

Bairds Malt Company Modern Slavery and Human Trafficking Statement

- Slavery and human trafficking are abuses of a person's freedoms and rights. They are however a growing issue across the world, in every region and every economy. We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain. We are committed to making a positive contribution to society by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner.
- Bairds Malt is committed to implementing responsible sourcing principles and assessment across our supply chain. We expect each employee and supplier to conduct all activities with integrity and according to the letter, spirit and intent of all applicable laws.
- We are committed to fostering open and inclusive workplaces that are based upon recognized workplace human rights, where all employees and partners are valued, engaged and respected in line with our corporate values.
- This statement is in response to the United Kingdom's Modern Slavery Act 2015 and outlines our approach to managing the risks of modern slavery and human trafficking. The statement applies to Bairds Malt and all of our business units and other entities in which we hold a majority interest. Bairds Malt encourages our business partners to uphold these principles and to adopt similar approaches within their businesses.

Bairds Malts Structure

- Bairds Malt operates through 6 divisions, namely: Bairds Malt, Brewers Select, Saxon Agriculture, Scotgrain Agriculture, Mark Lawrence Grain and Campbell & Penty. All the business are based in the United Kingdom.
- Bairds Malt is a major U.K. maltster with a total annual production capacity of 255,000 tonnes. Bairds Malt is a supplier of high quality malt products to all sectors of the brewing and distilling industries across the globe, we draw on many years of experience and strive to provide complete customer satisfaction. As a major UK maltster, Bairds Malt (either itself or through partners) purchases raw materials, manufactures malted barley and transports the malt to market where they are sold and consumed in the brewing and distilling sectors.
- Saxon Agriculture is a seed and grain merchant specialising in the trade, import and export of cereals, oilseed and pulses.
- Scotgrain Agriculture's activities cover the whole scope of farm activities supplying seeds, fertilisers, agrochemicals, animal feeds, agricultural lime and the procurement / marketing of all grains, oilseeds and pulses.
- Mark Lawrence Grain is a grain merchant specialising in domestic grain procurement and supply.



Our Approach

- Bairds Malt is committed to implementing responsible sourcing principles into its supplier assessment
 procedures and supplier agreements. We have standards that we expect of suppliers and from those
 we procure and we examine a supplier's policies and guidelines concerning business conduct,
 working conditions, employment, child labour, wages and hours, diversity, freedom of association and
 environment.
- Our employment principles are guided by international human rights standards, including the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact. They are also consistent with our shared values.

Due Diligence & Risk Identification

- Bairds Malt carries out a compliance and due diligence audit on any new operation or company that
 it acquires, to ensure that such entity is acting in compliance with Bairds Malt's policies.
- Bairds Malt regularly performs reviews and scrutinises potential risks in order to facilitate the early detection of sustainability risks in the supply chain.
- If supplier practices do not meet our standards (discovered through audit or otherwise), we will in the
 first instance work with suppliers to achieve compliance or in some cases terminate our relationship
 with them. Suppliers not adhering to our minimum requirements may be prohibited from future use.

Employee Engagement and Training

- Bairds Malt makes its employees aware of all of its policies and procedures including this statement or the policies referred to in it.
- Bairds Malt is committed to providing both online and face to face training to its staff, on the risks of modern slavery within the Bairds Malt supply chain.
- Bairds Malt expects each employee, officer and member of the board of directors to conduct all
 activities related to, or reflecting on, the Bairds Malt business with integrity and according to the letter,
 spirit and intent of all applicable laws.
- We also operate a whistleblowing policy, aimed at our employees, which encourages staff to report
 any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any
 reports of this nature will be fully investigated and appropriate remedial actions taken.
- For our employees, failure to comply with applicable standards may result in disciplinary action which could result in their immediate suspension or the termination of their employment.



Reporting

- Our employees have access to procedures for training, reporting and whistleblowing. This allows employees to ask a question or raise a concern in a confidential and/or anonymous way.
- All reports are recorded, and themes are tracked and monitored. All information is then recorded on the annual Corporate Responsibility report.

Approved by the board and signed on its behalf by:

Roger Woodley Bairds Malt Limited Chief Executive Officer

13 February 2019