



Modern slavery and human trafficking statement

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

The Company Directors and Senior Managers are responsible for the organisation's anti-slavery initiatives including;

- Review of policies in relation to our own workforce
- Supplier due diligence.
- Investigations
- Training on modern slavery awareness

Policies

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

- **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. The policy includes procedures for using third party recruitment agencies
- **Ethical and Social Responsibility Trading Policy** – Cotteswold Dairy requires all suppliers to share our values and commit to the principles of the Ethical Trade Initiative 'base code'.
- **Whistleblowing Policy** – Cotteswold Dairy is committed to conducting its business with honesty and integrity and staff are encouraged to report any suspected wrong doing.

Due diligence

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

Cotteswold Dairy maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence may include an on line search, to ensure that particular organisation has never been convicted of offenses relating to modern slavery, or on site visits, which include a review of working conditions. Our Farm Liaison Officer works closely with our contracted supplying farms to ensure they follow best practice and align to our values.

Any third party agencies that may be used for recruitment must be from a preferred supplier list and approved by the Human Resources (HR) department, in order for their terms and conditions and their Gangmasters and Labour Abuse Authority (GLAA) license to be checked (if relevant). For any agency providing workers for production related roles, they must be registered with the GLAA, and provide proof of a Gangmasters license, before they can supply any workers to the relevant areas. Quarterly checks are made and recorded to review GLAA status and we are registered to be alerted of any changes.

Our Ethical and Social Responsibility Trading 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 and that they comply with the Ethical Trade Initiative 'base code'. We may terminate a contract at any time should any instances of modern slavery come to light.

Training

Staff induction includes awareness of the Modern Slavery Act 2015 and potential signs of modern slavery. The organisation also requires all managers and staff working in procurement, technical compliance and HR to complete training on modern slavery. Training is completed annually and provided to new employees in applicable roles when they join the company. The HR department is registered for updates from the Association of Labour Providers (ALP) and GLAA and receives additional training and updates from them through online workshops.

The organisation's modern slavery training covers;

- Various forms of modern slavery, the size of the problem and risk to our organisation
- How to identify signs of slavery and human trafficking, what steps should be taken if this is suspected and what external help is available, for example through the Modern Slavery Helpline, GLAA and "Stronger together" initiative.
- Procedures to mitigate and monitor the risk of slavery and human trafficking occurring in our supply chain.

Awareness

As well as training staff, the organisation raises awareness of modern slavery issues by displaying 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.
- Posters supplied by Stronger Together are also displayed in additional languages spoken by our workforce.

Modern Slavery and Human Trafficking Awareness training will continue during financial year 2024.

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 – none identified.

Assurance received from our suppliers that they support the Ethical Trade Initiative base code – all forms returned

3rd party recruitment agencies are reviewed - review completed

Staff training is completed – all relevant staff have completed their training, all new staff have been made aware of Modern Slavery during their induction

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

April 2024