



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

**DATE: 30.09.2018
REVIEW DATE: 24/09/2023**

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023 Barrow, Lane & Ballard Ltd

1. Company Statement

- 1.1. Barrow, Lane & Ballard Ltd. is committed to improving our practices to combat slavery and human trafficking. We believe that by driving up transparency, modern slavery will be tackled with greater urgency.
- 1.2. This annual report will set out Barrow, Lane & Ballard due diligence processes, the effectiveness of measures taken to combat modern slavery and trafficking, auditing methods and communication to staff and suppliers. This report is endorsed and signed by the Managing Director and made accessible on the company's website.

2. Our business

- 2.1. Barrow, Lane & Ballard is an international merchant of nut kernels, dried fruit and seed kernels, established in 1887. The head office is based in London at 56A Crewys Road. The stocks are mainly held in third party warehouses all over the United Kingdom, we also carry stocks in Hamburg and Rotterdam.

3. Our organised structure

- 3.1. Our business is relatively non-hierarchical with only two levels, the directors (5) and the employees (13), all of whom are permanent and with employment contracts.

4. Supply Chains and Auditing

- 4.1 Our supply chain includes sourcing food products in bulk and packaging on a global level. We have BRC for agents and brokers which means that we audit these factories for food safety and with this we also do an ethical audit to make sure they confirm to our ethical standards.

5. Barrow, Lane & Ballard's policies on Slavery and Human Trafficking

- 5.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 5.2 Our existing policies reflect this commitment.
 - 5.2.1 The Ethical Policy shows clear commitment to ensuring that operations and supply chains are trafficking and slavery free.
 - 5.2.2 We are a small company all in one office. We have a Finance Director who is in charge of HR whose function it is to ensure that employees complaints or disputes are dealt with promptly and where necessary, formally. This procedure, though non-contractual, applies to all employees with the aim of ensuring consistent and fair treatment for all in the business.



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

**DATE: 30.09.2018
REVIEW DATE: 24/09/2023**

6. Barrow, Lane & Ballard's due diligence processes in relation to slavery and trafficking in its business and supply chain. As part of our initiative to identify and mitigate risk we have in place systems to:-

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains and work towards improvement of potential risk
- Work in collaboration with our customers and act on their advice

7. Supplier Adherence to our Values

7.1 We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a dedicated compliance team, which consists of our Managing Director, Finance Director and Quality Assurance Team.

8. Training

8.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have communicated to our staff via internal communication.

9. Our Effectiveness in combating Slavery and Human Trafficking

9.1 We submit audit data to independent third parties, Supplier Ethical Data Exchange and the SEDEX members Ethical Trade Audit to conduct externally facilitated reviews to bring insights on ways to we can tackle slavery and human trafficking.

9.2 As part of our supplier questionnaires we have questioned the suppliers concerning the rights and benefits of the staff who are employed by our suppliers.

10. Further Steps

10.1 Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following steps:

- Company Wide Communication – all staff and suppliers will receive and sign a copy of the Modern Slavery Policy. Staff will be required to sign and date a form confirming their understanding of the policy set out by the Company. This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018.

A handwritten signature in black ink, appearing to read 'Max Sondhelm'.

Max Sondhelm

CEO,

On behalf of Barrow, Lane & Ballard Ltd.