



Modern Slavery Act
Transparency Statement 2024

BARFOOTS

Sefter Farm, Pagham Road, Bognor Regis, West Sussex PO21 3PX



Modern Slavery Act Transparency Statement 2024

This statement is made on behalf of the Boards of the Barfoot Group of Companies, in accordance with Section 54(1) of the Modern Slavery Act 2015, and constitutes Barfoots slavery and human trafficking statement for the financial year ending 31 December 2023.

Our Businesses

Barfoots Group of Companies (Barfoots) is comprised of Barfoot Holdings Ltd, Barfoots of Botley Ltd, Barfoot Farms Ltd, Barfoots Cropping Ltd and Barfoot Energy Ltd.

Barfoots of Botley Ltd, Barfoot Farms Ltd and Barfoots Cropping Ltd are involved with the growing, processing, packing and marketing of a range of semi-exotic produce, with a quality and freshness that is second to none. Our customers include the major supermarkets within the UK and leading national restaurant chains.

Barfoot Energy Ltd is an anaerobic digestion waste management plant, producing green energy from food and crop waste.

Since being established in the early 1970's by Peter Barfoot, the family business has grown to employ over 600 people.

Our Commitment to combating Modern Slavery

Barfoots is committed to upholding the principles of human rights and ethical business practices. We recognise that modern slavery and human trafficking are grave violations of human rights, and we are dedicated to ensuring that our operations and supply chains are free from such practices. This Modern Slavery Act Transparency Statement outlines the steps we have taken to prevent modern slavery and human trafficking within our organisation and supply chain.

Barfoots is a member of the Supplier Ethical Data Exchange (SEDEX); supports the "Stronger Together" initiative and ensures compliance with the Ethical Trade Initiative (ETI) Base Code of Labour Practice, which is based on the standards of the International Labour Organisation (ILO).

Training

We believe that training is a fundamental way of raising awareness and ensuring that people understand the importance of this issue. Our HR Team and many of our operational managers have attended Stronger Together workshops and we also require all employees with Supervisory responsibility to undertake the Stronger Together e-learning course on Tackling Modern Slavery.

This structured training approach has several key benefits:

Modern Slavery Act Transparency Statement 2024

- **Enhanced Awareness:** By participating in these workshops and courses, employees become more aware of the signs of modern slavery and understand the severity of the issue.
- **Informed Supervision:** Supervisors, who are often in direct contact with employees and operations, are better equipped to identify and address potential instances of modern slavery.
- **Consistency in Knowledge:** Standardised training ensures that all supervisors have the same foundational knowledge and approach, which is crucial for a cohesive and effective response to modern slavery.
- **Compliance and Best Practices:** Attending these workshops and completing the e-learning courses help ensure that our organisation is following best practices and complying with relevant regulations and ethical standards.
- **Empowerment:** Educated employees and supervisors are more likely to feel empowered to take action if they suspect instances of modern slavery, leading to a safer and more ethical workplace.

By investing in this training, we are taking a vital step toward creating a workplace that is vigilant and proactive in combating modern slavery.

We also require all employees with Management / Supervisory responsibility to undertake training on Equality and Diversity with annual refreshers.

Our Policies

We have developed and implemented the following policies to prevent modern slavery and human trafficking:

1. **Ethical Trading and Human Rights Policy:** Barfoots have adopted the Ethical Trade Initiative (ETI) base code to guide our standards and to give us the confidence that we are doing all that we can to ensure that all our colleagues, staff and workers enjoy fair and decent treatment and that their human rights are respected and fully met.
2. **Prevention of Hidden Labour Exploitation Policy:** This policy outlines our commitment to preventing modern slavery and human trafficking within our operations and supply chain. It provides guidance to our employees and suppliers on identifying and reporting any suspicious activities related to slavery or human trafficking.
3. **Supplier Code of Conduct:** Our Supplier Code of Conduct sets out the minimum standards we expect from our suppliers, including their compliance with all applicable laws and regulations, including those related to modern slavery and human trafficking.
4. **Whistleblowing Policy:** Barfoots provide access to a confidential telephone reporting service, “SeeHearSpeakUp”, and encourages all workers to report any concerns they have using that service. The service is available in a number of languages.

Our Supply Chain

We are committed to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking throughout our supply chain.

Barfoots have an Ethical Trade policy that details our expectations of our suppliers, which follows the principles of the ETI Base code. This policy is sent to all suppliers at the start of their supply season – agreement to the policy is part of our terms and conditions of supply. In addition, suppliers are required to register on SEDEX and complete the Self-Assessment questionnaire; which is then used to risk assess suppliers against compliance to the ETI Base code, which includes modern slavery and forced labour issues. In some instances we may use other ethical management tools as appropriate.

Based on the outcome of the risk assessment process; suppliers may be required to undertake 2nd or 3rd party Ethical audits; which include sections on Modern slavery and Forced labour.

Due Diligence

We conduct due diligence to assess and address the risks of modern slavery and human trafficking within our supply chain. Our due diligence processes include:

1. **Supplier Audits:** Based on risk assessment, we periodically audit our suppliers to evaluate their compliance with our Supplier Code of Conduct. These audits include assessments of labour practices, working conditions, and other factors related to modern slavery.
2. **Supplier Self-Assessments:** Suppliers are required to complete self-assessment questionnaires that help us identify potential risks related to modern slavery and human trafficking.
3. **Training and Awareness:** We provide training to our employees and work with suppliers to raise awareness about modern slavery issues and to help them identify and address any related issues.
4. **Risk Assessment:** Our supply chain risk assessment process is ongoing and we use this to identify high-risk areas and take appropriate actions to mitigate these risks.

Agency Workers

Barfoots ensure that our labour providers have a Gangmasters and Labour Abuse Authority (GLAA) licence and follow the provisions of the Gangmasters (Licensing) Act 2004 and the Immigration Act 2016 and adhere to their standards accordingly.



Modern Slavery Act Transparency Statement 2024

The role of the GLAA is to protect vulnerable and exploited workers by working with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime.

The GLAA licensing scheme standards cover health and safety, pay, transport and accommodation. They also check that tax, National Insurance and VAT regulations are met. Barfoots are registered to receive “active checks” from the GLAA that keep us informed of any changes to a labour providers licence, such as a compliance inspection, additional licence conditions or a revocation.

Barfoots conducts regular audits of a random selection of agency workers and regular audits of each agency they work with to ensure compliance with these standards.

This Statement was approved by the Boards of the Barfoots Group of Companies on Friday, 17 May 2024.

Julian Marks
Group Chief Executive Officer