



## **MODERN SLAVERY ACT – The Summer Berry Company (UK)**

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 01 January 2025 – 31 December 2025**

#### **Introduction**

This statement sets out The Summer Berry Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 01 January 2025 – 31 December 2025.

As part of the soft berry sector & within the wider agriculture industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate and operational activities, and to ensuring that its supply chains are free from slavery and human trafficking.

#### **Organisational structure and supply chains**

This statement covers the activities of TSBC:

- The Summer Berry Company (UK) is based in West Sussex and is a leading UK grower and supplier of strawberries, blackberries and blueberries. Over 1,000 people are employed and accommodated on our farms near Chichester during peak periods. We also operate a state-of-the-art cool chain, controlled atmosphere storage and logistics operation. We pack all our own soft fruit, together with some from other growers.
- We also operate in Portugal; where we grow and supply raspberries and blueberries. Around 900 people are employed, and with just over 400 of those accommodated at our farm in the Alentejo region.

Our organisation understands that the agriculture industry is a high-risk sector for modern slavery and human trafficking, and we take those risks seriously.

#### *High-risk activities*

The following activities are considered to be at high risk of slavery or human trafficking:

- Employing and accommodating seasonal migrant workers
- Reliance on Labour Providers and their supply chain
- Employing and accommodating a large number of workers.

Whilst no instances of modern slavery or human trafficking were identified within our operations during the reporting period, we continue to review and strengthen our controls and monitoring processes.

### *Responsibility*

Responsibility for our anti-slavery initiatives is as follows:

- **Policies and Procedures:** The Corporate Services Director is responsible for the development of policies and processes, including anonymous reporting lines;
- **Risk assessments:** The Corporate Services Director is also responsible for overseeing pre-employment checks and audits of our labour supply chain
- **Investigations:** The Corporate Services Director is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking
- **Training:** Regular training is provided to our People & Culture team as well as leaders & managers with teams of people where the risk of modern slavery is higher, i.e. our seasonal worker teams.

### **Policies Supporting Our Commitment**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure enables workers to make confidential disclosures, without fear of retaliation. Concerns can be raised through our internal disclosure form or via Safecall, a third party, anonymous whistleblowing hotline accessible to all employees.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** We are committed to ensuring that our labour suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in

their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Agency workers policy** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

## **Due diligence activities during 2025**

During the reporting period, TSBC undertook a range of activities to identify, assess and mitigate risks associated with modern slavery.

These activities included:

- Participating in independent third-party labour provider compliance audits, while also conducting due diligence assessments and audits of new recruitment agencies prior to signing service level agreements;
- Conducting pre-employment and right-to-work verification processes;
- Monitoring worker welfare and accommodation standards through labour provider welfare visits, onsite worker engagement surveys and the external Ulula survey;
- Maintaining confidential worker grievance and whistleblowing mechanisms to enable concerns to be raised safely and anonymously where required;
- Reviewing supplier management processes and developing a supplier due diligence policy and procedure to support a more structured, risk-based approach to assessing modern slavery risks within our supply chain;
- Partnering with and providing funding to Stronger Together to support the establishment of its presence in Portugal and promote awareness of responsible recruitment practices and labour exploitation risks.

Where risks are identified, appropriate corrective actions are implemented and monitored.

## **Performance indicators**

During 2025, we assessed the effectiveness of our approach through a number of key initiatives and improvements, including:

- Achieving Stronger Together Business Partner status in the UK;
- Delivering two days of modern slavery awareness training to managers, People & Culture professionals and Team Leader/Supervisor roles;
- Securing approval and budget for an enhanced SEDEX membership, implemented in 2026, to strengthen supplier risk assessment, audit and corrective action monitoring, reporting capabilities and overall supply chain oversight;
- Developing a supplier due diligence policy and procedure during 2025, which was formally introduced in early 2026;
- Maintaining access to confidential whistleblowing channels for all workers.

These initiatives have strengthened our capability to identify, prevent and respond to modern slavery risks across our operations and supply chains.

## **Training**

We require all leaders working in our teams with general workers and our people professionals within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

## **Awareness-raising programme**

As well as training staff, we have raised awareness of modern slavery issues by sharing information to staff and putting up posters across our premises.

The information explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline and Safecall.

## **Looking Ahead**

During 2026, TSBC will continue to strengthen its approach to preventing modern slavery by:

- Continue embedding modern slavery risk management within our ESG, People & Culture and supplier management governance processes;
- Implementing our supplier due diligence policy and procedure and commencing a structured, risk-based approach to supplier assessment and monitoring;

- Utilising enhanced SEDEX membership capabilities to support supplier risk assessment, audit and corrective action monitoring, reporting and improved supply chain oversight;
- Maintaining Stronger Together Business Partner status in UK and continuing to promote responsible recruitment and worker welfare initiatives;
- Continue to enhance our awareness in Portugal, alongside Stronger Together as well as supporting that organisation across the industry;
- Continuing modern slavery awareness training for relevant employees and managers in both UK and Portugal;
- Strengthening worker voice mechanisms and engagement opportunities to ensure workers can raise concerns safely and confidently; and
- Maintaining a focus on ethical sourcing, responsible recruitment, supplier due diligence, worker voice and worker welfare across our operations and supply chains.

Through these actions, TSBC aims to further strengthen its ability to identify, prevent and mitigate the risks of modern slavery and human trafficking within its business and supply chains.

### **Executive Team approval**

This statement was approved on 24 June 2026 by our Corporate Services Director who reviews and updates it annually.

A handwritten signature in black ink, appearing to read 'H Wilson', with a long, sweeping underline.

**Helen Wilson**  
**Corporate Services Director**