



SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery Act 2015

Introduction

The Bartholomews Group of Companies is committed to improving our practices to combat slavery and human trafficking.

Organisational Structure

Bartholomews (Holdings) Limited, with its head office in United Kingdom, is the ultimate parent company of the Bartholomews Group, with five trading subsidiaries:

- Bartholomews Agri Food Limited – an agricultural merchants
- Shoreham Silo Services Limited – a grain storage and export facility working with customers of Bartholomews Agri Food Limited
- Ultimate Fertilisers Limited – a deep water import facility importing and bagging bulk fertiliser for to Bartholomews Agri Food Limited
- Churchill Freight Services Limited – a transport company operating a fleet of HGVs to service both the Bartholomews Group and third parties
- Bartholomews Specialist Distribution Limited – a storage and distribution company

The Group has over 200 employees and operates in the United Kingdom, although does export commodities overseas.

The Group has a turnover in excess of the statutory level of £36,000,000 under the Modern Slavery Act 2015

Our Supply Chains

Our supply chains include:

- Combinable crops purchased from UK farmers
- Services provided by other members of the Bartholomews Group
- Fuel purchased from multi-national companies
- Fertilizer purchased from both inside and outside the European Union
- Chemicals purchased from multinational companies
- Commodities for use in the Group's business activities purchased from companies trading in the European Union

Our Policies on Slavery and Human Trafficking

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 Anti-slavery 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.

Due Diligence Processes for Slavery and Human Trafficking

We actively seek to identify and mitigate the risk of slavery and Human Trafficking and 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.
- Protect whistle blowers.

The Bartholomews Group considers that its business is at low risk of slavery and human trafficking.

Parts of our business trade only with other members of the Group. Beyond that the majority of our suppliers are based in the UK and are either small or medium sized enterprises in the agricultural sector or multinational companies with extensive governance structures, which companies operate widely across the European Union under its regulatory regime. The sector is highly regulated with farmers seeking grants from the European Union which require the provision of extensive information and they also seek registration with organisations such as Red Tractor Farm Assurance.

Adherence to our values

We have zero tolerance to slavery and human trafficking. As identified we consider the Group's business is at low risk of exposure to slavery and human trafficking in our supply chain.

However in any areas where we consider there is a greater risk of such exposure we aim to ensure all those in our supply chain and contractors comply with our values. In circumstances where we perceive a risk matter will be referred to the relevant departmental manager in conjunction with the Group Legal Counsel who will consider the steps necessary to prevent Bartholomews being exposed to or assisting in Modern Slavery or Human Trafficking.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will highlight risk to our staff who are exposed to any area of our business where we have identified a higher than low risk of exposure in our supply chain to modern slavery and human trafficking.

All new members of staff will be made aware of our Policy in this field and will be expected to adhere to it.

Our Effectiveness in Combating Modern Slavery and Human Trafficking

We are committed to keeping our effectiveness in this area under review to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. Prior to the entry into a new sector of business the risk of exposure will be considered and appropriate safeguards identified and then implemented. Similarly any adverse concerns that arise in our activities will be reported to and discussed with the Group's Legal Counsel.

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 31st December 2016