafficking Policy;
- Whistleblowing Policy.

The policies referenced above are made available within our Staff Handbook which is provided to all employees upon commencing employment with the Company and is readily accessible on our [internal employee hub/ staff intranet].

John Thompson & Sons Limited

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Diligence

As part of our due diligence, 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 minimum pay standards; and
2. taken steps to assess and manage the risks identified including:
 - a. auditing our supply chain, contractors and recruitment agencies we use (as outlined below);
 - b. providing training to members of the team, management and board members, and in particular reviewing the induction for new employees; and
 - c. adhering to our Anti-Slavery and Human Trafficking policy.

Assessing and managing risk

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

In relation to our supply chain, we have used data from the [2023 Global Slavery Index](#) in order to identify high risk countries in which our suppliers currently operate. We audit our suppliers to identify whether they present any concerns in relation to modern slavery. To manage this risk and to ensure those within our supply chain are also aware of their obligations, we have rolled out an ongoing compliance initiative as part of our Quality Assurance programme whereby an audit sample of raw material suppliers are asked to confirm compliance and to supply copies of relevant policies or action plans. We have ensured that W&R Barnett Trading Ltd and R&H Hall Trading Limited (as our main commodity suppliers) have completed the necessary due diligence and training and published their respective Modern Slavery Statements.

In relation to recruitment, we complete thorough checks on recruitment agencies we use and on prospective employees. These checks are designed to identify any concerns relating to modern slavery and/or human trafficking and such processes are more specifically outlined in our Anti-Slavery and Human Trafficking Policy.

Monitoring and Evaluation

In order to continue to do all that we reasonably can to ensure that no modern slavery or human trafficking occurs within our supply chain, and to further enhance our approach, we intend to measure our performance against the following KPIs in the forthcoming financial year:

- (i) The number and turnover value of suppliers completing our modern slavery audit questionnaire;
- (ii) Completion rates for modern slavery awareness training; and
- (iii) The number of modern slavery concerns identified.

Annually, we discuss lessons, developments and opportunities for improvement between key divisions within the W&R Barnett Group Companies.

Training

We have developed a training programme for all our staff, the purpose of which is to ensure that our employees have an understanding of modern slavery legislation and our obligations in regard thereto. Training is conducted online and targeted based on differing roles within our organisation.

Expert legal guidance on the topic of modern slavery is also sought periodically to ensure that key staff are fully trained and are advised of developments in the legislation and guidance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, constitutes our modern slavery and human trafficking statement for the year ending 31st March 2024 and was approved by the Board of Directors on 25th June 2024.

A handwritten signature in black ink, appearing to read 'Gordon Donaldson', written in a cursive style.

Gordon Donaldson
Chief Executive
John Thompson & Sons Limited