



## Modern Slavery and Human Trafficking Statement

April 2016

### **This Statement**

This statement sets out the steps that Top Barn Produce has taken during the financial year 2016/2017 to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains.

### **What is Slavery and Human Trafficking?**

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

### **Organisational structure and activities**

Top Barn Produce Ltd packs and distributes fresh produce from its centre in Holt Health, Worcester, to a UK based customer for resale including supermarkets and independent customers.

The products Top Barn Produce Ltd processes are sourced from a range of National, European and International suppliers. All of Top Barn Produce's activities are managed from its centre at Holt Health.

Top Barn Produce employs between 50 – 300 employees, with a significant seasonal workforce. A works council is in operation and meets regularly, an independent consultant is available on site to enable staff to raise any issues they may have.

### **Supply chain structure and activities**

Our customer sources all our fresh produce which forms part of our supply chain and they have in place a Modern Slavery and Human Trafficking statement to safeguard against such activities.

All products sourced directly by ourselves are purchased from UK businesses. We do not source from high risk countries where modern forms of slavery are prevalent.

Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will only trade with those who fully comply with this policy or those who are taking verifiable steps towards compliance.

## **Risk assessment conclusions**

The Company has considered where / whether there is a risk in the organisation, or its supply chain, of slavery and human trafficking taking place.

It has concluded that the risks are low given the due diligence / actions taken to ensure human trafficking and slavery does not take place in the organisation, or supply chain, as noted below:

- Top Barn Produce is committed to employing Employee's directly and not via third party agencies to ensure there is visibility of the employment relationship, and no risk of inadvertently acquiring staff from a third party which engaged in slavery or Human Trafficking.
- Employees and workers are paid directly to their individual bank accounts, and no Identification or travel documents are held by the Company.
- All members of the Top Barn Produce supply chain are asked to produce a modern Slavery and Human Trafficking Statement to ensure there is a shared and joined up approach to avoiding acts of trafficking or slavery.
- Working practices of suppliers will be audited from time to time to include the commitments made in the supplier's modern Slavery and Human Trafficking Statement.
- We are members of the ETI and as such meet with the standards they set, assessed by regular audit.

## **Policies**

The following policies are in place to support the Company's commitment to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains, and are available as part of the employee handbook:

- The Ethical Trade Industry Base Code Statement
- Employee code of conduct
- Grievance Policy

All staff have access to these documents and all managers are responsible for acting in accordance with them.

## **Other activities/steps**

The Company is a member of the ETI and regularly reviews its standards to ensure that it works in accordance with its base code.

## **Approval**

This statement has been approved by the company's Directors and Mrs Alice Harper has been appointed as the Director with overall responsibility for compliance with the Modern Slavery Act 2015:

Signature:



Name:

John F Harper

Position:

Director