



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

### **1. INTRODUCTION**

Glenrath Farms Ltd is committed to adopting and developing a proactive approach to driving out acts of modern slavery, human trafficking, and hidden labour exploitation within our business, as well as from our supply chain, including suppliers, sub-contractors and partners.

The company recognises that labour exploitation is often hidden by the perpetrators and victims rarely acknowledge themselves as such and are often reluctant to come forward for help.

We acknowledge our responsibilities as detailed in the Modern Slavery Act 2015 and any further relevant statutory provisions and will ensure transparency within the organisation with customers and also suppliers of good and services to the organisation.

Section 54 of the Modern Slavery Act 2015 places a legal requirement on the business to publish an annual statement of steps the company has taken during the financial year to ensure that modern slavery has not occurred in our supply chains and in our own organisation. This Modern Slavery Act 2015 statement covers the period up to 31<sup>st</sup> May 2026.

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 is an egg producer, packer and manufacturer operating in Scotland selling eggs to both UK retailers and UK food service manufacturers.

We are the parent company of Glenrath Egg Products Ltd. We have in the region of 200 employees and operate in the United Kingdom.

Glenrath has farms, packing and manufacturing facilities at various locations throughout Scotland. We distribute our produce across the UK.

Glenrath Farms take pride in rearing our day old chicks to the point of lay and hen housing the birds on our own laying farms. Additionally we have contract producers who supply Glenrath Farms with their produce. Glenrath Farms diversified into liquid egg production (Glenrath Egg Products Ltd) to add value to all our eggs that are produced.

#### **a. Risk Monitoring and Compliance**

We actively encourage all our suppliers, customers, employees, to challenge their supply base to prevent and address risks of slavery and human trafficking in the supply chain.

All workers or agency workers (from reputable employment agencies) are approved by Gangmasters and Labour Abuse Authority (GLAA). We are cognisant of our responsibilities as an employer to ensure that any recruiter we deal with is appropriately licensed.

They must provide the correct evidence verifying their right to work in the United Kingdom before commencing work with our company. We randomly audit both our agency workers and providers to ensure full compliance.



Glenrath are committed to ensuring no one should suffer any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking in any part of our business/s or in any of our supply chains. Glenrath actively encourage openness and support anyone who raises genuine concerns in good faith relating to the slavery or human trafficking.

[CONSIDERING THIS SECTION IS CALLED 'COMPLIANCE' – HOW DO WE ENCOURAGE THIS, MONITOR, RESPOND AND HOW LONG DO WE RETAIN RECORDS]

Glenrath ensure all monies due to any employee, agency worker, supplier, and customer are credited directly into their nominated accounts. We do not provide payment for services to any nominated accounts, or to any other person than the named employee.

## **b. Policies**

Glenrath Farms operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of the whistleblowers.
- Glenrath Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behavior when operating in the UK, abroad and managing our supply chain.
- Glenrath Farms is a B member of Supplier Ethical Data Exchange (SEDEX). We have been building our SEDEX membership progressively throughout the company.
- Glenrath work in conjunction with the current Ethical Trading Initiative and are audited against this initiative.

This policy takes into account and supports the policies, procedures and requirements documented in our management system. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached.

## **c. Training**

All employees, agency workers or similar, receive an induction into the business where our policies, procedures and expectations are outlined and made available.

All commercial staff who manage contracts have received training on identifying and addressing modern slavery in supply chains

All HR Managers who recruit and manager staff have received training on identifying and addressing modern slavery in the workplace.

## **3. OUR SUPPLY CHAINS**

We procure goods and services from approximately 250 known and trusted suppliers mainly based in the UK. However, as we operate within a global supply chain similar to most entities it is impractical to have a direct link with all within the supply chain base.

Glenrath establishes a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence



of the supplier's reputation, respect for the law, compliance with health and safety, environmental standards, industry standards in conjunction with our customer standards.

As part of our due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

We will not support or deal with any business knowingly involved in slavery or human trafficking. Glenrath shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training etc.) and investment to ensure that slavery and human trafficking is not taking place within our organisation and within our supply chains.

Glenrath have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers.

#### **a. Risk Assessment and Supplier Due Diligence**

Glenrath Farms conducts due diligence on all procedures and policies to ensure we comply with the latest legislation to maintain our integrity. These policies and procedures are audited by external bodies such as BRC (British Retail Consortium) Global Standard for Food Safety Accreditation and ETI (Ethical Trading Initiative).

Assessing risks in the provision of particular services:

- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.
- We require all suppliers to attest that:
  - They don't use any form of forced, child, compulsory or slave labour
  - Their employees work voluntarily and are entitled to leave work
  - They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
  - They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
  - They don't require employees to surrender their passports or work permits as a condition of employment.

#### **4. AWARENESS**

Glenrath Farms raises awareness of modern slavery issues by ensuring staff are aware and informed of our commitment to drive out acts of modern slavery. We do this by individually informing each employee and implementing visual posters across our facilities that are focused specifically on modern slavery. These explain:

- Our commitment to drive out acts of modern slavery.
- **ETI:** - As our business relationship develops, we expect suppliers to raise their standards and improve working conditions, taking account of internationally recognised codes of practise. We have adopted several elements of international codes as well as the Ethical Trading Initiative (ETI) Base Code into our principles. We encourage our suppliers to achieve and maintain these standards.e.g. flags for potential cases of slavery or human trafficking.



- How employees should report suspicions of modern slavery – by speaking in confidence direct with their line manager or a Company Director.
- Our KPI Targets for the next 12 months:

**KPI 1:** Nominated managers will attend 'Introduction to Responsible Recruitment' online training via 'Stronger Together', Responsible Recruitment Toolkit (RRT).

**KPI 2:** Modern slavery information provided via poster to raise general awareness amongst all company colleagues.

Victim Support available in Scotland:

- Trafficking Awareness Raising Alliance (TARA) 0141 276 7724
- Migrant Helpline – 0808 8010 503 or email: [traffickingscotland@migranthelpuk.org](mailto:traffickingscotland@migranthelpuk.org)

This statement replaces the previous statement published in June 2024 and covers the period up to 31st May 2026.

Approved by the board members of Glenrath Farms Ltd by correspondence in May 2025.

Prof William A C McKelvey OBE, FRSE  
Chairman

Dated: 20<sup>th</sup> May 2025