



# Modern Slavery Statement 2025/26

J Sainsbury plc





# Overview

## About this report

This is our tenth statement on modern slavery, in line with Section 54 of the UK Modern Slavery Act 2015. It details the steps we have taken during the financial year ending 28<sup>th</sup> February 2026<sup>1</sup> to identify, prevent, mitigate and remediate modern slavery and human trafficking in our own operations and supply chains.

This statement covers Sainsbury's Supermarkets Ltd, Sainsbury's PropCo A Limited, Sainsbury's PropCo B Limited, JS Information Systems Limited, Sainsbury's Tyne Property Holdings Limited, Sainsbury's Thistle Scottish Limited Partnership, Argos Limited, Nectar 360 Limited and Nectar 360 Services LLP, all of which fall within the scope of section 54(2) of the Modern Slavery Act 2015.



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## Definitions for the purpose of this statement

### Business / J Sainsbury plc

Our business, which includes food, general merchandise and goods and services not for resale.

### Food

Sainsbury's own-brand food and groceries.

### General merchandise and clothing

Sainsbury's, Argos and Habitat own-brand general merchandise and Tu clothing.

### Goods Not For Resale (GNFR)

Goods and services not for resale, which include sectors such as energy, marketing, logistics and infrastructure.

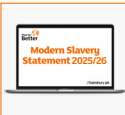
### Direct suppliers / Tier 1 suppliers

The final point of production, where there is manufacturing, processing, producing or service provision i.e. the final point at which labour was applied.

### Indirect suppliers / Tier 2 suppliers

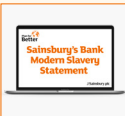
Suppliers to our Direct / Tier 1 suppliers. They can include intermediary processing sites, fresh produce growers, cotton farms, fisheries, extractive mines, etc.

## Our reporting suite



Our previous Modern Slavery Statement

[Read more](#)



Sainsbury's Bank Modern Slavery Statement

[Read more](#)



Plan for Better Report

[Read more](#)



Annual Report 2026

[Read more](#)



Our approach to Human Rights

[Read more](#)

<sup>1</sup> Any references to 'this year' in the statement relate to Sainsbury's financial year.



# Welcome from our Chief Executive, Simon Roberts



As Sainsbury's, we stand against all forms of modern slavery and are committed to preventing, detecting and remedying it. We make it our responsibility to respect human rights across our own operations and supply chains, and we strive to ensure that everyone we work with is not exploited or exposed to unsafe working conditions. We are also committed to ensuring that our transition to Net Zero is fair for the communities we source from.

Considering the evolving nature of modern slavery risks within the global context in which we are operating, we are aware of the importance of continually reviewing and adapting our approach. As part of this, we have this year placed greater emphasis on integrating human rights into our broader food supply chain resilience risk assessments and work, alongside environmental, geopolitical and supply chain viability risks. This ensures human rights are more prominently at the forefront of commercial planning and decision making, and that these risks are appropriately assessed and managed on an ongoing basis.

Recognising that modern slavery is an issue that requires systemic change to address it, we continue to contribute to policy development and initiatives to tackle forced labour. In the UK, we support the growing momentum around human rights and environmental due diligence legislation. As part of this, we participated in roundtable discussions with the UK Independent Anti-Slavery Commissioner and other stakeholders to develop draft legislation to strengthen the UK's Forced Labour and Human Rights legislative framework. We have also continued our advocacy efforts to ensure the effectiveness of the recently established Fair Work Agency in achieving its intended outcome of protecting vulnerable workers.

We are proud of the progress we are making in addressing modern slavery risks and upholding human rights, and we were pleased to be named the highest-scoring company in the 2025 CCLA Investment Management Modern Slavery Benchmark, recognising us as a leader in human rights. Over the year, we have advanced our Human Rights Due Diligence action plan, strengthening our processes to manage high-risk human rights issues and to support effective remediation across our supply chains.

We remain committed to working closely with our suppliers and partners to tackle modern slavery and to help build a more resilient and sustainable food system for future generations. We have been encouraged by the increased level of engagement from investors on human rights issues over the last year, and welcome the opportunity to share our ambition, strategic approach and thoughts on industry-wide challenges. We can additionally benefit from a greater understanding of investor perspectives, which we can incorporate into our strategic considerations, as well as knowledge sharing on best practice disclosures, which we factor into our own reporting.

Having reviewed our progress and commitments in line with Home Office's Transparency in Supply Chains guidance to Section 54 of the Modern Slavery Act, we have started to integrate and embed the recommendations into our Human Rights Due Diligence action plan and in this report. Updates on our implementation of this action plan are outlined in this year's statement.

This statement was approved by J Sainsbury plc Board of Directors in July 2026.

A stylized orange signature of Simon Roberts.

**Simon Roberts**

Chief Executive Officer

# Our approach

At Sainsbury’s, our purpose is simple yet powerful: to make good food joyful, accessible and affordable for everyone, every day. Fulfilling that purpose goes beyond the products we sell, it relies on ensuring that people behind our products are treated fairly and with dignity.

Modern slavery is one of the most pressing human rights issues globally. It is often hidden, complex and affects millions of people. As a retailer with extensive supply chains, we know we have a responsibility to act. Tackling forced labour and modern slavery is a central part of our Human Rights strategy, delivered through four key levers:

- Undertaking Human Rights Due Diligence (HRDD) and responding to issues
- Integrating Human Rights into sourcing decisions and supplier partnerships
- Improving Human Rights practices to build supply chain resilience
- Convening the industry and engaging with governments.

Through our forced labour strategy, we are committed to identifying, addressing and preventing all forms of forced labour. Our approach focuses on:

- Increasing our ability to detect indicators of forced labour
- Providing and facilitating training on good practices for colleagues and suppliers
- Collaborating with industry partners on innovative approaches and shared solutions
- Supporting remediation efforts, and assistance to survivors, where cases of forced labour are identified
- Reporting transparently on identified cases and the actions we take.

This work forms a core part of our Human Rights commitments within our Plan for Better sustainability strategy. Plan for Better is integrated into everything we do and underpins our Next Level Sainsbury’s strategy. Ensuring strong Human Rights practices throughout our supply chains is essential to building long-term resilience for our business, our suppliers and the people who work within our global value chains.

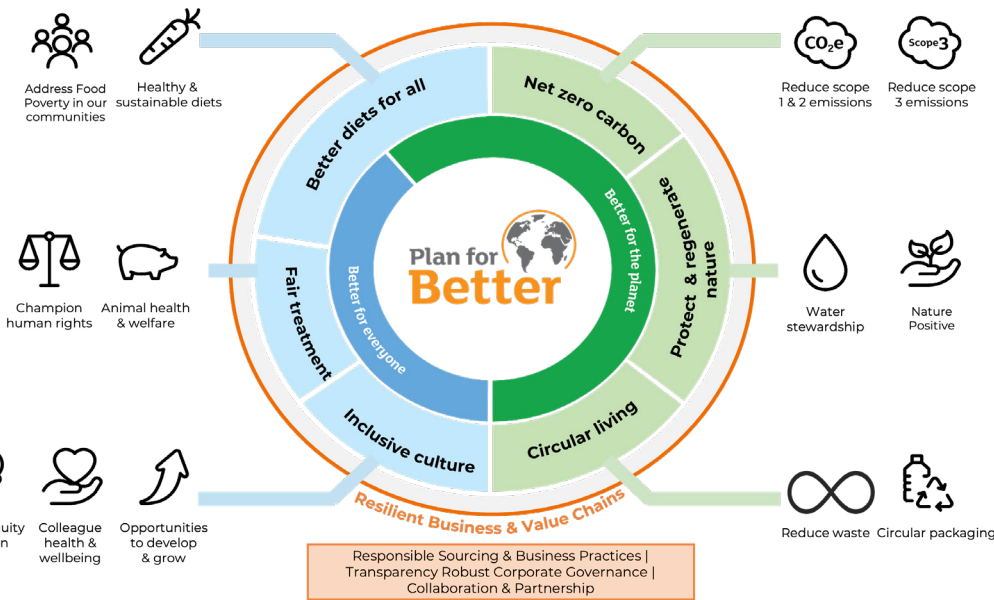
## Highlights

**CCLA**  
Ranked **highest scoring** company in CCLA’s 2025 Modern Slavery Benchmark

**31**  
Allegations related to forced labour and modern slavery identified this year

**702**  
Food supplier representatives participated in our Human Rights training

**1,414**  
Third-party ethical audits completed across food, general merchandise and clothing direct suppliers



## Our Human Rights commitments

|                                                         |                                                             |                                                                           |                                                                |                                                        |
|---------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------|
|                                                         |                                                             |                                                                           |                                                                |                                                        |
| Sustainable livelihoods                                 | Forced labour                                               | Safe and healthy workplaces                                               | Discrimination                                                 | Grievance mechanisms                                   |
| Improve wages and livelihoods in priority supply chains | Seek out and address forced labour across our supply chains | Tackle the most salient health and safety risks in priority supply chains | All tier 1 suppliers have an approach to tackle discrimination | Effective and trusted grievance mechanisms for workers |

### Raising concerns

This Modern Slavery Statement includes information about the ways people can be exploited, unfair labour practices, forced work, abuse and other forms of exploitation. We encourage anyone who sees, suspects or experiences exploitation linked to Sainsbury’s, to report it safely and confidentially through our Call it Out service.

### Call it out

Scan the QR code to report online or contact us directly.  
Visit [safecall.co.uk/sainsburys](https://safecall.co.uk/sainsburys)  
UK: 0800 085 2099





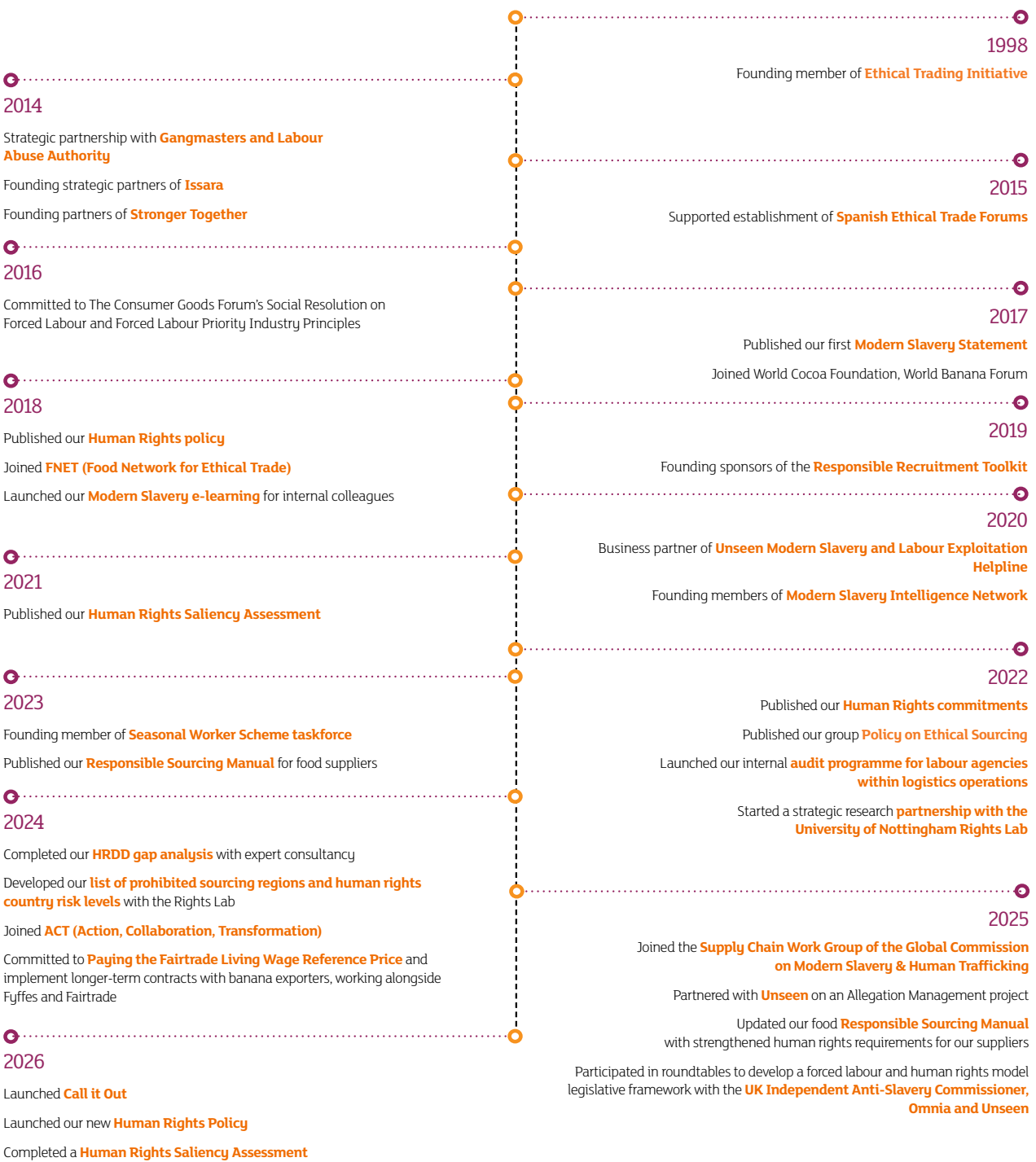
# Key activities and updates in 2025/26

We are working hard to make a difference by ensuring transparency and accountability across our operations, as well as engaging with suppliers and providing the necessary training and resources. We are also collaborating with partners and are committed to evolving our approach as challenges evolve.

## Key activities include:

- 
  - Progressed our Human Rights Due Diligence (HRDD) action plan** to deliver a consistent and strengthened approach in how we are identifying, mitigating, remediating and preventing human rights risks in our own operations and supply chains. Key activities included developing a new group Human Rights Policy, refreshing our saliency assessment, delivering human rights training and conducting in-depth risk assessments for high-risk raw materials and sourcing countries (see [‘assessing and managing risk’](#) and [‘due diligence’](#) for more information).
- 
  - Advanced our human rights issues management and remediation processes:** we worked with Unseen to improve our internal processes to handle human rights allegations, and launched ‘Call it Out’, our new whistleblower hotline (see [‘due diligence’](#) for more information)
- 
  - Strengthened our work on remediation:** we participated in several remediation activities in collaboration with other retailers and our suppliers to address forced labour issues in our supply chain. This included the investigation of several issues related to migrant workers in the fishing sector in the UK and internationally (see [‘due diligence’](#) for more information)
- 
  - Championed improvements for UK seasonal workers** through our membership of the Seasonal Workers Scheme Taskforce, and as part of their Governance Committee. Focus areas this year have been improving access to reporting mechanisms, establishing advocacy priorities, and participating in cross-industry consultation on the Employer Pays Principle (EPP) Feasibility Study (see [‘due diligence’](#) for more information)

# Our journey so far





# Our organisational structure, governance and supply chains

Delivering our purpose will only be possible by building resilience into our supply chains and collaborating across our industry. We need our colleagues and suppliers to work together to deliver our Plan for Better and Human Rights strategy.

### Our organisation structure, products, sectors and services

Sainsbury's is the second largest grocer in the UK, with 609 supermarkets 885 convenience stores. Alongside our food business, we are one of the biggest general merchandise and clothing retailers. Sainsbury's is a trusted, well-loved brand that has been bringing high quality, great value food to customers for over 150 years. Argos, Habitat, Tu, Smart Charge, Nectar, Nectar360 and Sainsbury's Bank are complementary brands which help deliver our purpose and give customers more reasons to shop with us.

### Sourcing and distributing our products

Our procurement, commercial and sourcing teams are responsible for sourcing both Sainsbury's brand and branded finished products, supported by our technical, product development, supply chain, sustainability and ethical teams. Supplier selection and supply chain reviews are carried out through cross-functional processes to ensure that all own brand suppliers meet our Technical, Human Rights and Environmental standards.

Our UK network of primary hubs, depots and local fulfilment centres enables us to store, move and distribute Sainsbury's and Argos products efficiently. We work with logistics partners to operate our warehouses and transport services. For Argos, we deliver products directly to customers' homes or to their preferred collection point, and we also fulfil home deliveries for online grocery orders.

Our brands

Sainsbury's

Argos

habitat

Tu

nectar

NECTAR  
360

Smart Charge

More information about our brands and services can be found here: [Our brands | J Sainsbury plc](#)



### Our company at a glance

- £33,647m

Group sales (exc. VAT)
- Around 140,000

Colleagues
- 609

Sainsbury's supermarkets
- 885

Sainsbury's convenience stores
- 201

Argos stores
- 4

UK offices
- 4

International Sourcing offices in Hong Kong, Shanghai, Delhi and Dhaka
- 4

UK Primary hubs
- 31

UK Depots
- 18

UK Local fulfilment centres

# Our organisational structure, governance and supply chains (continued)

## Our Governance

### Plan for Better Governance

Sustainability is integrated into Sainsbury's Group's overall strategy and is key to delivering it. The Corporate Responsibility and Sustainability (CR&S) Committee's role is to provide oversight and challenge on any material sustainability matters identified, advising and making recommendations to the Board where appropriate. The Committee has oversight of our progress relating to modern slavery and monitors engagement with stakeholders on sustainability and corporate responsibility, including customers, suppliers, the community, colleagues, shareholders and government. The CR&S Committee is chaired by Non-Executive Director, Keith Weed. Overall responsibility for modern slavery sits with our Board of Directors.

Our Chief Commercial and Sustainability Officer sponsors our Plan for Better sustainability strategy and is responsible for our Human Rights Policy. The directors of each business division are accountable for implementing our policies and standards throughout our business and supply chains. The Group Head of Human Rights leads our human rights strategy.

Our Plan for Better Acceleration Squad, chaired by our Director of Sustainability and sponsored by our Chief Commercial and Sustainability Officer, provides executive oversight of the delivery of our integrated Plan for Better, including progress against our human rights strategy and HRDD action plan, and oversight of high-risk human rights issues.

### Modern Slavery Governance

Tackling forced labour and modern slavery is a fundamental part of our Human Rights commitments. We work in collaboration with internal colleagues and external partners to identify and address forced labour and modern slavery issues in our own operations and supply chains. While all colleagues have a role to play, our technical, ethical, and human rights teams, together with our suppliers, are responsible for tackling these issues. These teams engage with and are supported by key departments

across the business to carry out this work. All four of our general merchandise and clothing sourcing offices in Asia have dedicated ethical colleagues, who are responsible for everyday management of ethical trade issues. Our leadership teams and Board hold ultimate accountability.

Concerns can be raised through a range of channels, including Unseen, whistleblowing mechanisms, supplier notifications, audit and visits findings, Non-Governmental Organisations (NGOs), or media reports. We manage modern slavery issues in accordance with our internal incident management processes and established escalation pathways. We have escalation routes at Category, Divisional and Board level based on the severity of the human rights impact. Modern Slavery and broader Human Rights incidents are shared quarterly to our Technical Leadership team, Audit & Risk team and six monthly to our Operational Board. We also share updates on human rights issues at our Plan for Better Acceleration Squad and PLC meetings at least twice a year.

At the end of the financial year, our internal Audit and Risk team conducted an audit to assess the effectiveness of the controls in place across the business to identify and address modern slavery in our supply chains and ensure compliance with the Modern Slavery Act 2015. The audit examined our oversight, risk assessment, incident management, monitoring and broader due diligence activities, including audits, training, whistleblowing and grievance mechanisms. Further details on findings and actions will be discussed in next year's report.

### Modern Slavery Statement development and consultation process

The content development of our Modern Slavery Statement is led by our human rights team, with support from internal stakeholders who participate in activities related to Modern Slavery, Forced Labour and Human Rights Due Diligence. We consulted with relevant internal stakeholders across human rights, ethical, people and employee relations, technical,

## An overview of the governance structure



<sup>1</sup> Remit of Committee in relation to the sustainability strategy. For full details on the Committees please see our 2026 Annual Report or our [Corporate Governance webpage](#).

<sup>2</sup> Attendees include the Chief Commercial and Sustainability Officer, Chief Property and Procurement Officer, and MD Smart Charge, Director of Sustainability, Director of Corporate Affairs, Director of Technical Sainsbury's, Director of Technical and Ethical Argos, Head of Finance and subject matter experts from different areas of the business



# Our organisational structure, governance and supply chains (continued)

## Our supply chain structure

### Our suppliers as partners

Our supply base ranges from large multinational companies to small, independently run businesses. Our Goods for Resale suppliers provide finished food, general merchandise and clothing products sold in our stores or online. Our Goods Not for Resale (GNFR) suppliers support functions across the Group, including logistics, marketing, technology and retail, and deliver services such as cleaning, security and contract labour for our retail and logistics operations.

We can only build resilience in our supply chain, implement our human rights strategy and achieve change through collaboration and long-term partnerships with our suppliers. A significant proportion of our own brand products are now covered by long-term agreements, and we have made strong progress across a wide range of food categories, including block chocolate, canned tuna and tomato products. We continue to build this culture of collaboration with our suppliers to help establish a food system which supports farmers and growers.

### Supply chain transparency

Traceability and transparency are key levers to help address human rights issues and understand risks, and we are committed to achieving greater visibility across our supply chains. We publish our Sainsbury's brand tier 1 supplier lists for food, general merchandise and clothing on [Open Supply Hub](#), to promote transparency and collaboration. All own-brand tier 1 supplier sites across these categories are registered on the Sedex platform and linked to Sainsbury's. This gives us access to information on their workforce demographics (including migrant workers numbers and nationalities), the use and names of labour providers, recruitment policies and management systems, freedom of association, accommodation standards, as well as ethical audit reports and related non-conformances.

We recognise that supply chain transparency cannot be achieved in isolation. Engagement with stakeholders is essential, and we continue to work collaboratively with partners to map and improve visibility across our supply chains. We work with our suppliers to map our food supply chains beyond tier 1 and have visibility at tier 2 level through our specification system. In fresh produce, full transparency back to farm level is required, with suppliers maintaining and sharing an up-to-date grower list with our technical team. Seafood suppliers must also disclose details of their supplying fishing vessels to ensure transparency throughout the supply chain.

To further strengthen resilience, foster closer supplier relationships and mitigate risks, we developed approved supplier programmes in areas where full upstream visibility is required. This approach was first implemented for protein supply chains, establishing a list of indirect suppliers from whom our direct suppliers of Sainsbury's brand products can purchase protein from, giving us full transparency of the supply chain. This has been completed for beef, lamb, chicken and pork, with progress ongoing for seafood. All approved indirect processing sites must meet the same safety, integrity and ethical requirements as our direct supplier sites, and Sainsbury's onboarding audits are in progress.

We publish our [own-brand black tea producer list](#) on Open Supply Hub, and we have visibility down to producer level across our tea and coffee supply chains. 100% of *by* Sainsbury's black tea is now Fairtrade, and we continue our commitment to sourcing 100% Fairtrade bananas and own-brand roast and ground coffee. We source roast and ground coffee for all of our own-brand products to an independent standard. We are also working towards increasing traceability in our block chocolate range, and we source 97.7% certified cocoa in all our own-brand products. In soy, we are working to source greater volumes of soy that are deforestation and conversion free, including EU Deforestation Regulation (EUDR) compliant soy and soy from low risk origins. As part of the UK Soy Manifesto, we are also working to achieve a Deforestation & Conversion Free standard for imports into the UK.



Ms Grace Njoki, Tea Farmer at Ndui Tea Factory, Kenya  
Credit: Fairtrade

## Our supply chain at a glance

61

Countries where we source own brand products

603

Suppliers of own brand products for food supply chains operating across 1,103 sites<sup>1</sup>

Top 5 food supplying countries<sup>2</sup> are: United Kingdom, Spain, France, Italy, Netherlands

472

Suppliers of own brand products for general merchandise and clothing supply chains operating across 808 sites<sup>1</sup>

Top 5 general merchandise and clothing supplying countries<sup>2</sup> are: China, Bangladesh, India, Türkiye, Cambodia

Over 965,000

Workers in first tier of food, general merchandise and clothing supply chain, of which:

6% are agency workers

20% are migrant workers

47% are women

21% are young workers<sup>3</sup>

1,587

Suppliers over 22 countries in GNFR supply chains managed by our procurement division

96%

Of GNFR spend is with suppliers based in the UK

<sup>1</sup> Some supplier sites might supply across both food, general merchandise and clothing.

<sup>2</sup> Top sourcing countries by number of Tier 1 manufacturing sites supplying Sainsbury's.

<sup>3</sup> Young workers are defined by the International Labour Organization as individuals aged between 15 and 24 years.



## A woman, Ms. Adriana Maria Alves, stands on a large pile of coffee beans in a field. She is wearing a blue long-sleeved shirt, blue jeans, and a blue and white patterned headscarf. She is looking towards the left. The background shows a vast landscape with green coffee plants, a body of water, and distant hills under a blue sky with scattered clouds. The text at the bottom of the image reads: "Ms Adriana Maria Alves, Coffee farmer at Boa Esperenca, Brazil" and "Credit: Eduardo Martino / Fairtrade Foundation".

| Food                                                                                           |                                                                                                | General Merchandise                                                                             |                                                                                                            | Goods not for Resale                                                                                                      |                                                                                                              |                                                                                                              |                                                                                                               |                                                                                                                                     |                                                                                                 |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Fresh<br>   | Grocery<br> | Clothing<br> | General Merchandise<br> | Utilities, Energy & Smart Charge<br> | Logistics Warehouse<br> | Logistics Transport<br> | Technology & Digital<br> | Marketing, Loyalty & Professional Services<br> | Energy<br> |
| Direct suppliers and service providers (e.g. tier 1 manufacturing sites, cleaning contractors) |                                                                                                |                                                                                                 |                                                                                                            |                                                                                                                           |                                                                                                              |                                                                                                              |                                                                                                               |                                                                                                                                     |                                                                                                 |
| Indirect suppliers (e.g. intermediary processing sites)                                        |                                                                                                |                                                                                                 |                                                                                                            |                                                                                                                           |                                                                                                              |                                                                                                              |                                                                                                               |                                                                                                                                     |                                                                                                 |
| Raw materials production and extraction (e.g. fisheries, produce farms, minerals extraction)   |                                                                                                |                                                                                                 |                                                                                                            |                                                                                                                           |                                                                                                              |                                                                                                              |                                                                                                               |                                                                                                                                     |                                                                                                 |



# Our policies

We do not tolerate any form of human rights abuse within our company or supply chains. We have well-developed policies and processes to avoid causing or contributing to adverse human rights impacts, including any form of modern slavery. We are committed to addressing such impacts if they occur.

## Overview of our policies

| Policy Framework                                                            | Scope                                                                                                  | Overview of content                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">Our Human Rights Policy</a>                                     | Our own operations, suppliers of Sainsbury's and Argos brands, suppliers of GNFR and branded suppliers | The policy outlines Sainsbury's commitment to upholding internationally recognised human rights and our expectations of colleagues, suppliers and service providers.                                                                                                                                                                                                                                                                                                                                                                  |
| <a href="#">Our Policy on Supplier Whistleblowing</a>                       | All direct suppliers who supply Sainsbury's and Argos with products or services.                       | This policy sets out our position and supplier requirements in relation to whistleblowing.                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <a href="#">Our environmental and key raw material policies</a>             | Specific high-risk raw materials or commodities in our supply chains.                                  | Our raw material policies, such as Leather and Precious Metals and Minerals, address the areas of highest social and environmental risks within our key raw materials supply chains. Each of these policies outlines our scope, our position, statement of intent, our approach (such as traceability requirements, environmental standards and respect for human rights), roles and responsibilities (of suppliers and Sainsbury's), and policy governance. For example, our Cotton Policy prohibits sourcing from specific regions. |
| <a href="#">Supplier handbooks and manuals</a>                              | Suppliers of Sainsbury's brands                                                                        | Our supplier manuals and handbooks translate our position and standards into specific supplier requirements across our business divisions. We currently have a Food Responsible Sourcing Manual (RSM), general merchandise & clothing supplier handbooks and a manual for the Responsible Use of Labour Providers in our logistics operations.                                                                                                                                                                                        |
| <a href="#">Colleague handbooks</a>                                         | All colleagues                                                                                         | Our handbooks for Sainsbury's, Argos, Logistics and our Asia-based colleagues outline the terms and conditions of working with us and are designed to protect both colleagues and the business. The handbooks summarise our ways of working and signpost colleagues to essential policies, such as Fair Treatment and Grievance, along with guidance on where these documents can be found.                                                                                                                                           |
| <a href="#">Our Fair Treatment and Grievance Policies (internal)</a>        | All colleagues                                                                                         | We promote a culture of fair treatment, and we take a zero-tolerance approach to unacceptable behaviours such as bullying or discrimination (including harassment, sexual harassment and victimisation). These policies detail set procedures to make sure that any complaints relating to colleague employment are dealt with in an appropriate way, but also to enable us to put steps in place to prevent incidents from reoccurring.                                                                                              |
| <a href="#">Our Reporting Wrongdoing - Whistleblowing Policy (internal)</a> | All colleagues                                                                                         | We expect our colleagues to act with honesty and integrity in the performance of their role. This policy sets out how colleagues should report wrongdoing when honesty and integrity are compromised. It provides protection for colleagues and sets out our expectations in these areas.                                                                                                                                                                                                                                             |
| <a href="#">Our Recruitment Policy (internal)</a>                           | All colleagues                                                                                         | This policy sets out how we decide when to recruit and the processes we follow as an equal opportunity employer to make recruitment fair, inclusive and effective for our business.                                                                                                                                                                                                                                                                                                                                                   |
| <a href="#">Our Third-Party Risk Management Policy (internal)</a>           | All colleagues and stakeholders involved in managing third-party relationships                         | This policy outlines the minimum activities required to be conducted for all GNFR third parties in scope of the policy for identifying, assessing, mitigating, and monitoring risks associated with third-party relationships.                                                                                                                                                                                                                                                                                                        |

## Policy development, embedding and monitoring

The human rights team is accountable for the development and review of group human rights policies. The technical and ethical teams are responsible for the implementation of the policies and supplier requirements. Our central technical operations teams support compliance tracking and monitoring of these policies.

Our human rights related policies are updated to reflect evolving good practice and emerging risks. Updates are informed by gap analyses focused on our priority human rights risks and high-risk raw materials and are aligned with relevant international standards and applicable local laws. Policies are developed and updated in consultation with internal ethical, technical, and legal teams and with external partners where appropriate, and are approved through our established governance processes.

Suppliers can access our external policies and supplier requirements through our supplier platforms and our website. Direct suppliers must communicate Sainsbury's requirements to their own supply chain partners. Specific supplier requirements to implement these policies are embedded in the Responsible Sourcing Manual and Supplier Handbooks. We monitor supplier compliance to our policies and requirements through a combination of third-party ethical audits, self-assessments, onboarding and ongoing supplier assessments completed by our ethical and technical teams. Supplier compliance is reported through our internal technical governance. We communicate the changes in our policies and manuals to our suppliers via alerts on our supplier platforms and to our colleagues via internal communication channels.

Internal policies are communicated to Sainsbury's colleagues through our internal Human Resources (HR) platform, and colleague handbooks.

Key changes to our policies and supplier manuals this year include:

- Updating our Human Rights Policy which brought together four policies (Human Rights, Ethical Sourcing, Prison Labour and Home Work policies) into one comprehensive document.
- Refreshing our supplier manuals: we updated our Food RSM, in consultation with internal stakeholders and 38 suppliers. As part of this update, we refined our clauses on the management of labour providers following feedback from suppliers and our auditing team. We updated our list of prohibited sourcing regions and strengthened requirements related to responsible recruitment in line with our new Human Rights Policy. In addition, we introduced requirements relating to prison labour, home working and country-specific accommodation standards within the produce supply chain. We also updated our general merchandise and clothing supplier handbooks, strengthening requirements on HRDD and grievance mechanisms. Next year, we plan to update our Manual for the Responsible Use of Labour Providers and develop a GNFR supplier manual for suppliers in scope of enhanced HRDD.
- Reviewing our internal policies: We implemented changes to our guidance on bullying & discrimination in response to the UK's Worker Protection Act (see below for more details). We are currently reviewing our internal Recruitment Policy, and we will share an update in our next statement. Finally, we developed our new Third-Party Risk Management Policy to ensure consistent management of risks associated with GNFR third-party relationships.



# Our policies (continued)

## Case study: Strategic review of our Human Rights Policy

This year, we worked with Inherently Human to complete a strategic review of our Human Rights Policy to address salient Human Rights risks in our own operations and supply chains. We addressed the gaps identified in our HRDD gap analysis completed last year, benchmarked ourselves against our peers, the Corporate Human Rights Benchmark and the Home Office's Transparency in Supply Chains statutory guidance.

We strengthened our Code of Conduct and reinforced the content on Forced Labour including our approach on responsible recruitment, aligning with the International Labour Organisation's (ILO) Principles on Responsible Recruitment, recruitment fees and management of labour providers. We have added new provisions on HRDD, responsible purchasing practices, and responsible disengagement. We also included remediation principles in line with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

We understand our duty to respect human rights and are committed to the following frameworks which we used to develop this policy:

- The International Bill of Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- UN Guiding Principles on Business and Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- Ethical Trading Initiative (ETI) Base Code
- UN Sustainable Development Goals (SDGs)
- Section 54 of the Modern Slavery Act 2015, Transparency in Supply Chains (TISC)
- UN Women's Empowerment Principles (WEPs)
- ILO's Operational Principles for Fair Recruitment

### Stakeholder engagement

We consulted with internal colleagues across human rights, ethical, legal, diversity, equity & inclusion representatives, technical, commercial and procurement teams to gather feedback on our policy. We engaged externally with key suppliers, a consultant with lived experience, the University of Nottingham Rights Lab (Rights Lab), ETI, Food Network for Ethical Trade (FNET) and trade unions to provide feedback during the development of the policy.

The policy will come into effect later in 2026, and we will provide further disclosure on its implementation in next year's report.

## Adapting our policies in response to legislative changes

In response to the UK's Worker Protection Act, we launched the Action Plan to Prevent Bullying & Discrimination (including harassment, sexual harassment and victimisation) in early 2026. This Action Plan outlines Sainsbury's zero-tolerance approach to unacceptable behaviours and is to be used as a tool and resource for all colleagues. Key features include:

- Clear definitions and examples of unacceptable behaviour, including scenarios involving third parties
- A responsibilities checklist to highlight our shared responsibility for prevention (employers, colleagues and line managers)
- A risk assessment to help leaders proactively identify risks
- Practical guidance and support for colleagues who experience or witness it.

Our Fair Treatment and Grievance policies were updated to reflect these changes.

In preparation for the Employment Rights Act 2025, we established a dedicated project group, to ensure compliance. We have not yet made any policy changes as we await secondary regulations and will share an update on our actions in the coming year. We will continue to monitor any upcoming changes in legislative requirements and ensure that we are responding appropriately.



# Assessing and managing risk

Modern Slavery risks are constantly evolving, shaped by factors such as weak local legislation and enforcement, market competition, environmental crises, geopolitical instability and demand for low-cost labour. As a result, we recognise the importance of continuously strengthening our risk assessment approach to deepen our understanding of our supply chains.

## Overview of risk assessment tools

The human rights team is responsible for identifying and understanding risks, such as modern slavery, within our supply chains. To support this, we use the following range of tools and information sources:

- Our refreshed human rights saliency assessment, to understand the most important risks in our supply chains and enable us to prioritise our efforts (see below for more details).
- Our country risk tool established by the University of Nottingham's Rights Lab which was refreshed this year. The data sources include new indices built for our identified salient and evolving risks, Sedex and FNET's country risk scores, and the Rights Lab High-Risk Products Score (which combines sources such as the US Department of Labour Lists of Goods Produced by Child or Forced Labour and the US State Department Lists of Forced Labor in Commodities).
- In-depth sector and commodity level assessments in key supply chains, such as Human Rights Impact Assessments and our risk assessment work in tea, bananas and coffee that we are doing as part of our work with Fairtrade on the Resilience Building Initiative.
- Sedex risk assessment tool to define frequency of third-party ethical audits in our food supply chain. This uses suppliers' answers to the Sedex Self-Assessment Questionnaire as well as country and sector inherent risk data.
- Audit data reported in our quarterly technical governance meetings.
- Incident data, including media allegations, NGO exposés, grievances, whistleblowers and Unseen reports.
- EiQ, a supply chain intelligence software developed by Lloyd's Register Quality Assurance (LRQA), which we started to pilot to conduct more in-depth supplier, country and product risk assessments. This includes an Artificial Intelligence tool to scan adverse media coverage linked to our supply chains.
- Representative industry bodies and industry initiatives such as the British Retail Consortium (BRC), ETI and FNET to keep up to date with evolving risks. Through our FNET membership, we receive comprehensive weekly horizon scanning updates on UK food industry news, ethical trade and human rights issues, emerging risks and innovations.
- Horizon scanning briefings delivered through our partnership with the Rights Lab, providing updates on emerging business and human rights issues, legislative developments, and geopolitical trends affecting human rights.
- To help create a respectful working environment, and in line with the Worker Protection Act (2023), we have introduced a new behavioural risk assessment internally. Its purpose is to proactively identify risks that could lead to bullying, discrimination, harassment, sexual harassment or victimisation and to set out preventative actions to reduce the likelihood of these behaviours occurring. A leader from each store, logistics site and from each Store Support Centre directorate is required to complete this assessment. They do so by reviewing the risk-assessment template and working with their leadership teams to identify future risks within their area. This includes considering factors such as interactions with third parties, power imbalances, and localised factors (including personal

circumstances or characteristics) that may create vulnerability. For each risk identified, the leader documents existing controls and agrees any additional preventative actions required. The assessment should be reviewed at least annually to ensure risks remain current and actions remain effective.

## Saliency assessment update

Recognising that our previous saliency assessment was conducted in 2021/22 and that a refresh was needed, we collaborated with Ergon, an LRQA company, to update both the assessment and the underlying methodology, enabling us to refresh our salient human rights risks more regularly. Our saliency assessment supports us in prioritising the most important human rights risks in our own operations and supply chains, ensuring we focus our efforts where risk is greatest and where we can drive positive change. As part of this refresh, we expanded the scope to place additional focus on general merchandise, clothing and GNFR supply chains. The assessment covered all tiers of the supply chain, with results organised at category level. The methodology assessed the severity and likelihood of human rights risks in our supply chains. This enables us to understand the potential impact on affected people, considering scope, scale and remediability, and the likelihood of the risk occurring. To complete the risk mapping, we used a combination of data sources, including our EiQ data, and engaged with internal human rights, ethical, technical, commercial and procurement colleagues, as well as external stakeholders such as the ETI, the Rights Lab and suppliers.

As the assessment was completed at the end of our financial year, we will integrate the outcomes into our Supply Chain Resilience and Human Rights strategies in the new financial year and provide a more detailed update in next year's report.





# Assessing and managing risk (continued)

## Forced Labour risks across our supply chain

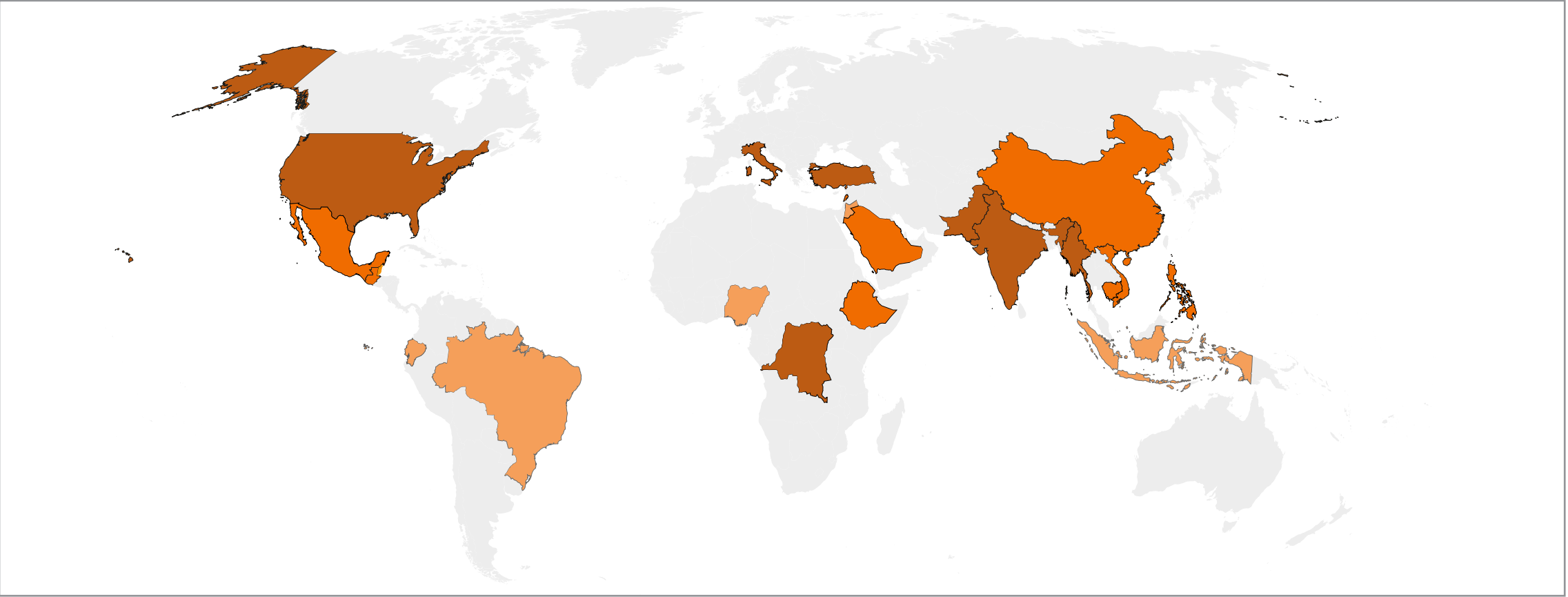
Forced labour remains one of the most salient human rights risks within our supply chain. This is driven by the severity and often irremediable nature of potential impacts, including long-term or permanent harm such as violence and psychological trauma. The risk of forced labour exists in varied forms across all tiers of the supply chain, disproportionately affecting vulnerable groups. This risk is further heightened by global trends such as conflict, poverty, displacement and migration, which increase exposure in certain sectors and geographies. Key risk drivers include

the prevalence of low-paid manual work, operations in high poverty areas, high levels of informality and subcontracting, and the use of migrant labour, particularly where workers are undocumented. Labour intensive sectors facing shortages of national workers, supply chains subject to cost pressure and low profit margins, weak enforcement of labour laws, and work carried out across disparate or ‘roaming’ locations also contribute to an elevated risk of forced labour.

Our saliency assessment highlighted the following priority areas to focus on to address forced labour risks:

| Stage of the supply chain | Sector                       |                        |                       |
|---------------------------|------------------------------|------------------------|-----------------------|
|                           | Raw material production      | Production of goods    | Services              |
|                           | Fisheries and aquaculture    | Fresh produce handling | Logistics and freight |
|                           | Labour intensive agriculture | Light manufacturing    |                       |
|                           |                              | Heavy manufacturing    | Warehousing           |
|                           | Metal and mineral mining     | Food processing        | Auxiliary services    |
|                           |                              | Textile manufacturing  |                       |

This map shows key sourcing countries with forced labour risks



# Assessing and managing risk (continued)

## Deep dive risk assessments in our supply chains

Conducting deep-dive risk assessments in our supply chains, collaborating and engaging with relevant stakeholders, has also allowed us to better understand human rights challenges further down our supply chains and put systems in place to address issues.

### Fairtrade Resilience Building Initiative

This year, we worked with the Fairtrade Foundation to launch the Resilience Building Initiative (RBI) with our key tea, coffee and banana producers. The RBI is a forward-looking, producer-centred approach that supports producers to identify, assess and prioritise their most salient human rights and environmental risks, and to strengthen collaboration with actors across the supply chain to address these risks over time. Enhanced dialogue and long-term commitments form the foundation of the RBI, enabling producers to develop context-specific risk mitigation and improvement plans that contribute to more sustainable and resilient supply chains.

Since work started in 2025, 19 risk assessments have been conducted by directly engaging producers in 14 countries, and 62 producer organisations have since been invited to join the RBI. These producers are now in the process of developing detailed action plans to tackle their salient risks. We look forward to working with our suppliers and producers to build resilience in our supply chain and producer communities.



### Case study: Forced labour risk identification in the RBI

Through the producer-led risk assessments, 14 risk areas were assessed at a regional level across tea, coffee and bananas, including forced labour. Participatory workshops were held at the regional level with farmers, workers, and management from key producer organisations identified by Fairtrade within Sainsbury's supply chains. These workshops included sessions to align understanding of Human Rights and Environmental Due Diligence (HREDD) risk areas, a traffic-light voting system to assess the urgency of each risk, alongside in-depth discussions with producers to understand their views on the root causes and impacts of these risks and to propose solutions.

Forced labour was identified as a low-priority area across all but one coffee and tea sourcing regions, where the area was considered a medium priority. In bananas, most producers also identified forced labour as a low-risk priority; however, hired labour organisations in Latin America, identified concerns around overtime, including consent and payment.

In the Dominican Republic banana sector, an estimated 80% of workers are Haitian migrants. Many face barriers to documentation, access to services, and adequate living conditions, which can increase vulnerability to labour exploitation and forced labour risks. Fairtrade addresses these risks through its certification standards, which prohibit forced labour and include requirements on recruitment practices, voluntary overtime, wage deductions, and worker protections. Fairtrade also supports training on workers' rights and enables producer organisations to invest the Fairtrade Premium in improving working conditions, services, and protections for workers and their communities.

### Human Rights Impact Assessments

This year, we completed a Human Rights Impact Assessment (HRIA) of yellowfin tuna sourced from the Republic of Korea to assess conditions on distant water longline vessels. We worked on this project in partnership with Ergon, another retailer and our supplier New England Seafood. The methodology included engagement with the fishing company, trade unions, NGOs and multi-stakeholder groups, as well as direct engagement with fishers, senior crew and the captain of the longline vessel in scope. This HRIA identified issues related to the payment of recruitment fees by migrant fishers, excessive working hours, freedom of movement due to the nature of fishing trips and health & safety. We are currently working on an action plan and are exploring how to engage with the wider industry to deliver this action plan and support improvement for fishers in this supply chain.

We are supporting the HRIA in the UK Nephrops and Scallop Supply Chains, in collaboration with Seafish, retailers, suppliers and the expert consultancy Poseidon Aquatic Resource Management Ltd. The overall project aims to identify, assess, and address human rights risks within the UK Nephrops and Scallop sectors, supporting businesses, regulators, and wider stakeholders in implementing responsible practices and meeting both current and emerging regulatory expectations. The consultation involved a wide range of stakeholders, including fishers, vessel owners, processors, worker representatives, port authorities, human rights organisations and government agencies. We are in the process of reviewing the findings and hope to support the industry in establishing an action plan that will drive improvements for workers and strengthen the long-term resilience of the supply chains.

We also commissioned a Human Rights and Environmental Impact Assessment in Indian and Thai rice supply chains in partnership with Ergon and our packed rice supplier LT Foods. The assessment was conducted in accordance with the UN Guiding Principles on Business and Human Rights, and applied a mixed-methods approach, combining desk-based research and multiple country field research programmes. It included visits to farms, rice mills and trading hubs, interviews with farmers, workers, worker representatives, NGOs and in-depth supplier engagements. Initial findings relating to human rights for India highlighted risks related to upholding decent working conditions (particularly for inter-state migrant workers, linked to wages, working hours, and labour contracts) and risks related to child labour. In Thailand, the assessment identified risks relating to vulnerable international migrant workers, including multiple indicators of forced labour, occupational health and safety concerns and child labour. We have discussed the findings and recommendations through an internal cross-functional workshop led by Ergon, as well as collaborative sessions with other participating companies and stakeholders.

In next year's report, we will share details about our upcoming HRIAs in wine and on our service providers in our retail operations.



# Our due diligence approach

HRDD is the most effective tool available for addressing forced labour and Modern Slavery. Through our approach, we seek to identify, mitigate and prevent human rights risks, linked to our operations, products or services and remediate adverse impacts that we have caused or contributed to.

## Overview of our HRDD action plan

Last financial year, we developed a comprehensive HRDD action plan, based on the UNGPs and OECD guidelines and co-created by our human rights, ethical, technical and procurement teams. The plan was informed by the gap analysis completed by Impactt, to build on our strengths and address any gaps against international good practices and standards. This year, we started implementing this plan, focusing on strengthening our HRDD foundations, by completing a strategic review of our human rights policies, refreshing our saliency assessment, improving our incident management and remediation processes, and training key colleagues across the business on Human Rights.

We believe that collaborating with others is crucial to ensure an effective response to Modern Slavery, which is a complex and evolving problem. We engage and work with a range of internal and external stakeholders to implement our HRDD action and plan and Human Rights strategy:

- Internally, our human rights and ethical teams lead our HRDD action plan across all divisions of the business. We work and consult cross-functionally with technical, commercial and procurement teams to implement our action plan. For example, our human rights team leads on the policy and risk assessment work, and supplier requirements are implemented by our ethical and technical teams. Our technical teams monitor and verify implementation.
- Externally, we work with our suppliers to strengthen their own HRDD approaches, as well as to deliver on the ground programmes and support investigation and remediation activities. We also take part in industry-wide and multi-stakeholder initiatives to improve workers' conditions in our supply chains.

Key activities related to tackling modern slavery have included:

- Reinforcing our position on responsible recruitment and recruitment fees in our Human Rights Policy.
- Improving our incident management and remediation approach, in collaboration with Unseen.
- Supporting remediation activities in cases related to forced labour collaborating with organisations such as Unseen to provide support to survivors.

## Supply chain resilience

Last year, we launched our Supply Chain Resilience initiative to strengthen our ability to maintain access to sustainable and affordable products and to better anticipate and respond to human rights, environmental, geopolitical and economic viability risks that could fundamentally disrupt supply. As part of this work, we have focused on understanding where risks are most significant and developing mitigation strategies that support responsible and resilient sourcing. These include deepening our knowledge of supply chains, building long-term supplier relationships, diversifying sourcing options, and participating in relevant industry programmes and certification schemes.

Over the past year, teams across our Food business have worked together to enhance our resilience approach by identifying and prioritising high-risk ingredients and sourcing regions. This has enabled us to put targeted mitigation plans in place, with strong supplier partnerships forming an essential component of this approach. To support this work, we conduct human rights assessments for higher risk commodities, drawing on an assessment framework developed with the Rights Lab. This helps us evaluate suppliers' HRDD practices and mitigation activities in place to address risks

linked to specific sourcing contexts. We have used this approach across several supply chains where risks are known to be more pronounced, including seafood, nuts and tomato products.

## Responsible purchasing practices

We are committed to establishing long-term, open, and fair relationships with our suppliers and making sure that they have the support and capacity to safeguard workers and local communities. This includes recognising the significant impact that purchasing practices can have on shaping workers' conditions and pay. It emphasises the importance of accounting for production and labour costs, providing fair payment terms, accurate volume forecasting, and ensuring adequate lead times.

In May 2025, we completed our first ACT brand and supplier surveys to drive improvement in our purchasing practices. The survey included questions on our clothing sourcing strategy, practices during product development, price negotiation, forecasting and order placement and relationship with suppliers. The scores enabled us to establish our baseline to drive improvement and meet our responsibilities under the [ACT Global Purchasing Practices Commitments](#). The survey was completed by 63 of our general merchandise and clothing suppliers. The areas of improvement identified included creating more incentives to reward suppliers' performance and progressing our practices related to order delays and cancellations.

We took part in an initiative led by ETI, Banana Link and GIZ to support retailers in assessing their purchasing practices across the global banana supply chain. The project involved gathering feedback from suppliers on retailers' purchasing practices, retailer self-assessment of their own purchasing practices and anonymised benchmarking of participating retailers to enable constructive peer-to-peer comparison. Once we receive the results of these activities,

we will create an action plan outlining how we will address gaps and improve our responsible business practices. We continue to buy all our bananas on Fairtrade terms, which ensures a Fairtrade Minimum Price that aims to cover sustainable cost of production and protects producers when market prices are low.





# Our due diligence approach (continued)

## Due diligence activities relating to our supply chain

We conduct due diligence to identify and address modern slavery risks that our business may have caused, contributed to or been linked to, and integrate these processes across food, general merchandise, clothing and GNFR business divisions. We continue to go beyond our audit due diligence approach, with on-the-ground collaborative programmes to address our salient risks.

### Supplier due diligence in food, general merchandise and clothing

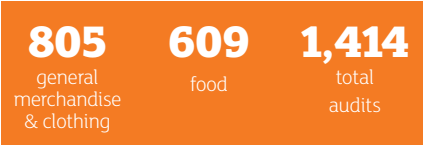
Any new direct supplier site goes through a robust onboarding process that includes an ethical compliance check by the technical managers in food and ethical team in general merchandise and clothing. We continue to roll out in-depth assessments at the onboarding stage of high-risk suppliers and on an ongoing basis, by using adverse media scanning, public sources reviews, and reviewing NGO and industry reports to further understands risks related to new suppliers.

All our direct supplier sites across food, general merchandise and clothing must go through a third-party Sedex Members Ethical Trade Audit (SMETA) before supplying Sainsbury's and on an ongoing basis. SMETA is a widely used audit methodology developed by Sedex to assess and improve ethical and environmental practices within supply chains. The SMETA methodology measures a site's practices against the ETI Base Code, the standards of the ILO Conventions and local law. The audit includes confidential worker interviews and an assessment of management systems, including a review of records, policies, and processes related to labour standards and health & safety. We require these third-party audits to be conducted unannounced or semi-announced and carried out by an independent audit company approved by Sainsbury's. Approved auditors must be certified by the Association of Professional Social Compliance Auditors.

This year, we started a review of our approved audit body list across food, general merchandise and clothing, and increased due diligence activities on these audit bodies, to improve the quality of third-party ethical audits in our supply chain. Next year, we will focus on monitoring the performance of audit bodies against set Key Performance Indicators (KPIs).

For general merchandise and clothing supplier sites, SMETA audits must be carried out annually. For food supplier sites, the SMETA audit frequency is determined by risk scores from SEDEX's risk assessment tool. High-risk sites are audited every year, medium-risk rated sites every two years, and low-risk sites have a minimum audit frequency of four years. We have a supplier ethical compliance rating in place, based on the number and criticality of issues, to focus our efforts where it matters most.

### Third-party ethical audits conducted



### Specific food due diligence activities

- In food supply chains, we assess the human rights strategy and HRDD approach of new and existing suppliers in high-risk supply base reviews to ensure they have robust policies and mechanisms in place to identify and address human rights issues. This assessment is embedded in the sourcing decision-making with the commercial, environmental and technical criteria. This year, we particularly focused on grocery and seafood categories.
- Food suppliers must meet more stringent requirements to conduct enhanced HRDD, when sourcing from high-risk countries.

Our Food RSM discloses the level of risk associated with each sourcing country, to support suppliers understanding their HRDD requirements for their own operations and supply chains.

- Indirect supplier sites in Fresh Produce and Protein (meat, seafood, and poultry) in high-risk sourcing countries must also have SMETA audits in place on an annual basis. Our approved indirect protein sites also go through the same onboarding process as direct supplier sites.
- As part of our analytical testing programme, we are partnering with Food Forensics to verify the authenticity of our tomato purée products through origin testing and prevent origin substitution, which can be linked to forced labour in undeclared, higher risk sourcing regions. By using independent reference data, we validate our Italian origin claims and strengthen our traceability efforts. This analytical testing forms an additional due diligence control alongside our ethical audits and wider traceability work.
- Our food safety audit programme includes core ethical questions for all sites on the responsible management of labour providers and the availability of grievance mechanisms on site. Every direct site is audited on a risk assessed frequency, at least every three years.
- We conducted 80 audits of produce suppliers against our RSM requirements, including accommodation checks.
- This year, we have worked on the implementation of our prohibited sourcing countries and regions list, leading to a significant reduction in the number of these locations listed as sources on product specifications. As part of our monitoring and product development processes, teams review raw material sourcing data on specifications and work collaboratively with suppliers to identify



alternative sourcing options where appropriate. This is an important step in reducing exposure to high-risk areas where due diligence is more challenging.

- We contributed to the working group to update the Fresh Produce Consortium's Temporary Accommodation guidance for the UK fresh produce sector. This is integrated into our RSM alongside country-specific accommodation

guidance documents for the agri-food sector in Spain and Morocco. Produce suppliers and growers based in other countries must use the Stronger Together Accommodation Due Diligence Guide and Checklist.



## Our due diligence approach (continued)

### Specific general merchandise and clothing due diligence activities:

- Our ethical team takes a risk-based approach to conduct additional ethical visits in the clothing and general merchandise supply base. We use audit compliance data, whistle-blower and allegation reports to prioritise these site visits. Our goal is to conduct country-specific assessments of high-risk suppliers, informed by known local risks. This helps us focus on the suppliers in need of additional support. We have the ambition to extend the scope of our internal ethical audit programme to tier 2 sites and are currently exploring an appropriate framework to do so.
- Our technical and commercial teams use the Everyone's Business App when conducting supplier visits to identify and record potential concerns such as indicators of forced labour. All issues are followed up by the ethical team and reported as part of our governance process to ensure adequate investigation and actions are put in place. We plan to include questions on the implementation of our new whistleblower hotline Call it Out as part of these supplier visits.

### Supplier due diligence in our GNFR supply chains

We recognise that goods and services provided to our business and supply chains that are not sold in our stores, may also be associated with human rights risks, including modern slavery. We carry out due diligence across GNFR to ensure we understand and tackle these risks.

Every procurement sourcing project starts with a risk assessment to identify areas of high human rights and modern slavery risk, and we tailor our approach accordingly. This year, we strengthened our approach to managing human rights risks within our GNFR supply base by embedding the principles of our Third-Party Risk Management (TPRM) Policy. This enhanced framework ensures the consistent assessment of GNFR suppliers against our human rights requirements across all procurement sourcing

projects. An initial risk screening is undertaken to identify where high inherent risks exist in the goods or services, followed by a detailed risk assessment which includes mandatory, tailored and risk-based human rights questions. Any risk identified through supplier responses are investigated by the human rights and procurement teams, who engage with suppliers to understand and manage the risks identified. These improvements have increased risk visibility and enabled more targeted mitigation. Mitigation actions may form part of supplier contractual obligations, ensuring accountability, where appropriate. This approach supports the consistent management of human rights risks across GNFR commercial relationships. In addition, we continue to work with our third-party risk management provider, to provide additional due diligence checks across a range of risk domains.

We identified the use of agency workers in our logistics operations as a high Human Rights risk. As a result, we have comprehensive standards and guidance incorporated into our supplier contracts with labour providers and third-party logistics providers. These standards provide clear requirements on the use of agency labour in all our warehousing and logistics supply chains, and we are planning to refresh them in the next financial year.

This year, we completed a review of our internal audit programme for labour providers in our Logistics operations, collaborating with TylerBladon Practical Ethics to strengthen our approach. The revised programme will be launched in the new financial year and will continue to incorporate direct worker engagement with reviews of labour providers' management systems. Alongside this internal audit programme, we continue working with our strategic third-party logistics providers to support them in strengthening their own audit programmes and due diligence, to mitigate risks across our value chain.





# Our due diligence approach (continued)

## Responsible recruitment

We recognise that both direct and indirect recruitment can expose workers to risks of labour exploitation if not managed responsibly. Third-party involvement in the recruitment process is known to increase these risks. To address this, we have strengthened our commitments and position on responsible recruitment and recruitment fees within our Human Rights Policy, due to launch later in 2026, and outlined our expectations for our suppliers. We endorse the [International Labour Organisation's General Principles and Operational Guidelines for Fair Recruitment](#) and we recognise the practical challenges of implementing these standards in full. Nonetheless, we are committed to working with suppliers and relevant governments and stakeholders to support responsible recruitment practices that minimise risks to workers. Our due diligence focuses on understanding the occurrence and impacts of recruitment related fees and costs, identifying risks linked to forced labour and illicit recruitment fees, ensuring workers receive clear information about their rights and collaborating on remediation where required.

## Responsible Recruitment Practices

In our food supply chain, the Food RSM sets out responsible recruitment requirements for all suppliers. Suppliers are required to carry out due diligence to ensure direct and indirect recruitment practices comply with local law and the ETI Base Code, including transparency in labour supply chains, appropriate policies and procedures, and efforts to reduce recruitment-related fees and costs. Suppliers must have systems in place to ensure workers are informed of their rights and terms of employment in a language they understand, are not charged illicit fees, are legally eligible to work, retain control of their identity documents and wages, and have freedom of movement. Our requirements state our suppliers must conduct due diligence of their labour providers, including audits, to verify their legitimacy, licensing, grievance mechanisms and safeguards against labour exploitation.

We provide guidance to support suppliers in strengthening their labour provider audit programmes.

Our internal Recruitment Policy defines how we recruit colleagues across retail, fulfilment, logistics and store support centres, outlining the processes we follow as an equal opportunities employer to ensure recruitment is inclusive and effective. The policy is currently under review, and a learning offer has been launched for store support centre colleagues, and it will be rolled out to all other business areas in the next financial year. We will share further update in our next statement. Right to work and imposter checks are part of our recruitment controls, and user and process guides are available to our recruiting colleagues. Following recent recruitment scams involving fraudulent domains, we have worked with our privacy and information security teams to remove these domains where possible and worked with affected people to support corrective action. Our colleague handbook and HR platform provide information to our colleagues on fair treatment and how to raise issues.

## Recruitment corridors project

We funded the development of a recruitment corridors database and map, led by Impactt. The objective is to develop a freely accessible, credible global database, that analyses a large-scale pool of data on worker-paid recruitment fees and related costs. This database will help us and our suppliers to better understand recruitment related risks that migrant workers face in our supply chains. It will enable us to take a more proactive approach to supplier engagement and to work collaboratively on responsible recruitment, helping to drive improvement for workers. We plan to further support the project by sharing anonymised data on recruitment fees and related costs identified in our own supply chains.

## Grievance mechanisms

Grievance mechanisms are a critical factor in helping us improve conditions for workers in our own operations and supply chain and they play a key role in the detection, prevention and remediation of modern slavery.

Sainsbury's colleagues can raise grievances in line with our Fair Treatment policy and processes. Our Human Rights Policy sets out our expectation for suppliers to have established processes and procedures for workers to be able to raise concerns and for those concerns to be addressed. We also expect our suppliers to enable freedom of association and ensure workers can voice important issues through their representatives.

Sainsbury's supports the UK Modern Slavery and Exploitation Helpline which is a free, independent and confidential service, operated by Unseen. Our partnership and membership of Unseen's business portal give us access to sanitised intelligence from reports raised through the Helpline, linked to either our own operations or supply chain in the UK (where this is appropriate). Unseen then supports Sainsbury's to respond to these potential cases, which could include investigating concerns raised, implementing corrective actions and providing remedy to those impacted. We also receive anonymised information about other cases reported through the helpline related to our sector. This is invaluable in helping inform our understanding of risks, so we can work to address modern slavery across our business and supply chain.

We also promote access to grievance mechanisms for workers in our supply chains through support for, and partnership with, external organisations. For example, we have an ongoing partnership with the Issara Institute to tackle forced labour and human trafficking in Thailand. Issara's worker voice channels are available to workers in processing facilities and businesses in our chicken ingredient, general merchandise and clothing supply chains in Thailand. Issara also engages with workers in-person at participating factories, at accommodation



## Case study: Call it Out launch

In January 2026, we launched Call it Out, our new whistleblower mechanism provided by Safecall. This is an independent, multi-language, confidential whistleblower service, available to all our colleagues in UK and Asia and suppliers both within and outside the UK to report wrongdoing that is in the public interest such as forced labour, bribery & corruption, fraud, crime, environmental damage and health & safety risks.

Sainsbury's employee relations, human rights and ethical teams worked together to develop the triage process, test the mechanism, and develop the online reporting webpage and communication materials for colleagues and suppliers, including posters. The triage process, supported by Safecall, ensures that genuine concerns are escalated, while personal grievances are redirected to our Fair Treatment processes in line with our internal policy, or suppliers' own grievance mechanisms to support workers. Issues meeting the whistleblower definition, high level grievances or unresolved grievances are managed following our employee relations or human rights incident management process. We monitor all cases internally as part of our governance, to ensure the triage has been correctly completed.

The internal Sainsbury's employee relations team delivers tailored intervention in business areas where we see higher volumes of complaints to address specific risks and build manager capability.

facilities, and in the community. Issara works to ensure communication is safe, accessible and inclusive for all workers, regardless of the languages they speak. Workers can exchange information and raise grievances via a free 24/7 multilingual phone hotline, Issara's Golden Dreams smartphone app, Issara-led in-person outreach activities, closed Facebook chats, and Line, Viber, and WhatsApp messaging. We have

quarterly review meetings with Issara to review trends that have been identified and to discuss solutions to address persistent or new issues. This year, together with Issara, we developed an escalation process and proactively monitor concerns that are raised and take appropriate action as needed. If certain thresholds are met, our incident management process is triggered.



# Our due diligence approach (continued)

## Case study: Seasonal Worker Scheme taskforce

The Seasonal Worker Scheme (SWS) Taskforce is a UK-based, industry-led coalition coordinated by Stronger Together and comprised of more than 130 individuals from over 60 organisations. Through our membership, and as part of their Governance Committee, we continue to partner with the Taskforce on its mission of ‘working collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers’ rights in the UK SWS and wider UK horticulture’.

We actively participate in three workstreams of the SWS Taskforce (SWSTF):

- Workstream A: Improving worker education, information, feedback tools, and access to effective grievance mechanisms (through participation in the Grievance Mechanism Sub-group)
- Workstream B: Due diligence and good practice during recruitment and on farm
- Workstream C: Improving Worker Finances.

Key activities this year have included:

- Improving access to and effectiveness of grievance mechanisms available to seasonal workers. Sainsbury’s contributed additional funding towards the establishment of an independent multilingual support line to provide accurate, consistent information and signposting to seasonal workers. This is part of a triage service delivered by Unseen, experts in the anti-modern slavery sector and operators of the UK Modern Slavery & Exploitation Helpline. We will share an update on this in our next report. The Taskforce also worked with Advisory, Conciliation and Arbitration Service (ACAS) to deliver a series of grievance prevention and management training workshops with over 60 grower participants. The workshops resulted in suggestions of future training and resources that would help inform growers’ grievance processes.
- Active engagement with Government departments and strategic policy development. Together with other stakeholders, we participated in the development of the SWSTF Policy Recommendations for 2025, which established both a SWSTF policy document and an engagement plan. The SWSTF Policy Recommendations 2025 were submitted to relevant Ministers at the Home Office and DEFRA in December 2025. We see this as key to enable the improvements needed to the scheme for the industry and for workers.
- Publication of Employer Pays Principle (EPP) Feasibility Study. We were part of the multistakeholder EPP Project Advisory Group that provided advice and technical input during this study. Following the publication of the study and cross-industry roundtables, the Taskforce has set up a working group to scope the report-proposed ‘Safeguarding Pot/Hardship Fund’ within the first quarter of 2026.
- Supported the roll out of the Independent Worker Survey to help identify and respond during the season to any trends in working, living and human rights challenges. Survey results from the start and mid 2025 season were monitored by Taskforce members and used to support the early identification of areas for improvement and to inform the prioritisation of 2026 activity.
- Ongoing roll out of the Responsible Recruitment Progress Assessments (RRPAs) to support continuous improvement in responsible recruitment practices by Scheme Operators. This is the combination of a self-assessment aligned to the Responsible Recruitment Toolkit and an independent on-site assessment with the Scheme Operator, on-farm and in one recruitment country. Four Scheme Operators completed one or more RRPAs by the end of 2025, with the remaining Scheme Operator proceeding with the RRPAs in early 2026.

Additionally, in the 2025 season, the SWSTF organised seven in-person regional grower roadshows and two online, responding to latest priority risks. The roadshows took growers through key updates in the SWS Grower Toolkit and facilitated multi-stakeholder discussions on worker welfare. They reached over 425 delegates including growers, Scheme Operators, retailers, and other businesses in the industry. 92% found the toolkit and training useful and relevant. 91% acted on the content to improve practices and implement practical actions to reduce risks and improve worker experience. At least 300 unique growers have been engaged through Taskforce roadshows since 2023. Additionally, the Just Good Work worker information app was further developed and distributed to increase communication with workers at the earliest stages of recruitment and throughout employment on their rights and entitlements, and where to access support. In 2025, over 45,000 users, and 19,000 new jobseekers and workers accessed information in their own language. In 2026, the Just Good Work app will be updated with new content, including guidance on scam avoidance, to help reduce the risk of scams targeting UK seasonal worker applicants and the charging of illicit work-finding fees.

## Engaging with workers and their representatives

Worker voice surveys help us understand workers’ experiences across our supply chains, and can highlight potential human rights risks, such as indicators of modern slavery. They also show us where further action is needed to improve worker wellbeing and provide better support to our suppliers. By conducting multiple survey cycles within the same supply chain, we can track progress and monitor improvements over time.

In food, we completed the last cycle of worker voice surveys, conducted annually over three years, in our Italian tomato supply chain in collaboration with &Wider, another retailer and our supplier to understand good practice and areas of improvement at farm level. Attaining good participation levels and response rates was challenging, and we are reviewing the findings in collaboration with our supplier. This year, we also co-designed and rolled out a further survey to our tomato growers, shared via WhatsApp, to understand their challenges and approaches managing risks to workers on their farms. We will share an update on the findings of this survey in our next statement. Working with &Wider, we also rolled out worker voice surveys to key flower growers in Ethiopia, Türkiye, Spain and the UK.

In our logistics operations, in collaboration with &Wider, we ran our second survey of our agency workers across 5 participating Sainsbury’s depots in the UK. The response rates, participation percentage and overall scores between the first and second survey improved across sites, enabling us to gain meaningful insights into workers’ experiences in 4 out of the 5 depots in scope. The results are being shared with each agency, and we are in the process of reviewing and assessing the priority areas highlighted by the surveys to implement any required site-level actions.

In response to findings from ethical audits, we expanded our worker voice programme in Logistics across 12 local fulfilment centres, also in collaboration with &Wider. We completed the first cycle of our survey for agency workers

during the Black Friday period which provided valuable insights into workers’ experiences, particularly around encouraging worker feedback and access to grievance mechanisms. We are now working with our labour providers to translate these findings into targeted action plans to improve conditions and support agency workers across our operations.

Once surveys have been completed, we process the information and discuss results and key findings with our suppliers. Where workers report positive experiences, we recognise and celebrate this with our suppliers. To address issues raised, we share guidance and support the development of supplier action plans. These surveys ensure that our strategy is informed by worker feedback and experiences at work.

Through the tripartite structure of the ETI, we also have the opportunity to engage with trade union and NGO perspectives on a range of topics including industrial relations and Just Transition.



# Our due diligence approach (continued)

## Allegations management

Modern slavery or forced labour allegations are managed by experienced and trained colleagues within our business. This year, we have accelerated our work to improve our Human Rights incident management processes. As part of this process, we monitor all allegations through various channels available to stakeholders across our business and supply chains. These channels include our Call it Out mechanism, whistleblowing, due diligence activities such as audits and visits, reports from the UK Modern Slavery and Exploitation Helpline, media, NGOs, civil society

organisations or intelligence bodies. This year's focus areas have included:

- Partnering with Unseen on an allegations management project: Unseen brought their expertise, including lived experience, to review our procedure, processes, governance and training materials to drive improvement in our ways of working. Unseen also supported the review of live cases throughout the year, continuing to build the skills of our ethical and human rights colleagues handling these cases.

- Developing our internal procedure: We have developed our Human Rights Incident Management Procedure, which sets out our process to handle, investigate, escalate, and remediate human rights issues that occur in our own operations or supply chains. With a strong emphasis on remediation, the procedure incorporates clear principles, illustrative examples, and defined roles and responsibilities. In line with the UNGPs, we have articulated our level of responsibility for human rights impacts by considering factors such as due diligence, foreseeability, sourcing and

purchasing practices, and our leverage. This procedure was reviewed by internal subject matter experts and external experts such as Unseen. To support its implementation, we plan to deliver training to colleagues across human rights, ethical and employee relations (ER) who will act as case managers, helping drive consistency and best practice in how cases are managed.

- Improving our incident management systems: The allegations that we capture have been governed through an internal

incident tracker, managed by ethical and human rights managers, and escalated to the relevant stakeholders and governance forums. To improve how we are recording, reporting and governing our human rights incidents, we have worked with Safecall to develop a new internal incident management platform, which we will implement next financial year.

The following case studies highlight the actions we have taken to address and resolve issues related to forced labour within our own operations and supply chain.

### Case study 1: Collaboration with Unseen on a modern slavery case at a UK supplier site

An agency worker of foreign nationality at Supplier A reported to a site employee that they were being coerced into working, had not received their wages, and were experiencing sexual exploitation. The concern was raised confidentially with the site's employee liaison officer. Supplier A contacted the UK Modern Slavery and Exploitation Helpline for guidance, and the police were notified. The police engaged with the individual, providing interpreter support and safeguarding measures.

Supplier A and their recruitment agency cooperated fully with the authorities throughout the initial investigation. Supplier A also reviewed its own procedures for detecting, reporting and escalating potential exploitation. All agency workers had the right to work in the UK, had received Modern Slavery awareness training during induction, and were paid directly into their own bank accounts. However, the survivor's bank cards were held by the alleged perpetrator. The employee Modern Slavery awareness training and the supplier's escalation process were key factors in the case being identified, reported and the victim being removed from the situation. Supplier A continues to share updates with Sainsbury's on the ongoing police investigation, and we are working with Supplier A to ensure the victim receives appropriate remediation support, including the payment of due wages.

### Case study 2: Collaboration with the authorities on a whistleblowing report at a UK store

We were notified by the Gangmasters & Labour Abuse Authority (GLAA) of a whistleblower report raising serious concerns about labour exploitation and abusive management practices at one of our UK stores. The GLAA also highlighted that the individual initially attempted to report the issue through our Call it Out mechanism, but the concern was incorrectly redirected into internal grievance channels despite clear indicators that it should have been treated as a whistleblowing matter.

In agreement with the GLAA, we commissioned an independent investigation by TylerBladon Practical Ethics. With the consent of those involved, the investigator engaged directly with the complainant, witnesses, and additional colleagues through an in-store visit across multiple shifts. While the investigation did not substantiate allegations of modern slavery or labour exploitation, it identified internal issues around working hours, workload pressure and the consistent application of Sainsbury's policies and procedures requiring follow-up. These matters are now being addressed by our employee relations team, through a comprehensive action plan. The case also prompted a review of our triage process with Safecall to ensure that high-level grievances are escalated appropriately to our employee relations and human rights teams. We continue to monitor this case internally and we are using the learnings to strengthen the effectiveness of our grievance processes and overall case management. Throughout the process, we worked collaboratively with the GLAA and provided regular updates on our findings and actions. The GLAA confirmed that the case was handled diligently, the investigation was thorough, and appropriate remedial steps were underway.

### Case study 3: Supporting a service provider to strengthen due diligence processes following a whistleblower report

We investigated a whistleblower report, received through our internal hotline, linked to a UK service provider for our retail operations. The report raised potential modern slavery concerns relating to contractors. To ensure an independent and robust investigation, we commissioned TylerBladon Practical Ethics to investigate the concerns. Their work included collecting worker testimony and conducting a site visit to interview both workers and management. The investigation did not identify evidence of labour abuses or misconduct by the supplier. However, it highlighted several areas where the supplier could strengthen its oversight processes, particularly regarding the management of subcontractors and labour providers.

Sainsbury's and TylerBladon Practical Ethics supported the supplier in enhancing their due diligence approach. As part of this, Practical Ethics assisted the supplier in assessing their own labour provider. While no indicators of forced labour were identified, the assessment highlighted gaps in the labour provider's due diligence procedures that required further attention. Following the investigation, the supplier developed a comprehensive action plan. This includes implementing an annual audit of the labour provider, establishing minimum requirements for verifying worker identity, eligibility and qualifications before employment begins, increasing workers' awareness of their rights during induction and conducting regular welfare checks to ensure ongoing worker wellbeing.



# Allegations

This financial year (FY), we handled 31 allegations related to forced labour indicators, child labour, repression of freedom of association or sexual harassment. These allegations and the actions we took in response are outlined in the table below:

| Risk                                 | Channel              | Country     | Action                                                                                                                                                                                                                                 | Status at the end of FY 2025/26   |
|--------------------------------------|----------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Trade Union Repression               | RSC                  | Bangladesh  | Ready-Made Garment Sustainable Council (RSC) investigation substantiated the concerns. Factory has started working with trade union.                                                                                                   | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | Issue related to forced resignation and incorrect settlement of final wages. Payment of final wages to worker completed.                                                                                                               | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | RSC investigation did not substantiate the concerns related to supervisor abuse, retention of ID and forced resignation. Improvement plan with supplier was completed.                                                                 | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | RSC investigation substantiated the allegation of forced resignation due to pregnancy. Remediation was completed through reinstatement, full maternity leave benefits, and outstanding payments completed.                             | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | Supplier investigation was unable to substantiate the concern. Full settlement paid to worker.                                                                                                                                         | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | RSC investigation did not substantiate concerns of forced resignation, ID confiscation and settlement of wages, but full settlement was completed.                                                                                     | Closed                            |
| Working conditions                   | Unseen               | UK          | Improvement identified to address working in heat concerns. Corrective action plan completed.                                                                                                                                          | Closed                            |
| Excessive working hours              | Unseen               | UK          | GLAA investigation did not substantiate the concerns related to excessive working hours and working conditions. GLAA closed the case.                                                                                                  | Closed                            |
| Forced Resignation                   | RSC                  | Bangladesh  | Investigation with supplier did not substantiate forced resignation concern. Payment of final wages to worker completed.                                                                                                               | Closed                            |
| Deception in recruitment             | Media                | Bangladesh  | Internal investigation was unable to substantiate the concern.                                                                                                                                                                         | Open                              |
| Gender Based Violence and Harassment | RSC                  | Bangladesh  | RSC investigation substantiated the concerns. Disciplinary process, remediation for worker and awareness training in progress.                                                                                                         | Open                              |
| Recruitment fees                     | Supplier             | New Zealand | Third-party investigation substantiated the concerns. Repayment to affected migrant workers and support to access legal remedies are in progress.                                                                                      | Open                              |
| Multiple indicators of forced labour | Media                | Colombia    | Independent investigation was completed and did not substantiate the concerns. An improvement plan with the indirect supplier is in place.                                                                                             | Open                              |
| Child Labour                         | SMETA audit          | Canada      | Inadequate working hours for young worker identified at indirect supplier site. Corrective action plan in progress with supplier.                                                                                                      | Open                              |
| Working conditions                   | Media                | Sri Lanka   | Third-party investigation substantiated the concerns. An action plan is in place.                                                                                                                                                      | Open                              |
| Modern Slavery                       | Direct whistleblower | UK          | GLAA and police investigations are ongoing. Survivors have been referred to the National Referral Mechanism and are safeguarded by the police. Sainsbury's is supporting improvements to the supplier's labour provider due diligence. | Open                              |
| Multiple indicators of forced labour | Unseen               | UK          | Supplier investigation substantiated some concerns. An action plan to improve HRDD activities is in progress.                                                                                                                          | Open                              |
| Child Labour                         | Supplier             | Egypt       | Child labour remediation is in progress, with measures in place to support completion of the child's education and provide financial support to the family.                                                                            | Open                              |
| Excessive working hours              | Unseen               | UK          | Improvement identified to address involuntary overtime and overtime payment concerns. Corrective action plan in progress.                                                                                                              | Open                              |
| Working conditions                   | Unseen               | UK          | Third-party audit and retailer assessment did not substantiate the concerns. However, an improvement plan has been developed with the supplier.                                                                                        | Open                              |
| Multiple indicators of forced labour | GLAA                 | UK          | Independent investigation completed which did not substantiate the labour exploitation concerns. Employee Relations issues are being addressed internally.                                                                             | Open                              |
| Modern Slavery                       | Supplier             | UK          | Police investigation is ongoing. Supplier engaged with survivor to understand their needs and provided support.                                                                                                                        | Open                              |
| Recruitment fees                     | Other                | Thailand    | Investigation in progress with local migrant workers organisation to assess recruitment fees paid through brokers.                                                                                                                     | Open                              |
| Multiple indicators of forced labour | Media                | South Korea | Investigation in progress related to forced labour concerns on fishing vessels.                                                                                                                                                        | Open                              |
| Gender Based Violence and Harassment | Industry Initiative  | Kenya       | Third-party investigation into concerns including sexual exploitation is ongoing.                                                                                                                                                      | Open                              |
| Abusive working conditions           | Industry Initiative  | UK          | Third-party investigation into abusive working conditions is ongoing.                                                                                                                                                                  | Open                              |
| Unauthorised subcontracting          | Sainsbury's Audit    | China       | Unauthorised subcontracting with excessive working hours issues identified during site visit. Corrective action plan in place to improve conditions and meet our requirements.                                                         | Open                              |
| Multiple indicators of forced labour | Unseen               | UK          | Monitoring of risks related to a courier with Unseen. Sainsbury's is not directly linked.                                                                                                                                              | No Action Needed from Sainsbury's |
| Working conditions                   | Unseen               | UK          | Monitoring of risks related to a courier with Unseen. Sainsbury's is not directly linked.                                                                                                                                              | No Action Needed from Sainsbury's |
| Child Labour                         | Unseen               | UK          | Monitoring of risks related to a courier with Unseen. Sainsbury's is not directly linked.                                                                                                                                              | No Action Needed from Sainsbury's |
| Labour exploitation                  | Industry Initiative  | Brazil      | Allegations of workers living in condition of slavery at a grower participating in a programme we fund, though no confirmed connection to Sainsbury's supply chain. The workers are being supported by the public authorities.         | No Action Needed from Sainsbury's |

# Our due diligence approach (continued)

## Remediation processes and activities

Sainsbury's is committed to supporting the remediation of harms experienced by workers and community members across our operations and supply chains. Our approach, set out in our Human Rights Policy and incident management process, is aligned with the UNGPs and centred on workers and communities. We work collaboratively with suppliers and other supply chain actors to address the root causes of issues and implement corrective action plans to prevent recurrence. Any remediation provided by Sainsbury's or our suppliers must be person-centred and informed by the expectations and priorities of those who have raised concerns. We prioritise remediation, particularly in cases involving severe human rights issues such as forced labour. Our efforts focus on addressing adverse impacts that we have caused or contributed to, and on collaborating to support remediation where we are linked to an impact through our business relationships. We also

work with other stakeholders and industry forums to enable coordinated action that best supports affected rightsholders. Where possible, our processes seek feedback from those who raised concerns to assess the effectiveness of the remedy, including consultation with rightsholders, civil society organisations and trade unions. Our approach has been reviewed by Unseen, applying a lived experience perspective.

We continue to apply the principles of the UK Food Supply Chain Serious Incident Escalation and Management Protocol established by FNET, working collaboratively with stakeholders to build collective leverage to support remediation activities. During the year, we particularly focused on investigation and remediation efforts in the seafood sector, coordinated by Seafood Ethics Action (SEA) Alliance and FNET, which highlighted the significant risks associated with the recruitment of migrant fishers and working conditions on fishing vessels in the UK and internationally.

## Responsible disengagement

We take a partnership-based approach with suppliers and work collaboratively with them to ensure that any human rights breaches identified within their operations or supply chains are effectively remediated. In rare cases, commercial relationships may be impacted where human rights issues are deliberately concealed, where a supplier is unwilling to remediate, or where remediation is not achieved within a reasonable timeframe and/or to the satisfaction of those affected. We recognise that terminating a supplier relationship might put workers at further risk. We therefore only consider exiting a site or ending a supplier relationship after all reasonable efforts to prevent or mitigate adverse impacts have been exhausted, and on a case-by-case basis. Prior to any disengagement, we commit to assess the potential impact on workers and communities and pursue a responsible disengagement approach that balances business decisions with human rights considerations, as well as social

and economic consequences. Responsible disengagement may include:

- maintaining commercial relationships for a defined transition period to allow workers and communities adequate notice of changes to employment or working hours.
- consulting with suppliers and relevant stakeholders to minimise disruption to workers and communities.
- facilitating alternative employment arrangements or transfers for affected workers, where possible.
- supporting worker income and benefits during transition periods.
- collaborating with local organisations or authorities to reduce wider community impacts.

We may consider re engaging with suppliers following disengagement where they have demonstrated meaningful improvements in their HRDD processes and where previous human rights issues have been fully investigated, and effective remedy has been provided to affected workers and communities.

## Case study: Industry collaboration on remediation activities

Last year, we disclosed a case involving indicators of forced labour identified at indirect supplier sites through worker interviews carried out by our direct supplier as part of its due diligence.

The issues identified included retention of identity documents, excessive recruitment fees paid to in-country recruitment agencies and subsequent high debts, deceptive recruitment practices, and excessive working hours. A separate in-depth study by a third-party consultancy commissioned by the indirect supplier also later further verified the payment of excessive recruitment fees.

This year, in line with the UK Food Supply Chain Serious Incident Escalation and Management Protocol, we continued to

engage with a multi-stakeholder working group of retailers, importers and suppliers. The objective of the working group is to support our indirect supplier resolve the issues identified through the delivery of an agreed action plan. Actions have focused on strengthening policies and procedures to prevent the retention of identity documents, engaging organisations such as the International Organisation for Migration (IOM) to build the capacity of local recruitment agencies, and supporting remediation for affected workers, including exploring repayment options and potential financial contributions from supply chain stakeholders.

During a site visit on behalf of the working group, Sainsbury's and our direct supplier talked to affected migrant workers to understand their experiences and to verify progress made to date. We subsequently engaged with our indirect supplier to ensure their ongoing commitment to address

the issues identified, uphold responsible recruitment practices and explore financing options to ensure repayment to all workers. In parallel, we engaged with government representatives to discuss strengthening the regulation of migrant worker recruitment and engaged with stakeholders across sectors to build leverage and scale action at national level. This case illustrates the complexity of remediation and the importance of sustained, multi-stakeholder collaboration to address modern slavery risks and drive responsible recruitment practices across supply chains.



Ms Mariana Mosquera Sánchez, Banana Worker, BANAFRUT, Colombia  
Credit: Fairtrade Foundation



# Training

Upskilling our colleagues and suppliers is integrated into our HRDD action plan and modern slavery training forms part of our human rights training plan.

## Modern slavery awareness training

Our internal modern slavery awareness training is tailored to each audience and brings to life how modern slavery risks are rising globally and how they impact our business and supply chains. The course is designed to help our colleagues spot the signs of modern slavery, including the 11 indicators of forced labour, and how to report any concerns. We continually assess the training needs of key teams and suppliers, and plan to refresh this training next year.

This training is compulsory for all store managers, depot managers, and key colleagues working with our suppliers across technical, commercial and supply chain functions. A mapping exercise identifies colleagues closest to modern slavery risks within our supply chain, thereby having the most opportunity to identify and act on signs of modern slavery. The training is available through our online learning platform so all colleagues can have the opportunity to complete it. We also have e-learning materials on forced labour (and on human rights more broadly).

We continue to partner with Stronger Together to deliver specialist training on modern slavery and responsible recruitment to Sainsbury's suppliers, labour and service providers in the UK, Ireland, Spain and South Africa, across own-brand, GNFR, logistics and construction supply chains. Through our sponsorship of the Stronger Together Consumer Goods Programme, suppliers and service providers gain free access to training workshops, resources, and tools to tackle hidden labour exploitation and promote responsible recruitment practices. This includes access to the new [Stronger Together 360° online tool](#), developed by merging the Responsible Recruitment Toolkit Online Tool and the Progress Reporting Tool, to offer one single comprehensive platform that supports suppliers in implementing responsible recruitment and fair work, free from exploitation in their operations and supply chains.

## Broader human rights training

This year, we have continued to roll out human rights training to internal colleagues across human rights, ethical, technical and procurement functions, in partnership with Inherently Human. Next year, this training will be delivered to general merchandise and clothing technical, buying and sourcing colleagues. We conducted a refresher training for 52 procurement colleagues in GNFR to provide an understanding of key principles relating to human rights. The training also included information about the principal risks in our supply chains and outlined specific case studies. In the new financial year, we will deliver deep-dive sessions on specific risks for buyers in high-risk areas such as logistics (warehouse and transport), construction, labour resourcing, and facilities management.

In March 2025, training was facilitated by specialist service provider TylerBladon Practical Ethics to our fresh produce technical and ethical managers and the food audit team, covering what to look for during onsite supplier visits, including specific considerations relating to worker accommodation on farms. The training involved a session on theory and case studies, followed by an in-person accommodation visit. We also delivered two deep-dive sessions with the fresh produce technical managers, inviting a SWS Scheme Operator to explain in detail the process, challenges and insights from the SWS. The aim of these sessions was to support overall team knowledge and facilitate the exchange of insights.

This year, we focused on upskilling our commercial team. The Executive Director of ETI, delivered a growth and development session for commercial colleagues on the topic of human rights, sharing his unique perspective on how, as a business, we can positively contribute to protecting people throughout our supply chains. The areas covered included emerging legislation, new and existing risks and how to

avoid them and what effective efforts look like, including the value of collaboration. With the support from the Rights Lab, we also delivered targeted and relevant briefings on human rights risks related to specific commodities, such as nuts and sugar, to inform sourcing decisions. Our human rights and environment teams collaborated to deliver upskilling sessions with our commercial colleagues on specific high-risk areas, such as human rights and environmental risks in cocoa, also to inform sourcing decisions.

Next year, we plan to roll out further training on human rights incident management, including how to engage with survivors of modern slavery.

## Case study: Supplier training on Human Rights

Following our HRDD gap analysis, we reviewed the training programme for suppliers, and this year delivered an online Human Rights training to Sainsbury's brand food suppliers. The training was developed by Inherently Human, with input from the human rights and ethical teams. The objective was to strengthen suppliers' understanding of HRDD and support them in implementing the requirements set out in our Food RSM. The training material included practical guidance on establishing effective grievance mechanisms and conducting robust audits of labour providers. Case studies and supplier-led videos were incorporated to demonstrate how HRDD principles can be applied in day-to-day operations and across supply chains.

This training was attended by 702 supplier representatives and is available on our food supplier platform. Over 80% of suppliers found the training useful and we will deliver more training next year.



# Monitoring and evaluation

We are committed to continuously improving how we prevent and respond to modern slavery risks. To ensure our policies and procedures are effective, we monitor, evaluate, and track our progress year-on-year.

### Key performance indicators

The indicators below enable us to monitor progress in our work on forced labour.

| Activity                                                                                                                  | Status        |               |
|---------------------------------------------------------------------------------------------------------------------------|---------------|---------------|
|                                                                                                                           | 2024/25<br>FY | 2025/26<br>FY |
| Modern Day Slavery E-Learning courses completed by key colleagues <sup>1</sup>                                            | 2,231         | 1,167         |
| Unique business entities in our supply chain that completed Stronger Together Modern Slavery Training <sup>2</sup>        |               |               |
| UK                                                                                                                        | 175           | 222           |
| South Africa                                                                                                              | 46            | 41            |
| Spain                                                                                                                     | 2             | 0             |
| Unique business entities in our supply chain that completed a Responsible Recruitment Toolkit focused training            | 62            | 84            |
| Critical non-compliances identified through third-party ethical audits linked to indicators of forced labour <sup>3</sup> | 366           | 329           |



### Workforce Disclosure Initiative (WDI)

The Workforce Disclosure Initiative mobilises investors to push for better jobs.

They score companies annually on workforce disclosure.

### Highlights

99%

Sainsbury's disclosure score

Above

the UK average disclosure score of 80%

This year, we have implemented KPIs to track our Human Rights commitments related to discrimination and grievance mechanisms, which are outlined in more detail in our Plan for Better report. We developed these KPIs last year, with support from the Rights Lab, and they were approved by our Plan for Better Acceleration Squad.

Our central technical operations teams report progress against these KPIs using Sedex data. To uphold our commitment that all tier 1 suppliers have effective and trusted grievance mechanisms, we have embedded checks into food supplier onboarding assessments and ongoing technical audits, enabling us to verify information provided in Sedex self-assessment questionnaires.

### Supplier compliance monitoring

Our technical and ethical teams monitor audit compliance of our suppliers and support them to establish corrective action plans to resolve any issues found on-site. Where Business Critical non-conformances are identified through ethical audits, these are escalated to ethical and technical teams and require immediate supplier investigation and resolution. Critical and Major non-compliances must be resolved within the timeframes given by the audit bodies. We have a supplier ethical performance rating in place, based on the number and criticality of issues, to focus our efforts where it matters most. Supplier compliance is tracked and reported to our technical teams weekly in general merchandise and clothing and periodically in food. Technical governance meetings review supplier compliance against ethical and technical requirements and discuss escalations. All serious or persistent issues are escalated, with ethical teams leading investigations and working with suppliers to agree and implement appropriate remedial action plans.

This year, we monitored the implementation of a new classification of issue findings in SMETA

audits, known as 'Collaborative Action Required' (CARs). CARs are raised when the responsibility to mitigate or remediate an issue lies outside the direct control of the supplier and requires input from additional stakeholders and a longer timeframe to address. For instance, recruitment fees issues will be raised as CARs. Sainsbury's is committed to taking a collaborative approach with suppliers on the management of CARs and to support suppliers' action plans to drive continuous improvement. We are focusing our efforts on CARs related to illicit recruitment fees in the supply chain and child labour remediation.

High risk incidents are reviewed through quarterly technical governance meetings across food, general merchandise and clothing to ensure appropriate action and escalation and are reported quarterly to the audit & risk team and six-monthly to the Operating Board.



<sup>1</sup> Based on the number of colleagues completing their refresher training. We expect this figure to increase following an update to our Modern Day Slavery E-Learning next year.

<sup>2</sup> Based on self-declaration data provided by suppliers to Stronger Together.

<sup>3</sup> Suppliers are required to have an agreed corrective action plan to resolve non-compliances against the ETI Base Code and local law within a set timeline. Actions are monitored by our ethical and technical teams. We have broadened disclosure of non-compliance to include Critical and Business Critical issues linked to forced labour.



# Industry wide convening and advocacy

Industry wide convening is integral to our approach to addressing modern slavery risks. We continue our engagement with a range of stakeholders, including industry initiatives, trade unions, governments and academics to ensure a coordinated approach to tackling human rights abuses.

Our collaborations enable us to deliver our Human Rights strategy, through on the ground programmes to improve resilience in our supply chain, and remediation activities to support impacted workers in our supply chains. The industry initiatives we are part of provide the opportunity to share learnings and best practice. A list of key partnerships can be found in the collaboration overview at the end of this report.

## Industry initiatives

### Ethical Trade Initiative (ETI)

We collaborate with the ETI through various industry initiatives, as part of the Food, Farming and Fisheries and Apparel & Textile groups, to improve conditions for workers in our supply chains. This year, we participated in the Gender Responsive Action Community (GRACE) programme which focused on supporting companies to identify, prevent, mitigate and remediate Gender-Based Violence and Harassment (GBVH) in the apparel and textile supply chains. Through GRACE, we completed a gender-maturity assessment tool which highlighted areas we could strengthen in our business-wide HRDD approach to ensure that gender is effectively considered throughout. The next step is to implement the learnings from this programme into our HRDD plan and use the tools developed under GRACE as part of our work. We also co-funded the Gender Action in Agriculture Initiative (GAIA), through which we co-developed [the GAIA principles to end gender-based violence in commercial agriculture and fisheries](#) together with more than 90 public and private organisations. These principles were released in November 2025. We also participated in roundtables coordinated by ETI, to promote decent work in UK fishing and strengthen HRDD efforts in this sector.

### Food Network for Ethical Trade (FNET)

As a member of FNET, we take part in monthly retailer alignment meetings to support efforts to discuss and drive retailer actions and make progress across key areas that impact our industry. We participate in several working groups to learn and share good practice on areas such as due diligence, responsible recruitment and service providers. This year, together with two suppliers, we have taken the lead in the Responsible Recruitment Working Group. The main objectives are to support members to embed principles of responsible and fair recruitment across their operations and supply chains, collaborate to promote best practices and support remediation where harms have been caused. We are also part of the Climate Change and Human Rights Working Group, as well as the Raw Materials and Services Working Group, which has created a haulage supplier checklist to help in identifying HRDD gaps. We have shared this checklist and associated toolkit with some of our suppliers.

### Seafood Ethics Action Alliance (SEAA)

We participated in SEAA which provided a platform for businesses to work together on human rights and labour standards in the seafood sector by improving human rights due diligence, advocating to governments for improved regulation and enforcement, and by supporting projects in the supply chain that are seeking to improve working standards. This year, we participated in remediation activities related to the recruitment of migrant workers in the UK and internationally, with SEAA supporting the coordination of these efforts.

### International Accord/RMG Sustainability Council

We are signatories to the International Accord, the Bangladesh Accord, as well as the Pakistan Accord. This is to support assessment and remediation activities in the ready-made garment (RMG) sector. Since 2020, the Accord on Fire and Building Safety in Bangladesh

transitioned to the RMG Sustainability Council (RSC). RSC implements health and safety inspections and remediation monitoring, and safety training. RSC also manages an Occupational Safety and Health (OSH) Worker Complaints Mechanism for workers and their representatives to raise safety and health issues, as well as violence and harassment concerns safely and confidentially. In November 2025, the International Accord announced that the Worker Complaints Mechanisms in Bangladesh will be expanded to cover non-OSH related issues such as wage payments, overtime or inequitable employment contracts. We continue to assess concerns and work with RSC to ensure adequate investigation and resolution of concerns.

### Action, Collaboration, Transformation (ACT)

We continue our engagement with ACT, an initiative that brings together 19 international brands, retailers, manufacturers, and IndustriALL Global Union to enable long-term improvements in wages and working conditions in the global garment industry through freedom of association and collective bargaining. This year, we strengthened our engagement with our sourcing colleagues to champion the delivery of our ACT commitments internally and started work on the Cambodia programme. As part of the Purchasing Practices Working Group, we carried out our first ACT supplier and brand surveys to assess our purchasing practices (for more details on the outcomes, please refer to 'Responsible purchasing practices' in the [due diligence](#) section).



### Spanish and Egyptian Suppliers Ethical Trade Forums

The Spanish Ethical Trade Forums (ETF) organise independently facilitated local forums and webinars for our suppliers in Spain to improve worker welfare in the Spanish agrifood sector, including addressing discrimination against migrant agricultural workers. We are a member of the ETF Association, supporting the organisation's plan of activities and strategic direction. The Forums have developed in the past years App Foros, a free mobile application designed to provide clear and accessible information on labour rights, legal requirements, and available resources for workers in the Spanish fruit and vegetable sector. It supports workers doing the circular migration route between different harvest campaigns in Spain to understand employment rights in different regions. The Forums also provide a space for dialogue between retailers, suppliers and other actors in the sector, helping companies share experiences and promote better labour practices in the Spanish fresh produce supply chain.

We are also sponsors of the Egyptian Suppliers Ethical Trade Forum (ESET) and co-fund the development of the ESET app in Egypt, with a focus on responsible recruitment and child labour risk.

### Supplier Ethical Data Exchange (Sedex)

We have joined Sedex's Policy Taskforce to support engagement with policymakers to ensure that evolving legislation aligns with international standards such as the OECD guidelines and UNGPs. We also participate in regular meetings with Sedex, alongside others in the industry as well as on a one-to-one basis, to address topics such as collaboration, communication and any audit related challenges. Sedex has recently launched their forced labour indicator tool, which identifies potential forced labour risks within supply chains using both inherent risk data and audit findings. We will assess how this data can be used to strengthen our understanding of risks in our supply chain.



# Industry wide convening and advocacy (continued)

## On the ground programmes

### Fairtrade

For more than 20 years, Sainsbury's and Fairtrade have been working in partnership. As one of Fairtrade's largest retail partners, Sainsbury's champions and supports the communities which pick and grow the food we enjoy every day. We sell Fairtrade-certified products across our range, including tea, coffee, bananas, wine, sugar and nuts, and in 2025 farmers and workers earned more Fairtrade Premium through our partnership than any other UK retailer.

We are proud to be the UK's largest retailer of Fairtrade tea, and bananas. By moving all *by Sainsbury's* black tea to Fairtrade, we are working with farmers and workers to ensure they receive a fairer price, along with more than £1 million each year in Fairtrade

Premium. For products to be sold as Fairtrade, the independent auditor FLOCERT must check that the supply chain complies with Fairtrade Standards. The Fairtrade Standards have minimum entry requirements based on the ILO conventions on forced labour as well as the UN protocol to prevent trafficking. If forced labour is endemic within a sector or region, producer organisations are encouraged to develop a written policy and a monitoring system to prevent it. However, standards alone are not enough to address the often illicit and hidden practice of forced labour, and as such, Fairtrade is also taking action in several areas. These include delivering training to farmers, workers and management on human rights topics, and building knowledge of trafficking patterns in areas of known risk and supporting producers to put preventative measures in place.

This year, in partnership with Fairtrade, we've launched the RBI with our key tea, coffee and banana producers (details of this project outlined in '[Assessing and managing risk](#)').

### Programmes with tea communities

Tea is grown all over the world on both plantations and by smallholder farmers. Around 13 million people are employed in the global tea sector; however, sourcing tea in a way that supports the people who grow it is not always easy. There are significant human rights risks in the tea supply chain, which the industry has been working together to tackle for decades. Human rights risks include GBVH of women working in tea, low wages and incomes, and poor working conditions. As a business, we want to ensure a safe, reliable and affordable supply of tea by mitigating these risks through a comprehensive and collaborative approach. Some of our projects include:

- Working in partnership with ActionAid, the Ethical Tea Partnership, Taylors of Harrogate and Lavazza Professional to empower tea farming communities in Kenya, ensuring that smallholder tea farmers and informal workers on tea farms are able to claim their rights to a positive working environment.
- Supporting the development of the Kenyan Multistakeholder Platform in collaboration with ETI, which was set up following a roundtable focused on sexual harassment and gender-based violence and harassment (SGBVH) in Kenyan tea, to facilitate industry-wide action and responses to SGBVH as well as wider human rights-related issues in the industry.
- Partnering with UK retailers, Fairtrade and our trusted tea supplier on a new initiative in Assam in North India called the Assam Approach. This Approach is tailored specifically to address systemic challenges facing gardens in the region and ensure security of supply for this distinctive tea. It supports tea workers and gardens on a journey of continuous improvement, increased transparency, working in partnership and effective monitoring of improvements.

### Comic Relief

This year, as part of our partnership with Comic Relief, we launched a new programme to help strengthen climate adaptation and resilience in key sourcing regions that are highly vulnerable to climate impacts. Using an Anticipatory Social Protection approach, the programme aims to bring together existing social protection systems with the latest understanding of how climate change amplifies risks, to influence long-term systemic change. Starting in Senegal, Ghana, Malawi and the Dominican Republic, we will work closely with suppliers and in-country partners to support meaningful change at local, landscape and policy levels. This initiative supports several pillars of our Plan for Better

strategy, including nature and human rights, and strengthens our ambition to build a more resilient food system.

### Harvesting the Future – Cotton in India

We are part of the Harvesting the Future - Cotton in India initiative, led by the Fair Labor Association. This initiative brings together global apparel companies, garment and textile producers and several local partners and seeks to improve human rights and labour conditions of cotton producers and harvesters in Madhya Pradesh, one of India's largest cotton-producing states. It is an opportunity to collaborate on addressing systemic issues in this sector and region, such as child labour, debt bondage and abusive working conditions, and to establish strong HRDD practices relating to child protection and responsible recruitment. This year, the project focused on launching coalition activities, building capacity of supply chain actors, supporting education of children and convening a Multi-Stakeholder Advisory Group to advise on field-level activities.

### Gender sensitive programmes in our garment supply chain

We participated in the ETI Gender Sensitive Workplace Programme in Bangladesh that aimed to contribute to a gender sensitive workplace through capacity enhancement, awareness raising and strengthening the factory grievance mechanism related to gender-based violence and sexual harassment. This work was completed in November 2025. This year, we joined Upfront, an initiative focused on building resilience through workforce wellbeing and inclusive practices. The programme's goal is to promote gender-equitable, safe and respectful workplaces for workers, particularly women by providing training to suppliers to strengthen factory-level grievance mechanisms, prevent sexual harassment and promote inclusive practices. We are piloting this initiative with three suppliers in India.



Ms Saritha Kumari, Tea Plucker, United Nilgiri Tea Estates, India  
Credit: Fairtrade Foundation



# Industry wide convening and advocacy (continued)

## Partnership with the Rights Lab

We have extended our partnership with the University of Nottingham's Rights Lab until 2027. Since 2023, the partnership has supported research on our salient and evolving human rights risks, interpretation of how these risks will affect our business in the future and understanding how Sainsbury's can respond. Key activities included:

- Continuing our efforts to contribute to policy development discussions on tackling modern slavery through our human rights advocacy strategy.
- Supporting the development of briefs on human rights risks related to specific commodities and sourcing countries to upskill Sainsbury's commercial and technical teams and inform tender processes and new sourcing decisions.
- Publication of [Towards a Just Transition in the UK food retail sector](#). This publicly available report provides recommendations to UK food retailers on how to implement a Just Transition. It includes analysis on the interlinks between modern slavery and environmental degradation (see section 3 of the report).

In 2026/27 the partnership will focus on supporting Sainsbury's to identify, prioritise and advance progress in achieving key national and international policy goals.

## Engaging with government and policy makers

Collaborating with government and industry helps us to better understand and address challenges across the UK food system, which is critical to the long-term resilience of our business and helps us provide products and services to our customers for generations to come. Driven by our human rights advocacy strategy, we are continuing to contribute to policy development initiatives and discussions, to deliver the systemic change needed to tackle modern slavery.

## Our support for Human Rights and Environmental Due Diligence (HREDD) legislation

We believe that well designed legislation is essential to strengthening protections for workers and the environment, enhancing cross-sector collaboration to address risks, promoting transparency, and encouraging consistent approaches that prevent the UK from becoming a destination for goods linked to human rights abuses. This year, we undertook a range of activities to support the introduction of HREDD legislation, including:

- Participating in roundtables and workshops as part of the Department for Business and Trade's (DBT) Responsible Business Conduct review, contributing to policy development and helping to inform recommendations to ministers. Through this engagement, we shared our approach to HREDD across our supply chains, alongside our perspectives on the future direction of the UK regulatory framework.
- Contributing to a letter from the British Retail Consortium (BRC) to the Minister for Employment Rights, Competition and Markets, reaffirming our support for the introduction of HREDD legislation aligned with international standards, including the UNGPs, OECD Guidelines and ILO standards, as well as forced labour import controls.
- Taking part in roundtable discussions with the Independent Anti-Slavery Commissioner, Unseen and Omnia Strategy LLP to support the development of a [model draft legislation](#) to strengthen the UK's Forced Labour and Human Rights legislative framework.
- Attending a private hearing with Members of Parliament to discuss forced labour and mandatory due diligence legislation.
- On World Human Rights Day, our Head of Human Rights joined The Fairtrade Foundation and supporters at Downing Street to hand in the Brew It Fair petition (with over 21,000 signatures), which calls on the UK government to introduce legislation enforcing HREDD in tea supply chains.



## Our support for the Employment Rights Bill and Fair Work Agency

As one of the first corporate supporters of the intentions behind the Employment Rights Bill, with our Chief Executive saying "we share the Government's vision of making work pay, enabling growth and driving productivity", we engaged closely with the Government on the specifics of the Legislation in the run-up to it becoming law.

Building on our ongoing advocacy efforts to ensure the effective running of the new Fair Work Agency (FWA), launching in April 2026 and brings together functions from His Majesty's Revenue and Customs, Employment Agency Standards Inspectorate, and the GLAA, we engaged with a number of DBT officials to understand their ambitions for the FWA. We supported calls for the GLAA to retain its specialist powers and expertise in modern slavery cases, and as the FWA

was being designed, advocated for its scope to include investigation and prosecution of modern slavery cases and wider labour market offences. We raised concerns regarding the GLAA's coverage in Scotland and on the lack of oversight of overseas recruitment.

## Address forced labour and illegal, unreported and unregulated (IUU) fishing

This year, with support from SEA Alliance, FNET and ETI, we co-signed a letter to the Secretary of State for Environment, Food and Rural Affairs and the Minister for Fisheries, calling for stronger action to address forced labour and IUU fishing. Labour exploitation and IUU fishing are closely connected, and it is essential that UK legislation effectively prevents illegal activity. Weak border controls can allow seafood linked to forced labour, human trafficking and environmental harm to enter the UK market.

To help tackle these issues, we urged the government to introduce a carding system for high-risk countries, digitise catch certificates to improve supply chain transparency, and adopt the Global Charter for Fisheries Transparency to strengthen enforcement.



# Looking forward

This coming year, we will continue to strengthen our approach to identifying and addressing instances of forced labour, while progressing the implementation of our HRDD action plan. We will also ensure continued integration of human rights within our Supply Chain Resilience workstream.

## HRDD action plan

- Develop a supplier manual in GNFR, and refresh our manual for the responsible use of labour providers.
- Progress our efforts on enhanced due diligence in priority high-risk supply chains, roll out our tools in general merchandise and clothing, and adapt our tools to emerging risks.
- Deliver and implement recommendations arising from the human rights impact assessments we completed this year.
- Implement any next steps from our modern slavery internal audit and strengthen controls related to modern slavery in our supply chains.

## Commercial integration

- Continue to integrate human rights assessments in supply chain reviews to inform sourcing decisions.
- Continue upskilling our internal commercial and procurement colleagues and suppliers on human rights across all divisions, and refresh our internal and external Modern Slavery Trainings.
- Develop and implement a roadmap to meet our ACT on Living Wage purchasing practices commitments.

## On the ground programmes and Supply chain resilience

- Integrate the outcomes from our human rights saliency assessment into our supply chain resilience work.
- Continue our participation in the SWS Taskforce to reduce recruitment risks and improve working and living conditions for migrant workers recruited through the UK SWS. This includes supporting

efforts to scope a potential 'hardship fund' and improve access to an independent support line specifically resourced for SWS workers.

- Work with Fairtrade Foundation, Fairtrade Producer Networks, and key suppliers in tea, coffee and bananas to support producer organisations to develop Risk Reduction Plans. RBI Forums will be held to discuss risks, plans and opportunities.
- Fund local and landscape-level climate resilience projects in Senegal, Malawi, and Ghana with Comic Relief.

## Collaboration and advocacy

- Prioritise our advocacy efforts on HREDD legislation and forced labour regulations, supported by our ongoing partnership with the Rights Lab.
- Engage with foreign government representatives to support better recruitment practices and conditions for migrant workers in our global supply chains.
- Continue supporting sector activities and collaborative initiatives in UK fresh produce, seafood and tea supply chains.





# Collaboration overview



**&Wider**  
&Wider uses worker engagement technologies to hear directly from workers about their experiences and working conditions, which enable us to understand and support improvements in our supply chain.



**Action, Collaboration, Transformation (ACT)**  
ACT brings supply chain actors together to drive meaningful industry collaboration and sustainable wage growth supported by responsible purchasing practices, creating win-win solutions for a future-proof industry and paving the way for living wages for workers in garment, textile and footwear supply chains.



**Association of Labour Providers**  
Association of Labour Providers is a not-for-profit trade organisation that promotes responsible recruitment and sustainable practices of labour providers.



**Better Cotton Initiative (BCI™)**  
BCI is a global nonprofit whose mission is to improve cotton farming globally for farmers, communities, and the environment, by providing the BCI Standards, training, and sourcing models. BCI supports farmers to use water efficiency, care for soil health, reduce harmful chemical use, and promote decent work, while enabling retailers to source more sustainably grown cotton. At Sainsbury's we have partnered with BCI to support our ambition to increase the amount of Physical BCI Cotton we source through a segregated chain of custody, which is traceable to its country of origin.



**British Retail Consortium (BRC)**  
BRC is a trade association for UK retail representing over 200 major retailers. Leveraging its expertise, the BRC influences government policy, provides collective media responses, develop standards, and offers insights, training and market intelligence through its communities and networks.



**Comic Relief**  
Sainsbury's and Comic Relief are partnering on a multi-country, multi-year programme to build resilience in key sourcing regions, support long-term livelihoods, and reduce climate-related risks across Sainsbury's supply chains. This programme uses an approach known as Anticipatory Social Protection, which helps preventative action before climate shocks hit, by strengthening national social protection systems and linking them with locally led adaptation. Across 9 climate-vulnerable sourcing countries, the programme will combine community-level adaptation with long-term systems change.



**Egyptian Suppliers Ethical Trade Forum**  
This initiative brings together suppliers, retailers, and other stakeholders (such as the government and UN agencies) to deliver training and develop context-specific solutions to drive continual improvement of working conditions in Egypt.



**Ethical Trade Initiative (ETI)**  
We are founding members of the ETI, working closely with other companies, non-governmental organisations, and trade unions to develop innovative and collective responses to worker exploitation and forced labour. We participate in several ETI working groups focusing on priority supply chains where there are opportunities to improve working conditions through collaboration.



**Ergon, an LRQA company**  
Ergon provides consultancy and advisory services, supporting human rights due diligence processes such as global risk assessments and country risk analysis. This year, Ergon, drawing on the broader LRQA group, supported our human rights saliency assessment and several human rights impact assessments in our supply chains.



**Fairtrade**  
Fairtrade works with farmers and workers in almost 1,900 producer organisations, across 67 countries, so they can improve their living standards and invest in their communities and businesses. We continue our collaboration with Fairtrade to support farmers and workers and address key risks in our banana, tea and coffee supply chains through our Resilience Building Initiative.



**Food Network for Ethical Trade (FNET)**  
Being members of FNET enables us to work alongside 82 peers (10 largest UK food retailers and 72 food manufacturers, producers, and hospitality companies, many of whom are our suppliers) to use our collective leverage to bring about positive change in global food supply chain working conditions by providing guidance, resources, training and opportunities for collaboration. We participate in the Climate Change and Human Rights Working Group, Raw Materials and Services Working Group, Developing Common Due Diligence Tools Working Group and the Responsible Recruitment Working Group.



**Fresh Produce Consortium (FPC)**  
FPC is the UK's fresh produce trade association. Sainsbury's attend the quarterly FPC quarterly sustainability meetings, as well as joining the working group to providing input and support for the revision of the FPC Temporary Accommodation Guide.



**Sustainable Trade Initiative (IDH)**  
IDH transforms international markets and local practices through convening, co-creating and co-investing. We participate in the UK retail commitment on living wages in the banana sector coordinated by IDH.



**Impactt**  
Impactt is a leading employee-owned consultancy that specialises in ethical trade and human rights. Impactt delivers human rights assessments and risk assessments as well as in-depth investigations, to drive change-focused solutions which maximise benefits for both workers and businesses. This year, Impactt supported multiple investigations and provided recommendations to enhance worker welfare and drive improvement.



**Inherently Human**  
Inherently Human is a specialist human rights consultancy that supports organisations to develop practical human rights strategies through risk assessments, policy and procedure development, and tailored training for executives, technical and procurement teams. This year, Inherently Human supported the development of our Human Rights Policy and delivered human rights training for our technical and procurement colleagues.

# Collaboration overview (continued)



### International Accord

The International Accord is a legally binding framework agreement between brands and trade unions to ensure worker health and safety in the textile and garment industry. Currently, its country programs in Pakistan and Bangladesh aim to ensure a safe working environment for garment factory workers through independent factory inspections and remediation, a training program, and a complaints mechanism for workers. The agreement recognises the rights of workers to organise, refuse unsafe work, and raise health and safety concerns. Sainsbury's has been a signatory since the International Accord was first established in 2013 as the Bangladesh Accord. We are currently signatories to both the Bangladesh Safety Agreement and the Pakistan Accord.



### Issara Institute

Issara Institute is an independent, not-for-profit organisation that works to transform the lives of millions of workers across Southeast Asia through worker voice, partnership and innovation. Sainsbury's has been a member of the Issara Strategic Partners Program since its inception in 2014.



### Lloyd's Register Quality Assurance (LRQA)

LRQA is a leading global risk management partner. From quality assurance to safety, cybersecurity, climate performance and responsible sourcing, LRQA works with clients to identify risks across their business. We are piloting LRQA's EiQ supply chain intelligence software, which brings together Artificial Intelligence, proprietary datasets and advance analytics to provide real-time visibility into risk factors related to our suppliers, products or sourcing geographies.



### Modern Slavery Intelligence Network (MSIN)

We are founding members of MSIN, a nonprofit collaboration of UK food and agriculture sectors. MSIN's objective is to share intelligence to disrupt modern slavery across the food supply chain, generate new insights and protect those vulnerable to labour exploitation in the sector.



### Seafood Ethics Action (SEA) Alliance

We participated in the SEA Alliance which provided a platform for businesses to work together on human rights and labour standards in the seafood sector by improving human rights due diligence, advocating to governments for improved regulation and enforcement, and by supporting projects in the supply chain that are seeking to improve working standards.

### Seasonal Worker Scheme Taskforce

The Seasonal Workers Scheme Taskforce's mission is 'working collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme and wider UK horticulture'. It is made up of industry trade bodies, retailers, growers, suppliers, scheme operators and nonprofits. Sainsbury's participates in workstreams that aim to improve access to grievance mechanisms, due diligence and good practice during recruitment and on-farm and improve worker finances. Sainsbury's joined the Governance Committee in 2025.



### Supplier Ethical Data Exchange (Sedex)

We actively engage with Sedex to develop industry tools, and we use their platform to risk assess our suppliers, manage their ethical audits and non-compliances.



### Spanish Ethical Trade Forums

We support the Ethical Trade Forums (Foros Comercio Ético) and sit on the Governing Board. They organise independently facilitated local forums for our suppliers in Spain to address discrimination against migrant agricultural labourers and investigate the provision of labour in first and second-tier suppliers.



### The Stronger Together Consumer Goods Programme

Stronger Together is an impact driven not-for-profit working towards a vision of a world where all workers are recruited responsibly and have fair work, free from exploitation. Sainsbury's is a combined sponsor of the programme across the two workstreams addressing forced labour and responsible recruitment. Through Sainsbury's sponsorship, specific colleagues, suppliers, labour providers, and service providers gain free access to training workshops, resources, and tools to tackle hidden labour exploitation and promote responsible recruitment practices.



### TylerBladon Practical Ethics

TylerBladon Practical Ethics provides ethical compliance solutions for businesses and supply chains, including supply chain auditing, compliance frameworks, labour exploitation investigation and case management, employee engagement and training and development on Modern Slavery. This year, TylerBladon Practical Ethics supported the investigation and resolution of several worker welfare and exploitation cases.



### University of Nottingham Rights Lab

We have partnered with the University of Nottingham Rights Lab to support research into our human rights risks, interpret how these risks will affect our business in the future, and understand how Sainsbury's can respond. This partnership, which has been extended until 2027, places us at the forefront of thinking on our human rights risks and unlocks practical and impactful business decisions to create benefits to people throughout our business and supply chains.



### Unseen

Sainsbury's supports the UK's Modern Slavery & Exploitation Helpline which is a free, independent and confidential service, operated by Unseen. Our partnership and membership of Unseen's Business Portal give us access to sanitised intelligence from reports raised through the Helpline linked to either our own operations or supply chain (where this is appropriate). This is invaluable in helping us build up a picture of risk, so we can work to keep modern slavery out of our business and our supply chain.



# J Sainsbury plc