



Arla Foods Modern Slavery Statement

This is Arla's ninth modern slavery statement. It includes progress made during the last year towards ensuring there is no modern slavery (including forced labour) in Arla's operations and supply chain, as well as setting out what we intend to do over the next 12 months.

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About Arla – who are we?

Arla Foods is a global dairy cooperative, owned by farmers in 7 European countries (UK, DK, SE, DE, NL, LUX, BE), supplying milk and dairy products to customers and consumers around the world. More than 16,600 suppliers deliver to our multiple processing sites and offices across the world, where Arla employs approximately 21,900 colleagues. This briefly illustrates the extent and complexity of our business. For further details about Arla click here:

<https://www.arla.com/company/investor/annual-reports/>

We operate and sell our products globally, and we ensure a culture that upholds internationally recognised human rights. This means that wherever we operate, we represent Arla's firm belief that the human rights of all people must be respected.

We follow the OECD Guidelines for Multinational Enterprises as well as the UN Guiding Principles on Business and Human Rights.

Arla Foods in the UK

Arla Foods Limited, which has its head office in Leeds, UK, is a UK subsidiary of Arla Foods amba, which has its head office in Aarhus, Denmark. It produces and supplies dairy products across the UK and globally, employing circa 3,900 colleagues across 15 sites. The global annual revenues for Arla Foods amba and Arla Foods Limited are EUR 13.8 billion, and EUR 3.6 billion respectively.

Arla Foods Cheese Company Limited holds the maturing bulk cheddar cheese stocks in the UK after they have been produced by Arla Foods Limited. Arla Foods Cheese Company Limited does not employ any colleagues in its business or procure or sell any goods or services, other than from/to Arla Foods Limited.

Yeo Valley Dairies Limited is the licensee of certain rights used within Arla Foods Limited's wider UK business and does not employ any colleagues in its business.

Arla Foods Ingredients Ltd., which produces whey products to the business of the Arla Foods Amba.

Arla Foods Hatfield Limited is wholly owned by Arla Foods Limited and is the holder of a lease at Arla's Hatfield distribution centre.

Lockerbie Biogas Limited owns and operates the effluent treatment plant at Arla's Lockerbie site and operates and oversees the construction of a biogas plant at Arla's Lockerbie site.

Our commitment

We are committed to contributing to social, environmental and economically sustainable development. Arla's Code of Conduct 'Our Responsibility' is our foundation: it covers the 10 principles of the UN Global Compact and the UN initiative to promote ethical business practices. Together with Arla Foods Human Rights Policy ([link](#)) and other related policies, it guides our behavior and is integral to every business decision made across our company.

We continue to embed our commitment to respect human rights in all business areas and processes and continue to work on implementing human rights due diligence processes and working with human rights impact assessments.

We do not accept forced labour and human trafficking and are committed to acting with integrity and ethically in our corporate activities and supply chain. We specify our expectations to suppliers in our **Code of Conduct for Suppliers and Business Partners** ([link](#)). As a farmer-owned cooperative we also recognise that we need to ensure human rights are respected on our owners' farms, and we work with farmer engagement and raising awareness.

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

In the UK, we only use **specified, reputable suppliers** to source labour as this is helping to reduce our exposure. Continuous registration checks are undertaken in line with the Gangmasters' Licensing Authority (GLAA) wherever applicable to verify the practices of any new agency before engaging with them.

All our Arla processing and production sites delivering to the UK market are registered with SEDEX, an ethical supply chain database. These sites complete required assessment questionnaires every year and are furthermore audited against ethical and human rights standards on a risk-based frequency, usually in the form of SEDEX Member Ethical Trade Audit (SMETA). The SMETA is based on the Ethical Trading Initiative (ETI) Base Code and local UK laws.

It is important to us that we continuously identify risks and areas for improvement and implement follow-up actions. We have a **global modern slavery steering committee** to formalise internal governance on modern slavery risks. We are committed to implementing and enforcing effective

systems and controls to ensure forced labour and human trafficking does not take place in our supply chains.

Further the principles include:

- Robust internal data checking processes in the UK. This includes checking of employee bank details and addresses to identify risk areas.
- Our General Membership Terms include our commitment to work against Modern Slavery including forced labour.
- Arla's farm quality assurance programme Arlagården®, which is compulsory for all members, aims to achieve a high level of compliance through bi-annual self-assessments. Arlagården® standards include a strong emphasis on the 'people' element on-farm including working environment, health and safety, accommodation and rest facilities.
- The 'people' standards in Arlagården® are assessed on-farm by third party auditors in all start-up and re-opening audits.
- Migrant worker colleagues in the Middle East retain their passports and identity documents, unless they sign a letter of consent if they want Arla to safekeep these.
- Upskilling of our leaders and colleagues about modern slavery.
- As selection criteria our Procurement department asks new preferred suppliers to provide a link to their Modern Slavery Statement.
- We work with responsible purchasing practices and continuously review our suppliers.
- Our confidential whistleblower service is open for all.
- E-learning and training materials related to responsible purchasing behaviour are available from our Intranet
- We promote and follow-up on purchasing compliance and act on non-compliant behaviour

Our expectations

We are committed to respecting human rights and preventing forced labour and human trafficking and acknowledge and embrace our responsibility in all our operations. We expect the same from business relationships (incl. joint ventures, suppliers and contractors) and our employees.

If any of our employees or anyone who has a business relationship with Arla identifies potential cases of forced labour and/or human trafficking within our business or supply chain, we expect them to inform Arla immediately, so we can take action, and we have established procedures in place for reporting such concerns.

Responsible sourcing

As a leading global dairy company, we source goods and services around the world. Since 2000, Arla's procurement has been centralised to ensure common standards and practices, enabling us to take environmental, social and human rights responsibilities into consideration when selecting a supplier. All suppliers sourced by our procurement department are required, as part of their contractual agreement with us, to comply with our **Code of Conduct for Suppliers and Business Partners**.

This requires our suppliers to e.g.:

- Provide a safe and healthy working environment;
- Respect the rights of children and not engage in or tolerate the use of child labour;
- Not use forced labour and at a minimum comply with applicable laws and industry standards relating to working hours and minimum wages;
- Respect international agreements on human rights

Due diligence and audit of our supply chain

Arla has a global approach to supplier assurance and our preferred suppliers of key categories (ingredients, packaging, contract manufacturing, and selected services such as facility management) are required to complete a detailed supplier questionnaire covering quality, food safety and human rights standards, among other areas of importance. We have processes in place for audit and assessment of our preferred suppliers and take a risk-based approach to auditing of suppliers using location, sourcing category, and historical performance as some of the selection criteria. Should we identify or become aware of any business relationships not adequately managing their potential or actual modern slavery risk, we follow up and act accordingly.

Progress since the previous statement

The 'Right not to be subjected to slavery, servitude or forced labour (incl. child labour)' is identified as one of Arla's salient human rights. During the year we have continued our general human rights work including annual reporting on this topic.

- We have reached out to suppliers who had signed a previous version of our Code of Conduct for Suppliers (CoCS) and asked them to sign the updated version 3.0 of our Code of Conduct for Suppliers and Business Partners .
- We changed our processes so that suppliers with such old versions would be registered as not-accepted suppliers to Arla Foods if they declined to sign the updated version 3.0.
- We have conducted human rights spot checks in Nigeria, focusing i.a. on the risk of recruitment fees, wages and working hours.
- We have finalised living wage mapping for Arla employees in countries with >25 Arla employees.
- We have run a global awareness campaign highlighting the need for responsible purchasing behaviour with the aim to ensure legal compliance, quality assurance, and reduce fraud risk and thereby safeguard Arla and our brands globally.
- Stronger Together hosted a training session for all Human Resources Business partners and Senior Shop Stewards within our UK Supply Chain team on the risks of Human exploitation and ways to prevent Modern Slavery.

Next steps to prevent modern slavery in our business and supply chain

We continually review our efforts in this area; we recognise that this is a complex area that requires continuous improvement to ensure we mitigate the risk of modern slavery in our business. During the next year we will be taking the following steps to improve our approach to mitigating the risk of modern slavery in our business and supply chain:

- Make training available for all people managers in our UK supply chain to raise awareness of the risks of modern slavery, how to support potential victims and the various reporting methods.
- Updating information material to be available for all colleagues
- Focus on communication on UK production sites to raise awareness in Arla UK.
- Continue annual training and calibration of Arlagarden auditors and all Arla employees working with Arlagarden.
- The Global Steering Group will continuously work to embed best practice across all countries where Arla carries out business

Grievance mechanisms

Arla values and respects honest and open communication, and all employees and other stakeholders have the opportunity to raise questions and/or concerns through our confidential Whistleblower Service – ‘EthicsLine’ at arla.whistleblownetwork.net.

Reporting

We will track and communicate progress in our Annual Reporting.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, constitutes our slavery and human trafficking statement for the financial year ending 2024, and was approved by directors of Arla Foods amba, Arla Foods Limited, Arla Foods Cheese Company Limited, Yeo Valley Dairies Limited, Arla Foods Ingredients Limited, Arla Foods Hatfield Limited, and Lockerbie Biogas Limited.

*Peder Tuborgh, CEO, Arla Foods amba
Aarhus, May 2025*

*Sebastiaan Padberg, Group Vice President Arla UK
(on behalf of the Arla Foods UK companies listed above)
Leeds, May 2025*