



# Modern Slavery Act Transparency Statement 2025

**BARFOOTS**

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

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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 2024.

### Our Business

The Barfoots Group of Companies (Barfoots) comprises the following entities:

- Posbrook Holdings Ltd
- Barfoot Holdings Ltd
- Barfoots of Botley Ltd
- Barfoot Farms Ltd
- Barfoots Cropping Ltd
- Barfoot Energy Ltd

Barfoots of Botley Ltd, Barfoot Farms Ltd, and Barfoots Cropping Ltd are involved in the growing, processing, packing, and marketing of a range of semi-exotic produce. Our customers include major UK supermarkets and leading national restaurant chains.

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

Since its establishment in the early 1970s by Peter Barfoot, the family business has grown significantly and now employs over 650 people.

### Our Commitment to Combating Modern Slavery

Barfoots is committed to upholding human rights and ethical business practices. We recognise that modern slavery and human trafficking are serious violations of human rights, and we are dedicated to ensuring that our operations and supply chains remain free from such practices.

We continue to be members of the Supplier Ethical Data Exchange (SEDEX), actively support the "Stronger Together" initiative, and comply with the Ethical Trade Initiative (ETI) Base Code of Labour Practice, which aligns with International Labour Organisation (ILO) standards. Additionally, we have joined the Food Network for Ethical Trade (FNET) because we consider collaboration to be critical in addressing the complex challenges posed by modern slavery and global supplier management; working with our industry peers and leaders in this area to ensure our approach remains as robust as possible, now and in the future.

### Training

We believe that training is a key factor in raising awareness and ensuring our employees understand the importance of tackling modern slavery. Our structured approach to training includes:

- **Stronger Together Training:** Our HR team and operational managers have attended Stronger Together workshops, and all employees with supervisory responsibility must complete the Stronger Together e-learning course on tackling modern slavery.
- **Enhanced Awareness:** Employees become more aware of the signs of modern slavery and understand the severity of the issue.
- **Informed Supervision:** Supervisors, who interact closely with employees, are better equipped to identify and address potential instances of modern slavery.
- **Consistency in Knowledge:** Standardised training ensures all supervisors possess a foundational understanding of modern slavery risks and responses.
- **Compliance and Best Practices:** Training aligns with legal requirements and industry best practices.
- **Empowerment:** Educated employees and supervisors are more likely to take action if they suspect instances of modern slavery, fostering a safer workplace.

Additionally, all employees with management or supervisory responsibilities are required to undertake training on Equality and Diversity, with annual refreshers.

## Our Policies

Barfoots has implemented the following policies to prevent modern slavery and human trafficking:

- **Ethical Trading and Human Rights Policy:** We adhere to the ETI Base Code to ensure fair treatment of all workers and full respect for their human rights.
- **Prevention of Hidden Labour Exploitation Policy:** This policy outlines our commitment to preventing modern slavery in our operations and supply chain and provides guidance on identifying and reporting suspicious activities.
- **Supplier Code of Conduct:** Our Supplier Code of Conduct sets out the minimum standards we expect from our suppliers, including compliance with modern slavery laws.
- **Whistleblowing Policy:** Barfoots provides a confidential reporting service, "SeeHearSpeakUp," available in multiple languages, to encourage workers to report any concerns related to modern slavery.

## Our Supply Chain

We are committed to implementing and enforcing effective systems and controls to prevent modern slavery within our supply chain. Our Ethical Trade policy outlines our expectations for suppliers, requiring adherence to the ETI Base Code. Compliance with this policy is a condition of supply.

As part of our due diligence process, all suppliers must register on SEDEX and complete the Self-Assessment Questionnaire, which we use to assess compliance with the ETI Base Code, including modern slavery and forced labour concerns. Additional ethical management tools may be used where appropriate.

Suppliers identified as higher risk through our assessment process may be required to undertake second- or third-party ethical audits, which include a focus on modern slavery and forced labour practices.

### Due Diligence

Our due diligence efforts to assess and address the risks of modern slavery include:

- **Supplier Audits:** Conducted periodically based on risk assessment to evaluate compliance with our Supplier Code of Conduct.
- **Supplier Self-Assessments:** Required for all suppliers to identify potential risks related to modern slavery and human trafficking.
- **Training and Awareness:** We engage with employees and suppliers to raise awareness and improve their ability to identify and address modern slavery concerns.
- **Ongoing Risk Assessment:** We continuously assess our supply chain to identify high-risk areas and implement mitigation strategies.

### Agency Workers

Barfoots ensures that our labour providers hold a valid Gangmasters and Labour Abuse Authority (GLAA) licence and comply with the Gangmasters (Licensing) Act 2004 and the Immigration Act 2016.

The GLAA plays a vital role in protecting vulnerable workers by working with law enforcement agencies to tackle organised crime and labour exploitation. GLAA licensing standards cover health and safety, fair pay, transport, and accommodation, as well as compliance with tax and employment regulations.

Barfoots is registered for "active checks" with the GLAA, allowing us to monitor changes in our labour providers' compliance status. We also conduct regular audits of a random selection of agency workers and the agencies we work with to ensure full compliance.

### Conclusion

Barfoots remains fully committed to combating modern slavery and human trafficking within our business and supply chains. We will continue to review and enhance our policies, training, and due diligence processes to strengthen our approach to this important issue. This statement has been approved by the Board of Directors of Barfoots Group of Companies and will be reviewed and updated annually.

This Statement was approved by the Boards of the Barfoots Group of Companies on [insert date].



Julian Marks  
Group Chief Executive Officer