

## Modern Slavery Act Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by NWF Group and its subsidiaries, during the 2018-19 financial year.

We acknowledge the responsibility we have to guard against modern slavery and human trafficking and are committed to eliminating any risk of it in our supply chain.

### Our Business

NWF Group is a specialist agricultural and distribution business delivering feed, food and fuel across the UK. With a heritage in the agricultural sector, established in 1871, the Group has over 140 years' experience in adding value to our customers.

The Group is made up of three trading divisions:

- NWF Agriculture (Feeds) is a leading national supplier of ruminant animal feed, feeding one in six dairy cows in Britain. The business supplies over 4,750 farmers from Scotland to Cornwall.
- Boughey Distribution (Foods) is a leading consolidator of ambient grocery products with significant warehousing and distribution assets.
- NWF Fuels (Fuels) is a leading distributor of fuel oil and fuel cards, delivering over 500 million litres of fuel across the UK to 58,000 customers.

### Risk Assessment

Each of the divisions is responsible for undertaking due diligence to identify where they feel modern slavery and human trafficking could most likely occur in their business. By identifying the high risk areas we then focussed our efforts.

We have identified our two key risks to be the following:

1. The supply chain in Feeds
2. Use of agency workers primarily in Foods

### Policies

Following a review of our current policies we believe that our present arrangements offer sufficient protection to all workers.

In addition to policies that protect all workers from mistreatment, we have a robust and effective Whistleblowing Policy which we are confident encompasses employees who wish to raise modern slavery and/or human trafficking as an issue.

We operate strictly in accordance with UK employment legislation.

### Due Diligence

A supplier questionnaire is in operation within the three trading divisions to establish risk within our supply chain.

On a continuing basis we will raise enquiries with all new suppliers, and those renewing their contracts, to satisfy ourselves that they have adequate provisions in place to prevent modern slavery and human trafficking.

As part of our process we carry out regular audits of the agencies that supply temporary workers. Part of these audits involve investigating what the agency are doing to combat modern slavery and human trafficking. From the responses we received we are satisfied that the agencies have reduced the risk to a satisfactory level. Also, it is our intention to continue with these audits on a regular basis in order to more closely monitor this.

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### Training

To ensure a high level of understanding across the Group senior executives and other appropriate employees attended a training session with external legal advisors who provided an overview of the Modern Slavery Act and advice on the next steps. Other members of staff also attended training where necessary, including trade body events and a visit from ACAS. The training will be repeated on a regular basis.

### Effectiveness

Across the Group, we have identified the key risks to our business and sought to diminish these using pragmatic and reasonable solutions. However, we understand that combatting modern slavery and human trafficking will be an ongoing process and we endeavour to reduce the risk of this being present in our supply chain year on year.

This statement was approved by the Board of NWF Group plc on 24 January 2019.

A handwritten signature in blue ink, appearing to read 'RWhiting'.

Signed on behalf of the Board by Richard Whiting, Chief Executive of NWF Group.