



# Sainsbury's Modern Slavery Statement 2020/21

J Sainsbury plc



Driven by our passion for food, together we serve and help every customer. As a responsible retailer, this includes treating people fairly wherever they are in the business and supply chains.

The world is a very different place now compared to twelve months ago. The COVID-19 pandemic has highlighted the resilience of communities to come together at a time of great need, but it has also heightened risks for the most vulnerable in our society, including victims of forced labour. We have seen that the most vulnerable have been the most affected by the pandemic in the same way that they also face the biggest challenges from climate change. This interconnectedness is informing our approach to joining our social and environmental work together to ensure positive impacts. Our priorities throughout the last year have been keeping our customers and colleagues safe, helping feed the nation and supporting our communities and the most vulnerable in society. This includes both the communities we serve and source from. Whilst COVID-19 has restricted our ability to meet in-person we have adapted our approach to managing modern slavery risks and maintain our commitment and duty to respect

human rights, identify vulnerable workers and we will not tolerate any form of slavery or servitude in our own operations or supply chains. Our risk-based approach continues to help us identify areas of potential exploitation of workers and provide resources where they are most needed to protect workers.

Modern slavery and human trafficking are abhorrent practices that still exist in many parts of the world, including the UK. This is our fifth statement on our efforts to prevent modern slavery in line with Section 54 of the UK Modern Slavery Act 2015. It details the steps taken during the year ending 6 March 2021\* to prevent modern slavery and human trafficking in our own operations and supply chains.

This statement has been approved by J Sainsbury plc Board of Directors.

**Simon Roberts**

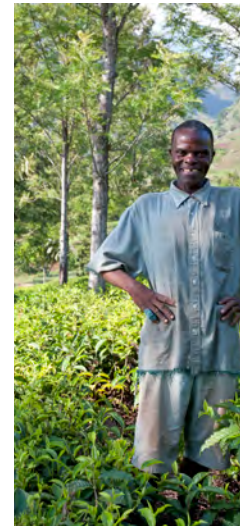
Chief Executive Officer J Sainsbury plc  
11<sup>th</sup> June 2021

\*Additional information is provided for activities in April 2021 in line with revised government reporting guidelines.



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# Key activities in 2020/21

## New activities 2020/21

We continuously review our performance as a business and as part of that process this year we have looked back at lessons learnt from our previous work tackling modern slavery. From our past work and in consultation with others we recognise that forced labour doesn't happen in a vacuum and an effective strategy for combatting forced labour needs to be part of broader human rights approach. We have evolved our approach to tackling modern slavery including advocacy for human rights globally as well as continuing to evolve our internal governance structures to most effectively capture and respond to environments that may foster or enable modern slavery.



## A moment to reflect on the year of COVID-19.

A [report issued by United Nations Department of Economic and Social Affairs](#) in July 2020 found that COVID-19 had unleashed an unprecedented crisis threatening to wipe out all the progress made on the 17 Sustainable Development goals to date. Findings from the report include:

- An estimated 71 million people are expected to be pushed back into extreme poverty in 2020, the first rise in global poverty since 1998. Lost incomes, limited social protection and rising prices mean even those who were previously secure could find themselves at risk of poverty and hunger.
- Underemployment and unemployment due to the crisis mean some 1.6 billion already vulnerable workers in the informal economy – half the global workforce – may be significantly affected, with their incomes estimated to have fallen by 60 per cent in the first month of the crisis.
- As more families fall into extreme poverty, children in poor and disadvantaged communities are at much greater risk of child labour, child marriage and child trafficking. In fact, the global gains in reducing child labour are likely to be reversed for the first time in 20 years.

These sobering statistics show that our work to combat modern slavery is needed now more than ever. Vulnerable people in extreme poverty are often forced into exploitative working conditions.

As we emerge from the pandemic there will be greater challenges ahead in terms of modern slavery and human trafficking, therefore to

re-double our efforts, we have formed new collaborations to work with others.

During 2020 our first priority was the safety of existing workers in our own operations and supply chains.

To support this, we worked with other Food Network for Ethical Trade (FNET) members to sponsor the development of a series of webinars to support suppliers managing COVID-19 in the workplace. This supplier webinar series reached 3,993 participants in 55 countries.

We joined the Unseen business portal in February 2021 to help increase our intelligence gathering for modern slavery risks in the UK and to support the UK's Modern Slavery Helpline which is funded through the membership's fees of the business portal.

Following the information learnt from Operation Fort in 2019 we have also joined forces with a group of retailers and UK food producers to pilot the Modern Slavery Intelligence Network, looking at how we can better share information about potential forced labour to understand how we might pre-empt and disrupt modern slavery networks.





# Our journey so far



○ 1998

**Ethical Trading Initiative founding members**

○ 2014

**Strategic partnership with Gangmasters and Labour Abuse Authority**

Founding strategic partners of Issara

Founding partners of Stronger Together

Input into government consultations

○ 2016

Establish **Ethical Champions**

Commit to The Consumer Goods Forum's Social Resolution on Forced Labour and Forced Labour Priority Industry Principles

Speak at Dutch embassy on Gangmasters and Labour Abuse partnership

**Accommodation** guidance for UK temporary workers

○ 2018

**Human Rights Policy**

**Verite** partnership

Fairly Traded grievance mechanism

Sustainable Sourcing Policy for **goods and services not for resale** and self-assessment questionnaire

**E-learning**

Chief Executive Officer becomes Retailer College Co-Sponsor for The Consumer Goods Forum sustainability pillar

Accommodation webinars for suppliers, shortlisted for Sedex award

Join Food Network for Ethical Trade

Pilot **Everyone's Business app**

Rank top four by Business & Human Rights Resource Centre for our statement

○ 2020

**Supporting suppliers** through COVID-19

Business partner of **Unseen Modern Slavery and Labour Exploitation Helpline**

Founding members of **UK Modern Slavery Intelligence Network**

Launch **worker voice survey pilot across food and non-food factories**

○ 2002

**Temporary Labour Working Group**

○ 2015

Spanish Supplier Forums

Establish **Modern Slavery Working Group**

○ 2017

**First** Modern Slavery Statement published

Launch **Modern Slavery Risk Assessment Tool**

Dedicated specialist social auditor

Joined World Cocoa Foundation, World Banana Forum and **Responsible Car Wash Scheme**

○ 2019

Require **Clearview** certification for depot labour agencies

**Published clothing and footwear supply chain locations**

Founding sponsors of **Responsible Recruitment Toolkit**

# About Sainsbury's

## Driven by our passion for food, together we serve and help every customer

Offering delicious, great quality food at competitive prices has been at the heart of what we do since John James and Mary Ann Sainsbury opened our first store in 1869. Today, inspiring and delighting our customers with tasty food remains our priority. Our purpose is that driven by our passion for food, together we serve and help every customer.

### Definitions for the purpose of this statement

#### Business / J Sainsbury plc

Business including food, general merchandise, clothing, goods not for resale and financial services

#### Food

Sainsbury's own-brand food and groceries

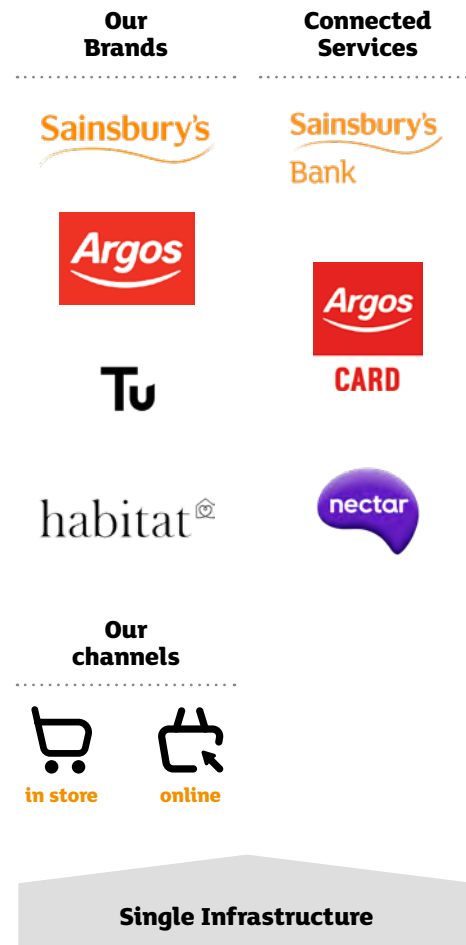
#### General merchandise and clothing

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

#### Our own-brand

Sainsbury's, Argos, and Habitat own-brand products

1. This statement sets out the steps taken by Sainsbury's Supermarkets Ltd, Sainsbury PropCo A Limited, Sainsbury PropCo B Limited, JS Information Systems Limited, Sainsbury's Tyne Property Holdings Limited, Sainsbury's Thistle Scottish Limited Partnership, Argos Limited, Habitat Retail 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.



This statement covers our approach to prevent modern slavery across the business<sup>1</sup>. For Sainsbury's Bank Modern Slavery Statement, please visit [www.sainsburysbank.co.uk](http://www.sainsburysbank.co.uk).

## Our company at a glance

**£32,285m**

Group sales (inc. VAT)

**189,000**

Colleagues

**598**

Sainsbury's supermarkets

**813**

Sainsbury's convenience stores

**737**

Argos stores and in-supermarket outlets

**3**

Habitat stores



## Our supply chain at a glance

**4**

International sourcing offices in Hong Kong, Shanghai, Delhi and Dhaka

**60+**

Countries where we source our own-brand products

**1,299**

Suppliers for our own-brand products (food, general merchandise, clothing and Habitat), operating across 2,207 sites

**2,000+**

Suppliers for our goods and services not for resale, of which 225 are for logistics

**70%+**

Of food supplier sites are based in the UK, Spain, France and Italy, providing food and grocery products

**70%+**

Of general merchandise and clothing suppliers are based in China, India, Turkey and Bangladesh, for products including furniture, electronics, clothing and toys

**1 million+**

Workers in the first tier of our food, general merchandise and clothing own-brand supply chain, of which around 7% are agency workers and 48% are women

# Policies and commitments

We do not tolerate any form of human rights abuse within our company or supply chains. We have well-developed policies and processes in place to avoid causing or contributing to adverse human rights impacts through our activities, including any form of slavery, and we are committed to addressing such impacts if they occur. These are reviewed regularly to ensure they remain relevant and encompass best practice as it evolves.

Policies which support our modern slavery programme include:

## Human Rights Policy

Outlines our commitment to the UN Declaration on Human Rights, UN Guiding Principles on Business and Human Rights, ILO Conventions, and the UN Women's Empowerment Principles. These outline our commitment to respect the human rights of all colleagues, customers and suppliers.

## Sustainable Sourcing Policy for Goods for Resale

Outlines our expectations for suppliers, including our Code of Conduct based on the Ethical Trading Initiative Base Code. The policy also includes The Consumer Goods Forum's Forced Labour Priority Industry Principles including 'no worker should pay for a job'.



## Sustainable Sourcing Policy for Goods Not For Resale (GNFR)

Aligned with above policy and applies to suppliers in our goods (and services) not for resale supply chain.

## New Policies

We have focused on updating and launching policies for our raw materials this year. We updated our [Cotton Policy](#) to include reference to a ban on sourcing from Uzbekistan and Turkmenistan which was already operationalised but hadn't yet been formalised into a policy. As part of this commitment, we also became signatories to the [Responsible Sourcing Network's Turkmen and Uzbek Cotton Pledges](#). We also acknowledge the difficulties with cotton from the Xinjiang region in China and our focus on gaining greater traceability of our cotton sourcing.

We launched a new policy covering high-risk [Precious Metals and Minerals](#) in our electronics, jewellery and cosmetic supply chains. The policy is based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. It requires suppliers to understand and conform to international sanctions on sourcing certain minerals from particular countries, to track where they source from, declare this to us, increase transparency year on year and ensure they are sourcing from certified sources. Traceability is a requirement for our jewellery and cosmetic suppliers, but as we recognise the difficulty of traceability within the electricals sector, over the coming year, we will instead focus on a deep dive on cobalt with a couple of suppliers.

We also launched a new [Manmade Cellulosic Fibres Policy](#) and updated our [Forest Products Policy](#).

## Industry Commitments

We continue to support the following industry level commitments:

The Consumer Goods Forum's [Social Resolution on Forced Labour](#) and [Forced Labour Priority Industry Principles](#), tackling three of the most problematic employment practices that can lead to forced labour.

EVERY WORKER SHOULD HAVE FREEDOM OF MOVEMENT >>>> NO WORKER SHOULD PAY FOR A JOB NO WORKER SHOULD BE INDEBTED OR COERCED TO WORK

The British Retail Consortium's [Better Retail, Better World actions](#), which address global challenges highlighted in the UN Sustainable Development Goals, including modern slavery and decent work. All signatories commit to enhance employment and recruitment best practices and to embed a policy for the supply chain that no worker should pay for a job.

The [Retailer Protocol for Handling Reported Cases of Modern Slavery](#), which we inputted into, in partnership with retailers, the British Retail Consortium, Gangmasters and Labour Abuse Authority and Stronger Together.

We manage compliance with these policies, standards and commitments in the following ways:

- Contractual terms and conditions include a clause on compliance with the Modern Slavery Act 2015
- Require suppliers to have their own codes of conduct, along with policies and systems to manage ethical trade in their own supply chains, report progress to us and allocate sufficient resource to do so
- Provide guidance through a Supplier Handbook, Sainsbury's and Argos Ethical Trade Manual for suppliers and our Colleague Handbook for colleagues



# Governance

The Corporate Responsibility and Sustainability (CR&S) Committee oversees the governance of being a sustainable business, including modern slavery. The Committee's principal role is to review the sustainability strategy, ensuring it is aligned with the Company's purpose, strategy, culture, vision and values. The Committee also plays a part in monitoring the business's engagement with stakeholders including customers, suppliers, the community, colleagues, shareholders and government on sustainability and corporate responsibility matters.

We are in the process of finalising our beyond-2020 strategy for human rights including modern slavery, and we will be setting targets and key performance indicators (KPIs) to track performance and publish our progress annually.

Angie Risley, Director of Group Human Resources, and member of our Operating Board is responsible for our human rights policy and strategy in our operations and supply chain. Our human rights strategy, which includes mitigating labour exploitation risks, is embedded in our human resource teams, sourcing with integrity and communities' teams; supported by our human rights and sustainable sourcing policies. Our sustainability strategy is overseen by the CR&S Committee, which is Chaired by Jo Harlow, one of our Non-Executive Directors.

Our sustainability team is responsible for designing appropriate policies, processes, and strategies to embed respect for human rights across the whole business and supply chains. This year we have reviewed our governance of social sustainability issues and will be introducing a new human rights working group to manage human rights risk up to and including modern slavery across the business. This is part of the revised strategy on human rights that will be published later this year.

When issues around modern slavery or human rights more broadly are identified in our supply

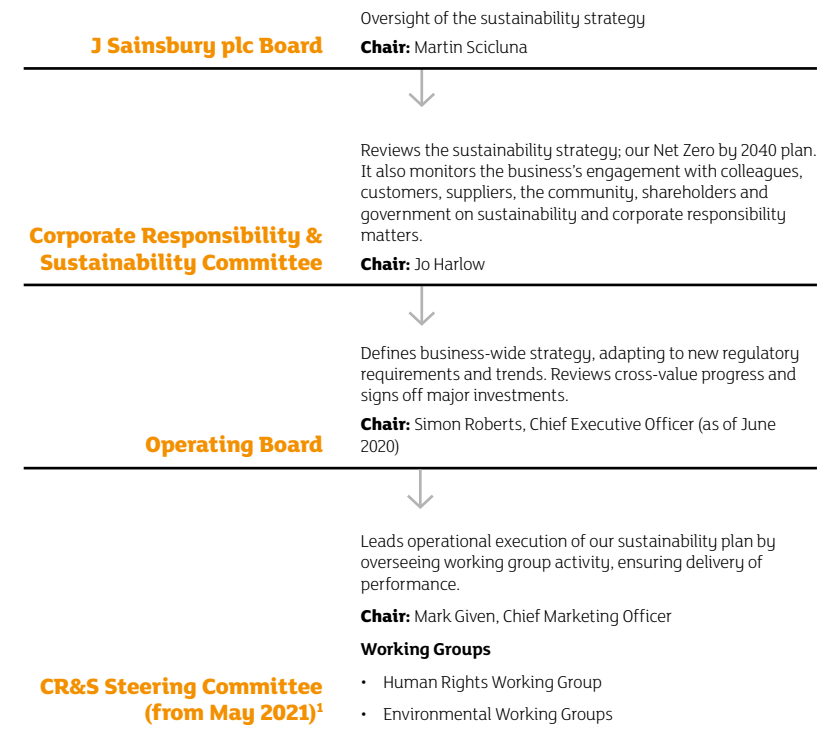
chain, they are managed by our technical and commercial colleagues, supported by our central team of social sustainability experts.

The general merchandise and clothing business has dedicated ethical trade teams in the UK and all four of our sourcing offices in Asia, who have responsibility for the everyday management of ethical issues.

Ethical issues are categorised by the level of seriousness and an action plan is put in place to ensure that the supplier reaches compliance within a set timeframe. Any issue deemed high risk or not resolved within the agreed timeframe is escalated to senior leadership.

For more on governance, see our [Annual Report and Financial Statements](#).

An overview of our governance structure is to the right.



<sup>1</sup>The Net Zero Steerco was established in February 2020 to support delivery of our Net Zero by 2040 plan. This forum initially existed alongside our Value Management Groups which governed our 2020 Sustainability Plan. These forums were phased out over the past year on completion of this plan, and our social agenda has been governed via Director forums and the Operating Board. To ensure effective governance across our Environmental, Social and Corporate Governance (ESG) agenda, we have refreshed our CR&S governance structure, with the CR&S Steerco replacing the Net Zero Steerco from May 2021.



# Risk assessment and management

We have expanded our Modern Slavery Risk Assessment Tool into a broader Human Rights Risk Assessment Tool to provide us with insights into different risks across our complex global supply chain, not only at product and service level but also for individual ingredients and components.

As we expand into a broader human rights agenda, we want to ensure that the tools we use are fit for purpose and reflect this. This is why we took the decision to expand our innovative Modern Slavery Risk Assessment Tool into a broader tool looking at human rights risks. We worked with Sedex, one of the world's leading ethical trade membership organisations, to gather the data scores about various risks across our Supplier Code of Conduct and overlay these with our own, detailed data.

This tool provides a level of detail that is unprecedented in our industry, combining our own data with economic models of sectors such as agriculture and manufacturing. This enables us to identify risks in multiple tiers of our supply chain, so we can take action. Importantly, this includes upstream tiers, where the risks are greatest but also more difficult to identify.

We continue to interpret the data from the new expanded tool to inform our human rights strategy. This year, however, the focus has been on conducting a deeper dive into the country risks identified in our statement last year.

Our Modern Slavery Risk Assessment Tool has confirmed higher risk products and raw materials that, along with others in our industry, we have been aware of for some time. We have procedures and programmes in place to manage these risks. It has also identified new risks for us to explore further.

## Raw Materials

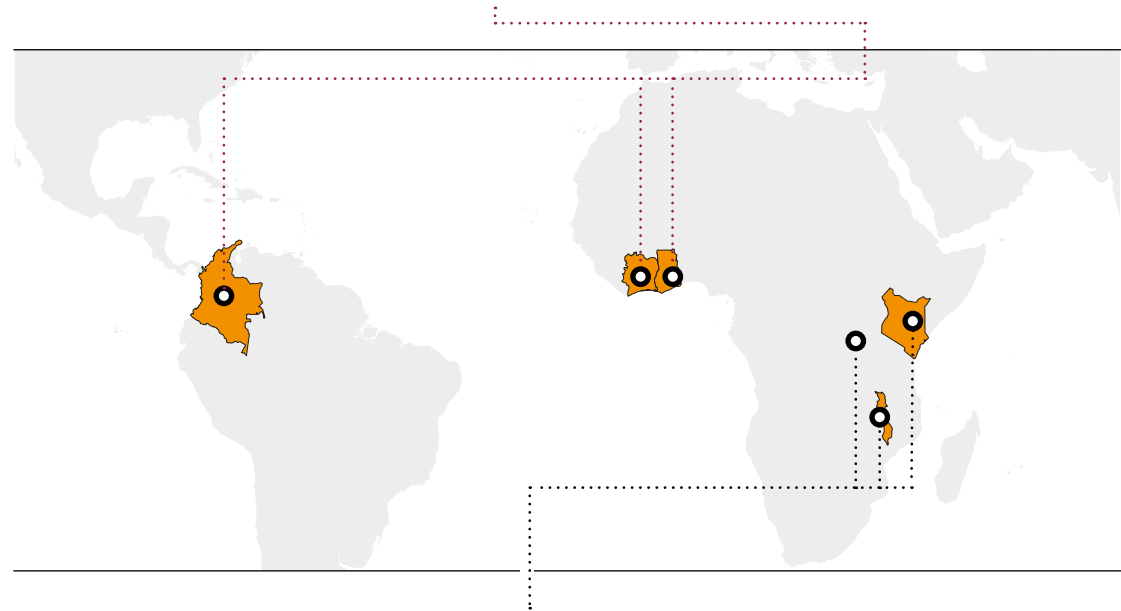
We are working on a refreshed strategy for our raw materials but in the meantime, we know there are risks we should be focusing on. Our activities across a few raw materials are outlined in the following maps:



### Cocoa

Example sourcing countries:  
Ghana, Ivory Coast, Colombia

We are members of the World Cocoa Foundation and the Retailer Cocoa Collaboration to drive positive change on forest protection, sustainable production, farmer livelihoods, community engagement and social inclusion. More information [here](#).



### Tea

Example sourcing countries:  
Kenya, Rwanda, Malawi

We invest heavily in the tea supply chain through Sainsbury's Fairly Traded programme. More information [here](#).

## Bananas

Example sourcing countries:  
Colombia, Dominican Republic,  
Ghana, Cameroon, St Lucia,  
Panama

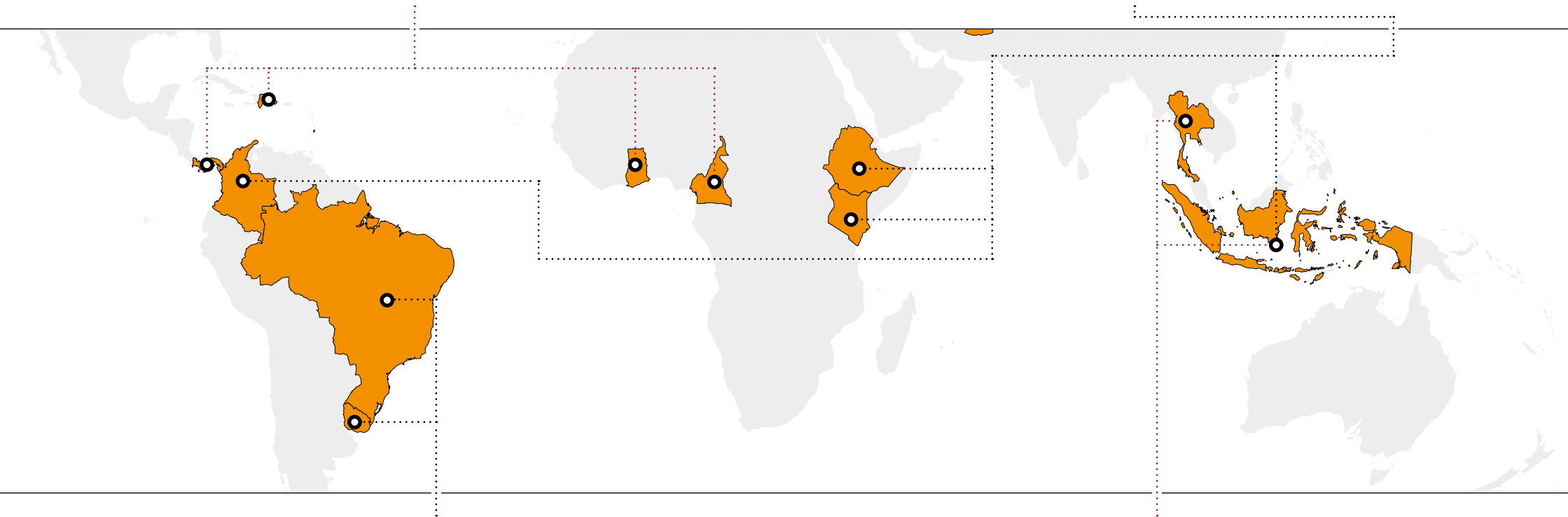
All our bananas are Fairtrade certified. Fairtrade is about better prices, decent working conditions, local sustainability and fairer terms of trade for farmers and workers in the Global South.

## Coffee

Example sourcing countries:  
Colombia, Indonesia, Ethiopia,  
Kenya

We have sold 100% Fairtrade own-brand roast and ground coffee for over ten years and have invested almost \$1 million per year back into the coffee supply chain through the Fairtrade Premium which allows producers to invest in social, environmental or economic projects of their choice.

In 2009, we set up the APECAFEQ sun dried community coffee project in Quinchia, Riseralda in Colombia to enhance the positive impact of our trade. We pay two cents per pound in addition to the Fairtrade Premium, which has enabled further investment in community programmes and productivity increases.



## Corned beef

Example sourcing countries:  
Brazil, Uruguay

We source corned beef for a small number of SKUs indirectly from Brazil and Uruguay.

This year we are also supporting - as part of a group of UK and international supply chain organisations - the development of a geospatial deforestation monitoring capability. Its aim is to enable sustainable commodity sourcing by identifying and communicating broader environmental and social risks within the supply chain, from farmer to customer.

We look forward to sharing further updates on this throughout 2021.

## Fish

Example sourcing countries:  
Thailand, Indonesia

We are members of and contribute to several global sustainable fish initiatives, such as the Issara Institute and Aquaculture Stewardship Council.

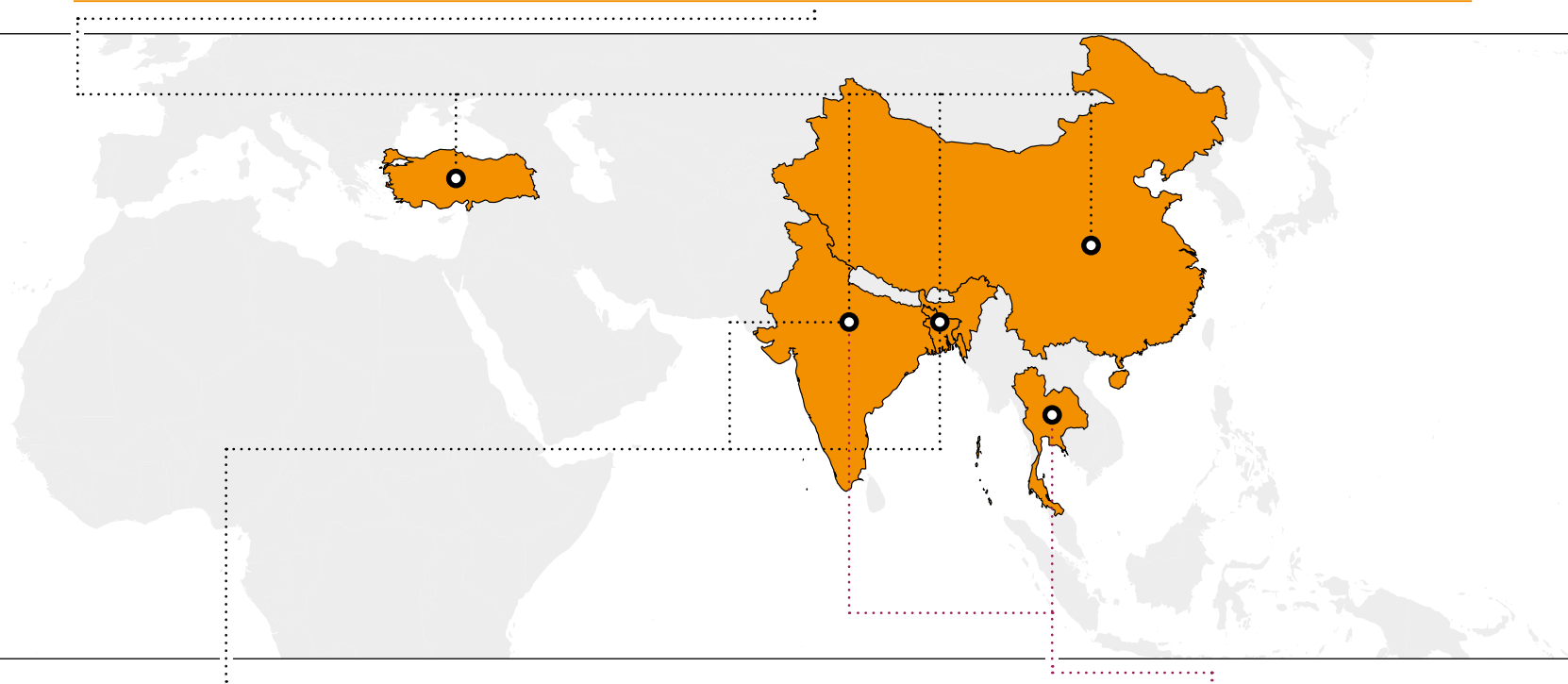


## Manmade cellulosic fibres

Example sourcing countries:  
Bangladesh, India,  
China, Turkey

Cellulosic fibres are typically manufactured from wood pulp. The manufacture of manmade cellulosic fibres often involves the use of highly toxic and corrosive chemicals. The discharge of pollutants into the air and chemicals into waterways can affect the delicate balance of ecosystems and water bodies and harm the health of factory workers and local communities. This year we developed a new policy as a starter to addressing some of these challenges and to ensure our suppliers protect the rights of indigenous peoples and rural communities where forest logging rights are allocated, or plantations developed.

We worked closely with Changing Markets and Canopy to draft our policy and made it publicly available [here](#). Through our traceability efforts, so far, we have identified that five of our direct suppliers account for 50 per cent of the viscose tonnage in our supply chain and they source from either Aditya Birla Group or Lenzing AG. We are committed to continue mapping our supply chain and aim to disclose more detail in future.



## Cotton

Example sourcing countries:  
Bangladesh, India

There are ongoing concerns around the use of government-sponsored forced and child labour in Uzbekistan, Turkmenistan, and the Xinjiang region in China. We committed to the Responsible Sourcing Network's Uzbek and Turkmen Cotton Pledges, to not source from these countries and updated our [Cotton Policy](#) to reflect this. We also acknowledge the difficulties with cotton from the Xinjiang region in China and our policy outlines our focus on gaining greater traceability of our cotton sourcing.

## Precious metals and minerals

Example sourcing countries:  
Thailand, India

We launched a new policy covering high-risk [Precious Metals and Minerals](#) in our electronics, jewellery, and cosmetic supply chains. The policy is based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. It requires suppliers to understand and conform to international sanctions on sourcing certain minerals from particular countries, to track where they source from, declare this to us, increase transparency year on year and ensure they are sourcing from certified sources. Traceability is a requirement for our jewellery and cosmetic suppliers, but as we recognise the difficulty of traceability within the electricals sector, over the coming year, we will instead focus on a deep dive on cobalt with a couple of suppliers.



## The impact of COVID-19

Due to the pandemic, we have been unable to continue some of our normal activities such as visiting suppliers. To ensure we still maintained a good understanding of the risks within our supply base we altered our approach.

For example, our general merchandise and clothing teams have this year put an increased focus on building trusting and transparent relationships with our suppliers putting an emphasis on open dialogue. We have been following up virtually with our suppliers, more frequently than previously, ensuring we open the channel of communication for them to raise any concerns they may be facing. Including concerns from a capacity perspective, ethical standards or concerns related to COVID-19.

This has been an important part of our approach to risk assessment this year because we recognise that, in addition to not having as frequent site visits, the pandemic has put increased pressure on some suppliers and therefore increased the modern slavery risk. For example, some suppliers have operated on a reduced workforce due to capacity constraints, travel restrictions, workforce displacement and local lockdowns whilst at the same time seeing high fluctuations in orders leading to a potential reduction in ethical standards.

In India we carried out an amnesty with our suppliers whereby we gave them an opportunity to come forward with any ethical concerns they were facing through a questionnaire. We made it clear to suppliers any declarations that they made through this questionnaire would not result in any commercial penalty to encourage honest feedback. 38 suppliers responded through the questionnaire and we continued to work with these suppliers to close any concerns.

To ensure that we are maintaining our previous level of due diligence we have also carried out virtual tours of sites in both new

and existing suppliers. This has enabled us to ensure that the level of standard in our sites is being upheld. In addition to this we have worked with Bureau Veritas to carry out some tailored due diligence visits for us in countries where we do not have teams such as Vietnam and Taiwan. These visits were based on our internal visit protocols and gave us visibility of the sites we could not go to ourselves.

## Xinjiang

Last year we reported on the steps our clothing teams were taking following the allegations of forced labour in cotton from Xinjiang, China. Following the recent UK Government announcement of the measures put in place to ensure that British organisations are not complicit in, nor profiting from, the human rights violations in Xinjiang, China we have put an increased focus of examining our supply chain in this region.

We do not directly source any food, GM&C or GNFR own-brand products from Xinjiang and have carried out further mapping work to understand the risk beyond Tier 1. We have asked all suppliers in key risk categories to confirm and declare if they are directly or indirectly sourcing products, ingredients or components from this region. In addition to this we have been working with the Ethical Trading Initiative (ETI), British Retail Consortium (BRC), Food Network for Ethical Trade (FNET) and other stakeholders to try to understand and address the growing concerns.

To understand our supply chain risks more broadly in China we carried out a subcontracting amnesty where we asked our suppliers to declare if they were subcontracting without risk of commercial penalty. As a result of this we identified a number of sites where we had exposure and have since onboarded additional sites that we will continue to use going forwards.





# Due diligence

Informed by our risk assessments, we conduct due diligence across our own operations and supply chain, monitoring for indicators of any form of slavery or human trafficking and checking there are sufficient controls in place.

## Supplier monitoring and compliance

We endorse the efforts of the Association of Professional Social Compliance Auditors (APSCA) to enhance the professionalism, consistency and credibility of independent social compliance audits.

All new Sainsbury's, Argos and Habitat supplier sites require a third-party ethical audit from an approved audit firm. They must meet our minimum requirements before we can place business with them. Existing food supplier sites are regularly audited by third parties according to their risk rating. All existing general merchandise and clothing supplier sites are audited annually.

COVID-19 has impacted our ability to visit suppliers. In normal times, our technologists and supplier audit team regularly visit Sainsbury's suppliers to ensure that our ethical requirements are met and to provide support on issues where required. We carry out additional visits to monitor remediation of critical issues, according to our suppliers' risk rating. The general merchandise and clothing business has dedicated ethical teams and technical teams that carry out on-site visits. Colleagues are based in two locations in the UK and in the four sourcing offices in Asia.

We monitor suppliers through Sedex for food and this year we are in the process of transferring our clothing and general merchandise suppliers to Sedex. This will provide us with greater visibility of all supplier sites in one place, so we can provide better data to our colleagues and monitor suppliers' continuous improvement.

We continue to work with our suppliers to improve their systems and share responsibility with them for labour issues in our supply chain.

For the food business, Sainsbury's dedicated specialists help suppliers build their people management and systems capabilities, which improves outcomes for workers business. This includes supporting new suppliers on gap analysis with our standards, listening to workers to understand what is important to them and supporting root cause analysis and systems thinking. This approach identifies improvement opportunities not traditionally raised during third-party audits, such as better career progression for workers, enhanced management systems and meaningful worker dialogue.

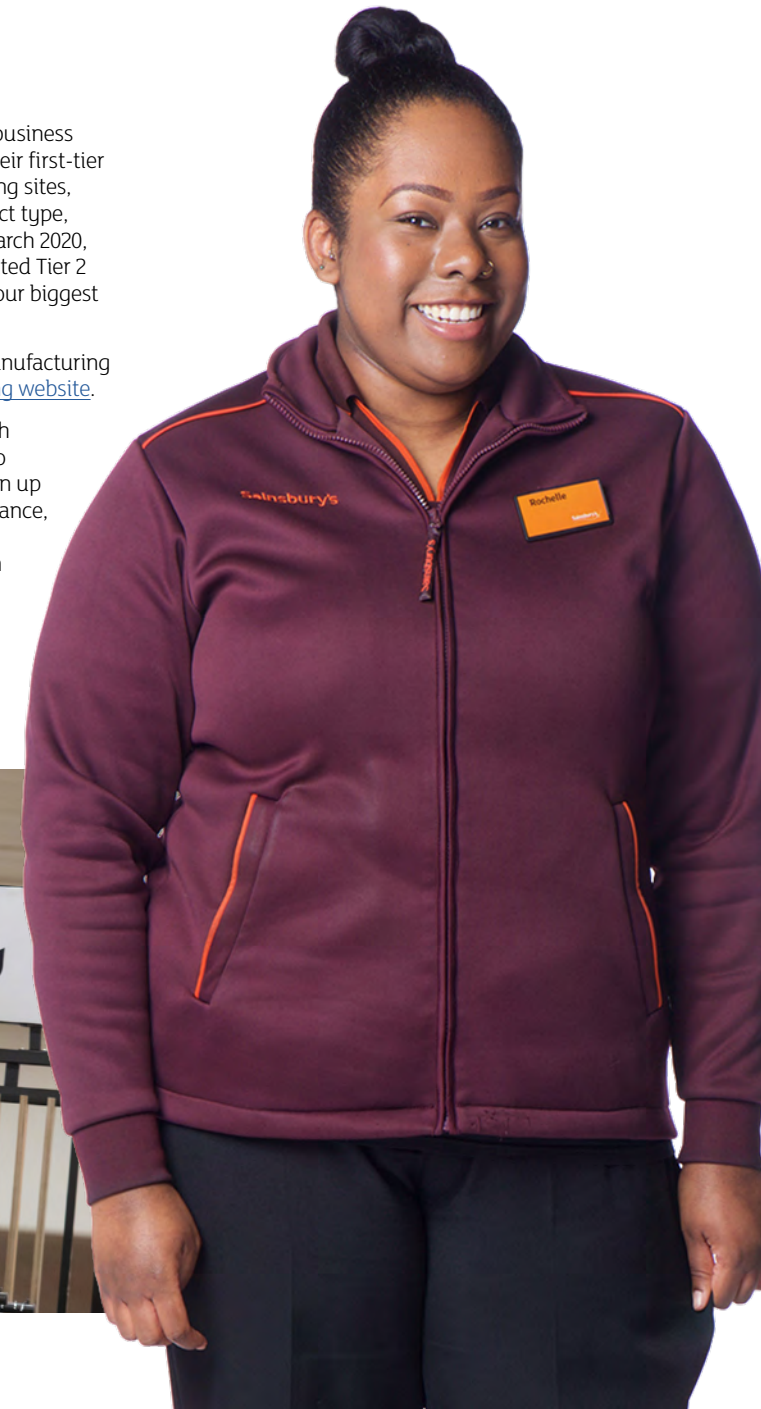
We require suppliers to have policies and systems to manage ethical trade in their own supply chains. This requirement covers topics from how they manage their employees to how they recruit agency workers. Many suppliers have added identifying and eliminating modern slavery to their ethical strategies and activity.

## Transparency

In 2020, the clothing and footwear business published a list of 100 per cent of their first-tier clothing and footwear manufacturing sites, this provided details on sites, product type, worker numbers and location. In March 2020, we published our mapped and audited Tier 2 factories in Turkey, which is one of our biggest sourcing countries.

The full list of our clothing Tier 1 manufacturing sites can be found on our [Tu Clothing website](#).

As more brands and retailers publish their supplier lists, we will be able to identify shared sites, which will open up collaboration opportunities. For instance, partnering with other associated brands and retailers on remediation if a serious incident such as forced labour is identified.



# Advocacy

As we continue to develop our approach to tackling modern slavery, we are increasingly aware of the need to collaborate to find solutions and to advocate for a level playing field for workers. This year we have joined with various industry and multi-stakeholder groups to add our voice to calls to do just that.



## COVID-19 response

Recognising that the impact of the pandemic requires a collaborative industry response, we have endorsed the COVID-19 Call to Action in the garment industry. This means we are working alongside global institutions, NGOs, trade unions and businesses to generate action from across the global garment industry to protect workers' income, health and employment and support employers to survive the crisis, as well as working together to establish sustainable systems of social protection for a more just and resilient garment industry.

## Human Rights Day 2020

We joined with fellow Consumer Goods Forum (CGF) members to celebrate Human Rights Day 2020 (10 December) by taking part in the [#SilenceIsUnacceptable video](#) to launch the Human Rights coalition. Judith Batchelar, Director of Corporate Responsibility & Sustainability and Public Affairs, added her voice to call out the need to act on forced labour now.

## Minimum wages in Tamil Nadu

We recognise there are ongoing concerns in South India and therefore we have been working collaboratively with brands through ETI on the topic. This year we also signed a collective ETI letter to the new minimum wage committee for textile workers in Tamil Nadu setting out recommendations for the review of minimum wages.

## Occupational health and safety as a fundamental right

Modern slavery doesn't occur in a vacuum, poor labour practices can escalate into instances of forced labour including poor health and safety at work. Therefore, in March 2021 we joined other ETI members to urge the International Labour Organisation (ILO) governing body to put into effect the proposals for including safe and healthy working conditions in the ILO's framework of fundamental principles and rights at work.

# Training

All our colleagues and suppliers need to be able to recognise the signs of modern slavery and know what to do if they come across anything that concerns them.

This is about making sure everyone understands their shared responsibility to identify issues and the important role they can play, rather than leaving it to a small group of experts within the company or external stakeholders.



## Upskilling our colleagues

We continue to provide mandatory e-learning on ethical sourcing and modern slavery for Sainsbury's colleagues in relevant areas, including the Food Commercial division. This raises awareness of the 11 signs of forced labour and highlights how our colleagues can help identify and combat this crime.

Our general merchandise and clothing colleagues have an amended version of the modern slavery e-learning module with non-food case studies relevant to their supplier regions. All new colleagues also attend a mandatory training session on our ethical standards, policies and processes, led by a member of our ethical team.

## Upskilling our suppliers

We issued online training to our suppliers this year in the form of an interactive document on Implementing our Ethical Strategy for food suppliers, which 31 individuals from 24 suppliers completed and we issued a supplier e-learning on Modern Slavery which 27 individuals from 20 suppliers completed. This allows all our suppliers around the world to access training and understand our expectations. The two trainings are directed mainly at new suppliers and sites we on-board, but are available to all suppliers. We continue to partner with Stronger Together, a multi-stakeholder business led initiative aiming to reduce modern slavery. Delivering specialist training in identifying and addressing modern slavery, this year reaching 242 supplier participants in the UK, 78 in South Africa and 24 in Spain.



# Key performance indicators

## Here we provide an annual update on our key performance indicators

Monitoring the effectiveness of actions to identify and prevent slavery and human trafficking is a challenge for our entire industry. We collaborate on a range of industry initiatives, more information on these can be found in the collaboration case studies section.

We are in the process of developing our post-2020 Social Sustainability Plan which will include our Net Zero by 2040 commitments, human rights, modern slavery, labour standards approach and performance measures. We will develop a set of performance indicators to track performance and publish these on a regular basis.

## Non-conformances identified through third-party audits

**8**

categorised under the 'employment is freely chosen' clause of our Supplier Code of Conduct. These related to missing or inadequate policies, inappropriate monitoring of toilet breaks, compulsory overtime, and unreasonable recruitment fees.

**33**

categorised under 'no harsh or inhumane treatment' clause of our Supplier Code of Conduct. These related to opportunities to improve grievance and disciplinary policies and procedures, additional training required on these policies as well as instances of poor people management.

**All appropriately followed up and tracked to ensure the issues are remediated.**

## Our suppliers on Stronger Together training

KPI	Total to date	2019/20	2020/21
Suppliers subscribed to progress reporting tool – UK	64	6	15
Number of unique business entities that have been trained – UK	593	65	86
Number of supplier sites that have been trained – UK	832	112	101
Number of individuals who have been trained – UK	1,993	299	242
Suppliers subscribed to progress reporting tool – South Africa	11	0	11
Number of unique business entities that have been trained – South Africa	226	36	61
Number of individuals who have been trained – South Africa	367	87	78
Number of unique business entities that have been trained - Spain	23	-	23
Number of supplier sites that have been trained - Spain	23	-	23
Number of individuals who have been trained - Spain	24	-	24

**96%**

Of all suppliers trained said that it had increased their understanding of what modern slavery is

**72%**

Reported that senior management had made a commitment to tackle slavery in their business and supply chain

**87%**

Stated it has helped them prepare how to manage potential situations of forced labour

These figures are taken from an impact assessment carried out by Stronger Together in 2017. There is another impact assessment scheduled for 2021.



## Our suppliers on Responsible Recruitment Toolkit (RRT) training

KPI	Total to date	2019/20	2020/21
Number of subscribers to the RRT online tool at the 'full' level	94	21	65
Number of RRT training sessions completed	193	91	88
Number of 'Introduction to Responsible Recruitment' training sessions completed	138	73	51
Number of 'Eliminating Worker-Paid Recruitment Fees' training sessions completed	31	18	13
Number of individuals who have taken up at least one RRT benefit	207	-	-
Number of unique business entities who have taken up at least one RRT benefit	131	-	-
Average steps completed on RRT online tool self-assessment	59%	-	-
Average overall progress score on RRT online tool self-assessment	49%	-	-

### 100%

of respondents rated the RRT training as good or excellent (62% rated excellent)

### 98%

of respondents agreed that the RRT training helped them improve their understanding of the topic (45% strongly agreed)

### 100%

of respondents agreed that the RRT training helped them feel confident in taking relevant next steps in their business and/or supply chain (43% strongly agreed)

These figures reflect all responses for the current range of courses offered by the RRT.

## Training our colleagues

This year, 1,108 colleagues completed our modern slavery e-learning module across the business. Colleagues are encouraged to complete this module annually.

In addition, 58 colleagues completed our ethical strategy e-learning module and 108 colleagues completed our ethical sourcing e-learning module this year across the business.

In April 2021, 11 colleagues attended an 'Investigative Interviewing Skills in the Workplace' workshop, delivered by Stronger Together. These were our Ethical Champions, representing each category in food, plus two of our Supplier Assessment Specialists.

## Training our suppliers

This year, 31 individuals from 24 suppliers completed our e-learning module on Implementing our Ethical Strategy and 27 individuals from 20 suppliers completed our Modern Slavery e-learning.

## Partnering with the Issara Institute in Southeast Asia

In-depth consultations with 1,000+ workers in our Thailand supply chain on their working conditions and satisfaction carried out with Issara then worked closely with the employer to action improvement opportunities.

## Respecting human rights through sustainable sourcing

### 99.3%

Of palm oil in our products is certified by the Roundtable on Sustainable Palm Oil (RSPO) standard, which includes social criteria such as respecting the rights of Indigenous Peoples and local communities and respecting workers' rights and conditions within palm oil plantations, including vulnerable groups such as women and children.

### 65%

#### Of timber and paper-based products

are sourced to independent sustainability standards, including international standards for environmental and social sustainability such as the Forest Stewardship Council® (FSC®), which states: "There is an extensive due diligence process to ensure that slavery and human trafficking is not part of the production process of FSC®-certified products".

### 89%

Of the cotton for our clothing and general merchandise is sourced more sustainably through the Better Cotton Initiative (BCI), up from 76 per cent in 2019/20. As well as water and pesticide savings, an estimated €2.8 million additional profit benefitted BCI farmers in 2020 thanks to our sourcing of Better Cotton. BCI Farmers experience profit increases for a variety of reasons, most commonly due to increased yields and/or optimised use of inputs (such as irrigation water, pesticides, or synthetic fertiliser). BCI empowers farmers to implement the International Labour Organisation's principles of decent work.







## Workforce Disclosure Initiative score improvement

There are too many poor quality and precarious jobs around the world. The United Nations recognised this in the 2015 Sustainable Development Goals. Goal 8 calls for 'decent work for all' and this goal also includes the eradication of forced labour. [The Workforce Disclosure Initiative \(WDI\)](#) mobilises investors to push for better jobs. The first step is to make sure companies disclose comparable workforce information. Investors can then use this data to engage with companies and drive a race to the top.

The WDI brings investors together to request comparable data from companies via an annual survey. Its ultimate goal is to improve the quality of jobs in multinational companies' operations and supply chains.

We have taken part in the WDI survey since its inception in 2017 and submitted responses for 2020 again.

This year we improved our disclosure score and were in the top 10% of most complete responses.

WDI held the inaugural WDI awards this year where we gained a special mention for our COVID-19 response and won the award for our Supply Chain Disclosures.



# Sainsbury's case studies

## Actions in our own operations

### Policy and self-assessment questionnaire

Since 2017, our activities in this area have improved year on year. We started by developing our Sustainable Sourcing Policy and in July 2019 we piloted new sustainability questions in our holistic Supplier Self-Assessment Questionnaire (SAQ). During this year we have also extended the SAQ to include additional questions relating to contingency workforce.

We initially rolled out a risk-based approach, gathering data on higher risk categories based on factors indicated by external advice and we now continue to roll out the SAQ to all goods and services not for resale (GNFR) suppliers with annual spend above £100,000. Throughout this year we have been focusing on gathering data across the supply chain where suppliers have been willing to provide the information. The current SAQ coverage is 52 per cent of all GNFR spend with suppliers above £100,000 annual spend.

### Key areas of focus for 2021

Going forward, we will look to embed supplier assurance closer into our ways of working and make it mandatory for suppliers to provide us with the relevant data in order to do business for us. The approach of further embedding the supplier assurance process into our ways of working is in line with the recommendations from a third-party audit report conducted by a large reputable auditor. As part of the roadmap for the coming year, we will therefore look to embed the assurance process further and explore how potentially a third party could help

manage the administration and verification of the process. As we embed the SAQ more firmly in the GNFR procurement framework we will gather additional visibility of our contingent workforce, which is a key focus area for 2021.

### Next steps

We will assess responses from suppliers in our GNFR supplier questionnaires and engage suppliers in how to effectively manage and reduce risks identified. We are looking to further embed the supplier questionnaires in the ways of working and potentially obtain third party support in the administration of the process.

## In our food supply chain

### The complexity of modern slavery

Last year we reported on the impact of Operation Fort in our supply chain and the actions our produce supplier, G's Fresh has taken because of this, including hosting an industry event called 'working together to prevent modern slavery' with the Independent Anti-Slavery Commissioner (IASC).

In June 2020, our Director of Corporate Responsibility & Sustainability and Public Affairs, Judith Batchelar, was invited to speak on a panel hosted by Dame Sara Thornton, the Independent Anti-Slavery Commissioner for the launch of her in-depth review on Operation Fort and the launch of the IASC maturity matrix. As the review focused on what businesses should learn from the UK's largest anti-slavery prosecution, we shared the report with our suppliers and encouraged them to rate their modern slavery

strategy against the IASC maturity framework.

One of the other developments to come out of Operation Fort is the formation of the Modern Slavery Intelligence Network (MSIN).

Led by G's Fresh, the MSIN is a non-profit collaboration between a limited membership of supermarkets and large food and fresh produce processors.

Their purpose is to develop and trial a structured intelligence sharing mechanism between their members which will enhance the effectiveness of their contribution to the disruption of modern slavery and labour exploitation practices, in particular:

- Protect workers from exploitation
- Prevent and disrupt worker exploitation in their supply chains
- Prepare systems against identified trends

Companies within the food sector routinely come across intelligence which suggests modern slavery, in line with their obligations, report it to the relevant authorities. Some of this intelligence is sufficient to lead to further action, and some is not – either because it is unsubstantiated, or relates to behaviour which, while exploitative, does not clearly constitute a criminal act such as modern slavery as defined.

The rationale for forming an information sharing mechanism between the private company members of the MSIN is twofold. In some cases unsubstantiated evidence may not be actionable by investigative authorities on its own, but may be when collated from multiple sources. Secondly, although practices may not fall within the remit of a statutory investigative authority, it will empower members of the MSIN to take any action deemed appropriate to combat identified risks of worker exploitation.

MSIN is currently undertaking an 18-month pilot, which will include discussions with key

stakeholders. At the end of the pilot, a review of the impact and effectiveness will be undertaken prior to determining future actions or plans.

## In our non-food supply chain

### Worker voice

This year we have piloted a worker interview assessment to understand workers' perspectives on their recruitment and employment journeys. We worked with a third party, Ulula, to roll out a remote survey across 21 of our factories across general merchandise and clothing. This pilot has enabled us to gather direct worker feedback through interactive voice response (IVR) and web surveys on working conditions at factory level. The results have been analysed and suppliers provided with individual reports for their review. This includes a breakdown of all the results with aggregations by gender and migration. We are supporting our suppliers with action plans and feedback loops to workers, and we will rerun the survey to measure the impact of these action plans. We will be able to share more on this as the pilot concludes during the next financial year, however, here are some findings from our first survey round in our non-food Indian factories;

- 21 factories across general merchandise and clothing
- 3,974 workers responded to the survey
- 61 per cent responded via web survey and 39 per cent via IVR
- The three areas identified as opportunities for the biggest improvement were anxiety and stress, freedom of movement and forced overtime.



# Collaboration case studies

We believe collective action is the only way to tackle global challenges at the speed and scale required. Here are some of our current collaborations.



## Vulnerable Supply Chains Facility (VSCF) Project

### - Africa food

To support vulnerable supply chains throughout COVID-19, we have co-funded and supported two projects through the Ethical Trade Initiative (ETI) under the Foreign, Commonwealth and Development Office Vulnerable Supply Chains Facility Project<sup>1</sup>. In East and Southern Africa, we nominated two of our suppliers in the coffee and herb sector in Kenya to be part of the project. The aim of the project was to provide immediate assistance to suppliers and their workers badly impacted by the pandemic, to support producers and selected suppliers to improve their resilience against future shocks and to contribute practical knowledge on impactful ways to implement decent work within the context of COVID-19. By working with Partner Africa, our suppliers and their workers have received relief and training such as: provision of vegetable seeds for female smallholder farmers to establish kitchen gardens; training for workers / smallholders on COVID-19 awareness and prevention; training for management on COVID-19 outbreak control and management, as well as the provision of tools and resources; training and mentorship for management to develop business continuity plans, to support their resilience to future shocks.

## Vulnerable Supply Chains Facility (VSCF) Project

### - Bangladesh non-food

In Bangladesh the VSCF project focused on a tablet-based Occupational Health and Safety (OHS) and COVID-19 awareness training for both workers and management in Bangladesh. It was managed by the ETI in collaboration with the seven corporate partners; Sainsbury's, Primark, New Look, Marks & Spencer, Tesco, Dimensions and Arco. Across all brands, 20 suppliers were nominated; six of which are Sainsbury's suppliers. The course is divided into three separate modules; health and safety, fire and building safety, and COVID-19. The target is to provide this training to over 25,500 workers.

## Best Corporation (Best Corp),

### - India

Following a report carried out by Transparentem, into the working conditions in factories that are part of the Best Corp Group in South India, we have collaborated with a number of other brands on remediation. In collaboration with the other brands, we have investigated the allegations and worked with the factory to put remediation in place. The Brand Group then asked independent third-party, ELEVATE, to conduct an independent and comprehensive assessment to validate the effectiveness of the corrective actions

being taken by Best Corporation. We have seen improvement across a number of areas including restriction of movement. We will continue to work with the factory for further improvements and in addition they have been part of our worker voice pilot.

## Food Network for Ethical Trade (FNET)

### - supporting suppliers through COVID-19

We continue to be active members of FNET which is a supplier-led initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in global food supply chain working conditions by providing guidance, resources, training, and opportunities for collaboration.

As part of our COVID-19 response we worked with other retailer members of FNET to co-sponsor a series of eight webinars dealing with COVID-19 and the impact on workers. The webinars were supported by the Association of Labour Providers and nGaje.

The supplier webinar series reached 3,993 participants in 55 countries. An average 99 per cent of participants, who took part in the polls at the end of each webinar, stated that they had been useful. Feedback from the webinar surveys reinforces the intended unique selling point of the webinars which has been the provision of practical case studies and the sharing of best practice between food suppliers, growers, and farmers.

1. The Vulnerable Supply Chains Facility (VSCF) is a rapid COVID-19 response facility set up by the UK Foreign, Commonwealth and Development Office (FCDO), and managed by Mott MacDonald Ltd. The Facility partners with 20 UK and international retailers and brands, and nine not-for-profit organisations, supporting over 100 suppliers across Bangladesh, Ethiopia, Ghana, Kenya, Myanmar, Tanzania, and Zimbabwe. It will provide economic, social, and health benefits to around 1 million women and men directly and indirectly.

## Topics included:

- Webinar 1: Managing labour responsibly (8 April)
- Webinar 2: On-site health and safety management, accommodation, and transport (9 April)
- Webinar 3: Furloughing staff responsibly and managing absence during the crisis (23 April) for a UK specific audience of food producers, growers, and farmers.
- Webinar 4: Economic impact of COVID-19 on businesses and workers - sick pay, social protection, and longer-term provisions (30 April) intended for a global and UK food producer, grower, and farmer audience.
- Webinar 5 & 6: Engaging and supporting workers through anxious times (6 and 7 May) intended for a UK food producer, grower, and farmers audience.
- Webinar 7: Coming out of lockdown – what every business needs to know (19 May)
- Webinar 8: Managing recruitment and labour exploitation risks in light of COVID-19 (26 May) intended for a global and UK food producer, grower, and farmer audience.

The same group also ran a further two webinars on COVID-19 Winter Response in September as well as launching a [website](#) with useful guidance.

## Leading with The Consumer Goods Forum (CGF)

Simon Roberts, our Chief Executive Officer continued in the role of Retailer College Co-Sponsor for The Consumer Goods Forum's Sustainable Supply Chain Initiative (SSCI) in our 2020/21 financial year, covering issues including human rights.

We are active members on the Steering Committees for the CGF Sustainable Supply Chain Initiative (SSCI) to ensure that major social compliance schemes meet minimum customer requirements on issues such as forced labour and recruitment fees. With the overarching framework developed, this year we focussed on developing benchmarks for primary production and at sea operations.



The CGF officially launched the Human Rights Coalition (HRC) of action on Human Rights Day 2020. We are proud to be members of this coalition working to advance the CGF Forced Labour Resolution and its Priority Industry Principles in alignment with the UN Guiding Principles on Business and Human Rights. We will drive individual and collective action in our businesses and supply chains to:

- Implement Human Rights Due Diligence (HRDD) systems focused on targeting forced labour risk in our own operations, and support the deployment of this approach in the collective identified priority supply chain, palm oil
- Support responsible recruitment markets notably to address core drivers of forced labour both within own operations and with a geographical focus of southeast Asia
- Support a focused movement with all relevant stakeholders to jointly expedite the elimination of forced labour

### Coalition member commitments

1. Establish and deploy HRDD systems in our own operations with the aim of reaching 100 per cent coverage by 2025.
2. Activate pre-competitive practices (e.g. roundtable discussions and open-source training materials) to support responsible recruitment markets using the leverage

of our own operations and collective engagement in selected geographies / commodities by 2025.

3. Collaborate with selected suppliers starting with palm oil supply chains to develop and deploy HRDD systems from the refinery to the plantation level by 2023.
4. Engage relevant stakeholders to enable the adoption and enforcement of measures with governments to eliminate forced labour.
5. Act with relevant industry, multi-stakeholder groups and inter-governmental organisations to enhance cooperation and share information and resource openly.
6. Support transparency and disclosure efforts on risks and challenges in addressing forced labour within own operations and associated with supply chains.

### Coalition achievements

1. Launch of Priority Industry Principles (PIPs).
  - Every worker should have freedom of movement.
  - No worker should pay for a job.
  - No worker should be indebted or coerced to work.
2. HRC official launch on International Human Rights Day 2020 – [#SilenceisUnacceptable video](#).
3. Published its Forced Labour-focused Human Rights Due Diligence in Own Operations Maturity Journey Framework, March 2021.

## Protecting car wash workers

The police believe that many car washes in the UK may be operating irregularly. Whilst this may relate to forms of non-compliance with regulation, such as planning, there may be other breaches and offences across environment and labour laws, which may include in some cases, cases of worker exploitation and slavery. We aim to ensure the car wash companies we provide licences to in our car parks and petrol forecourts operate to the highest possible standards, and then to roll out this best practice to the rest of the industry.

We are particularly proud of our achievements in the UK car wash industry this year. Together with other retailers, we reignited an Industry Stakeholder Group with the Responsible Car Wash Scheme which received funding from the Home Office to develop and pilot a blueprint for a national industry accreditation scheme for hand car washes to raise regulatory compliance across the car wash sector. This blueprint will take the form of a pilot in four different local authorities and be active from March to July 2021. The Responsible Car Wash Scheme will work with the Gangmasters and Labour Abuse Authority and other regulatory bodies throughout the pilot. This multi-agency approach, implemented at local council level, will also provide valuable insight into how a Single Enforcement Body, currently being considered by Government may operate, and engage with different stakeholders to ensure the protection of workers' rights. We will report findings next year.





## Partnering with the Issara Institute in Southeast Asia

We continue to partner with Issara Institute, to tackle forced labour and human trafficking in Southeast Asia, through worker voice, data, technology, partnership and innovation.

Over 33,000 workers in our Thailand supply chain have access to Issara Institute's independent worker voice channels, which aim to improve working conditions and strengthen supplier systems and responsible recruitment. Approximately 72 per cent of these workers are foreign migrant workers.

In our Thailand supply chain, Issara is directly working with seven primary processing facilities and businesses in their upstream supply chain. In 2021 we seek to have greater worker voice coverage among our supplier base, although the COVID-19 situation is impacting direct in-person engagement with workers. In this environment, Issara's independent worker voice channels are more active than ever, and worker outreach and empowerment is focusing more on digital communications and support through Issara's independent helpline, Golden Dreams migrant worker app, closed Facebook chats as well as Line and Viber messaging.

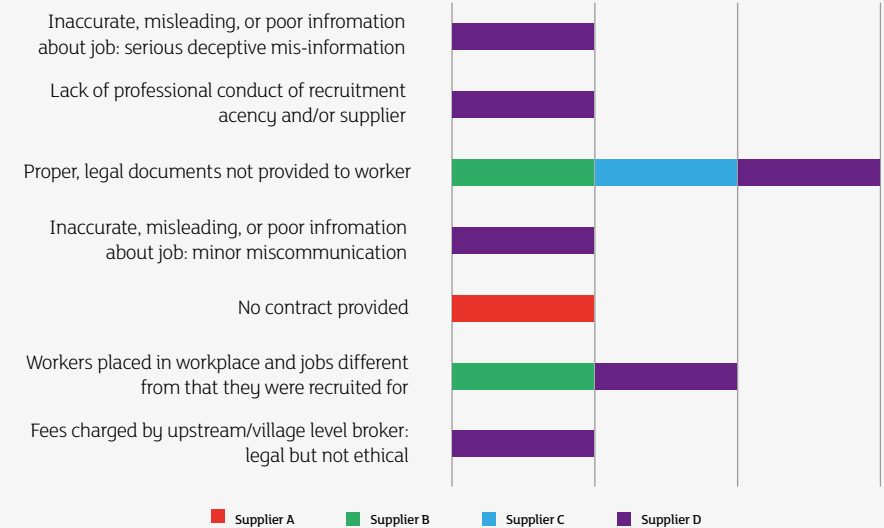
Building on previous research on the Myanmar-Thailand recruitment corridor, Issara continues to work with Sainsbury's suppliers in its Ethical Recruitment programme. This brings together companies and their recruitment agencies to improve recruitment practices and reduce recruitment costs for jobseekers, working closely with local civil society to empower jobseekers and disrupt informal brokers in recruitment systems. The vast majority of foreign migrant workers in Sainsbury's Thailand supply chain come from Myanmar. However, during 2020/21, COVID-19 caused the closure of the Myanmar-Thailand recruitment channel.

There was no formal cross-border recruitment in Sainsbury's Thailand supply chain during this period, compared to the previous reporting period of over 6,500 foreign migrant workers entering Thailand from Myanmar via the formal Memorandum of Understanding (MOU) channel, from 11 different origin country recruitment agencies. Nonetheless, recruitment issues for workers already working at facilities were still uncovered in four of the seven sites and addressed during this period.

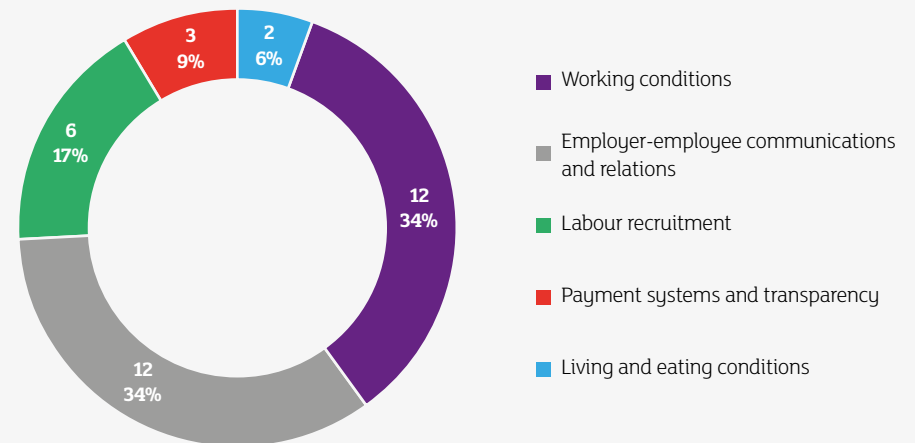
Improving working conditions is a high priority for Sainsbury's. Our collaboration with Issara and their work with our suppliers enables over 33,000 workers to have access to Issara's worker voice channels and remediation support for grievances raised, also helping suppliers to advance their internal capacity to handle grievances. During the reporting period of 7 March 2020 to 6 March 2021, Issara hotline alone received over 1,000 calls from these seven facilities, ranging from general queries, to ethical but not illegal issues, to more serious labour grievances. The latter included 35 serious worker-reported labour violations, covering: working conditions (12); employer-employee communications and relations (12); labour recruitment (6); payment systems and transparency (3); and living and eating conditions (2).

Through collaboration and support of worker voice, working conditions became more transparent and suppliers are better positioned to effectively carry out their own policies and Sainsbury's supplier standards for responsible sourcing.

### Labour Recruitment



### Labour Issues, By Category



# Looking forward



## Next steps

We recognise there is still a long way to go to tackle labour exploitation in our own operations and supply chains. We will take the following steps to keep moving this agenda forward:

- Finalise our beyond-2020 strategy for human rights including modern slavery, and design and set targets and KPIs to track performance. Decide reporting formats and incorporate into our broader CR&S agenda
- Begin assessment of own operations against CGF HRC due diligence framework
- Roll out mandatory completion of goods and services not for resale questionnaire
- Assess responses from suppliers in our goods and services not for resale supplier questionnaires and engage suppliers in how to effectively manage and reduce risks identified
- Restart programmes paused due to COVID-19 such as our women's empowerment project in India and Bangladesh and capture impact
- Publish our human rights impact assessments by 2022
- Take lessons and outcomes from our collaborative work on responsible recruitment and implement this more widely in our operations and supply chains
- Continue to support the Responsible Car Wash Scheme to develop strategy and implement improvements in car washes on our estates
- Engage with and support the Modern Slavery Intelligence Network


## More broad areas of work will include:







- Build on our materiality study to inform a data-led approach to risk assessment to help prioritise future workstreams based on our ability to influence and act – an approach that balances people, place, product, risk and influence
- Update our modern slavery training materials for colleagues and suppliers
- Define a set of performance indicators for the business to measure performance and show improvement in human rights due diligence
- Promote grievance and worker voice mechanisms so workers can better raise grievances and seek remedy to protect themselves
- Identify partnerships that facilitate training for workers on their rights and provide remedy








# Collaboration overview






We have a strong track record of partnering to help address global challenges and drive change in our supply chains. Here is an overview of some of our collaborative work this year.

Partner	Project / Initiative	Purpose
<b>Bangladesh Accord</b> 	Accord on Fire and Building Safety in Bangladesh	The Accord is an independent, legally binding agreement between brands and trade unions to work towards a safe and healthy Bangladeshi Ready-Made Garment Industry. Its purpose is to enable a working environment in which no worker needs to fear fires, building collapses, or other accidents that could be prevented with reasonable health and safety measures. Sainsbury's has been a member of the Accord since it launched in 2013.
<b>Aquaculture Stewardship Council</b> 		The Aquaculture Stewardship Council (ASC) is an independent, international non-profit organisation that manages the world's leading certification and labelling programme for responsible aquaculture. We have supported the ASC since its inception in 2010 and have been Board members since 2018.
<b>British Retail Consortium</b> 	Ethical Labour Working Group	As members of this Group, we share best practice with UK retailers on tackling modern slavery, the responsible use of labour providers and other topics related to the human rights of workers in our supply chains.
<b>Better Cotton Initiative</b> 		The Better Cotton Initiative exists to make global cotton production better for the people who produce it, better for the environment it grows in and better for the sector's future, by developing Better Cotton as a sustainable mainstream commodity. Through BCI and its Partners, farmers receive training on how to use water efficiently, care for the health of the soil and natural habitats, reduce use of the most harmful chemicals and apply decent work principles.
<b>The Consumer Goods Forum</b> 	Sustainable Supply Chain Initiative (SSCI)  Human Rights Coalition of Action – Working to End Forced Labour and Forced Labour Priority Industry Principles	We are active members of The Consumer Goods Forum (CGF) Sustainable Supply Chain Initiative (SSCI), a global benchmarking initiative for third-party audit and certification programmes. We contribute to the Social and Management Criteria Technical Working Group and the Steering Committee.  Through our policies and practices, we also support the CGF's Human Rights Coalition – Working to End Forced Labour and Forced Labour Priority Industry Principles, tackling three of the most problematic employment practices that can lead to forced labour and deploying a collectively developed HRDD framework to address forced labour in our own operations, and palm oil supply chains.

Partner	Project / Initiative	Purpose
Food Network for Ethical Trade		Being members of the Food Network for Ethical Trade enables us to work alongside 55 suppliers and retailers 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.
The Forest Stewardship Council®		The Forest Stewardship Council® helps take care of forests and the people and wildlife who call them home. This includes respecting the rights of workers, communities and indigenous peoples and ensuring that slavery and human trafficking are not part of the production process of FSC®-certified products.
Ethical Trading Initiative	 For workers' rights. For better business.	<p>Italian Produce Modern Slavery</p> <p>Peru</p> <p>India</p> <p>We are founding members of the Ethical Trading Initiative (ETI), working closely with suppliers, non-profit organisations and unions to develop innovative responses to worker exploitation and forced labour.</p> <p>We participate in a number of ETI working groups focusing on particular supply chains where there are opportunities to improve working conditions through collaboration.</p>
Gangmasters and Labour Abuse Authority		We partner with the Gangmasters and Labour Abuse Authority, sharing intelligence and supporting the GLAA to identify and protect vulnerable and exploited workers.
Issara Institute		<p>Strategic Partners Program</p> <p>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.</p> <p>Sainsbury's has been a member of the Issara Strategic Partners Program since its inception in 2014.</p>
Responsible Car Wash Scheme		We are founding members of the Responsible Car Wash Scheme to protect vulnerable workers in the UK's hand car wash businesses.



Partner	Project / Initiative		Purpose
Responsible Recruitment Toolkit			We are founding sponsors of the Responsible Recruitment Toolkit, providing access to guidance and training to our suppliers and their labour providers, as part of our efforts to ensure responsible recruitment in our supply chains.
Retailer Cocoa Collaboration			The Retailer Cocoa Collaboration has a membership of 10 retailers and aims to be a pre-competitive group that supports existing industry efforts to drive environmental and social improvements in the cocoa sector. The principle activity is the Annual Trader Assessment which is a robust process to assess major cocoa traders on their sustainability progress across topics such as deforestation, traceability, gender equality, farmer incomes and child and forced labour. More information <a href="#">here</a> .
Seafish		Seafood Ethics Common Language Group	Through Seafish, we collaborate with stakeholders in the seafood supply chain on initiatives that respond to concerns regarding unethical practices within the global seafood market.
Seafood Ethics Action Alliance			We participate in the Seafood Ethics Action Alliance, which provides a platform for businesses to work together to share information on emerging issues and agree solutions.
Sedex		Stakeholder Forum	We actively engage with Sedex to develop industry tools and we use their platform to risk assess our suppliers, manage their social audits and non-compliances.

Partner	Project / Initiative	Purpose
Spanish suppliers and UK retailers	 <p>Foros Comercio Ético Ethical Trade Forums</p>	Spanish Supplier Ethical Trade Forums
Stronger Together	 <p>stronger together building modern slavery in supply chains</p>	Spanish Supplier Ethical Trade Forums
Unseen	 <p>unseen</p>	Spanish Supplier Ethical Trade Forums
World Banana Forum	 <p>WORLD BANANA FORUM WBF</p>	Spanish Supplier Ethical Trade Forums
World Cocoa Foundation	 <p>World Cocoa Foundation</p>	Cocoa & Forests Initiative

We participate in 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.

We are project sponsors of Stronger Together, a multi-stakeholder business-led initiative aiming to reduce modern slavery, particularly forced labour, labour trafficking and other hidden third-party exploitation of workers.

Sainsbury's supports the UK's Modern Slavery Helpline which is a free, independent and confidential service, operated by Unseen, available 24/7. Our partnership and membership of Unseen's Business Portal gives us access to intelligence on modern slavery and exploitation reports linked to either our own operations or supply chain in the UK (where this is appropriate). We also receive anonymised information about other appropriate cases reported through the helpline related to our sector. 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.

We are members of the World Banana Forum, which brings together stakeholders in the global banana supply chain to work towards consensus on best practices for sustainable production and trade.

The World Cocoa Foundation provides a platform for us to work with cocoa and chocolate companies, non-governmental organisations and governments on challenges facing the cocoa sector to achieve a thriving and sustainable cocoa sector, where farmers prosper, communities are empowered, and the planet is healthy. More information [here](#).