



## **Modern Slavery Statement – 2026** **including review of activities between Jan 2025-Dec 2025**

Cobrey Farms is aware of the risks of modern slavery within our business and want to work to ensure modern slavery is stamped out. Often people believe this is not a problem in the UK; however, government statistics show in Q3 of 2025 the highest number of referrals to the National Referral Mechanism (NRM) of 6,414 (a 35% increase on the same quarter in 2024), with key trends being more females contacts and shifts in nationalities.

UK Government NRM statistics found that 35% (2,253) of potential victims claimed that they were exploited exclusively in the UK, compared to 40% in the previous quarter, and 57% (3,667) claimed that they were exploited exclusively overseas, compared to 50% in the previous quarter. Labour exploitation was the most commonly reported referral; 38% if all referrals. In addition to these victims, public authorities identified an addition 2,001 people between July and September who were unwilling to be referred, again with labour exploitation being the predominant reason. Considering that this is the reported numbers rather than potential victims there is more hidden issues behind the scenes.

We recognise these victims and wish to mitigate risks to our workforce to ensure they do not become victims of 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. Our aim is to ensure all workers within our business and supply chain are ethically and responsibly sourced to ensure they are not subjected to this exploitation.

We are continually looking to improve transparency within Cobrey Farms and our supply chain, engaging with suppliers to ensure a consistent and positive message is precipitation throughout. 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.

Cobrey Farms understands these crimes are evolving and complex and we work hard to encourage workers to speak up and then support them.

## **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, tender stem broccoli, potatoes, and other crops. The products we produce are sold in all major supermarkets, at wholesale markets and local stores.

We currently have ~50 permanent employees with a maximum of ~1200 seasonal workers from a range of countries for 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. Most workers live on site in accommodation provided by the business, but this is not a requirement. Workers can find their own accommodation and travel arrangements but the majority prefer to have the onsite welfare and free transportation support which makes being in a different country easier.

Cobrey Farms recruits labour directly but also uses Concordia, AGRI-HR, HOPS and Fruitful Jobs Ltd to recruit labour under the Seasonal Worker Scheme and may occasionally use agency labour if the peak harvest is larger than expected. The numbers of direct recruits have decreased which has been reflected in increased number of SWS participants. We recognise the importance of working closely with SWS operators to develop 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 and recruiters throughout the supply chain. Cobrey has completed a risk-based matrix for our supply chain, highlighting impacts on human rights and is 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, sex, and gender. We are business partners of Stronger Together and use this as the basis for recruitment and employment across the business. Stronger2gether Modern slavery and Advance Modern Slavery training has been undertaken by Managers and supervisors / workers are upskilled to understand risk factors and triggers. Continual upskilling is critical to ensuring our commitment and support to mitigating the risks and ensuring workforce education and protection. Refresher training is provided regularly and we have a variety of confidential routes for workers to confide in welfare and management with trained support available.

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 Policies, Ethical Trading Policy, Whistleblowing Policy, Application and Human Trafficking Policy and Freedom of Association and Collective Bargaining Policy. These policies are communicated to workers through induction, which is conducted in their own languages and external anonymous advice is available from the Speak Up advice line. Policies and procedures are reviewed annually.

DEFRA and SWS Taskforce survey results indicate that being able to speak up and raise complaints and grievances is sometimes a challenge for any one but being a seasonal worker out of your own country means this is even harder. To support the ability of employees to speak up in 2025 we updated and

extended our complaints and grievance procedure with a confidential reporting form and key point summary which will allow us to monitor and understand the challenges facing our workforce.

## **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. After induction, all employees are required to complete a survey questionnaire on how they were recruited and re-iterate the requirement of no-fee recruitment. To improve confidence in answers an additional questionnaire will be conducted after 2 months of working on the farm. Both questionnaire responses are compared and interviews conducted if discrepancies are found.
2. All employees are annually shown the Stronger Together video as part of their induction training.
3. Mobile homes and welfare facilities have leaflets, QR Codes and sources of support for all to use and before arriving all SWS Scheme Operators will have educated workers in identifying risks and understanding the correct process for recruitment.
4. Our HR team and Managers regularly attend training and updates and work with the GLAA.
5. Cobrey Farms has a GLAA licence.
6. 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.
7. Application form data is analysed for trends and any concerns investigated.
8. Cobrey Farms has an independent whistleblowing helpline, Speak Up for anyone with concerns and provides welfare support and has a workers committee.
9. 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.
10. Cobrey Farms audits labour providers annually and has been to in-country events to improve links with Cobrey and recruiters.
11. Cobrey is supportive of improved worker welfare and actively a member of the SWS Taskforce.
12. Cobrey has modern slavery champions onsite who support Cobrey principles and work to enhance education and communication with workers.

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 2026, we shall continue to be aware and try to stop modern slavery issues, awareness should focus on the risks from in-country recruitment as this is the area we consider highest risk and furthest from our control. We need to continue to collaborate with recruiters to ensure high quality recruitment meeting our standards across all countries and locations. There are limited instances of new countries being identified currently by Sponsor Operators and this, with the increased returnee rate reduces the risk of labour exploitation.

Cobrey Farms is committed to educating employees and ensuring workers have the right to work in the UK, engaging employees to ensure understanding of no recruitment fees and their entitlement to choose services from their recruitment agents. We will continue support displaced Ukrainian workers who have significant stresses at home and ensure a safe accommodation and workplace for all.

### **Risk assessment and management.**

Cobrey Farms aims to reduce the risk of modern slavery within the business, assessing risk based on factors such as geographical risk to human rights, level of supply chain control, external governance, and level of political stability.

To enhance our understanding of risk a human rights matrix assessment has been completed and the most significant risks for modern slavery, labour exploitation and human trafficking in our supply chain is where procurement and activities are outside of our direct control. Recognising this risk management will be based on the principles below:

1. We want to continually improve our recruitment and induction processes to reduce the likelihood of third-parties ability to exploit workers by arranging unofficial and hidden recruitment channels. Working with licensed, SWS sponsor recruiters to improve transparency and confidence in the supply chain.
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 and support workers to understand health, work and recruitment processes and engage with them to identify concerns or improvements.
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 online questionnaires for recruitment feedback.
5. The recruitment questionnaire is a means for employees to feel comfortable when raising concerns and raising issues / concern is encouraged as without feedback from employees we cannot support them.
6. We have clear procedures for immediate and long-term responses to support victims and provide intelligence to the police and GLAA as appropriate. These procedures will be updated in line with advice from the GLAA.
7. We expect managers and supervisors to be proactive in identifying and responding to concerns. We continue to collaborate with the managers and supervisors to ensure they have a good understanding of the risks and indicators of modern slavery and how to escalate concerns in an appropriate manner.
8. We annually complete and update the Stronger2gether progress tools which helps us focus on our supply chains and improve our management of potential risk within these businesses and enhance understanding for suppliers.
9. We want employee involvement in improving our policies and procedures and these are discussed at worker committee meetings.
10. We will audit any agencies used for recruitment and refer any concerns to the GLAA where appropriate. Also raising concerns with suppliers to ensure corrective actions are achieved and improve the recruitment process.

11. We will engage with GLAA and industry forums such as MSIN, SWS Taskforce to support identification of modern slavery and patterns which may be emerging.
12. We will continue to visit recruitment in country to understand the recruitment process, ensuring the key information is provided to workers and support the workers to have the best experience while working for us.
13. Cobrey has developed a clear response plan to support victims of modern slavery.

#### **Supply Chain Due Diligence:**

Suppliers are expected to adhere to Cobrey standards and support elimination of modern slavery and labour exploitation. Suppliers are questioned on labour issues and due diligence within their supply chain and sign a supplier term of business which confirm adherence to Cobrey policies on human rights and modern slavery.

#### **Key performance indicators and how effectiveness are the steps being taken:**

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

1. Involvement in Responsible Recruitment and recruiters are educated in the appropriate recruitment processes, HR policies, and expectations of the business.  
In 2025 the relationship between the HR Manager and recruiters has developed and this closer relationship backs enhanced confidence in the recruitment processes,
2. In Country visits – in 2025, the team visited with AGRI-HR Kazakhstan and the aim is to continue in Country visits annually building Cobrey profile and links to on the ground recruitment agents.
3. In 2026 - Conduct a risk assessment of business departments and accommodation to identify areas where there is a risk of exploitation, this links closely to sexual harassment risk assessment completed in 2025.
4. Review the percentages of questionnaire responses completed and concerns raised and review responses against previous answers.  
In 2025 we had response rate of 70% for the leaver questionnaire responses. Ulula responses were lower as the concern is that employees get survey fatigue, within the Taskforce we will review ways to enhance response rates as these are lower for all growers and operators. The aim is for 2026 to enhance responses particularly in year feedback.
5. Evaluate the outcomes of any concerns raised and monitor for patterns and re-occurrences.  
In 2025, with the higher returnee rate concerns did not identify any patterns.  
This KPI will continue to be monitored moving forward.
6. 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.
7. Audit any recruitment agencies on an annual basis and raise concerns with the GLAA if necessary. Auditing will use the RRPA completed by sponsor operators as a basis and then determine if follow up auditing is required. Understanding the importance of a positive relationship with Sponsors we will continue to engage on a one-to-one basis pre, during and after recruitment to ensure compliance and good business relationships.  
In 2025, the only operator without an RRPA was Concordia which will be conducted in 2026 and therefore they were the only operator to require a detailed audit. In season and end of year engagement with Operator supported the good working relationship. In 2026, we will continue to evaluate agency risk.
8. To engage with the SWS Taskforce in evaluating and supporting improved worker welfare alongside ensuring a sustainable horticultural industry.

In 2025, we engaged in workstream B & C to enhance grower knowledge, provide training to other growers and support improving working finances. Going forward, we will continue to engage and support the enhancement of the SWS Scheme.

9. Continue to support victims and look at ways of improving our understand and processes to support the victims in a better way.
10. Continue to deliver training and understanding to employees and embed our ethic business policies into all aspects of work.  
Internal training is being enhanced to be more engaging and interactive for roll out in March 2026.
11. In 2023 we completed a human rights risk assessment matrix and this has improved our understanding of risk.  
This will be reviewed in 2026 to ensure relevance and accuracy.
12. Worker interviews will be increased to improve engagement and enhance questionnaire responses. This will include in work short surveys in employee languages to encourage engagement and openness.  
The aim for 2026 is to conduct interviews of 10% of the seasonal workforce via group and individual interviews and review recruitment and employee surveys to ensure questions are effective at understanding modern slavery and labour exploitation within the workforce.
13. In 2026, working within the SWS Taskforce we will support the scoping and potential development of a Hardship Fund for genuine need.

### **Training on modern slavery and trafficking:**

Managers, welfare officers, and HR team are trained through Stronger2gether online learning. All supervisors and people in positions of responsibility have undertaken modern slavery training which will be refreshed on a bi-annual basis. We continue to educate workers during their induction training to ensure everyone has a basic understanding and knowledge for themselves and to support others. Managers and supervisors are educated in the Red Flags and warning signs and given support, as necessary. We have developed Investigation Skills by undertaking workshops and training and believe in continuous development, our Welfare Manager will be taking this course in 2026. Advanced modern slavery training has been undertaken by the HR team and is being refreshed as advised.

Cobrey's training covers:

- How to identify the signs of modern slavery, labour exploitation, and human trafficking.
- What initial steps should be taken if signs indicate a suspected case of modern slavery or human trafficking.
- How and who to escalate any potential concerns to within Cobrey Farms.
- What support can be given to potential victims?
- What external organisations or helplines are available to help.

Awareness Raising:

As well as training permanent/senior seasonal team members externally, we strive to raise awareness of modern slavery issues to all seasonal workers continually. We do this through displaying physical posters from organisations such as 'just good work' and stronger together in communal areas of the farm as well as customer support lines. We consistently post this information on our Facebook groups and we raise the subject in worker committee meetings. Repeated reminders and engagement support Cobrey's commitment to getting the message out to all workers and labour providers.

### **Employee Engagement:**

Cobrey Farms is committed to worker welfare and believe our workforce are critical to the business. We undertake regular employee surveys to establish feedback and well-being of our workforce throughout the year. In the 2025 worker survey 97% of seasonal workers wish to return to work at Cobrey next year with 95% states the were supported by Managers. In 2026 we aim to enhance this with more individual worker interviews and actively encourage open discussion. We will also use the Ulula SWS survey data to supplement internal surveys and data.

We continually encourage our employees to report any abuses of human rights; we want employees to feel valued and supported and this has been shown with the ~60% returnee rate.

### **Support for victims of modern slavery:**

We understand that when someone is impacted by modern slavery they react with varied emotions and feelings, and we want to ensure we can support them though all available avenues. This may be via the GLAA, Police, National Referral Mechanism, NGOs or through internal Cobrey support, it is important to support the victim in making their own informed choice. HR will offer advice on options, support decisions and be the link between Cobrey and external organisations as required. We will not make decisions or judgements about or for employees but support them to make informed choices.

Where appropriate continuation of employment, when work is available will be offered and if employees chose to another job support will be given working with labour providers to find a suitable solution. As labour exploitation often leaves workers in debt this avenue of support enables victims to take control of their situation which can be positive and empowering.

### **Industry Engagement:**

Cobrey is engaged in the SWS Taskforce. The Taskforce is an industry collaboration of trade bodies, retailers, growers, recruiters, and non-profit organisations which has a mission to “work collaboratively to develop and implement tangible actions to help safeguard and ensure access to worker rights in the UK Seasonal Worker Scheme and wider UK horticulture. The taskforce is developing practical actions to improve responsible recruitment and employment of seasonal workers and engaging with relevant Government departments to improve the scheme. Cobrey participates in workstream B & C, focusing on good recruitment practices, on-farm due diligence, EPP and improving worker finances.

### **Plans for 2026:**

1. Cobrey will continue to push the Just Good Work App to all employees.
2. Enhance worker interviews across site to include qualitative, in depth interviews of 50 people across different sites, departments and work timescales.
3. Add specific questions regarding modern slavery, sexual harassment and Stronger Together into the leaver survey to evaluate employee knowledge and effectiveness of learning given during employment at Cobrey.

4. Complete enhanced internal modern slavery training and roll out in March 2026.
5. Continue to educate all managers and supervisors in modern slavery risks and refresh and enhance learning as needs identify.
6. Continue to educate and enhance transparency within the supply chain.
7. Increase in-country engagement with Labour Providers. In 2026 in-country visits will include engaging in recruitment in Kenya with HOPS.
8. Continue to review and update policies, procedures and learn from other businesses on ways to enhance due diligence and support workers to speak out and get help.

**Commitment:**

Cobrey Farm is continuing to develop our response to modern slavery and human rights issues and is committed to ensuring our supply chain is free from exploitation. We will continue to develop initiatives and mechanisms to reduce the risks and enhance understanding and worker support. Developing learning and understanding throughout our workforce and supply chain is key to embedding and engaging everyone to eliminate modern slavery.

25<sup>th</sup> February 2026

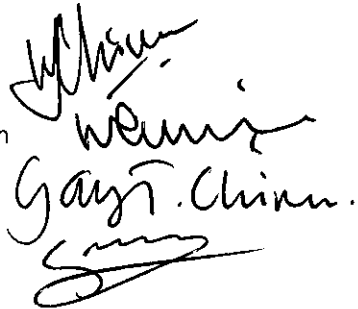
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