

An aerial photograph of a vast tea plantation. The tea bushes are arranged in neat, horizontal rows that stretch across the landscape. Numerous workers, wearing traditional conical hats and carrying baskets, are scattered throughout the field, actively harvesting the tea leaves. The scene is captured from a high angle, emphasizing the scale of the operation and the organized layout of the plantation.

Sainsbury's Our Policy on Supplier Whistleblowing



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Our Scope

At Sainsbury's, we believe that everyone in our supply chain should be encouraged to speak up when they have concerns about wrongdoing, and be protected from retaliation and any adverse impacts.

We are committed to operating in line with our Ethical Sourcing Policy and Code of Conduct, our business values and in accordance with the law. Ensuring that workers and other stakeholders in our supply chain can raise their concerns plays an important role in achieving this commitment.

We recognise that workers in our supply chain should have access to effective whistleblowing channels to raise concerns relating to wrongdoing at work that is under the scope of whistleblowing under UK law. Workers should not be victimised in any way for raising a concern in good faith.

This policy covers our position and supplier requirements in relation to whistleblowing. For our position and supplier requirements relating to grievance mechanisms, please refer to your relevant supplier manual or your key Sainsbury's contact.

This document is intended for all direct suppliers who supply Sainsbury's with products or services.

SECTION ONE

Our position

We recognise that our suppliers have committed to abide by our Ethical Sourcing Policy and Supplier Code of Conduct, and that our suppliers operate with honesty and integrity.

However, we know there may be occasions where issues arise. We want suppliers, workers and affected stakeholders in our supply chain to be able to raise their concerns.

Workers concerns related to their employment and treatment at work are known as grievances. For example, this includes bullying, harassment, sexual harassment, victimisation, discrimination or any other less favourable treatment towards individuals or group.

However, certain types of complaints are defined as “whistleblowing” as they are in the public interest. These are severe cases of wrongdoing.

It is critically important for people working in our supply chain to be able to blow the whistle on these serious concerns without fear of retaliation. Therefore, there must be a safe and independent means of whistleblowing within workplaces in our supply chain.

This policy relates to whistleblowing in our supply chain.

SECTION TWO

Governance

This policy has been agreed by the governance forum responsible for human rights and will be reviewed annually by the Head of Human Rights, or as required. All changes will be communicated to suppliers.



Supplier requirements

Clauses

1. All direct suppliers of products or services to Sainsbury's must have a written Whistleblowing Policy. The policy must:
 - a) Be signed by senior management;
 - b) Be communicated to all workers in a way they understand
 - c) Ensure confidentiality and anonymity (if requested) and that no one will suffer reprisals or retaliation for raising a concern in good faith
 - d) Allow concerns to be raised at any time about an incident that happened in the past, is happening now, or is believed will happen in the future.
2. The Whistleblowing Policy must be easily accessible, communicated effectively and be available in the main languages spoken at the supplier site(s).
3. There must be a confidential, independent hotline available at our supplier sites to receive whistleblowing reports.

Where a supplier does not have a confidential, independent hotline in place, the supplier must ensure that Sainsbury's whistleblowing hotline is available to receive whistleblowing reports. Posters are available on the relevant supplier portal or via your key Sainsbury's contact.
4. All suppliers must notify Sainsbury's within 24 hours of any ethical trade or human rights related whistleblower reports, as well as any other whistleblower reports that directly impact Sainsbury's products and the Sainsbury's business.



Roles and Responsibilities

Suppliers:

- All direct suppliers shall meet the supplier requirements.
- To notify Sainsbury's of whistleblower report, suppliers must contact their Sainsbury's Technical Manager (for own-brand and owned-brand goods for resale) or relevant Category Manager (for branded goods for resale and goods and services not for resale).
- Suppliers shall have a documented process in place to keep information related to whistleblowing incidents tightly controlled, investigated and resolved.

Sainsbury's:

- All whistleblowing reports raised to us, either via Sainsbury's whistleblowing hotline or via other channels are taken extremely seriously. If breaches of the law or relevant Sainsbury's policies are reported in our suppliers' operations, we will act quickly to assess the extent and nature of issue based on the information provided to us and conduct an investigation. This may include informing the relevant authorities as part of our responsibilities as a retailer.
- Sainsbury's will not immediately delist or suspend trade with a supplier as a result of the whistleblowing report received where the supplier has:
 - alerted their customers;
 - is cooperating with authorities;
 - is actively implementing corrective actions;
 - and is not found to be controlling, or complicit in, the offence.
- Reports will be escalated to the relevant technical, commercial and sustainability colleagues internally based on risk.
- Reports received directly from suppliers will be shared with the Head of Technical or Category Director in the first instance, and then shared with the Ethical Trade Manager and Human Rights Team.
- Where appropriate, we will establish a time-bound plan internally and/or with our supplier(s) to address and where necessary remediate the issue. Depending on the supplier, either the Head of Technical or the Head of Procurement will be responsible for overseeing the investigation and/or action plan with the supplier.
- Sainsbury's shall keep information related to whistleblowing incidents tightly controlled.



Definitions

Whistleblowing is a term used for the reporting of specific types of wrong doing. These types of complaints are made in the “Public interest” and for this reason are protected by UK law.

Complaints that count as whistleblowing are:

- A criminal offence, for example fraud
- Someone’s health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- The company is breaking the law
- Belief that someone is covering up wrongdoing

Ethical trade is about having confidence that the products and services we buy have not been made at the expense of workers in global supply chains enjoying their rights. It encompasses a breadth of international labour rights such as working hours, health and safety, freedom of association and wages.

Direct or Tier 1 suppliers refer to any supplier or site which packs into Sainsbury’s packaging.

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. At Sainsbury’s we are committed to protecting the fundamental rights of workers in our supply chains. These rights include protection from forced labour, modern slavery and harsh or inhumane treatment. The UN Guiding Principles on Business and Human Rights (UNGPs) inform how we address our responsibilities to protect and respect human rights associated with our business.



Examples of whistleblowing versus grievances

Issue	Whistleblowing or grievance?	Rationale
Allegations people working on a farm in Italy are acting as illegal “caporale”	Whistleblowing	<ul style="list-style-type: none"> • In the public interest • Relates to something illegal
Verbal abuse allegation from a worker	Grievance	
Allegation of payment of illegal recruitment fees	Whistleblowing	<ul style="list-style-type: none"> • In the public interest • Relates to something illegal
Allegation of injury sustained by worker on a farm caused by insufficient health and safety systems	Whistleblowing	<ul style="list-style-type: none"> • In the public interest
Workers raise allegation about not understanding sick pay	Grievance	
Worker raises allegations about long working hours and poor accommodation on UK farm	Grievance	
Community member raises concern about poor accommodation on UK farm	Whistleblowing	<ul style="list-style-type: none"> • In the public interest



Our Policy on Supplier Whistleblowing

The information in this document may be supported by other Sainsbury's Documents.
The information outlined in this document is in addition to all applicable UK and EU legislation.

Sainsbury's suppliers must ensure they meet all legal and regulatory requirements. Whilst this document is intended to help you supply products and services to Sainsbury's, they do not absolve you of your responsibility to understand and comply with all the quality, legal and safety requirements for the products or services you supply.

For the purpose of this document Sainsbury's means Sainsbury's Supermarkets Limited and Argos Limited only. Sainsbury's Argos is the trading name of both:

- 1)Argos Limited, Registered office: 33 Charterhouse Street, London, EC1M 6HA, UK Registered number . Registered number: 01081551
- 2) Sainsbury's Supermarket Limited, Registered office: 33 Charterhouse Street, London, EC1M 6HA, UK Registered number: 03261722

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