



Modern Slavery Statement 2022

Cobrey Farms is aware of the risks of modern slavery within our business and want to work to ensure modern slavery is stamped out. We continue to develop our approach to modern slavery and hidden labour exploitation. Hidden labour exploitation is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave. Within our industry this could include payment of work finding fees, administration charges, accommodation control, financial control and fears of retaliation to themselves and/or families.

Forced labour is well hidden and can have devastating effects on the person involved. We know sometimes the victim does not understand that they are a victim and we want to improve education and confidence of victims to come forward and for us to be able to help them.

We endeavour to achieve transparency within Cobrey Farms and with our suppliers and focus on continuous improvement. Cobrey Farms is committed to respecting human rights and will positively support the human rights of others and address people's concerns when raised in an appropriate and supportive manner. Cobrey Farms will include taking adequate measures for prevention, mitigation and, where appropriate, remediation of incidences of modern slavery found in our business and in our supply chain.

Organisation structure and supply chains

Cobrey Farms is a partnership of John, Gay, Henry and Christopher Chinn. The business is primarily involved in the growing, grading and packing of asparagus, blueberries, French beans, potatoes and other crops. The products we produce are sold in all major supermarkets, at wholesale markets and local stores.

We currently have 45 permanent employees with up to 1200 seasonal workers coming from a range of countries to work in the business during the peak harvest season between April and June. The seasonal workers are employed in the harvesting, grading, packing, distribution and pre-harvest work across all products. The majority of workers live on site in accommodation provided by the business but this is not required. Workers have the opportunity to find their own accommodation and travel arrangements.

Cobrey Farms recruits labour directly but also uses Concordia, AG Recruitment and Fruitful Jobs Ltd to recruit labour under the Seasonal Worker Pilot and may occasionally use agency labour if the peak harvest is larger than expected. Working closely with SWP operators is important to developing our relationships and ensuring workers are treated appropriately.

Cobrey Farms sources supplies from across the UK and Europe. We are committed to ensuring suppliers embrace our ethos on modern slavery and work together to transfer these processes and principles to workers throughout the supply chain. Being part of Stronger2gether we are developing a risk bases matrix for our supply chain and ensuring ethical commitments are included in contracts.

Policies in relation to slavery and human trafficking

Cobrey Farms believe all employees from the first contact with the business to the end of their contract of employment deserve to be treated fairly and ethically. Cobrey Farms is committed to ensuring this principle is applied to all regardless of ethnicity, race, religion, nationality and sex. We are business partners of Stronger Together and use this as a basis for recruitment and employment across the business. Advance Modern Slavery training has been undertaken and workers within the team are upskilled to understand risk factors and triggers. Modern slavery risks and opportunities to confide in welfare and management are provided via confidential routes with trained support available for workers.

Cobrey Farms has policies which help to ensure all members of the team know how to assess, prevent and mitigate the risk of modern slavery existing in the organisation and its supply chains including - Recruitment and Retention Policy, Ethical Trading Policy, Whistleblowing Policy, Application and Human Trafficking Policy and Freedom of Association and Collective Bargaining Policy. These policies are communicated to workers though induction, documents in their own languages and external anonymous advice is available from the Speak Up advice line. Policies and procedures are reviewed annually.

Due diligence processes

As a Stronger Together partner we use the following methods to educate and support our zero tolerance of modern slavery and human trafficking:

1. During induction training all employees are required to complete a questionnaire on how they were recruited and to improve confidence in answers an additional questionnaire will be conducted after 2 months of working on the farm.
2. All employees are annually shown the Stronger Together video and all mobile homes have leaflets and contact details within their employee welcome pack.
3. Our HR team and Managers regularly attend training and updates and work with the GLAA.
4. Cobrey Farms now has a GLAA licence.
5. We educate our managers and team leaders on how to spot those who may be vulnerable and support them to raise concerns with the HR and Welfare teams.
6. Application form data is analysed for trends and any concerns investigated.
7. Cobrey Farms has an independent whistleblowing helpline, Speak Up for anyone with concerns and provides welfare support and has a workers committee.
8. Cobrey Farms is a member of SEDEX, is regularly audited and has adopted the ETI base code, including the Code of Human Rights, Basic Working Conditions and Corporate Responsibility,

to address workplace issues such as working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and the environment.

We believe these principles should be used throughout our supply chain and work with suppliers and customers to encourage embedding of these principles in their own processes and operations.

In 2022 we shall continue to be aware and try to stop modern slavery issues, awareness should focus on the risks from normal recruitment and auditing channels being changed due to COVID, BREXIT and the war in Ukraine. These disruptions have the ability to open new channels for exploiters including exploitation of refugees and asylum seekers which having a potential to impact our employees on a personal and financial basis. Cobrey Farms is committed to educating employees and ensuring workers have the right to work in the UK. We will support SWPs to ensure entitlement to extensions to visas is achieved inline with government policy and we understand the stresses and worry that the war is creating will mean workers require more support.

Risk assessment and management

Cobrey Farms aims to reduce the risk of modern slavery within the business:

1. We want to continually improving our recruitment and induction processes to reduce the likelihood of third-parties ability to exploit workers by arranging unofficial and hidden recruitment channels.
2. We will continue to re-iterate that no one should pay to be recruited to Cobrey Farms and that all recruitment costs should be paid for by Cobrey Farms within the agency recruitment fee. This fee should cover all costs relating to finding an applicant and the related application process.
3. We will continue to update support workers enter the country to comply with COVID regulations, support vaccination and eliminate false information.
4. We want to increase our ability to detect issues and concerns and therefore we continue to strive to improve our induction process and provide a mechanism within the welfare team in which people can confide and be supported. We have included Stronger together within our induction training and provide questionnaires for people to give feedback on recruitment.
5. We have developed clear procedures in 2020 for immediate and long-term responses to support victims and provide intelligence to the police and GLAA as appropriate. These procedures will be updated inline with advice from the GLAA.
6. We expect managers and supervisors to be proactive in identifying and responding to concerns. We will work with the managers to ensure they have a good understanding including undertaking Stronger Together external training courses.
7. We are completing the Stronger2gether progress tool which will help focus on our supply chains and improve our management of potential risk within these businesses and enhance understanding for suppliers.
8. We want employee involvement in improving our policies and procedures and these are discussed at worker committee meetings.
9. We will audit any agencies used for recruitment and refer any concerns to the GLAA where appropriate.

Key performance indicators to measure effectiveness of steps being taken:

To ensure we are monitoring our steps to support workers we will measure the following:

3rd March 2022. CNC

1. Involvement in Responsible Recruitment and recruiters are educated in the appropriate recruitment processes, HR policies and expectations of the business.
2. Conduct risk assessments of business departments and accommodation to identify areas where there is a risk of exploitation.
3. Review the percentages of questionnaire responses completed and concerns raised and review responses against previous answers.
4. Evaluate the outcomes of any concerns raised.
5. Continually monitor and analysis recruitment levels, retention and leave rates, and the numbers of employees from specific villages, links to other workers and their interactions.
6. Audit any recruitment agencies on an annual basis and raise concerns with the GLAA if necessary.
7. Continue to support victims and look at ways of improving our understand and processes to support the victims in a better way.
8. Continue to deliver training and understanding to employees and embed our ethic business policies into all aspects of work.
9. Cobrey Farms is embedding Modern Slavery Champions into the business.
10. In 2022 we aim to map our goods not for resale supply chain and identify high risk categories and identify potential actions needed to protect vulnerable workers.
11. Develop internal guidance for support victims of modern slavery.

Training on modern slavery and trafficking:

Managers are trained through Stronger2gether and we continue to educate workers during their induction training. The Poultry team have undertaken GLAA training to understand the risks for catching teams who work at unsociable hours and with limited contact outside of their teams. We have developed Investigation Skills be undertaken workshops and training and believe in continuous development. Advanced modern slavery training has been undertaken by the HR team.