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Modern Slavery and Human Trafficking Statement

Introduction

This statement is provided in accordance with section 54 of the Modern Slavery Act 2015 and relates to the financial year ending August 17. It sets out BAR's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and supply chains.

BAR is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

To date we have not identified or been made aware of any slavery or human trafficking activities within our supply chain but should any such activities be highlighted to us then we would act immediately in line with our legal and moral obligations.

Organisational Structure and Supply Chains

BAR create and supply soups, sauces and recipe dishes to popular pubs and restaurants across the UK.

BAR operates in the UK only however we have approximately 300 supply chains across six tiers globally which include a combination of manufacturers and agents although we have full visibility back to source. We are linked to all of our suppliers on Qadex.

In order to assess whether or not particular countries are considered high risk in relation to slavery or human trafficking we refer to the Global Slavery Index.

Responsibility for BAR's anti-slavery initiatives is as follows:

- **Policies:** The HR team is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** The Technical team issue supplier questionnaires to all suppliers via QADEx which allow a risk analysis in relation to slavery and human rights.
- **Investigations/due diligence:** The Head of Purchasing and the HR team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. The Head of Purchasing would contact the primary supplier who would need to investigate within their chain. EBS has appointed a Group Auditor who is responsible for auditing our suppliers at both site and Group level.
- **Training:** The HR team will coordinate training as follows in the financial year 16-17:
 - Training session to be delivered to BAR Directors to raise awareness and highlight responsibilities
 - Training session to be delivered to the Purchasing team and appropriate members of the Technical team to better understand and respond to the identified slavery and human trafficking risks
 - Raise awareness to employees of modern slavery and human trafficking and guidance as to what action to take if these are suspected

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Relevant Policies

BAR operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** BAR encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can submit a confidential disclosure via the suggestion boxes which are located in each of the Production canteens and the Reception area.
- **Corporate social responsibility policy:** The CSR policy outlines our responsibilities to our employees in terms of provision of long term employment wherever possible, paying at least the living wage, employing from the local talent pool wherever possible and only using recruitment agencies that meet our standards and do not require any kind of security deposit of papers etc from their workforce.
- **Supplier/Procurement code of conduct:** Bar Foods encourages all of our suppliers to sign up to Sedex where a series of ethical questions are part of the approval process. Failure to comply with the standard required would then result in further investigation as to why prior to approval and trade with that supplier.
- **Labour Suppliers policy:** BAR uses only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency. All labour suppliers are required to complete a declaration of compliance in relation to the Modern Slavery Act 2015 prior to supplying labour to BAR.

Due Diligence

BAR undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. BAR's due diligence and reviews include:

- mapping the supply chain broadly to assess geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier via the QADEX questionnaire
- using QADEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Any suppliers found to have breached any of the policies within QADEX or Sedex will result in the potential termination of the business relationship.

Performance Indicators

BAR has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

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- requiring employees of the Buying team, HR team and appropriate members of the Technical team as well as the Company Directors to have completed training on modern slavery;
- developing QADEX system for supply chain verification which has been in place since 2011 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains on an annual basis, whereby BAR evaluates all existing suppliers via QADEX.

Training

The organisation requires employees of the Buying team, HR team and appropriate members of the Technical team as well as the Company Directors to complete training on modern slavery and human trafficking.

The organisation's modern slavery training covers :

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness Raising Programme

As well as training staff, the organisation raises awareness of modern slavery issues by various communication methods explaining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

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Director Approval

This statement has been approved by BAR's Managing Director, who has overall responsibility for ensuring this policy is maintained and applied.

Signed:

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

Date: 21.04.17

David Garland (Managing Director)