

ORNUA MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2017

1. INTRODUCTION

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Ornua Co-operative Limited and its subsidiaries (**'Ornua'**) are opposed to slavery and human trafficking in any part of our activities or our supply chains. Ornua Group is therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

2. ORGANISATIONAL STRUCTURE

- 2.1 Ornua is an agri-food commercial co-operative which markets and sells dairy products on behalf of its members, Irish dairy processors and the Irish dairy farmer. Ornua is Ireland's largest exporter of Irish dairy products.
- 2.2 Ornua's core purpose is to bring quality Irish dairy products to markets around the world. We are headquartered in Dublin and export to over 110 countries with annualised sales of circa €2.5 billion. We also operate from 15 subsidiaries worldwide.
- 2.3 The business is structured on two core platforms:
 - (a) **Ornua Foods:** is the division is responsible for the international marketing and sales of Ornua's consumer products portfolio which includes the *Kerrygold, Pilgrims Choice, Dubliner, Forto, Shannongold* and *BEO* brands. Markets are served through wholly owned subsidiaries and in-market teams in China, Germany, the Middle East, the UK and the USA.
 - (b) **Ornua Ingredients:** is the division is responsible for the procurement of Irish dairy products and for the sale of dairy ingredients to end users. Operating out of Ireland, the division exports dairy ingredients to over 110 countries and is supported by key subsidiaries in Spain, Saudi Arabia, the UK and the US.

3. SUPPLY CHAIN

- 3.1 As primarily an exporter of Irish dairy products, the majority of our purchases are made in Ireland. However, we also purchase dairy products produced in other countries, primarily the UK and the US. We source very little supply from countries where modern forms of slavery are a particular risk.
- 3.2 We do sell product to a large number of markets. We seek always to work with highly reputable distributors and customers. Our standard form of distribution agreement requires that our distributors adhere to the Ornua Code of Business Conduct and Ethics, which includes provisions prohibiting the use of forced, compulsory or trafficked labour.
- 3.3 In the last twelve months we have incorporated an updated anti-slavery and human trafficking clause in all new distribution and packaging contracts. We require the third party to undertake that:

- (a) it follows fair employment practices and its employees, personnel and other workers have safe working conditions and are paid a living wage;
- (b) neither it nor any other person in its supply chain uses trafficked, bonded, child or forced labour or has attempted to use trafficked, bonded, child or forced labour;
- (c) comply with all applicable laws, statutes, regulations and codes relating to employment law, slavery and human trafficking;
- (d) not take or knowingly permit any action to be taken that would or might cause or lead Ornua to be in violation of any anti-slavery requirements; and
- (e) at Ornua's request and cost, provide Ornua with any reasonable assistance to enable it to perform any activity required by any regulatory body for the purpose of complying with anti-slavery requirements.

4. ORNUA GROUP POLICIES RELEVANT TO SLAVERY AND HUMAN TRAFFICKING

4.1 The Ornua Counter-Party Approval Process and Procedures

We have increased the level of due diligence which we carry out prior to doing business with new third-party suppliers or customers. Accordingly, with effect from 1 March 2018 we have put in place new procedures for the approval of business counter parties that aim to ensure that they are compliant with all relevant requirements including modern slavery and human trafficking laws and regulations.

4.2 The Ornua Group Code of Business Conduct and Ethics

The Ornua Group code on Business Conduct and Ethics sets out the Group's commitment to acting ethically and with integrity towards our employees and in all our business relations. The code applies to all Ornua Group activities and includes all subsidiaries, business units, functional operations and all employees whether permanent or temporary, as well as contractor or agency staff.

4.3 Equal Opportunities Policy and a Dignity at Work policy

Ornua also implements an Equal Opportunities Policy and a Dignity at Work Policy. These policies are evidence of Ornua's commitment to fair employment practices and equality of opportunity for all current and potential employees, by promoting a work environment free from discrimination, intimidation or harassment.

4.4 Ornua Group Whistle Blower Policy

Ornua has an open-door policy that gives employees the freedom to approach any member of management with ethical questions or concerns without fear of retaliation thus to enable all individuals to voice concerns in a responsible and effective manner. In addition, Ornua uses a third party external global reporting service provider, which maintains employee anonymity, should the employee request it. We have a clear policy of non-retaliation against any person who raises such a concern and we investigate all concerns raised.

5. TRAINING AND COMMUNICATION

- 5.1 To ensure a suitable understanding of the risks of modern slavery and human trafficking, relevant directors and employees in our business will participate in training over the course of the current financial year.
- 5.2 We will publish this statement on our website and the website of our UK subsidiaries.

6. STATEMENT

- 6.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in the UK and constitutes Ornua Group's slavery and human trafficking statement for the financial year ended 30 December 2017.



Signed for and on behalf of the Ornua Group

DATE: 13 July 2018