

W.&R. Barnett, Limited Modern Slavery and Human Trafficking Statement 2020

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**).

Under section 54 of the Modern Slavery Act 2015 UK (GB and NI) there is statutory obligation for increased transparency in supply chains, and requires any organisation, in any part of a group structure that supply goods or services with a turnover of £36 million or more to produce a "slavery and human trafficking statement" each financial year. Such an organisation has an obligation to make a statement within 6 months of their year-end, indicating their position, policies and diligence in relation to modern slavery.

This is our fifth year of producing Modern Slavery statements for entities within our group, with the most recent statements being prepared for signature on 15th January 2021 for the period August 2019 to July 2020. These statements are published in accordance with the Modern Slavery Act 2015 and they set out the steps taken by the W&R Barnett Group during the financial year ending 31st of July 2020 to seek to prevent modern slavery in its business and supply chains.

Policy Statement

W.&R. Barnett, Limited acknowledges their responsibilities in relation to ethical business activity and tackling modern slavery within their supply chain and business. Our policies and our interaction with colleagues, as well as suppliers and customers, continues to reflect our commitment to acting ethically in all our operational matters. We continue to review our approach annually, as striving to ensure that we act in compliance with the Modern Slavery Act 2015 and have continued to monitor such compliance.

Group Divisions of the W&R Barnett Group

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

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

Due Diligence

As part of our modern slavery due diligence, each of the group divisions (as identified above) have taken the following steps:

1. undertaken a risk assessment of areas within their businesses and supply chains 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 their supply chain and recruitment agencies used;
 - b. providing training to members of their team, management and board members;
 - c. complying with their Slavery and Human Trafficking Statement; and
 - d. adhering to their Anti-Slavery and Human Trafficking policy.

Assessing and managing risk

Each group division is responsible for producing an annual modern slavery statement, report, and reporting compliance to the W&R Barnett Group. This is based upon their internal audit and risk assessment of their business, which seeks iterative improvement year on year.

Effectiveness of our procedures

For the financial period August 2019 to July 2020, all group divisions have confirmed their compliance with section 54 of the Modern Slavery Act 2015 UK (GB and NI) and have published their statements.

Training

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. Modern Slavery training has been developed and is being rolled out within each group division at an appropriate level throughout the businesses.

Policies

Our Anti-Slavery and Human Trafficking Policy and Whistleblowing policy are fully implemented within our handbook and issued to staff members. These policies seek to demonstrate our commitment to acting ethically and with integrity in all our business dealings and relationships. It also reinforces the need for effective systems and controls which seek to ensure modern slavery is not taking place anywhere in our own business.

W.&R. Barnett, Limited acknowledge their responsibilities in relation to ethical business activity and tackling modern slavery within their 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 ending July 2020. This statement was reviewed and approved by the Board of W.&R. Barnett, Limited on 7th December 2020.



William B Barnett
CEO
W.&R. Barnett, Limited
15th January 2021