

Modern Slavery Statement

Introduction:

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. It is a significant problem with an estimated 50 million victims worldwide.¹ Bryan W Nash & Sons Ltd is committed to acting ethically and with integrity in all business dealings and relationships we have by ensuring that we have robust policies, procedures and risk management systems in place to reduce the risk of engaging in any form of modern slavery within our supply chain.

About Us: Our Structure and Supply Chains:

For over 50 years Bryan W Nash & Sons Ltd has been a supplier of high-quality ingredients to the global food and drinks industries. We are a family-owned company with 17 direct employees based in Surrey, England. From this location, we buy products & services from our suppliers & sell to our customers, who are usually manufacturers of finished products.

Our Expectations:

As suppliers of food & beverage ingredients, we acknowledge that agriculture is a sector with a high risk of modern slavery and human trafficking as it has the fourth highest proportion of victims of forced labour worldwide.² We have therefore adopted strict procedures regarding modern slavery and human trafficking to mitigate this risk. This statement serves to outline these procedures publicly and to highlight areas for future development. Any suppliers who do not take all reasonable steps to ensure that modern slavery and human trafficking is not taking place within their supply chain or business, do not adhere to minimum internal standards or violate the law, will have their agreement terminated with Bryan W Nash & Sons Ltd. If appropriate, the relevant authorities will be informed.

Our Policies and Procedures:

Underpinning Bryan W Nash & Sons Ltd's zero tolerance to modern slavery are our policies and procedures. We aim to act ethically and responsibly in all business dealings & the following policies outline how this will be achieved:

- Whistleblowing policy
- Health and safety policy
- Prevention of modern slavery policy
- Anti-bribery and corruption policy
- Training and development policy
- Ethical code of conduct

¹ Unknown, 'Modern slavery facts and figures', *Unseen*, 2021 <https://www.unseenuk.org/about-modern-slavery/facts-and-figures/?gclid=EAlaQobChMI2cSowJTP_wIVBbjtCh155gP3EAAYIAAEgIN-_D_BwE> [Date accessed: 19/06/2023]

² Andrew Phillips, Dr Alexander Trautrim, Emily Kenway, 'Agriculture and Modern Slavery Act Reporting: Poor Performance Despite High Risks: A research report from the Office of the Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab.' <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2018/november/modern-slavery-act-and-agriculture.pdf>> [Date accessed: 12/07/2023]

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These policies are freely available to all employees and training on them is provided during induction to the company of all new employees.

Risk Assessment and Management:

The risks of modern slavery and human trafficking are considered when undertaking supplier approval. We request documentation from all suppliers to demonstrate that qualified bodies have audited their sites. Supplier Ethical Data Exchange (SEDEX) membership is always verified and highly regarded when considering suppliers. SEDEX's Self-Assessment Questionnaires or SEDEX members' Ethical Trade Audit Reports provide detailed information regarding suppliers' business practices & help us build a risk assessment.

Whilst Bryan W Nash & Sons Ltd will consider suppliers without SEDEX membership, questionnaires regarding ethical values must be completed and committed to. These perform the same role as SEDEX's Self-Assessment Questionnaires. Failure to adhere to these values may lead to the termination of any agreement. All suppliers must immediately report to us any breaches of, or deviation from, this code.

Potential suppliers are also assessed using 'Google Trends.' This tool highlights if online traffic has linked the company with buzzwords such as modern slavery or human trafficking. If a correlation is found, an investigation is conducted to examine why this has occurred. This is checked annually to ensure that any new trends are identified.

Risk assessments based on the product sold and the information provided by the supplier are always made. Those that are considered 'high risk' are flagged to the Senior Management Team and are subject to more rigorous oversight by the Quality and Senior Management Teams. Bryan W Nash & Sons Ltd aims to work together with our suppliers to share information and ensure that a solid understanding of business practices and our expectations are met.

Action on Modern Slavery:

Bryan W Nash & Sons Ltd has not had any instances of modern slavery or human trafficking reported to us, however, there is a clear procedure for reporting any concerns should this become necessary. Our whistleblowing policy explains to employees how to raise a concern in a safe and secure way, the protection afforded to workers who highlight issues and how an investigation will be conducted. There is also scope for employees to report concerns anonymously. This helps to ensure that all concerns can be properly investigated and encourages all to step forward. Basic training also highlights anonymous helplines and suitable charitable organisations, should employees require any additional assistance.

Training on Modern Slavery and Human Trafficking:

At Bryan W Nash & Sons Ltd appropriate training on modern slavery and human trafficking is provided upon induction. This provides a key defense and ensures that all employees are aware of potential risk factors. Bryan W Nash & Sons Ltd recognise that senior staff members and the Quality Department play the greatest role in preventing modern slavery. As a result, by August 2024 all senior staff and the Quality Department will have undergone additional and industry specific training relating to modern slavery. This will further reinforce our defenses against engaging in modern slavery.

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Key Performance Indicators and Future Goals:

Bryan W Nash and Sons Ltd is committed to improving our systems and practices to reduce the risk of modern slavery and human trafficking being present in any part of the business. Over the next year we will strengthen our internal communication regarding modern slavery by including information on modern slavery in our food safety bulletin. We are also establishing an enhanced risk assessment, with areas focused on modern slavery and human trafficking. This will be in the form of a matrix examining risk factors such as location, use of employment agencies, seasonal workers, type of agriculture and third-party certifications.

Signed: 

Date: 14.9.23

Matthew Nash CEO