We recognise the responsibility that we share with our supply chain, to buy raw materials and sell our products in an ethical manner. As part of our commitment we acknowledge our responsibility towards the Modern Slavery Act 2015 and will ensure transparency within the organisation and with our suppliers of goods and services to Cobell.

We are committed to maintaining and improving practices to combat slavery and human trafficking.

As one of Europe’s leading processed fruit (and vegetable) suppliers Cobell import, blend, stock, re-pack and distribute high quality processed fruit ingredients - all sourced directly from suppliers from around the world. Cobell Ltd is based in the UK and has its head office in Exeter, the company has over 60 employees.

Our supply chain includes the key product categories of frozen, aseptic and chilled juices and concentrates, purees, flavours, aromas & essences, IQF fruit & vegetables and equipment, packaging & disposables.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain or within our business.

All suppliers to Cobell Ltd are expected to comply with legal requirements and to have the following as a minimum requirement;

- An ethical policy in line with the Ethical Trading Initiative (ETI) base code.
- Observe International Labour Organisation (ILO) principles regarding working conditions, equal opportunities, equal pay, freedom of association, minimum wages, child labour, and overtime being freely chosen and maximum working hours are in line with legislation.

In addition to these minimum requirements we require, where appropriate all suppliers to be members of Sedex (a Global supply chain management solution designed to offer a simple and effective way of managing ethical and responsible practices) and progressively towards SMETA (The Sedex Members Ethical Trade Audit) or similar. If this is not in place then we will offer assistance to help the supplier develop:

**Key Principles**

**1 Working Together.**

*We will and we expect our suppliers to;*

- work collaboratively with suppliers in pursuit of this standard;
- guide relationships by the principle of continual improvement;
- consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

**2 Making a Difference.**

*We will and we expect our suppliers to;*

- develop an environmental and social risk-based approach to the implementation of this standard;
- focus attention on those parts of the supply chain where the risk of not meeting this standard is highest and where the maximum difference can be made with resources available.
- be prepared to demonstrate the basis of the approach with regard to the above.
3 Recruitment, Awareness Raising and Training.

_We will and we expect our suppliers to:_

- ensure that all new hires meet local labour laws (including checks on Gangmaster licences).
- ensure that all new hires are verified to work legally in the country they are hired, issued with appropriate contracts of employment, staff handbook and trained on all relevant Health and Safety aspects relating to their roles.
- ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.

4 Monitoring and Independent Verification.

_We will and we expect our suppliers to:_

- recognise that the implementation of this standard may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.
- provide reasonable access to all relevant information, premises, and workers (through interviews) and co-operate in any assessment against this standard – using reasonable endeavours to ensure that sub-contractors do the same.

5 Continuous Improvement.

_We will and we expect our suppliers to:_

- apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting the full standard.
- base improvement plans on individual case circumstances.

Ultimately, we will not do business with a supplier where the supplier fails to take corrective action within an agreed timescale or where serious breaches are identified.

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme. This consists of structured contractual documentation and a cyclical checking programme to ensure that all parties are upholding their commitments and our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide any required training to our staff.

**Achievements in 2016.**

- Over the last year we have visited over 40 suppliers around the world from Ecuador and Brazil to India and Thailand, to audit them against our sustainability and ethical standards as well as our food safety standards.
- Over 80% of our raw materials suppliers are SEDEX members. The rest have signed up to the Ethical Trading Initiative (ETI Base Code).
Achievements in 2016 continued.

• The Transparency International Corruption Perceptions Index (http://www.transparency.org/news/feature/corruption_perceptions_index_2016) is included in our calculations on supplier risk.
• Corporate Social Responsibility is an agenda item at all SMT meetings.
• All staff are aware of the issues around modern slavery.
• Ethical trading is included in the new staff induction training

Intentions for 2017.

• Increase the number of SEDEX members in our supplier base to 85%.
• Audit a further 40 suppliers

The Company Directors and Senior Management Team shall be responsible for the application of this policy and ensure all activity complies with the Modern Slavery Act 2015. Cobell will provide adequate resources, training and investment to ensure its successful application throughout the next financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31 March 2018.

David Pearce, MD Cobell Ltd., 31 March 2017