

# NORTH WEST SILOS LIMITED

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## Modern Slavery and Human Trafficking

### **Policy Statement**

North West Silos Limited is an organisation owned by W. & R. Barnett, Limited. North West Silos 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 and customers, continue to reflect 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.

### **Our Business**

North West Silos Limited is a dormant holding company, which has two trading subsidiary companies; McCaughey Russell and Baird Limited (the principle activity of which is the trading of proteins and cereals) and DT Russell and Baird (Ireland) Limited (the principle activity of which is operating its stores, stevedoring and receiving of goods).

### **Due Diligence**

We have in the past reporting period:

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; and
2. 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;
  - c. complying with our Modern Slavery and Human Trafficking Statement; and
  - d. adhering to our Modern 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.

Specifically and in relation to our supply chain, we have used the 2018 Global Index Data to identify high risk countries where our suppliers may operate. We audit high risk suppliers annually 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 a compliance initiative as part of our Quality Assurance programme and vendor approval process. Our ethical trading risk assessments now form an integral part of the approval process for new vendors; and will include annual spot checks for approved vendors. We have ensured Barnett-Hall (as our sole supplier entities) have completed the necessary due

diligence and training and published their respective Modern Slavery Statements. In the financial year past, Barnett-Hall have reviewed the supply chain audit process and covered this year's audit with an easily accessible online questionnaire for all suppliers at risk, including any new suppliers.

In relation to recruitment, we complete thorough checks on recruitment agencies we use and on prospective employees. Our HR department and/or Recruiting Managers ensure that we only use a small number of agreed reputable recruitment agencies, that are local and based in Belfast. 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 Slavery and Human Trafficking Policy.

#### **Effectiveness of our procedures**

To measure our effectiveness in ensuring that modern slavery is not taking place in our business or supply chains, we compile the responses received from our audit questionnaire so these can be assessed. This process allows us to identify any concerning responses received, compare these with previous responses, and follow up with any entities, if required. We include these responses in our annual modern slavery report which assists us to assess the measures we have taken to seek to combat modern slavery.

#### **Training**

We continue to train our staff on the issue of modern slavery within our supply chains and across our business, extending the reach deeper into the organisation.

#### **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. We have made positive progress in relation to our modern slavery and human trafficking policy, which has been reviewed and updated with the assistance of outside counsel during the year. Amendments have been approved by the board at the end of Q3 2021 and incorporated in our employee handbook at the end of Q4 2021. For the start of 2022 we intend to have all existing managers trained on this new policy so they are aware of their refreshed responsibilities. Recently these policies have been made available on our intranet site on SharePoint, as well as being included in our staff handbook, which also forms part of induction training for all new starts and includes a provision to address a safe mechanism for whistleblowing. Relevant policies can be made available to third parties on request.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year ending July 2021. This statement was reviewed and approved by the Board on the 30<sup>th</sup> of November 2021.

Claudine Heron



Chief Executive of Commodity Trading Division  
North West Silos Limited  
14<sup>th</sup> January 2022

