

Modern Slavery Statement 2022/23

Wm Morrison Supermarkets Limited

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, and covers our activity during the period from 31/10/2022 to 29/10/2023. This statement was approved by the Risk Committee of Wm Morrison Supermarkets Limited on 18/04/2024.

Our modern slavery statement also covers activity at the following wholly-owned subsidiaries: Chippindale Foods Ltd, Falfish (Holdings) Ltd, Farmers Boy Ltd, Flower World Ltd, International Seafoods Ltd, Lowlands Nursery Ltd, Neerock Ltd, Rathbone Kear Ltd, Safeway (Overseas) Ltd, Safeway Stores Ltd, Safeway Ltd, Wm Morrison Growers Ltd and Wm Morrison Produce Ltd.

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1. Introduction

Morrison's is a unique business. We are a food maker and shopkeeper with stores and manufacturing sites across Britain supported by local and global supply chains. We are committed to addressing the risk of modern slavery throughout our operations and are focused on ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces.

Our seventh Modern Slavery Statement provides detail on our ongoing work to deliver on this, including how we identify and address modern slavery and labour exploitation risk in our business and supply chains, whilst enhancing our ability to support positive outcomes for victims.

Strong supplier relationships based on mutual trust and respect remain at the heart of this activity and underpin our work to address modern slavery risk. We are also committed to maximising our leverage through collective action, and have built on this further in the past year by forging partnerships to drive meaningful change.

We will continue to develop our approach throughout 2024 and beyond, building our resilience to modern slavery risk and increasing the training and support we provide for our colleagues and suppliers.



Rami Baitieh,
Chief Executive

Highlights of our 2022/2023 activity included:

Recognised as Bright Future's most successful partner after providing further placements for modern slavery survivors

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Completed human rights impact assessments in higher risk supply chains

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Streamlined our Modern Slavery Partnership & Prevention Plans across our business operations

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Supported the establishment of the Seasonal Worker Scheme Taskforce

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Conducted more dialogue-based factory improvement visits in higher risk sourcing locations

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Modern slavery training and briefings accessed by more than 10,000 colleagues across Manufacturing and Logistics

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2. Governance & Oversight

We maintain a robust and effective governance structure to assess and address risk across our Group operations.

The Risk Committee, which includes executive board representation, oversees implementation of Group policy and the monitoring of compliance with ethical standards and programme governance. This covers our commitments on tackling modern slavery in addition to managing broader human rights risk in our business and supply chains. The committee meets on a regular basis, and includes two specific updates per year on our activity to address modern slavery risk.

Management of the modern slavery programme in our supply chains is overseen by our Corporate Affairs Director and implemented by the Morrisons Ethical Trading team, in collaboration with colleagues from all relevant internal departments.

Activity in our own operations continues to be directed by our Modern Slavery Steering Group.

This group ensures that effective controls are in place to support the delivery of our programme across five key areas:

- Regulatory Compliance
- Operations
- Training
- Incident Management
- Remediation & Survivor Support

The group continues to meet on a quarterly basis, and is chaired by our People Director for Resourcing, Talent, Learning & Development, with representation from Loss Prevention, People, Training, Employee Relations, Operations, Business Continuity, Procurement and Corporate Affairs.

Additional executive-level governance of our human rights strategy is delivered through our ESG programme - Sustain. This programme aims to ensure that the company delivers its ambitions of achieving sustainable growth with a positive supply chain impact and plays its full part supporting the communities we serve.

A senior-level Sustain Group meets regularly and reports against progress on key targets across eight workstreams to a sub-committee of the Executive Committee. The Sustain Executive Sub-Committee has operational responsibility for ensuring human rights are respected, and our agreed objectives are delivered. The Committee is chaired by our Group Commercial Director.



3. Structure, Business & Supply Chains

Morrison's is a 'vertically integrated' business: a major UK supermarket and significant food manufacturer employing more than 100,000 colleagues. We have 497 supermarkets and a growing convenience business following our acquisition of McColl's in 2022. In addition to our head office in Bradford, we have centrally controlled satellite offices for our Nutmeg clothing business in Coalville (Leicestershire), and our Global Sourcing operations in Hong Kong. We also operate a significant wholesale business and supply retail outlets across the UK.

Food remains at our heart, and our focus on fresh food is supported by our 'farm to fork' business model. We buy many of our fresh products directly from farmers and fishers, process through our own manufacturing sites and abattoirs, and distribute through our own network.

This gives us more control over the provenance and quality of the food we sell in our stores. Our position as both food makers and shopkeepers gives us unique insight into the risks and issues associated with both.

We are a major fresh food manufacturer, with 18 sites making a wide range of products including bread, flowers and plants, seafood, fresh fruit and veg, chilled foods and meat products. We also operate distribution centres at locations throughout the UK, and together our Manufacturing and Logistics sites employ over 15,000 people.

A third of our tier one, own brand supply chain is now based in the UK and a significant proportion of the fresh food in our stores is produced in our own factories. Outside of our vertically integrated supply model, most of our business relationships are operated indirectly through a UK or EU-based primary supplier, with the exception of goods purchased through our Global Sourcing team in Hong Kong where we predominantly deal directly with manufacturers. Our ethical compliance monitoring programme currently covers 1,524 tier one factories and processing locations in 59 countries, employing over 620,000 workers.

Since 2021, we have expanded our programme to map primary ingredient suppliers into our own manufacturing sites and increase visibility in the lower tiers of our Fresh Produce supply chains. Ingredient suppliers to Morrison's Manufacturing are required to join the Supplier Ethical Data Exchange (Sedex), register all tier one sites of employment supplying into Morrison's Manufacturing, and complete a detailed self-assessment questionnaire (SAQ). Over 75% of these suppliers are now compliant, which is up from 70% in 2021/22.

Supply Chain Transparency

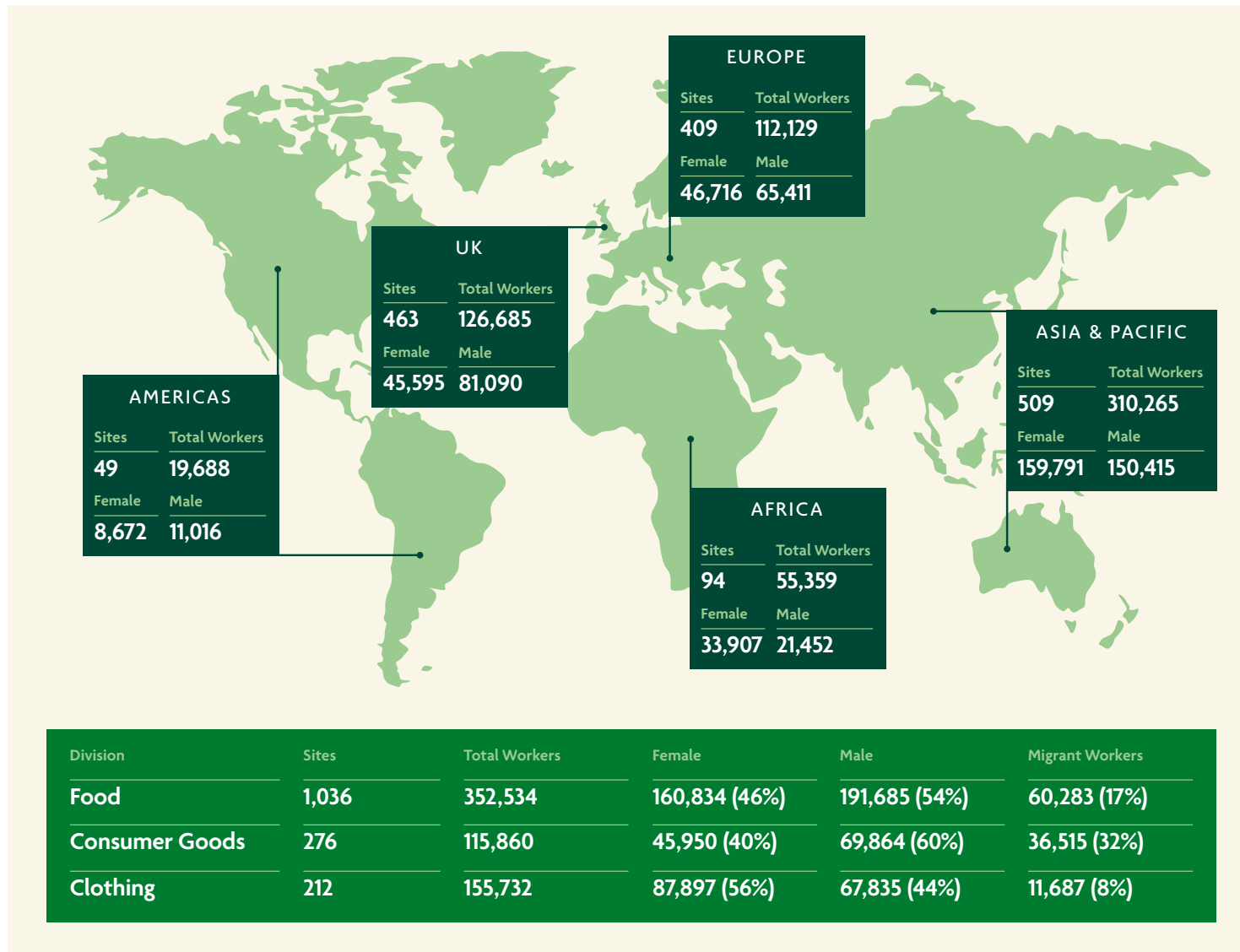
We remain committed to increasing transparency in our supply chains and achieved compliance with the Ethical Trading Initiative (ETI) Corporate Transparency Framework commitment in the first year of reporting. We first published details of our tier one, own brand factory base in April 2020 and continue to update this annually. The latest version, which includes a breakdown of gender data and whether workers have access to representation, either through a trade union or worker committee, can be found [here](#).



Garments and Apparel

Our Nutmeg supply chain is published on the Open Supply Hub site and updated on a bi-annual basis. This includes details of all our tier one manufacturing sites, which together produced over 31 million items of Nutmeg clothing in the 2022/23 reporting period.

3. Structure, Business & Supply Chains Continued



4. Our Policies Related to Modern Slavery & Human Trafficking

We are committed to ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces. Our approach is informed by the United Nations Guiding Principles on Business and Human Rights and underpinned by the principles of the Universal Declaration of Human Rights and core International Labour Organisation standards.

Policies in our Business

We have established policies and processes in place covering our own operations to ensure we conduct our business in a responsible manner, including aspects of modern slavery, human trafficking, forced labour and exploitation. These include Anti-Bribery and Corruption, Right to Work, Respect in the Workplace, Whistleblowing, and Preventing Hidden Labour Exploitation. These policies are regularly updated and made available to all colleagues through our online My Morri platform. Where appropriate they are translated and displayed around our sites.

Building on a commitment from 2020, our Employee Relations team worked with expert stakeholders (including the charity Slave-Free Alliance) to develop our Supporting Survivors of Modern Slavery Policy which relevant colleagues have access to. The policy reiterates our commitment to provide support and remedy to any colleagues who are victims of modern slavery or labour exploitation and outlines the support we can offer to survivors within our business. The policy is supported by an escalation process and additional resources that will enable us to provide more effective immediate and longer term support for survivors of modern slavery offences in our business.

Our ongoing commitment to the Bright Future programme initiative also ensures that we can utilise our Manufacturing and Logistics operations to offer workplace opportunities to a wider range of UK survivors. We welcomed the first survivor of modern slavery onto a placement in 2021 which led to a permanent role. We have since had three further successful placements. We are proud to have been identified as Bright Future's most successful partnership having hosted the most placements. We will continue to work with Bright Future with the aim of providing further placements at our sites across the UK whenever suitable candidates are available.

Policies in our Supply Chain

We are members of the ETI and use their internationally recognised Base Code as the foundation of our supplier expectations.

Our [Ethical Trading Policy](#) and [Ethical Trading Code](#) are at the heart of our approach to monitoring, managing and mitigating human rights risk in our supply chain. Morrisons' standard terms & conditions require all suppliers to meet and cascade our Code requirements which include specific commitments relating to modern slavery, forced labour and the responsible recruitment of both permanent and agency-provided workers. We also require suppliers to ensure, as far as is reasonably practicable, that their suppliers, agents, labour providers and subcontractors who are directly or indirectly involved in the provision of goods comply with these requirements.

In 2023, we updated our Ethical Trading Policy to include a specific requirement for all new suppliers to comply with the reporting requirements in the Modern Slavery Act. We support increased transparency of compliance with the Act and require suppliers to upload their statements to the [UK Government Modern Slavery Statement Registry](#).

We continue to supplement our Ethical Trading Policy with specific requirements. This includes for Fresh Produce suppliers, and for Manufacturing ingredient suppliers through the implementation of a Vendor Assurance Policy. These requirements support increased transparency and oversight in the lower tiers of our supply chain.

We have also embedded policies to clarify our expectations of suppliers in relation to the [remediation of child labour](#) and the use of [homeworkers](#) in our supply chains.

We have additional responsible sourcing policies which indirectly support our approach to tackling modern slavery and exploitation. This includes a requirement to use accredited certification schemes through our policies covering [Timber](#), [Soy](#), [Palm Oil](#) and [Cotton](#) sourcing. Our [Fish and Seafood Sourcing Policy](#) also includes explicit requirements for the management of risks around [Illegal, Unreported and Unregulated fishing](#), due to the associated risk of forced and bonded labour and migrant worker exploitation.

5. Risk Assessment

We have an established approach to assessing risk in our global supply chains which takes account of emerging challenges and updated information sources. We regularly review our approach to risk assessment, identifying new sources of data and engaging with a wide range of stakeholders to inform the process.

We acknowledge that it is still not possible to identify, manage and mitigate all risk in all tiers of our extended supply chains, but seek to expand our requirements into lower tiers and new business areas as our knowledge and understanding increases. Additional due diligence and mitigation requirements exist for suppliers and sources flagged as higher risk prior to commencement of business with Morrisons.

Our Ethical Trading team maintains country and commodity-level risk ratings to support and inform purchasing decisions which utilise and aggregate data from numerous sources, including the Food Network for Ethical Trade (FNET) Risk Assessment Tool and the Sedex RADAR Tool & Forced Labour Indicators.













We have also communicated to our own brand suppliers a separate list of countries and regions where all sourcing of finished goods, ingredients and raw materials is prohibited. This list includes countries where there is either no guarantee of worker's rights due to the breakdown of the rule of law, or where local circumstances make it impossible to conduct robust and effective due diligence.

The main focus of our compliance activity remains our tier one, own brand supply chain, and we continue to utilise the Sedex platform to undertake preliminary screening on all new suppliers in scope of our Ethical Trading Policy. We maintain a close working relationship with Sedex and contributed towards the development of their new Goods Provider SAQ. This includes a number of improvements and more questions in salient areas, including how migrant workers are recruited and the standard of their housing. Since the launch of the updated SAQ in 2023 we have been working closely with our suppliers to ensure 100% completion.

We are mindful of the risk of modern slavery in lower tiers of our supply chain. To understand this in greater depth in 2021 we commissioned Ergon Associates to undertake an independent assessment of our highest risk commodities and geographies. This involved desk research using recognised data sources to identify key risks across 60 commodities and six thematic areas: modern slavery, child labour, discrimination, low wages, water scarcity and deforestation.

Building on these initial findings, the product selection was refined further through internal stakeholder engagement and by combining highest risk factors across both human rights and sustainability topics. This enabled us to identify 15 priority, higher risk commodities and has underpinned our mitigation and improvement activity in key supply chains, complementing our existing tier one factory compliance programme.

PRIORITY HIGHER RISK COMMODITIES

BANANAS 	BERRIES 	COCOA 
COFFEE 	COTTON 	CUT FLOWERS 
PALM OIL 	WARM WATER PRAWNS 	RICE 
SALAD VEGETABLES 	SOY 	TEA 
TIMBER 	PROCESSED TOMATO 	TUNA 

Following the risk assessment, we developed specific buyer guidance for colleagues involved in higher risk commodities. We also commissioned two Human Rights Impact Assessments (HRIA) on coffee supply chains in Brazil and Peru to gain a detailed understanding of the impact of our purchasing practices on workers, small-scale farmers and communities. Our HRIAs were undertaken by Ergon in collaboration with an expert third party, to a design and scope which considered UN, OECD and Oxfam guidelines. The HRIAs were completed in 2022/23 and have been published on our corporate website.

The HRIA enabled Ergon to develop a series of recommendations for Morrisons to mitigate identified negative impacts and create or enhance potential positive impacts. These recommendations were then workshopped with Morrisons colleagues, including representatives of the Ethical Trading and Buying teams, and are being taken forward where feasible.

In line with previous reporting, we consider our most salient and tractable primary-level risks to be:

- **Labour exploitation in UK agriculture and food processing**
- **Migrant worker exploitation in Southern European agriculture**
- **Forced and bonded labour in the Chinese and Indian manufacturing sectors**

These issues are established and complex and must be addressed over an extended period and through collective action. We cannot effectively tackle them alone, so choose to work in close collaboration with external partners including NGOs, social enterprises, charities and multi-stakeholder initiatives to build our understanding and capacity to act. Even with this assistance, we acknowledge that effective and sustainable solutions will take time to deliver. More detail can be found in the Due Diligence and Collaborative Action section of this statement.

6. Due Diligence in our Business & Supply Chain

We continue to enhance our approach to due diligence, risk mitigation and remediation, building on our experience of addressing issues in our supply chain, and seeking guidance from our extended network of partners and stakeholders. Our vertically integrated structure also provides broad insight of evolving risk in both our UK operations and global food supply chains, but also means we must face directly into the issues at hand.

Morrisons Operations

In our own, UK-based business operations, the most significant risk is presented by our use of temporary, agency-provided and migrant labour to manage peak demand. We have reduced our reliance on these labour sources in recent years and increased the number of permanent colleagues, but this remains a significant portion of our workforce.

Following a thorough review, in 2022/23 we consolidated the number of labour providers across our sites and worked closely with them to ensure a consistent approach to risk identification, investigation and incident management. Our key providers have extensive experience of managing modern slavery risk and provide support to our site teams and external authorities when addressing potential issues. We also access their expertise and sector knowledge through regular meetings to identify emerging risks and regional hotspots.

To provide additional oversight, our site-based People Managers conduct regular audits on labour providers using the [Complyer tool](#) developed by the Association of Labour Providers. The Gangmasters and Labour Abuse Authority (GLAA) 'Active Check' service is also applied to all labour and service providers in scope of the Gangmasters Licensing Act, which ensures that our Procurement teams receive live updates on any material changes to the licence status or business operations of relevant suppliers.

We continue to subscribe to the [Responsible Recruitment Toolkit \(RRT\)](#) principles and review further opportunities to use it to assess risk in more detail prior to onboarding of new suppliers.

In both our Manufacturing and Logistics operations, we seek to mitigate risk through a proactive approach to sharing information with migrant workers on their rights in the UK and providing clear routes to raise grievances and issues. This includes:

- Modern slavery awareness induction briefings for all new colleagues
- Regular updates on key risks and the indicators of exploitation
- Awareness-raising posters for all sites, available in 21 languages
- Multi-language, modern slavery specific versions of our whistleblowing hotline posters
- Quarterly worker welfare questionnaires which include a specific section on the indicators of forced labour, exploitation and unfair recruitment fees (1,085 responses were received in 2022/23)

During the 2022/23 reporting period a number of key activities have been reviewed, developed and introduced. Essential to this was feedback from Manufacturing and Logistics sites identifying that the existing Partnership and Prevention plan was too strategic for sites to deliver effectively. We commissioned a peer review by the not for profit organisation Stronger Together which supported this assessment. As a result, and following consultation with key internal partners, a revised plan was developed and agreed. This was introduced in January 2023 and focuses on delivering 11 key activities over the next two years at all sites. Amongst other things, the plan includes support for Modern Slavery Champions and Incident Management teams, peer review of the site Prevention and Partnership plan to ensure its effectiveness, communications and signage support, and feedback and learning loops. The plan is subject to review and has milestones to monitor and ensure timely delivery.

During 2022/23 a full review of our incident tracker was carried out, looking at all potential incidents of modern slavery recorded by the business since 2018. The results of this review were delivered and all recommendations accepted by the Modern Slavery Steering Group in July 2023. The review analysed all elements of our process for managing potential incidents of modern slavery. A number of positives were identified, including good understanding of the different indicators of modern slavery, along with opportunities for improvement including providing greater awareness of the National Referral Mechanism for victims of modern slavery.

6. Due Diligence in our Business & Supply Chain Continued

Partnership working continues to underpin all elements of our approach to modern slavery, including regular engagement with the police and other agencies. For example, in September 2023 following liaison with the police Scotland National Serious Crime Intervention Team, all third-party providers in Scotland are required to sign two declarations as part of the contract process. This followed a police investigation into organised crime including people trafficking in car wash franchises. The declarations require the provider to demonstrate their commitment to non-involvement in both human trafficking and labour exploitation as well as serious and organised crime. Opportunities to achieve the same in England and Wales are being explored, but with 46 forces taking different approaches this is not straightforward. The relationship with our third-party resource provider Staffline is key to partnership working. This remains an effective working partnership which is tested regularly.

Our Supply Chains

Where increased risk is identified in our tier one food and non-food supply chains, we require our suppliers to demonstrate compliance to our Ethical Trading Code through the provision of third-party social audits.

There were 848 audits undertaken at active sites linked to Morrisons on the Sedex platform in 2022/23 using either the Sedex Members Ethical Trading Audit (SMETA) or Business Social Compliance Initiative (BSCI) methodologies. This includes over 97% of the high risk manufacturing sites in scope of our compliance programme. There were no significant indicators of forced labour or modern slavery raised at any sites via this route during the reporting period.

We have a dedicated, independent [whistleblowing hotline](#) operated by EthicsPoint, which is available to internal colleagues and all of our suppliers, enabling them to raise concerns directly and anonymously to our head office Risk team. We did not receive any concerns relating to modern slavery or labour exploitation via this route in 2022/23.

To increase the effective sharing of intelligence in our sector, in 2020 Morrisons became a founding member of the Modern Slavery Intelligence Network (MSIN). MSIN was created by some of the UK food and agriculture sector's largest companies to drive sharing of information to disrupt modern slavery activities. We continued our support for MSIN throughout 2022/23. This included intelligence sharing and a keynote address at the MSIN conference in September 2023 on our practices and experience.

We encourage all our suppliers to take ownership of issues in their extended supply chains and undertake their own due diligence, mitigation and improvement activity. We support this process by building relationships with multi-stakeholder and membership initiatives, enabling suppliers to come together at a local level to build awareness and develop action plans. Examples of this that are pertinent to our salient modern slavery risks include the FNET, the ETI, Spain Ethical Trade Forum, the Centre for Child Rights and Business, and the Mekong Club. Further details of our work with these organisations can be found in the [Collaborative Action](#) section.

Building on our previous participation in the ETI Italy Fresh Produce working group, in 2022/23 we made a commitment to support a two-year project to improve access to grievance mechanisms for vulnerable workers in selected agricultural supply chains. We joined a working group to support implementation of the project, providing oversight of the initiative and facilitating access to growers and suppliers in the countries of production. The work is funded by the UK Government through the third phase of the Modern Slavery Innovation Fund.

UK SEASONAL HORTICULTURAL WORKERS

Concerns have been raised around exploitation risks faced by some migrant workers on temporary visas during their recruitment and employment on UK farms. In response, and with input, support and funding from Morrisons, other supermarkets, and Scheme Operators, the Seasonal Worker Scheme (SWS) Taskforce was established in March 2023. The Taskforce, coordinated by Stronger Together, is made up of over 50 members including retailers, growers, suppliers, Scheme Operators, industry and membership associations, non-governmental and intergovernmental organisations. Its mission is to work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK SWS and wider UK horticulture. In the reporting year Morrisons actively supported SWS Taskforce activity, which was focused on five key areas:

- Education, information and grievance mechanisms
- Due diligence and good practice during recruitment
- Due diligence and good practice on farm
- Improving worker finances
- Policy, enforcement and stakeholder communication

6. Due Diligence in our Business & Supply Chain Continued

Beyond tier one, our commodity-level risk assessment identified potential risks in our supply chain, including forced labour in coffee, tea and cocoa sourcing from Africa, Asia and South America. As part of our subsequent action plan we have improved engagement with third-party certification schemes to add an additional layer of mitigation at primary producer level. All own label tea, coffee and hot chocolate products within the hot beverages category are now either Rainforest Alliance or Fairtrade certified.

The assessment also highlighted that in some agricultural supply chains, legal minimum wages are not always sufficient to cover the cost of living. Workers may struggle to cover basic costs for themselves and their families with nothing left for emergencies or discretionary spending, which can leave them in a precarious position and more vulnerable to exploitation.

We continued to collaborate with the Dutch sustainability initiative IDH throughout the year, and along with other major UK retailers signed up to the Banana Living Wage commitment in early 2023. The first year of the commitment focused on engagement with our supply chain partners and the collection of wage data using the IDH Salary Matrix to measure the living wage gaps of workers. The next step is to commence work to close the gap over time, focussing on responsible purchasing practices. Collaboration across the sector is key and alignment and coordination across the national coalitions will continue as the commitment moves into year two and beyond.

To enhance due diligence in our clothing supply chains, we entered into a partnership with the ESG specialist The Reassurance Network (TRN) in 2021 to trial an innovative, dialogue-based approach to factory manager and worker engagement. Through collaborative dialogue, this approach focuses on the needs of all supply chain actors, aiming to identify root causes and build sustainable foundations for improvement based on mutual trust. Crucially, this process also gives workers the opportunity to highlight issues that are not commonly reported through ethical audits, including those related to forced labour and exploitation.

These site visits are conducted in a different way to traditional audits. TRN consultants engage in open conversations with factory owners, managers and workers, aiming to create a safe space for in-depth discussion. They set out to understand the needs, challenges and aspirations of these three stakeholders, covering topics such as wellbeing, values, diversity, economic security, communities, family, the environment, and general opportunities in life and at work. All actors then work together to improve working conditions via their strengthened relationships. Throughout 2022/23 we continued to build our relationship with TRN. Sites were revisited where issues were found in the initial reports and supported through their remediation plans.

Our Nutmeg business maintains membership of the Better Cotton Initiative and established a long-term target to source 100% of our cotton as Better Cotton by 2025. This demonstrates our continuing commitment to sourcing cotton in a responsible and sustainable manner and ensures workers can benefit from improved conditions and a higher standard of living. It also provides a degree of mitigation against sourcing cotton from regions where there is a known risk of forced or child labour.

In our Chinese supply chains we continue to work in close partnership with local organisations. We access digital tools and participate in workshops provided by the Mekong Club, and also work with [The Centre for Child Rights and Business](#) and [Business which provides](#) information on identifying and remediation of child labour in supply chains.

7. Training, Awareness & Capacity Building

Training and awareness programmes continue to be at the forefront of our approach to addressing modern slavery risk in our business and supply chains. By providing training to our colleagues and suppliers, we can build the capacity to effectively manage incidents in a way that supports positive outcomes for victims.

We have reviewed and updated our approach continuously since 2016, enhancing the options available through the development of in-house courses and accessing third-party training through external partnerships.

Training for Colleagues

In our own business, we continue to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant and is current information. Modern Slavery Awareness training is available to colleagues at all levels of the business through our online learning platform and is tailored to job roles where relevant.

Our interactive modern slavery and human trafficking training package has been developed specifically for our vertically integrated operations, and includes content informed by actual cases of modern slavery, together with additional material provided by the GLAA. This is regularly reviewed by our Training team and updated where necessary.

We have Modern Slavery Champions in our Manufacturing division who support and drive due diligence across the business. The purpose is for them to support sites and our leaders with incident management and be a key point of contact for advice and support.

In 2022/23 our modern slavery training and briefings were accessed by over 10,000 colleagues across our Manufacturing and Logistics operations. This is broken down into the following categories:

Managers' e-learning module

1,595

managers have completed this to date

Managers' Scenario Training module

779

managers have completed this to date

Face-to-face briefings (using the material from the e-learning module)

9,016

colleagues

To build awareness and address the risk of unlicensed labour provision in our people supply chain, we worked with the GLAA to develop an e-learning module for colleagues who are directly involved in the recruitment of temporary workers. This was rolled out to all applicable colleagues in our Procurement, Manufacturing and People teams in 2021, and as at the end of 2022/23 51 colleagues had completed the module. We require colleagues to undergo refresher training on this topic annually via our My Learning platform to ensure continued compliance with our requirements in this area.

Every four weeks we hold an in-person training session for new buying colleagues, from Buyers Assistant up to Commercial Director. The course is designed to give an introduction to ethical trading, supply chain human rights and modern slavery. We plan to further strengthen this with the launch of an e-learning module which is designed to be an annual refresher of the topics covered when colleagues first join the business.

Training for Suppliers

We maintain a supplier engagement programme with key tier one, own brand suppliers, conducting meetings to understand their approach to managing human rights risk in their own operations and supply chains. These sessions continue to play a key role in our compliance programme. They also give us the opportunity to communicate the details of available training and ensure that suppliers are cascading this information into their supply chains.

Morrisons are founder sponsors of [Stronger Together](#) and offer free, industry-leading training through the initiative to all our suppliers and labour providers in the UK. Since we commenced our relationship in 2013, Stronger Together have delivered workshops on Tackling Modern Slavery in UK Business to 2,315 delegates from over 776 of our suppliers, including 329 delegates in 2022/23. In addition, 105 supplier delegates have now attended the Advanced Tackling Modern Slavery in UK Business training and 34 of our primary UK suppliers are registered as [Stronger Together Business Partners](#) to demonstrate their continuing commitment to tackling these issues.






Through our sponsorship of the [RRT](#), 255 of our suppliers have accessed the benefits of the Toolkit and over 420 individuals have attended RRT training sessions since 2019. 198 suppliers and labour providers from across our Food, Non-Food and Goods Not for Resale divisions have also now subscribed to the RRT Online Tool.

Ethical Trading colleagues from our Global Sourcing office in Hong Kong continue to engage with our suppliers in Asia on modern slavery and forced labour issues. They maintain awareness of current and emerging issues through networks of local and regional experts including the ETI, Sedex, Mekong Club, the Centre for Child Rights and Business, and TRN. Resources, guidance and tools developed by these organisations are shared with all our suppliers in the region to ensure they have access to the most up to date advice.

Throughout 2022/23 we delivered training sessions and held workshops for suppliers in our Chinese supply chain. This was designed to enhance participants' knowledge of responsible recruitment and management practices, and showcase best practice for reducing child labour and forced labour risk with practical prevention tools that could be implemented after the training. 99% of respondents to a subsequent impact survey agreed that following this engagement they were more confident to take measures to keep their factory child labour and forced labour free. This is in addition to in-person and virtual site visits to verify compliance and initiate opportunities for suppliers to discuss issues directly with us.

8. Collaborative Action

Working with others to increase our understanding and maximise the impact of our actions to tackle modern slavery remains a cornerstone of our approach. Details of some of the work we have undertaken through collaborative partnerships in 2022/23 can be found here:

<p>Better Cotton Initiative (BCI)</p>	<p>Ethical Trading Initiative (ETI)</p>	<p>Food Network for Ethical Trade (FNET)</p>	<p>Gangmasters and Labour Abuse Authority (GLAA)</p>	<p>IDH</p>
				
<p>We are committed to improving cotton farming practices globally through engagement with the Better Cotton Initiative.</p> <p>In 2020 BCI reviewed the current Standard and implemented recommendations to improve the effectiveness of the system in identifying, preventing, mitigating and remediating forced labour risks. Our aim is to use BCI certification requirements to prevent sourcing cotton from regions and countries at heightened risk of forced labour. In 2022/23 we achieved 98% BCI cotton coverage on all Nutmeg clothing. All cotton used in our Nutmeg clothing range will be Better Cotton certified by 2025.</p>	<p>ETI membership enables us to join forces with other businesses, trade unions and civil society organisations to support wider advocacy and influence at government level in countries with systemic human rights issues. We actively participate in several working groups to develop effective responses to global human rights challenges.</p>	<p>Through our FNET membership we work with other large UK food suppliers and use our collective leverage to positively impact human rights in global supply chains through a common approach to managing ethical trade. In 2022/23 we were members of the FNET working group on responsible recruitment.</p>	<p>We have a well-established relationship with the GLAA and continued to work closely with them throughout the year. This includes support with the development of colleague training.</p>	<p>IDH is an organisation that works with businesses, financiers, governments and civil society to realise sustainable trade in global value chains. In early 2023 we signed up to a collective goal, coordinated by IDH, to close the living wage gap within banana supply chains by the end of 2027.</p>

8. Collaborative Action Continued

Mekong Club



Mekong Club is a Hong Kong based initiative supporting the private sector in the fight against modern slavery across the Asia-Pacific region. We use the Mekong Club's digital tools and our Hong Kong team regularly attend workshops and events to address the risks of forced labour in our China-based supply chains.

Modern Slavery Intelligence Network (MSIN)



Morrisons is a founding member of the MSIN, a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.

We continued to actively support the development of the Network throughout 2022/23 and maintained positions on both the Technical and Strategic Advisory Groups.

Palm Oil Transparency Coalition



We continue to build on our engagement with key supply chain stakeholders through collaborative platforms, including the Palm Oil Transparency Coalition, an initiative led by 3Keel and supported by a wider retail and food industry membership. Through this platform we engaged with large global commodity traders on key sustainability issues, including the protection and respect of workers' rights.

Seasonal Worker Scheme (SWS) Taskforce

Morrisons is a funding member of the SWS Taskforce. The Taskforce's mission is to work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK SWS and wider UK horticulture. The Taskforce is currently made up of over 50 member organisations including retailers, growers, suppliers, Scheme Operators, industry and membership associations, non-governmental and intergovernmental organisations, who actively contribute to and support the various working groups and activities.

Responsible Recruitment Toolkit (RRT)



We sponsor the RRT, a comprehensive online tool and suite of training supporting businesses to ensure that all workers are recruited in a transparent manner that respects and protects their rights throughout recruitment, work and post-termination. Through our sponsorship, suppliers have free access to training and RRT's online self-assessment tool to embed responsible recruitment standards into their business processes.

Seafood Ethics Action (SEA) Alliance



We continue to support and actively engage with the SEA Alliance on collaborative action and information sharing across the seafood industry. In May 2023 we also provided funding to a SEA Alliance project providing direct support to foreign fishers in the UK through the development and dissemination of guidance and training materials for migrant fishing crews. These materials have been translated into the key languages for foreign crews, and have been designed for differing levels of literacy.

Through the collective action and funding of a number of SEA Alliance members, including Morrisons, an independent investigation was conducted into allegations raised within the Northern Ireland fishing sector in a series of Financial Times articles published in June 2023.

8. Collaborative Action Continued

Slave-Free Alliance (SFA)



We became the first supermarket member of SFA in 2020 when they first completed a gap analysis of our approach to mitigating modern slavery across the business. Throughout 2022/23 we have continued to work with SFA on areas of improvements and access their services and guidance.

We have also been able to attend multi-stakeholder meetings and gain insight from members outside grocery retail.

Spain Ethical Trade Forums (SETF)



We have been members of the SETF since 2019 and actively support their work, facilitating grower-led responses to labour challenges in the Spanish agricultural sector. They operate several working groups and have produced best practice guidance for members on topics including:

- Responsible use of labour providers
- Grievance mechanisms
- Worker accommodation standards

We encourage all our suppliers in the region to engage with SETF and retained a seat on the Governance Group in 2022/23.

Stronger Together



Morrisons is a founding sponsor of Stronger Together, an impact driven, not for profit organisation with the mission of working together to enable organisations to embed responsible recruitment and employment practices, and mitigate labour exploitation in their operations and supply chains.

Through Morrisons sponsorship of the Consumer Goods programme, our suppliers are supported in taking action to mitigate modern slavery within their own operations, with their labour providers, and throughout their supply chains.

We offer free Stronger Together resources and training for all our suppliers in the UK. This continues to play an essential role in building awareness throughout our UK supplier base.

The Centre for Child Rights and Business



The Centre for Child Rights and Business supports businesses to deliver improvements within their supply chains that not only benefit workers, families and children, but also deliver positive business outcomes. We have been members since 2019 and are one of the core members of the working group. Since our membership began we have continued our work with the Centre to advocate and eliminate the risk of child labour and raise awareness of child rights.

The Reassurance Network (TRN)



TRN is a global network of experts who work with companies and their supply chains to improve environmental, social and governance performance.

We have been working with TRN since 2021 on the development and delivery of worker-focused, dialogue-based factory improvement visits in our clothing supply chain. Over 25 visits have taken place to date. In 2022/23 we further developed our relationship with TRN through a deep dive investigation into our Indian supply chain, and worker training in China on benefits, remuneration and social insurance participation.

9. Performance Reporting

In line with our previous statements, we continue to measure our performance based on four indicators that we consider appropriate to our programme:

- **Reported incidences of modern slavery in our business and supply chains, and our response - see Performance Reporting section**
- **Third-party ethical audits undertaken on our own brand and exclusive sites - see Risk Assessment and Due Diligence sections**
- **Colleagues and suppliers who have undertaken Modern Slavery Awareness training - see Training, Awareness & Capacity Building section**
- **Collaborative improvement action undertaken in specific areas of our supply chain - see Collaborative Action section**

Reported incidences of modern slavery in our business operations

We identified nine potential incidences of modern slavery or labour exploitation in our business during the 2022/23 reporting year. This represents the same number of suspected cases that we had in 2021/22 and none of the incidents subsequently developed into confirmed cases of modern slavery. These issues were communicated to us from a variety of sources, including the direct reporting of concerns from potential victims to our site People teams. We also continue to access good intelligence from our primary labour providers and receive excellent support from their site-based account managers and compliance teams.

Our People and Loss Prevention teams conducted detailed internal investigations in each of the nine cases with the full support of our third-party labour providers. We took guidance from external partners to facilitate this process and worked in conjunction with both the GLAA and regional police modern slavery teams.

Reported incidences of modern slavery in our supply chains

In addition to activity in our own operations, we were also made aware of a small number of potential incidents of modern slavery in our extended supply chain. These related to migrant labour in fresh produce, Chinese seafood processing, migrant labour on UK-flagged fishing vessels operating in Northern Ireland, and clothing manufacture in Tamil Nadu, India. In all cases multiple UK retail supply chains were affected and the issues were addressed collectively.

In the case of clothing manufacture, the potential human rights issues were identified through dialogue-based worker welfare visits commissioned by Morrisons. The manufacturing site involved is part of a group which employs around 25,000 workers and supplies a range of major brands. Over the course of a number of visits, TRN consultants gained the trust of a group of workers which enabled them to speak in confidence and raise concerns regarding their working conditions.

Due to the size of the supplier group involved, we reached out to the ETI to involve brands who were also sourcing from the supplier. ETI established a brand caucus and worked collaboratively with a local NGO, ASK, to conduct further investigations based on TRN worker-voice claims. The site has created a remediation plan, demonstrating their commitment to improve. ASK will revisit the group to verify their corrective actions.

Our relationship with TRN is now well established, and their programme has proven to be effective in identifying real issues which standard audit programmes fail to address. We will continue to work with TRN, identifying strategic suppliers in high risk areas where workers would benefit from the programme.

“

The mark of a responsible business is one that seeks to detect potential risks to workers in their supply chain and then acts when such risks are found. Morrisons demonstrated real leadership when concerns were raised in their garment supply chain in south India. Reaching out to the ETI and other buyers to ensure that appropriate action was taken, effective support was provided to the supplier with positive outcomes for workers. This is a great example of human rights due diligence in action.

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Peter McAllister
Executive Director - ETI

10. Progress Against Existing Objectives

We set objectives across our business and supply chain on an annual basis, which are purposefully challenging and can evolve over time. We are pleased to report that good progress has been made to address key challenges in both our business and wider supply chains.

Commitment	Update
Increasing the relevance and impact of modern slavery training through regular site-level briefings.	In addition to Manager Training, site briefings for all colleagues have been held across our Manufacturing and Logistics sites to over 9,000 colleagues.
Developing an e-learning module for Logistics colleagues on the risks of organised immigration crime.	Training module developed in collaboration with our Learning & Development team. This training has been trialled as a face-to-face module at our Sittingbourne Logistics site, specifically targeting those who complete 'goods in' tasks.
Recruiting additional, dedicated resource to oversee and advance our work on addressing modern slavery and labour exploitation risk.	In 2023 we recruited additional dedicated resource to oversee and advance our work on addressing modern slavery and labour exploitation risk. This resource is specifically working on safeguarding and labour exploitation across each of our business areas, including the recently acquired McColl's convenience stores.
Implementing management information processes to regularly review indicators of risk at colleague level.	Full implementation of ongoing employment checks via our Payroll system. This allows for more detailed and structured checks on key indicators of risk. For example, multiple colleagues living at the same address, with the same bank details or with the same next of kin.
Supporting collaborative industry initiatives to make improvements to the UK Seasonal Agricultural Worker Scheme.	With input, support and funding from Morrisons, the SWS Taskforce was established in March 2023. This brings together more than 50 organisations to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme (SWS) and wider UK horticulture.
Improving access to modern slavery and exploitation resources for growers and processors in the agricultural sector.	As outlined in this statement, our support for initiatives including the SWS Taskforce and RRT has created and improved access to important resources for growers and processors.
Increasing engagement with human rights and sustainability certification standards in higher risk supply chains.	100% of our own brand tea, coffee and hot chocolate is now either Rainforest Alliance or Fairtrade certified.
Commencing work to improve living wage levels in priority commodities and geographies.	We continued to collaborate with the Dutch sustainability initiative IDH throughout the year and along with other major UK retailers signed up to the Banana Living Wage commitment in early 2023.

Note: The table above details progress against objectives set out in our 2022 interim statement

11. New Objectives

Our core objective remains to continuously reduce the risk of modern slavery, forced labour and third-party exploitation in our own operations and wider supply chains, whilst improving outcomes for victims.

In 2023/24 we will continue to deliver improvement and progress in our own operations by:

Rolling out Immigration Crime training to all colleagues who complete 'goods in' duties across Manufacturing and Logistics

Working with external specialists to understand the common risks in last mile delivery providers

Continuing to build our relationship with the Bright Future programme to support victims back into the workplace

Strengthening our approach to third party requirements, specifically within popular and useful services and site-based cleaning and security

Using intelligence from MSIN to create quarterly learnings to share with relevant stakeholders

Continuing to strengthen colleague training on modern slavery and labour exploitation risks

We will continue to strengthen our approach to tackling modern slavery in our wider supply chains through:

Updating our supply chain risk assessment to ensure we maintain focus on the highest risk supply chains

Expanding our programme of supplier engagement to identify and mitigate the risk of modern slavery and exploitation in lower tiers of the supply chain

Monitoring our primary suppliers' compliance with Modern Slavery Act reporting requirements

Continuing engagement with specialist third parties to increase access to worker voice as part of our wider audit programme

Developing relationships with established organisations to train our suppliers on the importance of gender equality and prevention of gender-based violence and harassment

Publishing details of our tier one manufacturing sites for our own brand food products on the Open Supply Hub



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