



Modern Slavery Act  
Transparency Statement 2026

**BARFOOTS**

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## Modern Slavery Act Transparency Statement 2026

This statement is made on behalf of the Boards of the Barfoots Group of Companies. It is a single group statement intended to meet the requirements of section 54(1) of the Modern Slavery Act 2015 for each group company that is a commercial organisation carrying on business in the United Kingdom with a total annual turnover of at least £36 million. It constitutes the Barfoots Group of Companies' slavery and human trafficking statement for the financial year ending 31 December 2025.

### 1. Our business and structure

The Barfoots Group of Companies comprises Posbrook Holdings Ltd, Barfoot Holdings Ltd, Barfoots of Botley Ltd, Barfoot Farms Ltd, Barfoots Cropping Ltd and Barfoot Energy Ltd. This statement covers each of these entities to the extent that it is a commercial organisation within the meaning of section 54 of the Modern Slavery Act 2015.

Barfoots of Botley Ltd, Barfoot Farms Ltd and Barfoots Cropping Ltd are involved in the growing, processing, packing and marketing of fresh produce, supplying major UK retailers and foodservice customers. Barfoot Energy Ltd operates an anaerobic digestion plant generating green energy from food and crop waste. Barfoots employs over 650 people across its operations.

Barfoots is a UK-based fresh produce business with its own operations and a global supply network. In 2025, the business continued to prioritise its supply chain work based on annual spend, available human rights data, the potential scale of impact and its ability to influence change. Crop raw materials and labour provision remained the highest priority areas, with logistics and packaging also identified as important areas for further data improvement and risk management.

Barfoots sources produce from the UK and a range of international sourcing countries, including Argentina, Brazil, Egypt, France, Germany, Greece, India, Kenya, Mexico, Morocco, the Netherlands, Peru, Portugal, Senegal, South Africa, Spain and the USA. These sourcing locations are assessed through Barfoots' risk framework using available internal and external information, including sector and country risk data and stakeholder input, to identify where enhanced due diligence may be required.

Wherever possible, Barfoots sources directly from growers, enabling closer relationships, improved visibility and greater opportunity to influence responsible labour practices and human rights standards. Barfoots does not use importers, agents or other intermediaries in its fresh produce supply chain. Our wider supply chain also includes labour providers, logistics providers, packaging suppliers and other service providers that support growing, packing and distribution activities. Fresh produce is treated as a higher-risk supply category for the purposes of Barfoots' human rights due diligence, rather than risk being assigned only to specific products.

In logistics, haulage is predominantly arranged by Barfoots' retail customers, with hauliers appointed through retailer-managed processes. Barfoots has identified logistics as an area where it is working to improve visibility and strengthen its own human rights due diligence



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approach over time. In 2026, we intend to map key logistics providers more systematically and extend our risk assessment and engagement activities to this category.

### 2. Our commitment

Barfoots is committed to respecting human rights and to preventing modern slavery, forced labour, child labour, human trafficking and hidden labour exploitation in all parts of the business and supply chain. We recognise that these issues are serious abuses of human rights and that addressing them requires vigilance, effective controls, worker awareness, responsible recruitment and collaboration. Our approach is guided by the UN Guiding Principles on Business and Human Rights and informed by the Ethical Trading Initiative Base Code.

Our approach to preventing modern slavery and labour exploitation is supported by our wider worker welfare framework, including compliance with the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

### 3. Governance and oversight

During the year, Barfoots continued to strengthen its governance of human rights and ethical trade matters through its Human Rights Working Group, chaired by the Group Chief Executive Officer and bringing together representatives from key business functions to review progress, agree actions and support continuous improvement. Human rights was added explicitly to Board reporting, and the Group agreed to increase the frequency of meetings to quarterly in order to support stronger oversight of this agenda.

Overall accountability for modern slavery and human rights risk within the Group rests with the Boards of the Barfoots Group of Companies. The Human Rights Working Group is responsible for coordinating delivery of the human rights due diligence action plan, reviewing progress against agreed actions and escalating material risks or issues to senior management and the Board. Functional leads support implementation in their respective areas, including HR, procurement, technical, operations and supplier management.

During the year, the Group also progressed supporting documents for internal and external use, continued work to align requirements across different supplier types and contractor arrangements, and consulted suppliers, customers and Barfoots' own workforce on its renewed Human Rights Strategy. Barfoots is also developing human rights champions to support engagement and representation across different levels of the business.

### 4. Our policies

Barfoots' approach is supported by a suite of policies rather than a single standalone modern slavery policy. These include:

**Ethical Trading and Human Rights Policy**, which adopts the ETI Base Code and sets out standards relating to employment, equality, fair pay, working hours, grievance mechanisms and prohibition of child, bonded and forced labour. This policy applies to Barfoots' own

operations and forms the basis of the human rights requirements we expect from our suppliers.

**Prevention of Hidden Labour Exploitation Policy**, which sets out Barfoots' commitment to preventing labour exploitation, protecting workers, providing confidential reporting channels and working with relevant external agencies where concerns arise. The policy is communicated to managers, labour provider contacts and worker representatives and is supported by targeted training.

**Child Labour Policy**, which confirms a zero-tolerance approach to child labour and sets out expectations for identification, remediation, monitoring and escalation.

Supporting policies and procedures also include supplier requirements and whistleblowing arrangements. Our whistleblowing arrangements are intended to enable workers and other stakeholders to raise concerns, including concerns about modern slavery and human rights, without fear of retaliation. Together, these policies form the basis of our approach to ethical trading, responsible recruitment, protection of workers and prevention of labour exploitation across our operations and supply chain.

### 5. Risk assessment and human rights due diligence

We continue to develop our approach to identifying and managing modern slavery and human rights risks across our operations and supply chain. During the year, Barfoots completed a human rights due diligence review through its external engagement work, including the FNET Human Rights Due Diligence assessment, and used this as a baseline to develop its longer-term human rights roadmap and action plan covering 2025, 2026 and beyond. This work has supported a more structured approach to reviewing risk, aligning supplier requirements and planning further improvements.

Barfoots' human rights due diligence approach is guided by the UN Guiding Principles on Business and Human Rights and is underpinned by an ongoing cycle of implementation, consultation and review. During 2025, this work helped us identify and prioritise salient labour and human rights risk areas relevant to our operations and supply chains. These included risks associated with seasonal and temporary labour, recruitment fees, labour provider practices, excessive working hours, worker understanding of rights and reporting channels, and consistency of human rights requirements across different supplier categories. We also began work to identify higher-risk suppliers and to align risk assessment across crop, non-crop and service supplier groups.

Our risk assessment draws on a range of sources, including country and sector risk information, Sedex and SMETA data, external initiatives such as FNET and the Modern Slavery Intelligence Network, internal audit findings, worker feedback and grievance data. This enables us to prioritise higher-risk supplier categories, sourcing locations and operations for enhanced due diligence.

Fresh produce is treated as a higher-risk category within Barfoots' risk assessment approach, reflecting the labour-intensive nature of production and the potential for worker vulnerability across source countries and supply chain stages.

Barfoots operates a risk-based approach to supplier due diligence. Before onboarding, fresh produce suppliers are assessed against defined ethical management standards, including Sedex membership requirements, SMETA audits in higher-risk situations, and internal audits or visits where required based on risk. SMETA audit frequency is determined through risk analysis, and Barfoots' internal audit programme is similarly risk-based, including worker interviews where appropriate. All fresh produce suppliers are required through Barfoots' supplier undertaking to commit to adherence to the ETI Base Code. Ongoing due diligence includes supplier audits, internal audits, site visits, worker interviews, supplier engagement, stakeholder consultation and horizon scanning. Barfoots uses multiple data sources to inform this work, including FNET resources, WWF data, enhanced Sedex reporting, internal audits and other monitoring tools. Where data gaps have been identified, particularly in areas such as logistics and packaging, Barfoots is working to improve visibility and strengthen its approach.

Where serious non-conformances are identified, Barfoots works with suppliers on corrective action plans with clear time-bound actions. Where material issues remain unresolved, Barfoots will consider the most appropriate response, taking into account the nature of the issue, the willingness and ability of the supplier to improve, and the potential impact on affected workers.

In relation to labour providers, Barfoots' due diligence includes pre-supply audit inspection, ongoing compliance monitoring and twice-yearly audits, with findings documented, tracked through corrective action plans and reported to the Human Rights Working Group.

We also continue to review our own operations, including key labour-related risks, root causes and relevant workforce indicators, to support continuous improvement in our internal approach. Internal reviews include analysis of working hours, overtime, use of agency labour, grievance themes and worker survey feedback.

### **6. Labour providers and responsible recruitment**

Barfoots recognises that responsible recruitment is a key safeguard against labour exploitation. Barfoots currently works with one labour provider, Pro-Force, with whom it has had a long-standing collaborative relationship since 2009. Before supply commenced, a full audit inspection was carried out on Pro-Force, and this has since been repeated twice yearly as part of Barfoots' ongoing due diligence and compliance monitoring. Pro-Force also has a team based on the Barfoots site, which supports day-to-day communication and enables issues to be raised and addressed promptly.

Labour providers are required to hold a valid Fair Work Agency gangmaster's licence where required in the regulated sectors for agriculture, horticulture and associated processing and packaging, and Barfoots monitors labour provider compliance status and carries out checks and audits relating to agency labour and labour provider arrangements.

Barfoots carries out twice-yearly audits of Pro-Force using the ALP Agency Labour Compliance audit tool through ComplyER. These audits cover a wide range of labour standards and compliance controls, including licensing status, fit and proper checks, right

to work checks, worker contracts, payment of wages, holiday pay, working hours, grievance procedures, health and safety cooperation, accommodation where relevant, and worker interviews. The audits also review whether workers report issues such as fees for work, withheld wages, coercion, retention of identity documents, or barriers to raising concerns.

Our policies also make clear that workers must not be charged fees for work, that original identity documents must not be retained, and that recruitment, agency sourcing and training placement processes must be managed by competent staff. Labour provision remains one of Barfoots' priority risk areas within its wider supply chain work, and the business continues to develop its due diligence approach in this area alongside its work on crop suppliers, logistics and packaging. We will continue to review the adequacy of labour provider fees and cost structures to help ensure that workers receive at least the legal minimum wage and are not placed under debt or other forms of coercion.

### **7. Training and awareness**

Barfoots believes training and awareness are essential to preventing modern slavery and labour exploitation. Stronger Together training remains part of our approach, with relevant HR and operational colleagues receiving training and colleagues with supervisory responsibilities required to complete relevant learning. Equality and Diversity training also continues for employees with management or supervisory responsibility.

During the year, Barfoots also reviewed its ethical trade and human rights training approach through the Human Rights Working Group. This included work on a training matrix, review of ETI-related training, clearer expectations around induction and refresher training, and use of the HR system to trigger reminders and support completion. An aspirational KPI of over 95% completion for required courses was also discussed as part of this work.

In 2026, we intend to formalise role-based training requirements for key groups such as procurement, HR, site management and supervisors and to monitor completion against the 95% KPI.

### **8. Worker voice, reporting and remediation**

Barfoots encourages workers to raise concerns and provides access to grievance processes and the confidential reporting line SeeHearSpeakUp, which is available in multiple languages. Our policies support the right of workers to raise concerns without fear and set out how issues should be handled appropriately and sensitively. The business also supports the use of multiple grievance channels and expects appropriate reporting mechanisms to be in place across relevant parts of its supply chain.

We do not tolerate retaliation against anyone who raises a concern in good faith, whether through our internal procedures or externally to regulators or other competent authorities.

During the year, we continued to review worker engagement arrangements, including focus groups, survey feedback and broader representation across worker groups. Survey feedback highlighted areas for continued focus, including confidence in reporting concerns



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and understanding of rights relating to overtime. These themes informed follow-up actions including management reminders, focus group discussion and further worker engagement activity. The business also agreed to trial additional drop-in sessions to encourage worker voice and feedback.

No confirmed cases of modern slavery or human trafficking were identified during the reporting year through our reporting channels, labour provider checks, audits, worker engagement activity or management processes. We recognise, however, that the absence of identified cases does not mean absence of risk, and we continue to strengthen our ability to identify, escalate and remediate potential concerns.

Where issues are identified, they are escalated through the Human Rights Working Group with Board oversight. Barfoots' remediation policy applies across company operations and extends to the supply chain where adverse impacts are directly linked to the business. The policy commits Barfoots to providing or cooperating in remediation where it has caused, contributed to, or is directly linked to adverse human rights impacts. Remediation is overseen by the HR team and Human Rights Working Group, with regular reporting to senior management. Our approach is intended to be worker-centred and proportionate, informed by the UN Guiding Principles' effectiveness criteria, including accessibility, predictability, transparency, rights-compatibility, continuous learning, and engagement and dialogue. Where concerns are identified, our policies also provide for escalation and engagement with relevant external agencies where appropriate, including the Fair Work Agency, police, child protection services and other authorities.

### 9. Collaboration and external engagement

Barfoots recognises that collaboration is important in addressing modern slavery and wider human rights risks. We continue to engage with external initiatives and frameworks including SEDEX, Stronger Together, the Ethical Trade Initiative Base Code and the Food Network for Ethical Trade. During the year, we also joined the Modern Slavery Intelligence Network to strengthen our access to intelligence, peer learning and cross-sector collaboration.

Insights from customers, FNET and MSIN are being used to support Barfoots' evolving approach to horizon scanning, risk assessment and human rights due diligence.

### 10. Progress in 2025 and focus for 2026

Area	2025 progress	2026 focus
Governance	Human Rights Working Group scope, responsibilities and Board reporting strengthened	Quarterly Human Rights Working Group meetings and clearer ownership across functions
Risk assessment	Human rights due diligence review completed and action plan agreed	Further alignment of risk assessment across crop, non-crop and service supplier groups
Supplier engagement	Work progressed to align supplier requirements and communications across supplier types	Extend and standardise human rights requirements across supplier categories

Area	2025 progress	2026 focus
Training	Training review started, training matrix developed further, refresher expectations reviewed	Set role-based training requirements and monitor completion against KPI
Remediation	Remediation approach considered through policy and due diligence work	Develop a fuller remediation framework and response plan
Monitoring	Work progressed on KPIs, worker engagement and use of survey feedback	Add grievance, worker voice and other human rights due diligence indicators into regular KPI reporting

In addition to the qualitative progress set out above, we have begun to develop quantitative indicators to track our effectiveness, including the percentage of high-risk suppliers subject to enhanced due diligence, the number of labour provider audits completed, training completion rates and the number and nature of grievances and worker voice reports relating to labour and human rights.

## 11. Monitoring effectiveness and looking ahead

Barfoots continues to monitor and strengthen the effectiveness of its approach through governance oversight, due diligence, worker engagement and reporting mechanisms. During the year, this included further development of KPIs, internal reporting and human rights due diligence actions.

For 2026, we intend to formalise a set of human rights due diligence and modern slavery KPIs covering training completion, supplier risk assessment, audit and non-conformance trends, grievance and worker voice data, labour provider assurance and closure of corrective actions. These KPIs will be reviewed by the Human Rights Working Group and reported through the Board reporting process.

In 2026, our planned priorities include developing a remediation framework and response plan for serious human rights concerns, including forced labour; extending ethical trade and human rights requirements across all supplier types; aligning traceability and risk assessment processes for higher-risk supplier categories; formalising a time-bound action plan for our own operations and key supply chain risks; adding grievance data and worker voice indicators to KPI reporting; reviewing training effectiveness and setting role-based completion expectations; and continuing collaboration through FNET, MSIN and customer engagement. A further focus for 2026 will be to strengthen human rights due diligence beyond crop supply chains, including continued development of the approach to logistics, packaging and other non-crop supplier categories where data and visibility are currently less developed.

## 12. Board approval

This statement was approved by the Boards of the Barfoots Group of Companies on Monday, 15 June 2026. It has been approved as the slavery and human trafficking statement for the financial year ending 31 December 2025 pursuant to section 54(1) of the Modern Slavery Act 2015. It will be published on the Barfoots website and submitted to the UK Government modern slavery statement registry. A link to this statement will be placed in a prominent position on the homepage of our main website, and previous years' statements will be retained online so that stakeholders can review our progress over time.



Julian Marks  
Group Chief Executive Officer