

# BHH Limited

## Modern Slavery and Human Trafficking

For the year ended 31 March 2024

### Our Business

BHH Limited is an dormant holding company, owned jointly by W&R Barnett Limited and Origin Enterprises UK Limited, and has three trading subsidiaries; John Thompson & Sons Limited, whose principal activities are the manufacture and sale of animal feeds and the distribution of fertilisers, reports independently on Modern Slavery. Independent Fertilisers Limited whose principal activity is the blending, bagging and sale of fertiliser products also reports independently on Modern Slavery. Precision Analysis, whose principal activity is the provision of laboratory testing and analysis services for the animal feed industry does not prepare a separate report on Modern Slavery. BHH also has 14 dormant subsidiary companies.

### Policy Statement

BHH Limited 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 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.

### Due Diligence

We have:

- 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
- Taken steps to assess and manage the risks identified including:
  - a. auditing our supply chain 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;
  - c. complying with our Slavery and Human Trafficking Statement; and
  - d. 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 supply chains are key areas which our business must control 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 to identify high risk countries in which our suppliers currently operate. We audit our suppliers 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 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 key main commodity suppliers in our business) 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.

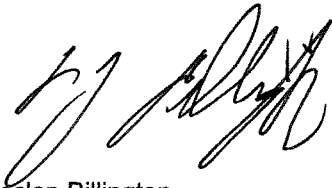
### **Training**

We have developed a training programme for all our staff, the purpose of which is to ensure that staff in our organisation have an understanding of modern slavery legislation and our obligations in regard thereto.

### **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, including our Anti-Slavery and Human Trafficking Policy. These policies have been made available within our staff handbook, and include a provision to address a safe mechanism for whistleblowing.

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 31<sup>st</sup> March 2024 and was approved by the Board of Directors on 8<sup>th</sup> October 2024.



Declan Billington  
Director  
BHH Limited