

Modern slavery and human trafficking statement

Statement wording

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Cotteswold Dairy has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cotteswold Dairy has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain

Our Business and Supply Chains

Cotteswold Dairy Limited is a liquid milk and cream processor and distributor, supplying a range of markets including direct consumers on the doorstep, wholesalers, retailers, ingredients and food service.

All milk is procured from UK suppliers and processed in the UK. Other complimentary goods are sourced from both UK and European suppliers.

Cotteswold Dairy is an AB member of SEDEX (Supplier Ethical Data Exchange) a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains.

High Risk Activities

There are no activities that are considered to be at high risk of slavery or human trafficking highlighted during the financial year.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Board of Directors is accountable for reviewing and designing all Cotteswold Dairy's policies in relation to its own workforce.
- **Risk assessments:** The Operations Director is accountable for the auditing of all packaging and ingredient suppliers to Cotteswold Dairy.
- **Investigations/due diligence:** During the financial year, there were no known breaches or suspected instances of slavery and human trafficking.
- **Training:** The HR & Marketing Director is accountable for ensuring that Modern Slavery Awareness Training in the organisation is delivered accordingly.

Relevant policies

The organisation operates the following policies that links its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Cotteswold Dairy Recruitment Policy** – Cotteswold Dairy ensures that all new employees provide proof of their identification and right to work in the UK. This involves physical checks of employee's passports or birth certificates.
- **Provision for Agency Workers Policy** – Cotteswold Dairy uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agency providers have to be a registered member of the Gangmasters Licencing Authority.

Due diligence

Cotteswold Dairy aims to undertake due diligence when considering taking on new suppliers, and to regularly review its existing suppliers

Cotteswold Dairy operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits, which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

The organisation requires all staff working in Procurement, Technical Compliance and HR within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline

Modern Slavery and Human Trafficking Awareness Sessions will continue to take place during financial year 2019 for Managers within the business.

Key Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.



George Workman –Managing
Director

Date: 8th April 2019