

Modern Slavery Statement

At Cobra Coffee Limited, we are committed to operating responsibly, ethically, and sustainably. We take a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, and exploitation, and we fully support the principles of the Modern Slavery Act 2015. This statement outlines the steps we are taking to prevent modern slavery in our business operations and supply chains and reaffirms our commitment to transparency and accountability.

Who We Are

Cobra Coffee Limited is a subsidiary of The Southern Co-Operative Limited (“Southern Co-Op) and operates licensed Starbucks stores across the South of England. With more than 800 employees, who we refer to as partners, we recognise the scale of our operations brings with it the responsibility to ensure that ethical practices are embedded throughout our business.

As part of our licence agreement, we are required to source goods and services through Starbucks’ nominated suppliers. Starbucks has a longstanding commitment to ethical sourcing and has put in place rigorous global standards to ensure that its suppliers operate responsibly. These standards cover a wide range of issues, including respect for human rights, workplace safety, fair treatment of workers, and environmental sustainability. All suppliers are required to comply with the Starbucks Supplier Code of Conduct, which is monitored through independent audits and a programme of continuous improvement. This gives us confidence that the goods and services we use are sourced in a way that aligns with our values.

Our Commitment

We are proud to align our approach with Southern Co-op’s Anti-Modern Slavery Strategy, which has been designed with the help of external experts and goes beyond statutory requirements. Oversight of this strategy within Cobra Coffee is provided by our Modern Slavery Working Group. This group is chaired by our Central Services Director and includes senior leaders from Human Resources, Legal and Governance, and Communications. The involvement of senior leadership underlines the importance we attach to tackling modern

slavery and ensures that all areas of our business remain engaged and accountable.

We also take steps within our own recruitment practices to safeguard



unscrupulous recruiters. More broadly, we seek to promote a culture of openness where colleagues feel empowered to speak up about any concerns they may have. We believe that fostering an environment where people feel safe to raise issues is a vital part of protecting both our employees and our supply chains.

Our Supply Chains

Through our relationship with Starbucks, we work with suppliers that are committed to operating in a responsible and ethical manner. Starbucks suppliers are expected to demonstrate respect for human rights and dignity, ensure safe and fair working conditions, and actively contribute to the welfare and sustainability of the communities that produce goods and services. They are also required to meet or exceed national laws and international standards on environmental protection, thereby minimising the impact of their operations.

Compliance with these standards is not optional. Verification is subject to regular audits, either conducted directly by Starbucks or by approved third-party assessors. These audits include checks against Starbucks Ethical Sourcing requirements, the Supplier Code

of Conduct, and its Social Responsibility Standards for Manufactured Goods and Services. Suppliers are required to remediate non-compliances, and serious violations may result in suspension of purchases or termination of relationships. This process ensures that suppliers remain accountable and provides a framework for continuous improvement in ethical and sustainable sourcing practices. See Starbucks Supplier Code of Conduct and Ethical Sourcing policies here: [Supplier Code of Conduct_2024 Final](#)

Monitoring and Progress

We believe it is important not only to have robust processes in place but also to assess their effectiveness on a regular basis. With the benefit of strengthened governance and oversight arrangements, we are able to confirm that in 2024 we identified no instances of modern slavery or human trafficking within our operations or supply chains. While this is encouraging, we remain fully aware that modern slavery is a hidden crime and that vigilance is essential. We therefore remain committed to monitoring our practices carefully, working with our partners and suppliers to address risks, and reporting transparently on our progress each year.

Approval

This statement has been approved by the Board of Directors of Cobra Coffee Limited on 01st July 2025.

Signed

Janet Paraskeva

JANET PARASKEVA, CHAIR OF THE BOARD OF DIRECTORS



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