



Modern Slavery Statement – 2025

including review of activities between Jan 2024-Dec 2024

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 estimate +16,000 potential victims in 2022. 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 is 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, 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 ~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 can find their own accommodation and travel arrangements but the majority prefer to have the on site welfare and 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. Working closely with SWS 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 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, and gender. We are business partners of Stronger Together and Responsible Recruitment use these 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. 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 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.

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 questionnaires 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 questionnaires are evaluated responses and interviews will be conducted if discrepancies are found.

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 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.
9. Cobrey Farms audits labour providers annually and has been to in-country events to improve links with Cobrey and recruiters.
10. Cobrey is supportive of improved worker welfare and actively a member of the SWS Taskforce.
11. 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 2025 we shall continue to be aware and try to stop modern slavery issues, awareness should focus on the risks from in-country recruitment and how new country opportunities enhance risk as practices and understanding of UK expectations are not embedded. 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.

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. Recruitment questionnaire are 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 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.
7. We expect managers and supervisors to be proactive in identifying and responding to concerns. We continue to work 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 and RRT 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.

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 terms of business which confirm adherence to Cobrey policies on human rights and modern slavery.

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:

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 and monitor for patterns and re-occurrences.

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. Auditing will utilise 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.
7. To engage with the SWS Taskforce in evaluating and supporting improved worker welfare alongside ensuring a sustainable horticultural industry.
8. Continue to support victims and look at ways of improving our understanding and processes to support the victims in a better way.
9. Continue to deliver training and understanding to employees and embed our ethical business policies into all aspects of work.
10. In 2023 we completed a human rights risk assessment matrix and this has improved our understanding of risk. This will be evaluated against current auditing standards in 2025 to improve auditing process.
11. Worker interviews will be increased to improve engagement and enhance questionnaire responses.
12. Develop internal guidance for supporting victims of modern slavery.

Training on modern slavery and trafficking:

Managers 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. Managers and supervisors are educated in the warning signs and given support as necessary. We have developed Investigation Skills by undertaking workshops and training and believe in continuous development. 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 we also strive to raise awareness of modern slavery issues to all seasonal workers. We do this through displaying physical posters from organisations such as 'just good work' and stronger together in communal areas of the farm, we also regularly post this information on our Facebook groups and we raise the subject in worker committee meetings. Cobrey is committed 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 2024 worker survey 95.8% of seasonal workers wish to return to work at Cobrey next year with 94% states they rate their Manager positively. In 2025 we aim to enhance these with more individual worker interviews and actively encourage open discussion.

We continually encourage our employees to report any abuses of human rights.

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 through 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.

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 is involved in workstream A, B & C, focusing on good recruitment practices, on-farm due diligence, EPP and improving worker finances.

Plans for 2024:

1. Cobrey will continue to push the Just Good Work App to all employees.
2. Enhance worker interviews across site.
3. Add specific questions regarding modern slavery and Stronger Together into the leaver survey to evaluate employee knowledge and effectiveness of learning given during employment at Cobrey.
4. Continue to educate all managers and supervisors in modern slavery risks and refresh and enhance learning as needs identify.
5. Continue to educate and enhance transparency within the supply chain.
6. Increase in-country engagement with Labour Providers.
7. 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:

14th February 2025. CNC

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.

14th February 2025

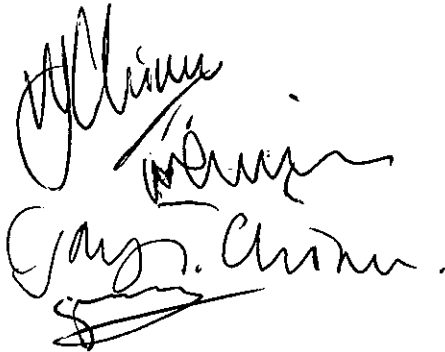
Partners:

John Chinn

Henry Chinn

Gay Chinn

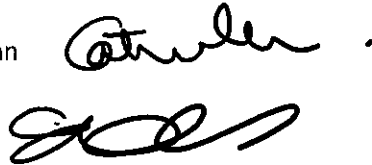
Chris Chinn

Four handwritten signatures in black ink, arranged vertically. The first signature is 'John Chinn', the second is 'Henry Chinn', the third is 'Gay Chinn', and the fourth is 'Chris Chinn'.

HR:

Catherine Chinn

Emma Hicks

Two handwritten signatures in black ink, arranged vertically. The first signature is 'Catherine Chinn' and the second is 'Emma Hicks'.

