



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

1. INTRODUCTION

Glenrath Farms Ltd is committed to adopting and maintaining a proactive approach to preventing and eliminating all forms of modern slavery, human trafficking, and hidden labour exploitation within both our own operations and across our supply chain, including suppliers, subcontractors, and business partners.

The company recognises that labour exploitation is often concealed by perpetrators, and that victims may not identify themselves as such or may be reluctant to seek help. We are therefore committed to raising awareness, encouraging vigilance, and promoting a culture where concerns can be reported safely and without fear.

We acknowledge our responsibilities under the Modern Slavery Act 2015 and any other relevant statutory provisions. We are committed to ensuring transparency in our business practices and in our relationships with customers and suppliers of goods and services.

In accordance with Section 54 of the Modern Slavery Act 2015, Glenrath Farms Ltd will publish an annual statement outlining the steps taken during the financial year to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

This statement covers the financial period up to **31 May 2027**.

A full copy of the Modern Slavery Act 2015 can be accessed on [Legislation.gov.uk](https://www.legislation.gov.uk).

2. OUR ORGANISATION

Glenrath Farms Ltd is an integrated egg producer, packer, and manufacturer based in Scotland, supplying eggs to major UK retailers and food service manufacturers.

The company is the parent organisation of Glenrath Egg Products Ltd and employs approximately 200 people across its UK operations.

Glenrath Farms operates a network of farms, packing centres, and manufacturing facilities located throughout Scotland, with distribution of products across the United Kingdom.

The business takes pride in its vertically integrated model, rearing day-old chicks through to point of lay before transferring birds to its own laying farms. In addition, Glenrath works closely with a network of trusted contract producers who supply eggs in line with company standards.

Glenrath Farms has diversified into liquid egg production through Glenrath Egg Products Ltd, enabling the business to process and add value to its egg output.



a. Risk Monitoring and Compliance

Glenrath Farms Ltd actively encourages all suppliers, customers, and employees to challenge their own supply chains to prevent and address risks associated with modern slavery and human trafficking.

We ensure that all workers, including agency workers, are engaged through reputable employment agencies licensed by the Gangmasters and Labour Abuse Authority (GLAA). We recognise our responsibility as an employer to verify that any labour provider we engage is appropriately licensed and compliant with relevant legislation.

All workers are required to provide valid documentation confirming their right to work in the United Kingdom prior to commencing employment. In addition, Glenrath Farms conducts random audits of both agency workers and labour providers to ensure ongoing compliance.

The company is committed to ensuring that no individual suffers any detriment as a result of raising concerns, in good faith, regarding suspected modern slavery or human trafficking within our operations or supply chains. We actively promote a culture of openness and support, encouraging employees and stakeholders to report genuine concerns without fear of retaliation.

Glenrath Farms also maintains strict financial controls to protect workers from exploitation. All payments due to employees, agency workers, suppliers, and customers are made directly into their nominated bank accounts. Under no circumstances are payments made to third parties or to accounts other than those held in the name of the individual or organisation concerned.

b. Policies

Glenrath Farms Ltd operates a number of policies and procedures to identify, prevent, and address the risks of modern slavery and human trafficking within our operations and supply chain:

- **Whistleblowing Policy**

We encourage employees, customers, and suppliers to report any suspicions of modern slavery or human trafficking without fear of retaliation. A confidential reporting mechanism is in place to protect the identity of whistleblowers and ensure concerns are handled appropriately.

- **Code of Conduct**

The Glenrath Code of Conduct sets out the standards of behaviour expected of all employees when representing the business. It promotes ethical decision-making and reinforces our commitment to maintaining the highest standards of integrity across our UK operations and supply chain.

- **SEDEX Membership**

Glenrath Farms Ltd is a member of Supplier Ethical Data Exchange (SEDEX). We continue to develop and expand our participation across the business to enhance transparency and ethical compliance within our supply chain.

- **Ethical Trading Initiative (ETI)**

Glenrath Farms works in alignment with the Ethical Trading Initiative and is subject to audits against its standards, supporting our commitment to fair labour practices.

This policy is supported by the wider Glenrath Farms management system, which incorporates relevant procedures, controls, and compliance requirements. The effective implementation of this system underpins our commitment to preventing modern slavery and human trafficking.



Formal procedures are in place to address any breaches of this policy, including disciplinary action where appropriate.

3. TRAINING & AWARENESS

Glenrath Farms Ltd ensures that all employees, agency workers, and relevant personnel receive appropriate training and guidance to support the prevention of modern slavery and human trafficking.

- **Induction Training**
All employees and agency workers undertake an induction process, during which company policies, procedures, and expectations—including those relating to modern slavery—are clearly communicated and made accessible.
- **Commercial Team Training**
Employees responsible for managing supplier and customer contracts receive training to help them identify, assess, and address risks of modern slavery within the supply chain.
- **HR Training**
HR personnel involved in recruitment and employee management are trained to recognise and respond to potential indicators of modern slavery and labour exploitation within the workplace.

This ongoing training supports a culture of awareness, vigilance, and accountability across all areas of the business.

4. SUPPLY CHAIN

Glenrath Farms Ltd procures goods and services from approximately 250 known and trusted suppliers, the majority of which are based in the United Kingdom. As with most organisations operating within a global supply chain, it is not always possible to maintain direct relationships with every tier of the supply base.

We are committed to building relationships with suppliers based on trust, integrity, and shared values. Our supplier selection and onboarding process includes due diligence checks covering:

- Reputation and business integrity
- Compliance with legal requirements
- Adherence to health and safety and environmental standards
- Alignment with industry standards and customer expectations

As part of our commitment to preventing modern slavery and human trafficking, our supplier approval process includes an assessment of the controls implemented by suppliers to mitigate such risks. We recognise that goods sourced from outside the UK and EU may present a higher risk, and we apply enhanced scrutiny and ongoing monitoring where appropriate.

Glenrath Farms Ltd will not knowingly support or engage with any business involved in modern slavery or human trafficking. We take responsibility for implementing this policy and its objectives, and we are committed to providing appropriate resources, including training and investment, to ensure compliance across our operations and supply chains.

At the time of this statement, Glenrath Farms Ltd has not been made aware of any allegations of modern slavery or human trafficking involving our suppliers.



a. Risk Assessment and Supplier Due Diligence

Glenrath Farms Ltd conducts comprehensive due diligence across its policies, procedures, and operations to ensure compliance with current legislation and to uphold the highest standards of integrity.

Our systems and controls are subject to external audit and verification, including accreditation against the BRCGS (formerly British Retail Consortium Global Standard for Food Safety) and alignment with the Ethical Trading Initiative.

As part of our risk assessment processes, we evaluate suppliers and service providers to identify and mitigate potential risks related to modern slavery and labour exploitation. Where concerns are identified, we will:

- Require improvements to substandard employment practices
- Monitor progress against agreed corrective actions
- Sanction or discontinue relationships with suppliers who fail to meet our standards

All suppliers are required to confirm that they meet the following minimum standards:

- They do not use any form of forced, bonded, compulsory, or child labour
- Employment is freely chosen, and workers are free to leave in accordance with agreed notice periods
- Employees are provided with a clear employment contract, including reasonable notice provisions
- No deposits or financial bonds are required as a condition of employment, and wages are not withheld unfairly
- Employees are not required to surrender passports, identity documents, or work permits

This approach ensures that Glenrath Farms Ltd maintains a robust framework for identifying and addressing risks within its supply chain.

5. AWARENESS

Glenrath Farms Ltd is committed to raising awareness of modern slavery and human trafficking across all areas of the business. We ensure that employees are informed of our zero-tolerance approach and understand their role in identifying and reporting concerns.

This is achieved through:

- **Employee Communication**

All employees are individually informed of the company's commitment to eliminating modern slavery as part of induction and ongoing communication.

- **Visual Awareness Materials**

Posters are displayed across all sites to reinforce key messages and provide clear guidance. These materials highlight:

- Our commitment to preventing modern slavery and labour exploitation
- Indicators and warning signs ("red flags") of potential cases
- How to report concerns safely and confidentially



- **Ethical Standards & Supplier Expectations**

Glenrath Farms Ltd aligns with the principles of the Ethical Trading Initiative Base Code. As our relationships with suppliers develop, we expect continuous improvement in working conditions and adherence to internationally recognised standards. We actively encourage suppliers to meet and maintain these expectations.

- **Reporting Mechanisms**

Employees are encouraged to report any suspicions of modern slavery or human trafficking in confidence, either through their line manager or directly to a Company Director.

- **Key Performance Indicators (Next 12 Months)**

KPI 1: Two nominated managers will attend a workshop for Tackling Modern Slavery in UK and ROI Businesses via Stronger Together.

KPI 2: Display Stronger together multi-lingual poster in various key locations

Victim Support (Scotland)

Support is available for individuals who may be affected by modern slavery or human trafficking:

- **Trafficking Awareness Raising Alliance (TARA)**

Tel: 0141 276 7724

- **Migrant Help**

Tel: 0808 8010 503

Email: traffickingscotland@migranthelpuk.org

Statement Approval - This statement replaces the previous version published in May 2025 and covers the period up to **31 May 2027**.

It was approved by the Board of Glenrath Farms Ltd at the board meeting held on **12 May 2026**.

Prof William A C McKelvey OBE, FRSE
Chairman

Dated: 12th May 2026