



Barron Wood Distribution Limited

Anti-Slavery & Human Trafficking Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

About Barron Wood Distribution.

Barron Wood Distribution Ltd was established in 1993 and is a family owned UK and European Distribution company. It employs approximately 130 employees based across 2 sites in Preston and Glasgow. Annual turnover to the 31st October 2020 is in the region of £70 million, comprising over 186,000 shipments. The company provides transport services across a broad range of market sectors to a wide range of both Domestic and International customers.

Our Values

Barron Wood Distribution Limited has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our corporate policies which contribute to the prevention of slavery and human trafficking include but are not limited to the following:

- A recruitment policy including a check on an individual's Right to Work in the UK to enable us to identify any instances of human trafficking or forced labour.
- A whistleblowing policy setting out the steps for employees to raise any concerns that they may have without fear of reprisals.
- Equal opportunities and stringent Disciplinary and Grievance policies to ensure that our ethical standards are met.

Our Supply Chain

All of our direct employees are UK based office or managerial staff, who are paid at least the National Living Wage and as such we are confident that there is a very low risk of human slavery or forced labour in our direct employee base. We have therefore identified that our supply chain is a more likely area where there is a risk that human trafficking and modern slavery could occur.

We expect high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. In addition, we expect that our suppliers will hold their own suppliers to the same high standards. In the event of our suppliers not adhering to our standards, there can be material consequences up to and including the termination of our relationship with them.

Our employees are encouraged to raise any questions or concerns that they may have about modern slavery in our business or supply chain via our whistleblowing procedures.

During FY 2020, no complaints or concerns were raised about modern slavery or human trafficking taking place in our business.

Future Steps

We continue to monitor the modern slavery risk by way of policy, compliance and training, including;

- Ensuring new employees are made aware of the company's approach to Modern Slavery upon induction.
- Enhancing existing pre-contract checks to assess the anti-slavery policies / procedures that new suppliers have in place.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Policy Director (David Fairbrother) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Employees must notify their immediate manager or David Fairbrother as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees who have any concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or supply chains of any supplier tier must notify their immediate manager or David Fairbrother at the earliest opportunity.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery or human trafficking, raise it with your manager or David Fairbrother.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015, and will be reviewed and updated as appropriate, at least annually.

Signed by the Policy Director for and on behalf of Barron Wood Distribution Limited.

(Original document approved on 4th January 2019 and reapproved on 31st January 2020)

David Fairbrother **Dated** 31st January 2021
Policy Director