



Glenrath Farms Ltd – Modern Slavery Act 2015 and Human Trafficking Statement

Introduction

Glenrath Farms Ltd is committed to adopting and developing a proactive approach to abolishing modern slavery, human trafficking, and hidden labour exploitation of any job applicants, workers or agency workers by any company, groups of individuals, individual/s and or suppliers.

The company recognises that labour exploitation is often hidden by the perpetrators and victims rarely acknowledge themselves as such and are often reluctant to come forward for help.

Section 54 of the Modern Slavery Act 2015 ("MSA") places a legal requirement on our company to publish an annual statement of steps the company has taken during the financial year to ensure that modern slavery is not occurring in our supply chains and in our own organisation. This Modern Slavery Act 2015 statement covers the period up to 31st May 2021.

Organisation Structure and Supply Chains

Our organization:

Glenrath Farms is an egg producer packer and manufacturer operating in Scotland selling eggs to both the UK retailers and UK food service manufacturers.

We are the parent company of Glenrath Egg Products Ltd. We have over 200 employees and operate in the United Kingdom.

Glenrath has farms, packing and manufacturing facilities at various locations throughout Scotland. We distribute our produce across the UK.

Glenrath Farms take pride in rearing our day old chicks to the point of lay and hen housing the birds on our own laying farms. Additionally we have contract producers who supply Glenrath Farms with their produce. Glenrath Farms diversified into liquid egg production (Glenrath Egg Products Ltd) to add value to all our eggs that are produced.

Our supply chains:

We procure goods and services from approximately 250 known and trusted suppliers mainly based in the UK however as we operate within a global supply chain similar to most entities it is impractical to have a direct link with all within the supply chain base.

Glenrath establishes a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health and safety, environmental standards, industry standards in conjunction with our customer standards.

Glenrath have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the relevant authorities.

Procedures:



Risk monitoring and Compliance

We actively encourage all our suppliers, customers, employees, to challenge their supply base to prevent and address risks of slavery in the supply chain.

All workers or agency workers (from reputable employment agencies) are approved by Gangmasters and Labour Abuse Authority (GLAA).

They must provide the correct evidence verifying their right to work in the United Kingdom before commencing work with our company. We randomly audit both our agency workers and providers to ensure full compliance.

Glenrath actively encourage openness and support anyone who raises genuine concerns in good faith relating to the slavery or human trafficking.

Glenrath are committed to ensuring no one should suffer any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking in any part of our business/s or in any of our supply chains.

Glenrath ensure all monies due to any employee, agency worker, supplier, and customer are credited directly into their nominated accounts.

Policies:

Glenrath Farms operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of the whistleblowers.
- Glenrath Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behavior when operating in the UK, abroad and managing our supply chain.
- Glenrath Farms is a B member of Supplier Ethical Data Exchange (SEDEX). We have been building our SEDEX membership progressively throughout the company.
- Glenrath work in conjunction with the current Ethical Trading Initiative and are audited against this initiative.

Risk Assessment and Supplier due diligence:

Glenrath Farms conducts due diligence on all procedures and policies to ensure we comply with the latest legislation to maintain our integrity – and these policies and procedures are audited by external bodies such as BRC (British Retail Consortium) Global Standard for Food Safety Accreditation and ETI (Ethical Trading Initiative).

Assessing risks in the provision of particular services;

- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.
- We require all suppliers to attest that:
 - They don't use any form of forced, child, compulsory or slave labour
 - Their employees work voluntarily and are entitled to leave work
 - They provide each employee with an employment contract that contains a



reasonable notice period for terminating their employment

- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment.

Training:

All employees and agency workers receive an induction into the business where our policies, procedures and expectations are outlined and made available.

We regularly attend Stronger Together Workshops to refresh our understanding of the current issues and proactive measures that we can take to reduce modern slavery in our business and our supply chains.

Glenrath continually upskill our key staff whom attended generally via e learning workshops of Modern Slavery, Human Rights and the Ethical Trading Initiative.

Awareness:

Glenrath Farms has raised awareness of modern slavery issues by notifying all our staff of our commitment in the fight against modern slavery by individually informing each employee, visual posters across our facilities that are focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery.
- **ETI:** - As our business relationship develops, we expect suppliers to raise their standards and improve working conditions, taking account of internationally recognised codes of practise. We have adopted several elements of international codes as well as the Ethical Trading Initiative (ETI) Base Code into our principles. We encourage our suppliers to achieve and maintain these standards.e.g. flags for potential cases of slavery or human trafficking.
- How employees should report suspicions of modern slavery – by speaking in confidence direct with their line manager or a Company Director.

Victim Support available in Scotland:

- Trafficking Awareness Raising Alliance (TARA) 0141 276 7724
- Migrant Helpline – 0808 8010 503 or Email: info@migranthelpuk.org

This statement replaces the previous statement published in January 2019 and covers the period
1 June 2019 to 31 May 2021.

Approved by the board of Glenrath Farms Ltd at the board meeting on 19th March 2020.

Sir John P Campbell
Chairman

Dated: 19th March 2020.