

J Sainsbury plc

Human Rights Policy



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We take our responsibility to respect people's human rights and to remedy any harms seriously, both in our business and our supply chains. This policy sets out Sainsbury's commitment to upholding internationally recognised human rights and our expectations of colleagues, suppliers and partners in line with the Ethical Trade Initiative (ETI) Base Code and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We acknowledge that the implementation of this policy may differ across geographies, sectors and supply chains and we will work with our suppliers to support the protection of human rights no matter where they may be impacted.

Our aim is to embed strong social, human rights and environmental standards in the way we work, and we expect the same from our suppliers. We recognise and respect our colleagues, suppliers, customers and everyone who enables our business to operate, as legitimate actors with equal human dignity and fundamental rights. We work in partnership with our suppliers, not only to safeguard against any exploitation or wrongdoing, but also to maximise positive impacts for the people who work for and with us.

Scope

This policy and its requirements apply to:

- Sainsbury's own operations
- Suppliers of Sainsbury's brands
- Suppliers of Goods and Services Not for Resale (GNFR)
- Branded suppliers

Whilst all employees, contingent and temporary workers are covered by this policy, we recognise the need to protect the most vulnerable people. They could include (but are not limited to) migrant, seasonal, temporary and informal workers, as well as women, young people, LGBTQ+ workers, indigenous groups and people with disabilities and long-term health conditions. Due consideration should be given to any additional protection or safeguards where required.

Roles and responsibilities

Sainsbury's commits to review the policy annually, consult with relevant internal and external stakeholders – including trade unions – to inform policy statements, and maintain governance to monitor implementation and compliance against this policy. Our Leadership teams and Board hold ultimate accountability.¹

All direct suppliers shall agree to abide by this policy, our Supplier Manuals and Handbooks. Direct suppliers should hold their suppliers to the same standards either through communication of these documents or equivalent internal policies and standards.

Sainsbury's, our suppliers and our partners will work collaboratively with other brands, retailers and suppliers to combine our collective leverage to drive respect for human rights and continuous improvement across our supply chains.

Governance

This policy has been approved by Sainsbury's Directors and will be reviewed annually by the Head of Human Rights, or as required. Consultation on the policy has taken place with internal Sainsbury's teams including technical, responsible sourcing and procurement, with suppliers, with trade union and civil society partners and with survivor-led organisations. All changes will be communicated to suppliers and colleagues.

Overview

The following principles will be applied in our own business and by our suppliers throughout our supply chains:

- **Commitment to ethical sourcing:** providing sufficient resources to ensure both we and our suppliers are able to fulfil our commitments and respect human rights.
- **Human Rights Due Diligence:** committing to understand human rights risks and take action to prevent, mitigate and remediate these impacts.
- **Responsible purchasing practices:** aiming to establish long-term and productive relationships with suppliers. Reviewing purchasing practices and asking for feedback to ensure that behaviour supports suppliers to comply with policy commitments.
- **Building the capacity within our business and with partners:** committing to providing guidance, training and support to colleagues and suppliers where needed.

We recognise the [OECD Due Diligence Guidance for Responsible Business Conduct](#) which outlines the six-step human rights due diligence process. Both Sainsbury's and our suppliers are expected to refer to the UN Guiding Principles on Business and Human Rights when conducting due diligence to ensure it covers adverse human rights impacts that the business may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships.

We understand our duty to respect human rights, so Sainsbury's commit to the following frameworks which have been used to develop our policy:

- [The International Bill of Human Rights](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ETI Base Code](#)
- [UN Sustainable Development Goals](#)
- [Transparency in Supply Chains \(TISC\) Statutory Guidance](#)
- [UN Women's Empowerment Principles](#)
- [International Labour Organisation's Operational Principles for Fair Recruitment](#)
- [UN General Assembly Resolution 76/300 on rights to a healthy environment](#)
- [UN Declaration on the Rights of Indigenous Peoples](#)
- [ILO Convention 169](#)
- [ILO MNE Declaration](#)

Compliance and monitoring

Suppliers and service providers must comply with this policy which should be read in conjunction with all applicable national and international legislation in relation to our products, services and business activities. Supplier Manuals and Handbooks provide requirements and guidance to ensure the effective

implementation of our relevant policies for each area of the business.

We monitor compliance to this policy through regular risk assessments, second and third-party audits and visits, worker voice programmes and ongoing dialogue with suppliers and stakeholders. We expect our suppliers to keep records and provide data to help us support this dialogue.

We commit to monitoring our own progress against the Sainsbury's human rights due diligence action plan and public commitments, with progress tracked against specific human rights Key Performance Indicators (KPIs). These are reported at regular governance meetings. We continuously review and strengthen our monitoring processes to ensure they remain effective and transparent.

Ethics and business integrity

Sainsbury's has separate *Anti-Bribery and Corruption* policies for suppliers and colleagues in the UK and Asia, which set out expectations of behaviour in relation to situations of potential bribery, fraud, facilitation or inducement, as well as gifts and hospitality.

Our **Supplier Terms and Conditions** (T&Cs), which are legally binding, set out a requirement to comply with all applicable laws, statutes, regulations and codes including but not limited to the Bribery Act 2010, the Modern Slavery Act 2015, the Health and Safety at Work Act 1974 and the General Data Protection Regulation 2016/679.

Trust and transparency

We encourage open dialogue and collaboration with our suppliers and the industry. We aim to be transparent with all our stakeholders and encourage our suppliers to do the same. Suppliers should be able to provide full visibility of their own operations and their supply chains to Sainsbury's and are expected to demonstrate continuous improvement in mapping and transparency.

Sainsbury's provides training and guidance to help our suppliers strengthen their own systems to prevent exploitation and promote fair treatment. We also seek to learn from suppliers' knowledge and expertise.

Sainsbury's commits to the public reporting of our progress against our human rights commitments.



Ethical Code of Conduct

We require our suppliers to meet the requirements of the [ETI Base Code](#) and the additional topic-specific clauses outlined in this section. If there is a divergence with local law, suppliers should follow whichever provision affords the greater protection to workers.

1. No forced labour or modern slavery

ETI Base Code

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

We are committed to identifying vulnerable workers and will not tolerate any form of slavery, servitude, trafficking or exploitation within our business or supply chain. We report annually on the steps we are taking to combat slavery, forced labour and human trafficking in our [Modern Slavery Statement](#).

In addition to the ETI Base Code clauses above, suppliers are expected to demonstrate compliance with all relevant national forced labour legislation, including the Modern Slavery Act 2015.

Suppliers should also be able to provide Sainsbury's with information on due diligence steps to manage forced labour risks and to have policies and procedures in place to ensure the unrestricted freedom of movement for workers in both the workplace and provided living quarters.

Responsible recruitment

We recognise that direct and indirect recruitment of workers can create risks of labour exploitation if not managed responsibly. Third-party involvement in the recruitment process is known to increase these risks.

In terms of **recruitment**, our expectations are that suppliers:

- Recruit directly where feasible.
- Make sure that all migrant workers in their operations agree to employment, receive detailed pre-departure training on their rights and conditions in a clear, accessible language that they can understand, retain control of their travel and identity documents and have a clear understanding at the recruitment stage of the site, role, performance requirements, skills, terms, conditions, pay and benefits, length of contract and how to speak up regarding any concerns.
- Provide all workers with written contracts in a language they can understand and ensure these are understood before work starts.
- Provide all workers with disciplinary, grievance and termination of employment procedures.

- Terminate the employment of workers fairly and in line with local law, with reasons and documents provided so workers can find new work.

In relation to **labour providers**, our expectations are that suppliers:

- Work with legally licensed recruitment agencies, sub-agents, third party recruiters and labour providers who are supplying workers registered with them.
- Ensure relationships with labour agencies are covered by a Service Level Agreement which meets all national legal requirements.
- Have effective oversight and due diligence processes on labour providers where third-party labour is necessary.

Recruitment fees

We endorse the [International Labour Organisation's General Principles and Operational Guidelines for Fair Recruitment](#). We understand the implementation of these principles is challenging. However, we are committed to working towards their implementation in partnership with our suppliers.

We prohibit illicit recruitment fees. Where fees are permissible under applicable laws, suppliers should make every effort to reduce costs borne by workers and work towards the elimination of recruitment fees. Suppliers' due diligence efforts should focus on the impact of fees and costs on workers and risks

associated with forced labour and remediate workers where needed.

Sainsbury's will work with suppliers and relevant governments to support responsible recruitment, ensuring risks to workers are minimised.

Prison labour

Prison labour is prohibited except in specific circumstances and with approval by Sainsbury's. Possible or confirmed use of prison labour must be reported to Sainsbury's, no matter where in the supply chain it occurs, to initiate the review process.



Ethical Code of Conduct

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2. Freedom of association and the right to collective bargaining are respected

ETI Base Code

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

We respect the right to freedom of association and to request collective bargaining, and support union agreements.

Where a union is recognised, either voluntarily or through statutory recognition, suppliers must abide by all relevant local legislations, and the respective

roles and legal responsibilities of the employer and union should be understood and complied with.

Relevant collective bargaining agreements, where in place, should always be adhered to. Timely, good faith consultation, negotiations and dispute resolution should underpin mature industrial relations arrangements.

3. Working conditions are healthy, safe and hygienic

ETI Base Code

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative

Suppliers must follow a clear set of procedures regulating occupational health and safety to prevent, address and mitigate health and safety risks and accidents. These should be based on known risks including climate-related risks and include a process to identify any emerging local, national or global, safety and climate risks.

Reasonable adjustments shall be provided to ensure that pregnant workers, workers with disabilities or with long-term health conditions can work safely and effectively, with necessary adaptations made to remove or reduce barriers in the working environment.

Building and fire safety

Building, structural safety and fire permits and certificates should be held in line with legal requirements, and all construction work must be in strict conformity with approved building plans, both for business premises and any accommodation provided. Adequate safeguards in case of emergency must be in place, and accident insurance available to all workers. There shall be no unsafe exposure to hazardous machines, equipment, substances and/or processes.



Ethical Code of Conduct

4. Child labour shall not be used

ETI Base Code

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

We work with our colleagues and suppliers to ensure there is no use of child labour, both through preventative measures and wider industry action to tackle systemic issues. In addition to the ETI Base Code clauses, suppliers are expected to:

- Ensure that hiring and employment of young workers is in line with all legal requirements and age verification is undertaken at recruitment.

- Have a child labour policy applicable to their own operations and their supply chain which includes remediation. All Sainsbury's colleagues are expected to comply with the internal *Employing Young Persons Under 18 Years of Age Policy*.
- Identify and responsibly prevent and eliminate child labour from their own operations and supply chains.

5. Living wages are paid

ETI Base Code

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Sainsbury's commits to securing real increases in wages and income in its own operations and across its priority supply chains, publicly sharing efforts towards payment of living wages and living incomes in high-risk sectors. We expect our suppliers to have an approach to driving improvements towards living wage and living incomes in their own operations and priority supply chains. Where applicable, suppliers should play an active role in collaborative industry initiatives that support progress on this topic.

Workers must be paid punctually and fully for all hours worked, including overtime, in line with local laws and collective agreements. Workers must receive an itemised payslip, outlining all pay components in local languages. Piece-rate systems must still ensure minimum or negotiated earnings within standard hours.

We support the ILO Principles for the Operationalisation of Living Wages which highlight the importance of considering the needs of workers and their families, strengthening social dialogue, promoting incremental progression to living wages, ensuring national and/or local ownership, ensuring gender equality and non-discrimination, using robust and reliable data, taking into account the root causes of low pay, and recognising the role of the state.



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6. Working hours are not excessive

ETI Base Code

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law.

- This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
- Appropriate safeguards are taken to protect the workers' health and safety.
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.*

**International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.*

In cases where overtime is not paid at 125% premium, workers should be adequately compensated in other ways, such as enhanced pay. Overtime work should always remain a choice for workers and the approach taken to overtime payment should always be taken in a way that is most advantageous to the worker.

Our internal Working Time Directive policy sets our requirements for our colleagues to comply with the UK Working Time Regulations 1998.



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7. No discrimination is practiced

ETI Base Code

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Sainsbury's is an inclusive business with diverse representation at all levels, serving diverse communities across the UK. We strive to address representation issues across our business and supply chains, ensuring people are treated fairly, with respect and can fulfil their potential.

Regardless of whether a word, act, or behaviour is intended or not, we do not tolerate unacceptable behaviour such as bullying and discrimination or accept any form of harassment in the workplace. We seek to work closely with our colleagues and suppliers to identify where discrimination might be happening and address both the root causes and any discriminatory practices.

Our commitments extend to identifying discrimination risks in our operations and supply chain and working to prevent, mitigate and remediate these. These include ensuring fair recruitment, promotion, opportunities in the workplace, compensation, termination or retirement practices.

Action should be taken to progress equality, diversity and inclusion and minimise health and safety concerns that are particularly prevalent among women workers.

Both in the design of processes and the workplace, accessibility should be considered to prevent discrimination against persons with disabilities and ensure available access to participation.

8. Regular employment is provided

ETI Base Code

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

We recognise that precarious employment can place workers in more vulnerable positions, exacerbating human rights risks such as discrimination and gender-based violence and harassment.

Sainsbury's takes a zero-tolerance approach to unauthorised sub-contracting. We ask our suppliers to share full visibility on any sub-contracting sites and to ensure they meet our Ethical Code of Conduct and requirements.

The use of home working (see appendix) is subject to Sainsbury's approval through risk assessment and human rights due diligence activities. Homeworking is only allowed in exceptional circumstances and as long as requirements outlined in Supplier Manuals and Handbooks are met.

Entitlement to work

Only workers with a legal right to work in the country should be employed. For both workers and agency workers, original documents should be reviewed to verify right to work and then returned to the worker.

9. No harsh or inhumane treatment is allowed

ETI Base Code

9.1 Physical abuse or discipline*, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

* This refers to physical punishment or abusive disciplinary practices, not formal HR disciplinary processes conducted in line with employment law.

Gender-based violence and harassment

Sainsbury's is committed to tackling gender-based violence and harassment (GBVH) throughout our business and supply chains. We will not accept or ignore failure to act or a lack of meaningful response when an issue, concern or violation is identified.

The root causes of GBVH include unequal power dynamics and we are committed to addressing the root causes that contribute to the occurrence of GBVH in the world of work, including through risk assessments, effective grievance mechanisms and meaningful worker engagement. Please refer to [ILO C190](#) for more information.

Evolving risks

We recognise that there will be continually evolving human rights risks that we need to tackle in our own business and supply chains, which we aim to identify through proactive and on-going human rights due diligence, especially in conflict-affected and high-risk areas (CAHRAs). We encourage our suppliers to raise any feedback, questions or comments with us and we strongly welcome receiving feedback from our key partners on future challenges they have identified with us.

Human Rights Due Diligence

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Our human rights due diligence (HRDD) approach is based on the [UN Guiding Principles on Business and Human Rights](#) and [OECD Due Diligence Guidance for Responsible Business Conduct](#). Through our approach, we seek to identify, prevent or mitigate adverse human rights risks that are linked to our operations, products or services and where possible, remediate any adverse impacts caused or contributed to.

Our suppliers should develop their own HRDD approach based on meaningful stakeholder engagement and have in place specific remediation policies and procedures based on international standards. HRDD will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations. Our Supplier Manuals and Handbooks detail specific HRDD requirements for our suppliers based on risk.

We expect all our suppliers to go beyond compliance and make commitments to uphold and respect human rights, decent work and diversity and implement and promote these within their operations and supply chains.

Suppliers are supported by training and guidance from Sainsbury's and its partners, with regular monitoring of action and progress by the Sainsbury's Technical and Human Rights teams.

Responsible purchasing practices

Human rights is core to our Supply Chain Resilience strategy and is a key criterion of our supplier selection process and sourcing decisions. We recognise that stable business relationships contribute towards good labour practices, and we endeavour to establish long-term and productive relationships with our suppliers and expect them to do the same with their suppliers.

Along with our suppliers, we are committed to dealing openly and fairly with our direct suppliers, adhering to contract terms and conditions and avoiding the exertion of undue pressure. We and our suppliers will continue to review our purchasing practices to ensure that our behaviour in turn supports our suppliers to comply with our Ethical Code of Conduct.

Responsible purchasing practices are a key responsibility for Sainsbury's and our suppliers. Where applicable, we embed the [Common Framework for Responsible Purchasing Practices](#) in our ways of working with suppliers and expect our suppliers to follow the same principles. Open and honest dialogue is encouraged for us and our suppliers to ensure that the way we conduct business enables human rights to be respected.

Prohibited sourcing regions and sourcing from high-risk countries

Trade can be a driving force in supporting decent work and sustainable livelihoods. However, we recognise that there are situations where this cannot be done whilst also ensuring the protection of human rights. Therefore, there are some circumstances under which we will not source from an area, region or country.

Please refer to the following documents for the list of regions which are not permitted for sourcing for Sainsbury's own-brand or owned brand products or services:

- Supplier Handbook and Portal (Clothing and General Merchandise suppliers).
- The Responsible Sourcing Manual (Food and non-Food Grocery Suppliers).
- Achilles or your Procurement team contact (GNFR suppliers).

Our human rights due diligence activities are guided by a comprehensive risk assessment. Where high-risk locations are identified, we undertake our own enhanced due diligence steps and require our suppliers to do the same. More information on requirements can be found in the relevant Supplier Manual or Handbook.



Ms Umawathi, tea plucker at Matheson tea estate, South India.
Credit: Nologo / Fairtrade Foundation

Human Rights Due Diligence

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Grievance mechanisms

Sainsbury's commits to providing trusted and effective grievance mechanisms for our colleagues, in line with the principles outlined in the [UN Guiding Principles \(UNGP\) Effectiveness Criteria](#), and we require our suppliers to work towards doing the same.

It is essential that personal or collective concerns, whether they have occurred, are ongoing, or are anticipated, can be reported confidentially to an independent reporting service.

Colleagues and workers in our supply chain must have knowledge of their rights and documented grievance procedures should be clearly and effectively communicated.

The confidentiality of complainants must be protected, and all grievances should be raised without fear of retaliation. Sainsbury's strictly prohibits any forms of retaliation against workers or other stakeholders for raising human-rights related concerns, and we expect our suppliers to do the same. We will take steps to prevent retaliation including guaranteeing anonymity when complaints or concerns are raised. Those responsible for handling grievances should be properly trained, and all concerns should be addressed promptly through transparent processes that provide timely feedback.

Grievance procedures should not undermine the role of trade union and representation or impede access to alternative judicial or non-judicial mechanisms.

All workers, including those who may be marginalised or disadvantaged, must have access to grievance mechanisms throughout the business and supply chain, with barriers to inclusivity identified and addressed.

Whistleblowing

We recognise that everyone in our business and supply chain should have access to effective whistleblowing channels to raise concerns relating to wrongdoing at work that is within the scope of whistleblowing under UK law. Maintaining a clear and accessible whistleblowing process for reporting unacceptable behaviour and wrongdoing is fundamental to our commitment to a respectful and inclusive workplace.

We want colleagues and workers in our supply chain to feel safe, comfortable and confident to raise serious concerns when they need to.

Workers should not be victimised in any way for raising a concern in good faith and should be protected from retaliation and any adverse impacts.

[Our Policy on Supplier Whistleblowing](#) details the mechanisms and processes that suppliers should have in place to enable safe and effective whistleblowing in the workplace. The policy is intended for all direct suppliers who supply Sainsbury's with products or services.

Call it Out

Sainsbury's colleagues and external stakeholders can report any concerns using our Call it Out whistleblower hotline:
[Safecall.co.uk/Sainsburys](https://safecall.co.uk/Sainsburys)

Incident management

Human rights impacts are managed by Sainsbury's through a risk assessment in an agreed governance process involving relevant stakeholders. The nature and severity of the incident determine the level of escalation and action. Our internal procedure involves assessing the risk of a reported issue, investigation by internal or external parties, taking action to mitigate the impact, providing timely remedy when needed and monitoring the implementation of an agreed remediation plan.

We expect our suppliers to have a robust process to identify any human rights concerns or incidents and a response plan and to notify Sainsbury's **within 48 hours** of discovery or occurrence. At all times, we encourage suppliers to share any issues that are identified and are committed to working collaboratively with suppliers to investigate and resolve issues.



Human Rights Due Diligence

Remediation

We acknowledge that Sainsbury's, our suppliers, and their suppliers have a responsibility to support the remedy of harms experienced by workers or community members in our operations and supply chain.

Our approach is focused on workers and communities (rightsholders) and we treat remediation, particularly of severe human rights issues such as forced labour, as a priority. We focus our remediation efforts on adverse impacts that we have caused or contributed to. We collaborate and support remediation activities where we are linked to a human rights impact due to our business relationship. We commit to provide or cooperate in remediation for individuals, workers, and communities through legitimate processes, including both judicial and non-judicial mechanisms.

We are committed to ensuring that complaints are addressed and human rights issues are remediated through processes that are transparent, accountable, within a reasonable timeframe and mutually agreeable. When needed, we review our processes and practices to prevent similar adverse impacts in the future. Where required, we establish partnerships and collaborate with others to address systemic issues, address root causes and foster industry-wide change. We are committed to driving ongoing improvement by publicly reporting on the remediation of human rights issues.

Suppliers must define their remedy processes, investigate grievances, resolve root causes, and

demonstrate continuous improvement, always centring the rightsholder and focusing on dialogue with affected groups. Remediation processes should meet the principles and effectiveness criteria defined in the UNGPs.

Where issues are linked to our business, we will work with suppliers to ensure suitable remedy is provided. Where severe human rights issues such as involuntary prison labour, child labour or forced labour are identified, we will work closely with suppliers to devise and implement an agreed remediation plan. In cases of child labour specifically, the safety and security of the child must be a priority. No child should be dismissed without a comprehensive plan for their financial and emotional wellbeing, which mitigates any further risk of harm.

Responsible disengagement and re-engagement

We engage with suppliers who share our commitment to respect human rights and demonstrate a willingness to meet our requirements. We aim to foster a partnership approach with suppliers, and we seek to work with them to ensure they remediate any human rights breaches identified within their operations or supply chains.

Commercial relationships may ultimately be affected where cases are intentionally hidden, if a supplier is unwilling to remediate and if a supplier fails to remediate issues within a reasonable timeframe and/or to the satisfaction of the complainant/s.

Steps to exit a site or terminate a relationship will only be taken, on a case-by-case basis, after all reasonable attempts at prevention or mitigation have failed. Before any disengagement commences, we assess any potential impact on workers and pursue a "responsible disengagement" that balances business decisions with human rights considerations, social and economic consequences. Any disengagement should comply with national laws, international benchmarks and union agreements.

Responsible disengagement may include:

- Continuing commercial relationships for a reasonable transition period to allow workers and communities notice of changes in hours or employment status.
- Consulting with the supplier and relevant stakeholders to minimise disruption to workers and communities.

We expect our suppliers to undertake similar considerations before any disengagement with their suppliers, and they should assess the potential impact on workers, local communities, and other affected stakeholders, particularly in conflict-affected and high-risk areas (CAHRAs). Mitigation actions to reduce any impact, may include:

- Alternative employment arrangements or transfers for affected workers. Support for worker income and benefits during transition and including a commitment to ensure severance payments are made to workers in the case of dismissals directly resulting from the loss of business.

- Collaboration with local organisations or authorities to reduce community disruption.

Where disengagement from a lower tier supplier has occurred, Sainsbury's direct suppliers should demonstrate a clear improvement in their approach to due diligence in order to mitigate and prevent further risks. The root cause of the disengagement should be identified and appropriate actions taken to address them.

All disengagement decisions, remediation steps, and impact assessments must be documented and reviewed internally to ensure transparency, accountability and lessons learned for future supplier engagement.

Sainsbury's, and where appropriate its supplier, will risk assess re-engaging with suppliers when evidence is shown of the following:

- A thorough and transparent investigation into how human rights breaches have been dealt with has taken place.
- Documentation is available which shows the remediation options considered and taken and how these meet the needs of the victim(s).
- A documented approach to due diligence has been developed which is effective and seeks to avoid future harms.

Human Rights and Environment

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To grow our business sustainably, we are cutting carbon and maximising energy efficiency, whilst working to protect all dimensions of nature, and collaborating to restore nature, ecosystems and landscapes. Both Sainsbury's and our suppliers operate in line with our environmental policies to ensure a consistent and robust approach.

Environmental harms and climate change directly and indirectly have an impact on human rights. These may include water stress, pollution, flooding, drought, heat stress, biodiversity loss, access to water and sanitation, deforestation and land degradation. Additionally, natural resource scarcity and climate change impacts can exacerbate social issues such as unrest, conflict and climate-induced migration, all of which can create and heighten risks for vulnerable worker populations.

Addressing environmental, climate and human rights challenges reflects our responsibility to avoid harm and support positive outcomes for people and the environment. In doing so, we also strengthen the resilience of our supply chains and long-term surety of supply. Sainsbury's takes a partnership approach, working with suppliers, workers, trade unions, communities, certification bodies, NGOs and expert organisations to ensure that measures are appropriate and have beneficial outcomes.

Suppliers should respect the resilience of the landscape in which they are operating to ensure the long-term viability of future livelihoods in the area.

To manage environmental harms including those related to raw materials, chemicals, energy and greenhouse gas (GHG) emissions, water, sanitation, biodiversity, waste and air pollution, we expect suppliers to:

- Operate according to applicable national and international environmental laws, regulations, administrative practices, policies and standards.
- Risk assess the potential environmental and nature-related damage caused, contributed or linked to business activities, as well as the impact of climate change through consultation with stakeholders such as workers, local communities and Indigenous Peoples where relevant.
- Create response plans, informed by consultation with stakeholders, including workers, local communities and Indigenous Peoples.
- Have systems to ensure that operations and supply chains do not cause environmental damage that violates the rights of people, communities and ecosystems.
- Take adequate measures to prevent, mitigate and remediate negative impacts of environmental damage and climate on workers' rights, including health, safety and wellbeing.

Climate change adaptation and mitigation measures should respect regional conditions, be informed by social dialogue with workers, embed principles of decent work and respect for human rights and take into account the disproportionate impact on more vulnerable populations such as women, migrant workers and Indigenous Peoples.

Land and water rights

- All suppliers should demonstrate that they have identified and documented any legal and / or customary rights in relation to land and water use of their operations.
- All suppliers should operate legally within their premises with the correct business licenses and permissions and have systems to ensure that all relevant land and water rights have been complied with.
- There must be meaningful engagement with Indigenous People and local communities about the risks that affect them.
- When land or water rights have been relinquished by Indigenous People or Local Communities to the benefit of the supplier, the supplier should ensure that the decision was reached through a process of Free, Prior & Informed Consent in line with national legislation and/or international best practice. If a land or water rights claim against the supplier is raised through judicial or non-judicial processes, the supplier should engage in good faith to resolve the conflict and should keep Sainsbury's informed at all stages of the claim.



Stakeholder engagement

J Sainsbury plc

We recognise that we cannot tackle severe human rights abuses in our supply chains alone, therefore we work with a wide range of stakeholders to achieve a positive impact for workers and communities.

In the design of our HRDD processes, audit activities, and investigation and remediation activities, we endeavour to engage meaningfully with workers, trade unions, communities, civil society, human rights defenders, NGOs, suppliers, governments and other stakeholders.

We expect our suppliers to do the same wherever possible.

Human rights defenders

Neither Sainsbury's nor its suppliers should tolerate threats, intimidation, violence, punitive action, surveillance or physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations. Any threats to human rights defenders should follow the remediation principles outlined above with Sainsbury's and/or its suppliers taking responsibility for remediation as determined by which party has the direct relationship with the harm in question.

We believe that companies such as ours, as well as our suppliers, have a responsibility to respect Human rights defenders, such as trade unionists and other individuals advocating for human rights and environmental issues.



Definitions

Accessibility refers to designing, developing, and operating products, services, environments and processes so that people with disabilities can participate fully, independently, and with dignity. It means ensuring that people with disabilities can access the same opportunities, information, and experiences as non-disabled people, across both digital and physical touchpoints.

Branded products are products which do not include any reference to Sainsbury's or Sainsbury's brands.

Child The ILO (Convention No. 138) defines a 'child' as any person under the minimum working age set by national law or 15 years, whichever is higher.

Collective bargaining is the formal process through which trade unions negotiate with employers on behalf of their members to establish agreements on working conditions and employment terms. It can only take place when an employer recognises a trade union, and both parties agree on the scope of the issues to be negotiated.

Contingent workers refer to agency workers, contractors or freelancers who are engaged for short-term needs or specialised expertise.

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

Discrimination occurs when a person is unable to enjoy their human rights or other legal rights on an equal basis with others. It is the unfair treatment of people or groups based on characteristics such as race, caste, national origin, religion, age, disability, sex, gender, marital status, sexual orientation, pregnancy, union membership or political affiliation.

Ethical sourcing 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.

Forced labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Freedom of association is the right of workers to join and form trade unions or organisations of their choosing. Closely linked to this is the right to request collective bargaining, which allows workers to freely negotiate their working conditions with their employers. These rights apply to all workers, irrespective of race, religion, gender, occupation, nationality or political opinion. Workers in the informal economy, such as homeworkers, have the same right to freedom of association as those with formal contracts of employment.

Gender-based violence and harassment (GBVH) is violence and harassment "directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment" (Art. 1(b) ILO Violence and Harassment Convention No. 190). GBVH can be physical, verbal, sexual, psychological and economic. Women are disproportionately affected by GBVH, but it is important also to recognise that LGBTIQ+ and gender non-conforming workers may be targets of GBVH, including discrimination, homophobia and transphobia.

Homeworkers in the context of this policy are subcontracted or dependent workers, working for an employer, intermediary or subcontractor for a piece rate. These workers form the vast majority of home-based workers used within export supply chains. They operate in their home or in other premises of their choice (other than the workplace of the employer) for remuneration and in order to produce or deliver a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used.

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. 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.

Human rights defender refers to individuals or groups that, in their personal or professional capacity and in a peaceful manner, strive to protect and promote human rights. This includes affected communities, non-governmental organisations and individuals, members of the media, lawyers, judges, academics, government officials and civil servants or members of the private sector (including company employees such as trade unionists and whistle-blowers).

Living wage is defined by the International Labour Organisation (ILO) as 'the level of remuneration that is sufficient to afford a decent standard of living for the worker and their family.'

Migrant worker is defined by the ILO as 'a person who is to be engaged or has been engaged in a remunerated activity in a state of which he or she is not a national. A 'foreign migrant worker' is defined as a person 'admitted by the receiving State for the specific purpose of exercising an economic activity remunerated from within the receiving country. Their length of stay is usually restricted as is the type of employment they can hold. Their dependents, if admitted, are also included in this category.'

Modern slavery is the severe exploitation of other people for personal or commercial gain. It can come in many forms, including forced labour.

Definitions

National minimum wage exists in more than 90 per cent of the International Labour Organisation's (ILO) member states. It is defined as the minimum amount of remuneration that an employer is required to pay wage earners for the work performed during a given period, which cannot be reduced by collective agreement or an individual contract.

Nature stewardship (or environmental stewardship) refers to the responsible use and protection of the natural environment through active participation in conservation efforts and sustainable practices.

Own brand and owned brand products are products clearly labelled as 'by Sainsbury's' or have any reference to Sainsbury's or any of J Sainsbury's or Argos Plc brands on the label or product.

Prison labour refers to the work carried out by someone who has a conviction (a guilty verdict in court) and is confined in custody. Work should be carried out voluntarily. Prisoners forced to work without remuneration is considered forced labour.

Recruitment fees refer to payments for recruitment services offered by labour recruiters (public or private); payments made in the case of recruitment of workers with a view to employing them to perform work for a third party; payments made in the case of direct recruitment by the employer; and payments required to recover recruitment fees from workers. These fees may be one-time or recurring.

The ILO also refers to '**related costs**' which are defined as expenses integral to recruitment and placement. These may be initiated by an employer,

labour recruiter or an agent acting on behalf of those parties and relate to securing access to employment or placement or imposed during the recruitment process, including; medical, insurance, training and orientation, travel and lodging, and administrative costs, as well as costs for skills and qualifications tests. **Illegitimate, unreasonable and undisclosed costs** are defined as; extra-contractual, undisclosed, inflated or illicit costs that are never legitimate.

Subcontracting is a contractual relationship between two businesses where one (the subcontractor) carries out work for another (the principal contractor) independent of direct employment by the latter — even if its workers may work on the principal's premises.

Supplier A supplier is any enterprise, organisation, or individual that provides goods, materials or services to Sainsbury's directly or indirectly.

Temporary employment typically refers to contractual work that is expected to end after a specified period or the completion of a task.

Temporary workers are those with employment expected to last only a limited period, under fixed-term or similar arrangements (e.g., short-term, casual).

Trade union is a labour organisation that operates independently from government or employer control and influence and focuses on the protection and promotion of the rights, interests and aspirations of workers. Trade unions represent workers and can collectively bargain on their behalf with both employers and governments (in the public and private

sectors) to progress the interests of their members. Independent and democratic trade unions will, ordinarily have to be legally registered and certificated in their country of origin and may be affiliated to national, regional and international forums.

Water stewardship is the responsible use of water that is economically beneficial, environmentally sustainable, and socially and culturally equitable.

Whistleblowing is a term used for the reporting of specific types of wrongdoing. 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.

Worker is someone who performs work for an employer, under a contract or employment relationship. This includes both paid and unpaid work in formal or informal sectors in some contexts.

Young worker Under ILO (Convention No. 138), a 'young worker' refers to an individual above the legal working age but under 18 years of age.



J Sainsbury plc

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

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

Document reference	Document Owner	Amendment History	Date
PL006	Head of Human Rights	Combined Our Ethical Sourcing Policy, Human Rights Policy, Home Work Policy and Prison Labour Policy into one document, strengthened position statements.	June 2026
PL006	Head of Human Rights	Updated to reflect change in head office location	June 2025
PL006	Head of Human Rights	Minor updates and reference to prohibited sourcing regions	April 2025
PL006	Head of Human Rights	New document	September 2022

