



Modern slavery and human trafficking statement

1. Purpose

This policy sets out the commitment of AJ & RG Barber Ltd, Ashley Chase Estate Ltd/Ford Farm and Somerdale International Ltd to preventing modern slavery and human trafficking in our business operations and supply chains. It demonstrates our zero-tolerance approach to all forms of modern slavery and our duty under the UK Modern Slavery Act 2015.

2. Scope

This policy applies to:

- All employees, officers, and directors across our Group.
- All subsidiaries and joint ventures.
- All suppliers, contractors, and partners providing goods or services to our UK and international operations.

3. Definitions

- Modern Slavery: Includes slavery, servitude, forced or compulsory labour, and human trafficking as defined in the Modern Slavery Act 2015.
- Supply Chain: Includes all stages of our operations — from milk production, ingredient sourcing, packaging, processing, storage, distribution, and international sales.
- High-Risk Suppliers: Those based outside the UK/EU or operating in sectors or countries known for poor labour protections.

4. Organisational Structure

Our group includes:

- AJ & RG Barber Ltd (milk production and cheese/whey manufacturing, and export - Ditchet, Somerset)
- Ashley Chase Estate Ltd/Ford Farm (cheese production and export - Litton Cheney, Dorset)
- Somerdale International Ltd (cheese export and distribution - Wellington, Somerset)

We operate in the UK and USA, and source ingredients and packaging primarily from UK/EU suppliers, with some imported ingredients subject to enhanced scrutiny.

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5. Our Commitment

- Zero tolerance to modern slavery in any form.
- Full compliance with the Modern Slavery Act 2015 and international ethical trade initiatives.
- Continuous improvement in identifying and mitigating modern slavery risks in our operations and supply chains.

6. Governance and Responsibility

Role	Responsibility
Board of Directors	Policy approval and annual review
MD	Strategic oversight and resource allocation
Sustainability & Compliance Lead	Policy implementation, reporting, risk management
Procurement & QA Teams	Supplier due diligence, ETI compliance checks, audits

7. Policies Supporting This Commitment

- Whistleblowing Policy – Includes anonymous reporting channels.
- Ethical Trading Policy – Aligned with the Ethical Trade Initiative (ETI) Base Code.
- Supplier Code of Conduct – Mandatory for all suppliers and includes ETI-aligned expectations.
- Recruitment Policy – Only licensed recruitment agencies (e.g., GLA-certified) are used.
- Employee Code of Conduct – Promotes a culture of integrity and responsibility.

8. Due Diligence and Supply Chain Controls

We apply the following controls across our procurement and supply chains:

- ETI Assurance: All suppliers must confirm compliance with ETI principles.
- Chain of Custody Checks: Required for ingredients and sub-ingredients, identifying country of origin.
- Audits:
 - i. Annual self-assessments for all suppliers.
 - ii. SMETA (SEDEX Members Ethical Trade Audit) conducted as per risk assessment.
 - iii. On-site visits for UK suppliers; risk-based inspections for international ones.
- Agency Labour Checks: All UK agencies must hold valid Gangmasters Licencing Authority (GLA) certification.

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9. Risk Assessment and Mitigation

We assess risks through:

- A structured Supplier Risk Assessment covering geography, product type, and labour intensity.
- A reviewed Modern Slavery Risk Register.
- Escalation procedures for non-compliance, including potential termination of supply contracts.

High-Risk Activities Include:

- Use of ingredients or packaging sourced from outside the UK/EU without verified ETI compliance.
- Employment of migrant or temporary labour via third parties.

10. Training and Awareness

- Mandatory Induction: All new employees receive modern slavery awareness training.
- Annual Refresher Training: For procurement, QA, and operational staff.
- Specialist Training: For those involved in audits, inspections, or high-risk supplier management.
- Posters and Resources: Available at all sites to promote awareness and external help contacts (e.g., Modern Slavery Helpline).

11. Reporting and Whistleblowing

- Anonymous hotline and reporting email available.
- All reports investigated promptly.
- Whistleblowers are protected against retaliation.
- Issues are recorded in a secure incident log with actions documented.

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12. Performance Monitoring and KPIs

We monitor the following indicators annually:

- % of high-risk suppliers audited.
- Number of reported modern slavery incidents and resolution timelines.
- % of staff trained on modern slavery awareness.
- Supplier compliance levels with ETI and contract clauses

13. Communication and Transparency

- This policy and our annual Modern Slavery Statement are published on our website.
- All suppliers receive this policy and are required to acknowledge and comply.
- We engage with sector-wide initiatives such as Stronger Together and SEDEX.

14. Continuous Improvement and Innovation

We are committed to:

- Exploring blockchain and digital traceability tools.
- Supporting supplier development programs to raise labour standards.
- Collaborating with industry groups such as the UK Dairy Responsible Sourcing Programme

15. Review and Approval

This policy will be reviewed at least annually and updated by the organisation's board directors and members as required in response to legislative, market, or operational changes.

Director's signature:

Director's name: A Walker

Date: 22/10/25

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