

*The*  
**ILCHESTER**  
**CHEESE**  
*Co.*

# Modern Slavery Policy



# Contents

---

1. Scope
2. Definitions
3. Responsibilities
4. Risk Assessment & Due Diligence
5. Training & Awareness
6. Reporting Mechanism
7. Continuous Improvement
8. Communication
9. Review & Appeal

# Purpose

---

The Ilchester Cheese Co Ltd is committed to preventing modern slavery and human trafficking within its operations and supply chains, following the principles of the Stronger Together initiative. The Ilchester Cheese Co Ltd also commits to being a member of the Association of Labour Providers (ALP). We recognize that modern slavery is a grave violation of human rights and is inconsistent with our values. This policy outlines our commitment to identifying and eradicating modern slavery in all aspects of our business.

# Page 1

## 1. Scope

This policy applies to The Ilchester Cheese Co Ltd and covers all colleagues, workers, agency labour, contractors, suppliers and labour providers engaged in our operations and relevant supply chains. It sets out our approach to preventing modern slavery, human trafficking, forced labour, debt bondage, servitude and other forms of labour exploitation. We expect all organisations that supply labour, goods or services to us to operate in a lawful, ethical and responsible way and to meet our standards on human rights, responsible recruitment and fair treatment of workers.

We are committed to acting in line with the principles of the Modern Slavery Act 2015 and to supporting practical good practice promoted through responsible recruitment and anti-exploitation initiatives. Preventing exploitation is not treated as a paper exercise; it requires active management, proportionate due diligence, speaking-up routes and action where concerns are identified.

## 2. Definitions

**Modern slavery** is the recruitment, movement, harbouring or receiving of a person through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is an umbrella term covering slavery, servitude, forced or compulsory labour, involuntary prison labour, human trafficking and other forms of labour exploitation. It arises where a person is controlled, coerced, deceived or cannot freely leave work because of threats, intimidation, debt, abuse of vulnerability or restriction of movement.

**Supply chain** means the network of organisations and individuals involved in providing labour, ingredients, packaging, services, logistics and other goods or support to our business. Risk may arise in direct operations, labour supply arrangements or

deeper tiers of supply where visibility is weaker.

## 3. Responsibilities

### 3.1 Board and senior leadership

Senior leadership is responsible for setting expectations, approving this policy, allocating appropriate resources and ensuring that modern slavery risks are considered within governance, recruitment, procurement and supplier management arrangements.

### 3.2 Managers and employees

Managers must remain alert to indicators of exploitation, challenge unsafe or unethical practices and escalate concerns promptly. All employees, workers and agency staff are expected to understand this policy, complete relevant training and report concerns in good faith.

### 3.3 Suppliers, contractors and labour providers

Suppliers, contractors and labour providers must comply with applicable law and our standards on modern slavery, ethical treatment and responsible recruitment. Where relevant, they must be able to demonstrate appropriate policies, controls, worker protections and cooperation with audits, enquiries or remediation activity.

We expect suppliers in higher-risk areas, including labour provision, ingredients and packaging, to maintain effective controls relating to human rights, child labour, forced labour, recruitment fees, right-to-work compliance, worker welfare and grievance handling.

Where concerns are identified, we will assess the facts and take proportionate action. That may include corrective action plans, closer monitoring, suspension of new business or termination of the relationship where serious issues are not addressed.

## 4. Risk Assessment and Due Diligence

We will take a risk-based approach to assessing and managing modern slavery risk in our operations and supply chains. This includes considering labour models, use of agency workers, recruitment channels, worker vulnerability, country and sector risk, supplier performance, audit findings and any concerns raised through speaking-up routes or management reviews.

Our due diligence may include supplier onboarding checks, contractual expectations, verification of labour providers, review of recruitment practices, site audits, worker interviews, document checks, follow-up actions and escalation where warning signs are identified. We recognise that failing to find issues does not automatically mean risk is absent; it may mean our controls are too weak or our visibility is limited.

## 5. Training and Awareness

We will provide appropriate training and awareness activity so that relevant colleagues understand what modern slavery is, what warning signs may look like, how exploitation can arise through recruitment or labour supply arrangements, and how concerns should be raised and handled.

In support of this policy, the business will:

- Train relevant managers and employees on identifying, preventing and escalating modern slavery risks.
- Maintain recruitment and labour sourcing processes that are controlled by competent and trusted personnel.
- Require that workers are not charged unlawful or exploitative recruitment or work-finding fees.
- Provide workers with clear information about rights, pay, reporting routes and available support.
- Use induction, noticeboards, the staff app and other channels to reinforce awareness and speaking up.

- Assess labour providers and relevant suppliers to confirm that they meet legal and ethical requirements.
- Investigate concerns promptly, fairly and confidentially, with a focus on worker safety and appropriate evidence gathering.
- Provide confidential channels, including the Applewood Staff App where available, for workers and others to raise concerns.
- Take appropriate action where exploitation is suspected, including escalation to relevant authorities where necessary.
- Work with suppliers and labour providers on corrective action where issues are identified, rather than relying on passive compliance statements.
- Review training, incidents, supplier findings and policy effectiveness regularly to strengthen our approach over time.

## 6. Reporting and Response

Anyone who suspects modern slavery, trafficking or labour exploitation connected to our business should raise the concern immediately through management, HR or a confidential reporting route. Reports will be taken seriously and handled as sensitively and confidentially as possible. No one will suffer detriment for raising a genuine concern in good faith.

Where concerns indicate potential criminal activity or immediate risk, the business will consider referral to the appropriate authorities, which may include the police, the Gangmasters and Labour Abuse Authority or modern slavery reporting mechanisms. Any response should prioritise safeguarding, appropriate remediation and avoiding further harm to affected individuals.

## 7. Monitoring and Continuous Improvement

We will monitor the effectiveness of our approach through management review, supplier oversight, training completion, audit findings, incidents, grievances and lessons learned. Our controls will be reviewed and strengthened where gaps, trends or emerging risks are identified.

The Ilchester Cheese Co Ltd is committed to continuous improvement in preventing modern slavery, aligned with the principles of the Stronger Together initiative and the standards set by the Association of Labour Providers. We will regularly review and update our policies and procedures to ensure their effectiveness.

### **8. Communication**

This policy will be communicated to relevant employees, workers, agency staff, contractors, suppliers and labour providers. It will be made available through internal communication channels and, where appropriate, published externally alongside our wider modern slavery commitments.

This policy, in adherence to the Stronger Together initiative and as a member of the Association of Labour Providers, will be communicated to all employees, suppliers, and contractors and made publicly available on The Ilchester Cheese Co Ltd's website.

### **9. Review and Ownership**

This policy will be reviewed at least annually and earlier if legislation, guidance, organisational structure or risk exposure changes. The HR Director is responsible for policy ownership and for approving material updates.