

**SOUTH CAERNARFON CREAMERIES LTD**  
**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

***Policy statement***

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. South Caernarfon Creameries Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

***Responsibility for the policy***

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The Compliance Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

***Compliance***

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

We only use **specified, reputable recruitment agencies** to source temporary labour. The agencies are subject to regular audits and continuous registration checks are also undertaken in line with the Gangmasters' Licensing Authority.

Our site is registered with SEDEX, an ethical supply chain database, which is updated annually.

### ***Breach of the policy***

South Caernarfon Creameries Ltd values and respects honest and open communication, and all stakeholders have the opportunity to raise questions and/or concerns through: [mail@sccwales.co.uk](mailto:mail@sccwales.co.uk)

Our confidential Whistleblowing Policy also provides a further opportunity for employees to report information about any possible irregularities.

Our principles for tackling modern slavery both in the UK and globally include:

- Robust internal data checking processes in the UK. This includes checking of employee bank details and addresses to identify risk areas.
- Upskilling of our leaders and colleagues in this area and a commitment to all our UK sites becoming Stronger Together Business Partners.
- The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

### **Anti-Bribery and Corruption Policy**

We condemn any form of bribery or corruption. Engaging in corrupt behaviour is not compatible with how we conduct business and it is against our business compliance policy. This policy defines the framework and provides guidance on how to act accordingly.

### **Further steps**

As a business, we will:

- continue to follow our due diligence processes to monitor our compliance against modern slavery and human trafficking;
- monitor, report on and address any issues identified by the business by taking the appropriate steps to meet our own high standards of compliance and our statutory obligations;
- continue to educate all employees within the business of our commitment to eradicating modern slavery and human trafficking in our supply chains by providing ongoing support and training where appropriate;
- investigate the use of our internal ethical training to support our supplier's education in this area; and
- launch and communicate a revised strategy for sustainable business including commitments to further responsible sourcing, engaging with our people and tackling modern slavery.