



MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT

INTRODUCTION

Graham's Dairies Limited is committed to ensuring that its business and supply chains are free from slavery and human trafficking. To date, we have reviewed our current practices and procedures relating to supply chain due diligence and associated risk management in order to understand how we can best develop in this area.

Section 54 of the Modern Slavery Act 2015 ("MSA") places a legal requirement on large businesses such as Graham's Dairies Limited to publish an annual statement of the steps that the organisation has taken during the previous financial year to ensure that modern slavery (including human trafficking) is not taking place in its business or supply chain. This statement is made pursuant to the MSA for the financial year ending 5th April 2024.

ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

OUR ORGANISATION

Graham's Dairies Limited is a manufacturer and supplier of dairy products in the agriculture and food processing sectors.

We are the parent company of Graham's the Family Dairy Limited (the "Group"). We have over 700 employees and operate in the United Kingdom.

We have an annual worldwide turnover of £171 million.

Our business is organised into five business units: Bridge of Allan, Glenfield, Nairn, Inverurie, and Glasgow who produce and distribute a variety of dairy products to customers.

OUR SUPPLY CHAINS

We operate three manufacturing sites in the United Kingdom. We procure goods and services from approximately 700 suppliers based in four countries, namely the United Kingdom, Germany, Italy, and France. Of these suppliers, we have direct contractual relationships with 700 first-tier suppliers and the remainder are lower tier suppliers, with whom our first-tier suppliers' contract.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains and this is reflected in our policies, Modern Slavery Response Plan, Whistleblowing, Anti-Bribery & Corruption Policy, Child Labour & Remediation & Young Worker Policy, Human Rights Policy.

Everyone who works for Graham's Dairies Limited will be obliged to comply with the modern slavery policy. All our suppliers will be required to accept contractual obligations to comply with our Supplier Code of Conduct and to oblige suppliers who supply them with goods/services to do so.

Our Managing Director has overall responsibility for our policies relating to ethics and conduct and is also responsible for the implementation, management, and day-to-day operation of such policies.

RISK MONITORING & COMPLIANCE

As part of our initiative to identify and address risks of slavery in our supply chain we:

- Carry out pre-contractual checks on suppliers, by way of scoring supplier-completed assessment forms, which scoring determines whether or not we enter into a contract with that supplier.
- Carry out an annual risk rating of all our suppliers by re-running the assessments described immediately above.
- Only engage workers from reputable employment agencies and always obtain evidence verifying their right to work in the United Kingdom before accepting a worker.
- Encourage openness and support to anyone who raises genuine concern in good faith relating to slavery or human trafficking. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- Annual SEDEX Audits (SMETA) with results being published on the SEDEX system to all suppliers and customers.

NEXT STEPS

Following a review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Continue to educate all colleagues across the Graham's Dairies business of our commitment to eradicating modern slavery and human trafficking in our supply chains by providing ongoing support and training.
- Continue to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains.
- Ensure adherence to the ETI Base Code, Human Rights Policy and raise staff awareness.
- Follow Stronger Together Guidance and Support
- Establish reporting mechanisms for employees or stakeholders to raise concerns about slavery or trafficking
- Scotland Against Modern Slavery – continue to be a member of the Round Table for SAMS