



**Stonegate Farmers Limited**  
**Ethical Trade,**  
**Modern Slavery and Human Trafficking Statement**

This statement has been published in accordance with section 54 (1) of the Modern Slavery Act 2015. It sets out the steps taken by Stonegate Farmers Limited during the year ending 30<sup>th</sup> December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

**Introduction**

The International Labour Organisation (“the ILO”) estimates that almost 21 million people worldwide are victims of forced labour; almost 19 million of those victims are exploited by private individuals or enterprises, generating US\$ 150 billion of illegal profit per year. In response to this atrocity, the United Kingdom Modern Slavery Act 2015 requires larger companies to publish an annual report setting out what, if any, steps they take to ensure that slavery and human trafficking is not taking place in any of its supply chains or in its own business. There have been many well-reported instances of slavery globally in the farming and agricultural industry including in the UK. We have a zero-tolerance approach to modern slavery and human trafficking within our own operations and our wider supply chains.

**Our Business**

We are a wholesale supplier of shell egg and egg products serving our customers in the food service and retail market throughout England, Wales and Scotland. Our main depot is in Wiltshire where all our customer orders are picked and then the goods are distributed in delivery vehicles to customers. We have customers in England, Wales and Scotland including: High street Supermarkets, Michelin starred restaurants, contract caterers, hotels and pub chains.

**Organisational Structure**

Our holding Company is GOTT AGRI SYNERGY Ltd. As at the year ending 30<sup>th</sup> December 2018 our annual turnover was £85357k (gross) and £82780k (net) and we had 292 employees.

**Our Supply Chains**

As at 30<sup>th</sup> December 2018, we had approximately 204 suppliers who we purchased products from for re-sale. We buy products from many independent producers nationally for our customer base within the UK and European Union.



Where we purchase products directly from local growers there is only one tier involved in the supply chain, which makes the process of mapping our supply less complex for these suppliers.

### Our Policies on Slavery and Human Trafficking

We are committed to the respect of workers' rights in our own business and throughout our supply chains, with a primary focus on the abhorrent abuses of slavery and human trafficking. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our own business or supply chains.

### Steps Taken

1. We send our produce suppliers a Supplier Questionnaire to complete before we commence trading which asks if the supplier has an ethical sourcing policy along with other relevant searching questions
2. Some of our employees have attended training courses on modern slavery and human trafficking.
3. Our supply chain employees and internal colleagues have access to a confidential telephone number to call, anonymously if they wish, 24 hours a day, 7 days a week, to report any ethical concerns including modern slavery or human trafficking.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we intend to put systems in place to:

- Improve our Supplier Approval Questionnaire by raising more ethical trade questions to gain further information.
- Map our supply chain routes.
- Identify and assess potential risk areas in our supply chains and grade all our suppliers with a risk rating of high risk (red), medium risk (amber), or low risk (green).
- Use the risk assessment results to manage the risk of slavery and human trafficking occurring in our supply chains and our own business.
- Identify and assess potential risk areas in our own business and supply chain such as the use of agency workers.
- Monitor potential risk areas in our supply chains and own business.
- Protect whistle blowers.

### Action and Responses to Slavery and Human Trafficking Risks

Our aim is that through demanding transparency from our suppliers and by providing them with the knowledge and training they require (where appropriate) we can ensure that the abhorrent practices of modern slavery and human trafficking are not tolerated at any level of our supply chains. We are committed to helping and supporting our suppliers in certain situations where their treatment of workers has fallen below the minimum standards that we expect. For example, where excessive hours are being worked or where workers are not being provided with a rest break we would seek to educate and train the supplier and then undertake further monitoring. We will only delist a supplier as a last resort if no improvement has been shown where we have detected a problem and taken steps to try and get the



supplier to meet our minimum standards. For the most serious cases of slavery (such as passports confiscated, forced to work for no pay, unacceptable working conditions) we would immediately stop purchasing products from such a supplier. Such abuses are not tolerated but we appreciate that careful consideration is given to each situation to determine the most appropriate response.

### Training

We are committed to continuous training on the required understanding of the ETI base code and potential modern slavery situations

Chief Executive Officer

Adrian Gott

December 2018