

Modern Slavery Act 2015
FENGRAIN (SERVICES) LTD & FENGRAIN LTD
POLICY AND STATEMENT
For Financial Year 1 August 2018 to 31 July 2019

We, the Board of Directors of Fengrain (Services) Ltd, are committed to the continued improvement of practices to combat slavery and human trafficking. We take our obligations under the Modern Slavery Act 2015 seriously and have robust working practices in place to comply with its' obligations. We adopt a zero tolerance approach to modern slavery and human trafficking in all forms.

We are committed to ensuring there is transparency in our own business and in our approach to tackling any issue throughout our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015 and we expect the same high standard from all of our contractors, suppliers and other business partners.

Structure and Supply

Fengrain (Services) Ltd was established in 1980 and is an independent farmer owned business based in Wimblington, Cambridgeshire. The company employs 43 staff and provides storage and conditioning facilities for combinable crops exceeding 150,000 metric tonnes per annum. In addition, the company also trades in excess of 850,000 tonnes of combinable crops each year from their offices in Wimblington and Kent.

Fengrain (Services) Ltd are accredited by TASCC, GTP, ISCC and are also BRC Agents and Brokers accredited, all of which are annually audited.

All counterparties to which we contract, or do business, must read, understand and comply with this policy.

Our supply chain includes:-

1. Combinable Crops purchased from UK farmers registered to Red Tractor assurance scheme.
2. Fertiliser purchased from multinational companies
3. Seed purchased from multinational companies
4. Commodities purchased from companies contained within the EU.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery 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 slavery and human trafficking is not taking place anywhere within our supply chain.

Associated policies supporting our commitment include our recruitment, employment, health and safety and ethical policies.

Compliance and Communication

Any concerns, including a suspected breach of this policy or if a party is unsure about a particular act or risk, from a member of staff or counterparty to any contract regarding the likely or actual risk of breach of this policy must be raised to the Board of Directors at the earliest opportunity. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If anyone believes that treatment has been suffered, the person should inform the Board of Directors immediately. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Training and Support

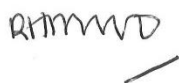
We provide training and employee support from time to time understanding of expected behavior, particularly in respect of their business decisions and the Code of Conduct. We encourage employees to raise concerns. Training on this policy, and on the risk faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and further training will be provided as necessary in the light of the risks faced by our business.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures as well as the oversight built into our business operations and the knowledge and skills of our staff.

We aim to identify, assess and mitigate risk and we consider that Fengrain (Services) Ltd is a low risk of slavery and human trafficking as the majority of our suppliers are based in the UK and are small to medium sized growers in the agricultural sector. Additional businesses are multinational companies with extensive governance structure who operate wisely throughout the EU under its regulatory regime. The sector is highly regulated with farmers seeking financial assistance from the EU which require the provision of extensive information and also registration under Red Tractor Standards for farm assurance

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and incorporates our slavery and human trafficking statement for the financial year ending July 2018.



R Munro
Managing Director

**Approved On behalf of the Board of Fengrain Ltd and Fengrain (Services) Ltd.
29 March 2019**