

Barber's Cheesemakers group

AJ & RG BARBER LTD, Ditchheat, Somerset, BA4 6PR

FORD FARM, Ashley Chase Estate, Litton Cheney, Dorset, DT2 9AZ

Modern slavery and human trafficking statement

Introduction

This statement sets out AJ & RG Barber's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

As part of the UK Dairy Industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely 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.

Organisational structure and supply chains

This statement covers the activities of AJ & RG Barber Ltd:

- AJ & RG Barber Ltd is the holding Company, which operates the production of milk from its own UK farms, the purchasing of additional milk from Farm Assured UK Dairy Farms and the manufacture of cheese, butter and whey products
- Subsidiaries to AJ & RG Barber Ltd are:
 - AJ & RG Barber (Sales) Ltd which operates the selling arm of the business
 - Ashley Chase Estate Ltd, producing cheese in a traditional way from local UK milk, with sales out to UK and International markets

Countries of operation and supply

The organisation currently operates in the following countries:

- UK, where the business operates from two sites in the West Country, manufacturing, packing and selling cheese and other Dairy products
- USA, where the joint venture owned Ford Farm USA operates as a selling arm and as a subsidiary of Ashley Chase Estate Ltd

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- AJ & RG Barber Ltd and its subsidiaries, buy ingredients and packaging from suppliers who have commercial activities in the UK or EU.

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- In financial year commencing 1st April 2016, AJ & RG Barber Ltd will seek directly to the Company's approved suppliers, a statement of assurance that all products supplied to the Company have a supply chain which meets the ETI Initiative for Global Trade
- The Company, have already started a risk assessment process to assess the vulnerability of the production and supply chain. This is as part of the Company's Supplier Approval process, to which suppliers must comply with the Company standards to warrant approved status. By way of a Chain of Custody analysis completed by the Supplier, this shall reveal the Country of origin for sub-ingredient /raw materials for each product type supplied.
- Ingredients or sub-ingredients supplied from overseas are in the minority, so where these are identified in the supply chain, a cross check against the supplier ETI compliance statement is made.
- Agency Labour is considered to comply with the ETI initiative when supplied through Agencies holding a current Gangmasters Licence.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Ingredients or Raw Materials manufactured outside of the EU, unless otherwise verified by the Supplier to conform to the ETI initiative

Responsibility

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

- **Policies:** Those relating to Ethical Purchasing, which includes procurement under the Ethical Trade initiative guidelines, are managed by the QA department, reviewed annually by members of the Board of Directors
- **Risk assessments:** Procurement of ingredients / raw materials for our products are from Approved Suppliers, the process including assurance of the supply chain to the principles of the ETI.
- **Investigations/due diligence:** If it were suspected that the supply chain had practices which contravened the ETI, further clarification would be sought from the supplier under the leadership of the Finance Director. If doubt about compliance still remained, trade with that supplier will be stopped.
- **Training:** The Company subscribes to Sedex, which systematically addresses each requirement in the ETI. Both the Company's Personnel and the QA function share the responsibility to ensure the compliance steps are understood and adopted.

Relevant policies

The organisation 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:

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- **Whistleblowing policy:** The organisation 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.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. The process of implementing the Supplier code of conduct, in relation to slavery and human trafficking, is explained in the Company's Ethical Trading Policy, and assurance of understanding and implementation by a positive response to their supply chain conforming to the ETI.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Agencies providing manual labour must hold a current Gangmasters licence.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews are currently under development, but by end of financial year 2016/17 will include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or requiring Supplier self-assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as in the current "Stronger together" initiative;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

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Performance indicators

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

- developing a system for supply chain verification expected to be in place during financial year 2016/17, whereby the organisation evaluates potential suppliers for ETI compliance before they enter the supply chain; and
- reviewing its existing supply chains, expected to be completed during financial year 2016/17, whereby the organisation evaluates all existing suppliers.

Training

The organisation has in place policies and procedures for supply chain managers/HR professionals within the organisation.

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 Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti- slavery policies; and
- 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

The organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The flyers/posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking; Modern
- what external help is available, for example through the Modern Slavery Helpline.

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Board approval

This statement has been approved by the organisation's board directors and members, who will review and update it annually.

Director's signature: 

Director's name: C N Barber

Date: 22/06/2016

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