



Policy Statement on Preventing Hidden Labour Exploitation

PURPOSE

The purpose of this Policy Statement is to provide clarity to employees, trade unions, agency labour providers and suppliers on the Lactalis standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

Lactalis recognises that it has a responsibility to take a robust approach to tackling hidden labour exploitation. The Company is committed to actively preventing all forms of labour exploitation in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

SCOPE

This policy covers Lactalis UK & Ireland. The Lactalis Group in the UK is made up of different legal entities, including:

- Lactalis McLelland
- Caledonian Cheese Company
- McLelland Cheese Packing
- Fresh Milk Company
- Lubborn Cheese
- Lactalis Nestle Chilled Dairy

EXPLANATION OF TERMS

‘Hidden Labour Exploitation’ is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

RESPONSIBILITIES

It is the responsibility of the Group Human Resources Director to coordinate and monitor the effectiveness of delivery of all elements of this policy, and to maintain and update this Policy as required.

It is the responsibility of HR Managers in their business units to provide employees with advice and support as needed.

It is the responsibility of Directors and Line Managers to ensure that they maintain a close understanding of all elements of this procedure and that this procedure is complied with fully within the facility/team.

It is the responsibility of the ‘trusted person’ at each site to follow the reporting procedures set out in this Policy.

It is the responsibility of each individual member of staff to familiarise themselves with this procedure and to ensure their own compliance at all times.

POLICY

Lactalis commits to developing and adopting a proactive approach to tackling hidden labour exploitation by:

- Providing the HR Managers with the necessary training to have responsibility for developing and operating Company procedures relevant to this issue.
- Accepting that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensuring that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and adhere to the relevant Company policies at all times.
- Ensuring that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent HR Managers and Line Managers.
- Adopting a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
- Provide information on tackling “Hidden Labour Exploitation” to our workforce in a variety of formats, including the display of workplace posters, worker leaflets, holding Manager briefings and including information in induction training sessions.
- Encouraging workers to report cases of hidden third party labour exploitation, providing the means to do so and investigating and acting on reports appropriately.
- Positively encouraging and supporting employees and agency workers to report such exploitation which may be occurring within their communities through the procedures detailed in the posters and worker leaflets.
- Requiring labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above. The Company only uses 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.
- Communicating with all our suppliers, including farmers who supply us with milk, to encourage them to adopt policies and procedures consistent with the above, and to provide advice and information on this issue.
- The Company participates in collaborative initiatives focussed on human rights in general, and slavery and human trafficking in particular, such as participation in the ‘Stronger Together’ initiative.

This Policy Statement is made in accordance with s.54(1) of the Modern Slavery Act 2015, and has been approved by the Board of Directors. This Statement has been signed by the Companies’ Managing Directors on 3 October 2018.