

# Modern Slavery Statement 2021/22

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**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 01/02/2021 to 31/01/2022. This statement was approved by the board of Wm Morrison Supermarkets Ltd on 26/05/2022.

Our modern slavery statement also covers activity at the following wholly-owned subsidiaries: Chippindale Foods Ltd, Falfish (Holdings) Ltd, Farmers Boy 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

**In 2021 Morrisons was acquired by Clayton, Dubilier & Rice (CD&R). As we transition into private ownership, our commitment to tackling the risk of modern slavery is as strong as ever.**

We are resolutely focused on ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces. Our sixth Modern Slavery Statement provides detail on our continuing 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 by acting in collaboration with others, and have built on this further in the past year by establishing new partnerships to deliver meaningful change.

We will continue to develop our approach throughout 2022 and beyond, building our resilience to modern slavery risk and increasing the support we provide for our colleagues and suppliers.



David Potts,  
Chief Executive



## Highlights of our 2021/22 activity included:

SUPPORTING THE  
ESTABLISHMENT  
OF THE  
UK MODERN  
SLAVERY  
INTELLIGENCE  
NETWORK

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UNDERTAKING  
A GLOBAL  
ASSESSMENT  
OF HUMAN  
RIGHTS RISK  
IN OUR SUPPLY  
CHAIN

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PROVIDING  
WORK PLACEMENTS  
FOR SURVIVORS  
OF MODERN  
SLAVERY

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IMPLEMENTING  
MODERN SLAVERY  
PARTNERSHIP  
& PREVENTION  
PLANS ACROSS  
OUR BUSINESS  
OPERATIONS

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LAUNCHING  
OUR NEW  
MODERN SLAVERY  
SURVIVOR  
SUPPORT POLICY

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CONDUCTING  
WORKER-FACING,  
IMPROVEMENT  
VISITS IN HIGHER-  
RISK SOURCING  
LOCATIONS

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## 2. Governance & Oversight

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

Following Morrisons transfer into private ownership in October 2021, responsibility for governance moved from our Corporate Compliance and Risk Committee (CCR) to a newly formed Risk Committee. This committee includes executive board representation and retains oversight for both the implementation of Group policy and monitoring compliance with ethical and governance standards. 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 in our business and supply chains.

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.

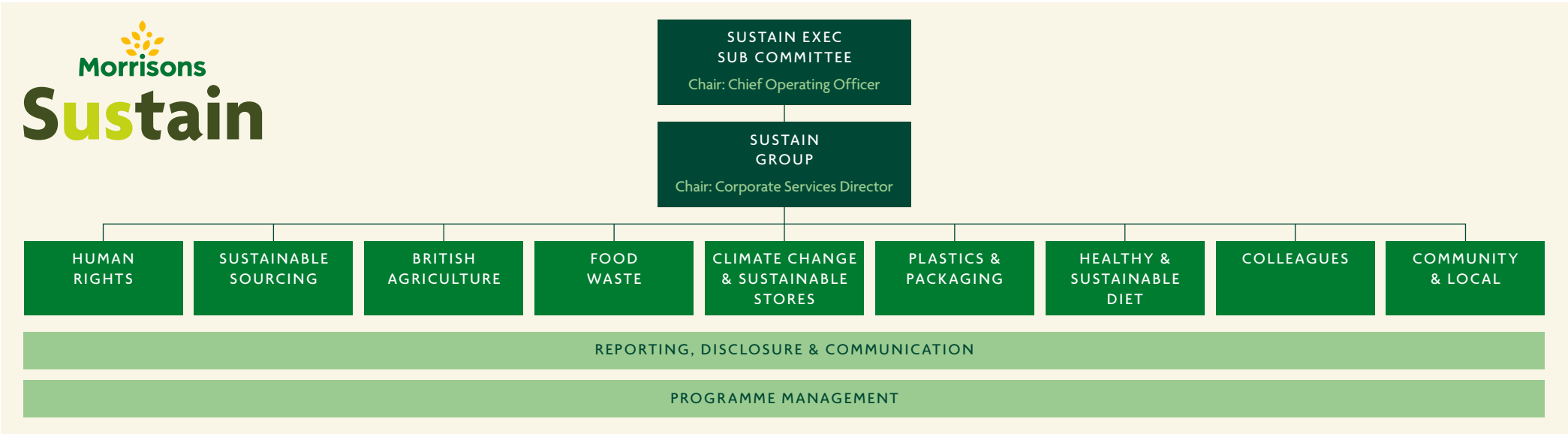
Activity in our own operations continues to be directed by our senior-level Modern Slavery Steering Group. This group ensures that effective controls are in place to support the delivery of our programme across five key areas:

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

The group continues to meet on a quarterly basis, is chaired by our People Director for Reward & Employee Services, and includes representation from Loss Prevention, People, Training, Employee Relations, Operations, Business Continuity, GNFR 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 lives of our colleagues and the communities we serve.

A senior-level Sustain Group meets monthly and reports against progress on key targets across ten 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 Chief Operating Officer.



### 3. Structure, Business & Supply Chains

Morrisons is the UK’s fourth largest supermarket and operates a significant food manufacturing business.

We employ more than 110,000 colleagues in 497 stores. 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 with Safeway products and national brands.

In October 2021 Morrisons was acquired by Clayton, Dubilier & Rice (CD&R). Following the re-registration as a private company, the Company’s name was changed from Wm Morrison Supermarkets Plc to Wm Morrison Supermarkets Limited. Subsequently, our financial reporting year will now cover the 12 month period ending October 31st. We will issue an interim Modern Slavery Statement at the end of 2022 to reflect this, and will align our reporting requirements under the Modern Slavery Act to our revised financial reporting period going forward.

During the reporting period covered by this statement we have also acquired Falfish, a family-owned wholesaler of sustainably sourced seafood operating from two sites in Cornwall.

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 fishermen, 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 makes us different from our competitors and 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 seven distribution centres at locations throughout the UK, and together our manufacturing and logistics sites employ over 15,000 people. We are committed to delivering a fair day’s pay for a fair day’s work, and maintain constructive dialogue with unions and colleagues to continuously review our offer. Permanent colleagues in our stores, manufacturing and logistics operations continue to receive a basic rate of at least £10 per hour once they have completed their probation period. This remains significantly above the UK National Living Wage, and we were the first major UK retailer to achieve this milestone.

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.

1899

Year established

497

stores across the north, central and south

18

manufacturing facilities

7

regional distribution centres

110,000

colleagues

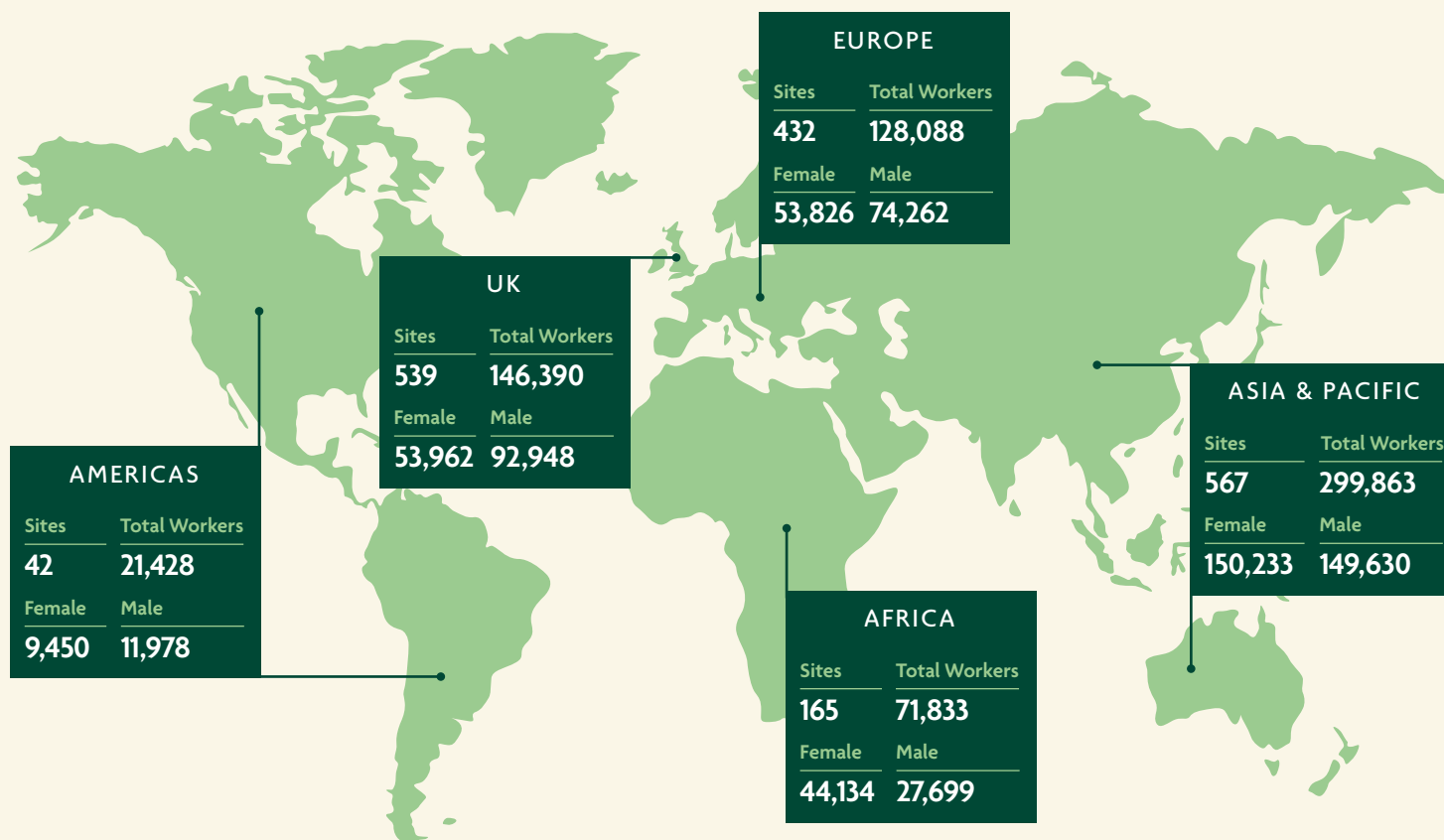


15,000

employed in manufacturing and logistics sites



### 3. Structure, Business & Supply Chains Continued



**Our monitoring programme currently covers 1,745 tier one factories and processing locations in 57 countries, employing over 660,000 workers.**

In 2021, we continued to expand 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 Morrisons Manufacturing are now required to join the Supplier Ethical Data Exchange (Sedex) and complete a detailed self-assessment questionnaire (SAQ), and over 70% of these suppliers are now compliant.

Our Raw Material Sourcing Policy also now includes a requirement for all actors in the Fresh Produce value chain to be registered with Sedex and share details with Morrisons. This covers over 5000 processors, packhouses, co-operatives and growers in over 50 countries and will be an ongoing focus of our work in 2022. We will share details of our findings and proposed risk mitigation strategies in our next full statement.

Division	Sites	Total Workers	Female	Male	Migrant Workers
Food	1,105	365,098	167,177 (46%)	197,921 (54%)	65,823 (18%)
Consumer Goods	460	180,646	73,766 (41%)	106,880 (59%)	7,276 (4%)
Clothing	180	121,858	70,662 (58%)	51,196 (42%)	2,235 (2%)

### 3. Structure, Business & Supply Chains Continued

#### Supply Chain Transparency

We remain committed to increasing transparency in our supply chains and want to make it possible for our customers and other stakeholders to raise concerns they may have about any of our sourcing sites directly with us. 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](#).

Delivering on a commitment to further increase transparency, we also now share details of our Clothing, Seafood and Tea supply chains through engagement with external initiatives.



#### Garments and Apparel

Our Nutmeg supply chain is published on the Open Apparel Registry site and updated on an annual basis. This includes details of all our first-tier manufacturing sites, which together produced over 35 million items of Nutmeg clothing in 2021. This list was last updated in February 2022.



#### Seafood

Morrisons supports the Ocean Disclosure Project (ODP), and we publicly share details of our seafood supply chains in line with ODP guidance. Full details can be found [here](#).



#### Tea

In 2021 we contributed to the Tea Transparency Tracker project undertaken by the Business and Human Rights Resource Centre, sharing full data on growers producing our own-brand tea. More information and details of all the plantations and estates in our own-brand tea supply chain can be found [here](#).



## 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 (UNGPs) and underpinned by the principles of the Universal Declaration of Human Rights and core International Labour Organisation standards. We are members of the Ethical Trading Initiative (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 2022, we will be updating 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 will additionally require suppliers to upload their statements to the [UK Government Modern Slavery Statement Registry](#).

### Policies in our Business

We have established policies and processes in place covering our own operations and supply chains 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, made available to all colleagues through our online 'My Morri' platform, and where appropriate are translated and displayed around our sites.

We developed and launched a Labour and Site Services Procurement Policy in consultation with the [Gangmasters and Labour Abuse Authority](#) (GLAA) in 2020 and supported this in 2021 with the rollout of e-learning for all colleagues involved in the procurement of these services.

This proved especially important as we continued to face labour shortages that required an increase in our use of third-party labour and service providers.

Building on a commitment from 2020, our Employee Relations team worked with expert stakeholders (including [Slave Free Alliance](#)) to develop our new [Supporting Survivors of Modern Slavery Policy](#) and launched this to our manufacturing and logistics operations on UK Anti-Slavery Day in October. 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 updated 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](#) 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 on to a placement at our Cutler Heights Fresh Produce processing site in 2021 which led to permanent role. We will continue to work with Bright Future throughout 2022 and beyond, with the aim of providing further placements at our sites across the UK whenever suitable candidates are available.

### Policies in our Supply Chain

We continue to complement our Ethical Trading Policy with additional policies where required, including requirements for Fresh Produce suppliers in our [Raw Material Sourcing Policy](#), and for manufacturing ingredient suppliers through the implementation of a [Vendor Assurance Policy](#).

Both policies support increased transparency and oversight in the lower tiers of our supply chain by mandating membership of Sedex and requiring suppliers to complete a detailed self-assessment questionnaire (SAQ) in full. Higher-risk suppliers are required to provide additional due diligence information, including the provision of third-party audits, prior to supply.

We built on this further in 2021 with the launch of two new policies to clarify our expectations of suppliers in relation to child labour and the use of homeworkers in our supply chains. These policies were developed in consultation with expert third parties including [Homeworkers Worldwide](#) and the [Centre for Child Rights and Business](#).

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 (IUU) fishing, due to the associated risk of forced and bonded labour and migrant worker exploitation. Fishery improvement programmes form an integral part of our approach to seafood sourcing and our policy recognises those that are reporting on the [fisheryprogress.org](#) website. In 2021 FisheryProgress launched their [social responsibility policy](#) which has seen early adopter uptake from 29 fisheries and proved a valuable tool in providing transparency in standards and conditions in our supplying fisheries.

We also remain committed to supporting suppliers experiencing cases of modern slavery, and in 2021 supported discussions with the GLAA and other stakeholders on a food sector approach which builds on the existing [Supplier / Retailer Protocol](#).

“  
WE ARE VERY HAPPY TO BE WORKING WITH MORRISONS TO SUPPORT SURVIVORS OF MODERN SLAVERY INTO SAFE AND SECURE EMPLOYMENT. WE ARE LOOKING FORWARD TO ROLLING OUT THE PROGRAMME TO MORE SITES IN THE COMING MONTHS TO SUPPORT SURVIVORS ACROSS THE UK.  
”

Mischa Macaskill  
Bright Future Manager



# 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.

We have also developed a separate list of countries and regions where all sourcing of finished goods, ingredients and raw materials is restricted. This list includes countries where there is either no guarantee of workers' rights due to the breakdown of the rule of law, or where local circumstances make it impossible to conduct robust and effective due diligence. This will be communicated to suppliers in 2022 with compliance monitored through our online supplier technical portal, Morrisons Create.

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. All primary suppliers in scope of our policy have now completed the updated Sedex Self-Assessment Questionnaire and we have expanded this requirement to cover all Fresh Produce and Morrisons Manufacturing ingredient suppliers. We maintain a close working relationship with Sedex and are contributing to the development of an updated SAQ for launch at the end of 2022.

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:

- US State Department Trafficking in Persons Report
- Transparency International Corruption Perceptions Index
- International Trade Union Confederation Global Rights Index
- US Bureau of International Labour Affairs (ILAB) list of Goods Produced by Child Labor or Forced Labor
- Food Network for Ethical Trade (FNET) Risk Tool
- Supplier Ethical Data Exchange (Sedex) RADAR Tool & Forced Labour Indicators
- UK Government Overseas Business Risk guidance

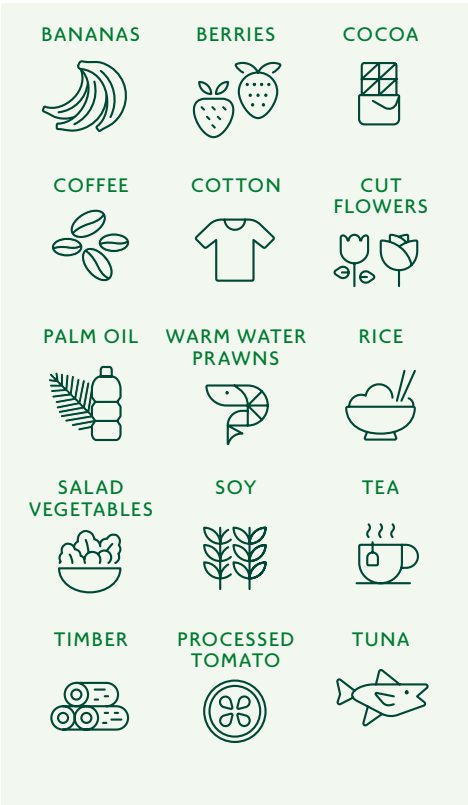
Morrisons also led the initial development of a human rights risk assessment tool with the Seafood Ethics Action Alliance that enables risk identification within specific fisheries. This helps us to identify areas where resources should be allocated to best manage potential risks and is now going through its first revision since initial adoption in 2021.

Building on a commitment from the 20/21 statement, our cross-functional working group on Organised Immigration Crime has engaged with suppliers, external stakeholders and law enforcement to strengthen our assessment of risk within our logistics networks. In 2021 this included the development of a detailed e-learning module that has been rolled out to colleagues in relevant operations – see Training, Awareness & Capacity Building section for further detail.

To increase understanding of our exposure to risk in the lower tiers of our supply chain, 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.

# 5. Risk Assessment Continued

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 products to focus our mitigation and improvement activity over the next 3-5 years, to complement our existing tier one factory compliance activity.



A key next step in this process is to gain a detailed understanding of the extent of Morrisons exposure to specific sourcing regions and the impact of our purchasing practices on rights holders. We consider the most effective way to deliver this activity is through the use of human rights impact assessments (HRIAs) and commenced two assessments on coffee supply chains in Brazil and Peru during 2021.

Our HRIAs are being undertaken in collaboration with an expert third party, to a design and scope which considers the UN Guiding Principles on Business and Human Rights, the OECD Guidelines on Multinational Enterprises, the OECD-FAO Guidance for Responsible Agricultural Supply Chains and the guidelines on conducting an HRIA produced by Oxfam.

The assessments will enable us to access detailed insight on the impacts of our operations and business practices on workers, small-scale farmers and communities across some of our highest risk food supply chains. We will also seek to identify how these impacts may differ by gender, focusing specifically on the challenges faced by women and how we can use the insight to effectively address the root causes.

We will publish these assessments on our corporate website following a period of stakeholder consultation and will seek guidance from our external partners on the development of long-term Human Rights Action Plans (HRAPs) to address any identified impacts.

This year we also began to consider risks inherent in our supply chains that have not previously been covered by our programme. Building on engagement with the ETI's Expert Logistics Support Network, we worked with the International Transport Workers' Federation (ITF) to assess the risks presented to seafarers on vessels in our supply chains, which have been exacerbated by the COVID-19 pandemic. We trialled the ITFs Human Rights Due Diligence Health Check tool on the vessels used by Morrisons in 2021 and found that 87% were covered by active ITF agreements. We are now working with our logistics providers to build awareness of the importance of these agreements and support collaborative work to reduce the gap.

87%  
of vessels used by Morrisons in 2021  
were covered by ITF agreements

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 labour in the Chinese manufacturing sector

These issues are established and complex so must be addressed over an extended period. 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 not be delivered in the short term. 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. Shortages of locally available workers in key manufacturing roles such as butchery have additionally required us to source labour from outside the UK, presenting new challenges and opportunities for us to establish good practice.

In order to address this shortage of skilled butchers for our vertically integrated abattoir operations, we accessed the UK Government Seasonal Agricultural Worker Scheme (SAWS) which was expanded on a temporary basis 2021 to include pork butchers. We worked with an authorised scheme provider, Concordia, to source workers from Ukraine and Uzbekistan on six month contracts. All recruitment was undertaken in line with guidance from the Responsible Recruitment Toolkit and all fees relating to the process were covered by Morrisons. We also sourced and provided accommodation and transport for all workers, which will be included in the scope of our scheduled SMETA audit in 2022

We continue to manage our exposure to risk by only using a limited number of selected labour providers, and work 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 issues 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 (ALP). The 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.

In 2022 we aim to increase due diligence for new labour and service providers by requiring them to subscribe to the Responsible Recruitment Toolkit (RRT), link to Morrisons' account, and complete the online self-assessment. This will enable us to assess risk in more detail prior to onboarding of new suppliers, and also track progress against key elements of the RRT Standard.

Delivering on a commitment in our previous statement, in 2021 we conducted a full review of our internal, modern slavery incident response and escalation process to ensure it remains accessible and effective. Feedback from colleagues involved in managing incidents on our sites highlighted that the current process could be difficult to follow, and overly complex.

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
- Dissemination of information cards to all new workers that detailed guidance on their rights in the UK, minimum wages, holiday pay and benchmark costs of accommodation and travel
- Awareness raising posters for all sites, available in 21 languages
- Multi-language, modern slavery specific versions of our 'EthicsPoint' whistleblowing hotline posters
- Quarterly worker welfare questionnaires with a specific section on the indicators of forced labour, exploitation and unfair recruitment fees. 1762 responses were received in 2021.

## 6. Due Diligence in our Business & Supply Chain Continued

This has now been simplified through the creation of a new manager guidance document broken into three distinct sections:

- Preparation
- Incident Response
- Victim Support & Remediation

Each section includes checklists and supporting documents to assist our site-based colleagues, all of which are accessible through links in the guide. It also contains details of internal and external support available to managers when dealing with live situations. We worked closely with experts from Slave Free Alliance to ensure the new process covers all our obligations and provides enhanced support for any potential victims. We also consulted with law enforcement and the GLAA to provide guidance on ‘out of hours’ support.

The updated and revised guidance was communicated to all sites in October 2021 and complemented by the launch of our new Supporting Survivors of Modern Slavery Policy to ensure any confirmed victims are fully supported both during and after any incidents.

Our regional Modern Slavery Champions are integral to the delivery of our revised process. This group was established by our Modern Slavery Steering Group to ensure that all sites have access to a colleague with enhanced knowledge and experience of managing investigations and liaising with senior colleagues. We conducted an additional training needs analysis for our Champions in 2021 and agreed a bespoke development programme to be delivered throughout 2022 in conjunction with Slave Free Alliance.

### MODERN SLAVERY PARTNERSHIP & PREVENTION PLANS

To ensure improvement actions are effectively and consistently implemented across all our Manufacturing and Logistics sites, in 2021 we introduced bespoke Partnership & Prevention Plans developed by our Loss Prevention team. These plans use the Independent Anti-Slavery Commissioner’s Maturity Framework as reference point, and build on several of the recommendations from the review into Operation Fort.

These Plans are designed to support and guide sites as they progress through four levels of compliance and improvement – Foundation, Basic, Intermediate and Advanced, with key deliverables aligned to each phase. All sites are working towards achieving the Advanced level by the end of 2022 and progress is reviewed on a regular basis.

Engagement with regional Anti-Slavery Partnerships is an important aspect of the Plan and all sites are now developing these working relationships with the support of our MS Champions. These partnerships are key to building more effective responses at a local level and enable our site teams to establish networks and access on the ground support from local government and law enforcement agencies.

### Our Supply Chains

Where risk is identified in the first tier of our Food, Non-Food, and Fresh Produce raw material supply chains, we require our suppliers to demonstrate compliance to our Ethical Trading Code through the provision of third-party social audits. Restrictions on travel into and within countries due to COVID-19 continued into 2021 and we accept Sedex Virtual Assessments where in-person visits were not possible.

Third-party audit activity identified 12 tier one factories with Major, Critical or Business Critical non-compliances raised under the heading of ‘Employment is Freely Chosen’. These issues mainly related to poor implementation of overtime rules or requesting workers to make financial contributions towards protective equipment or access cards. There were no significant indicators of forced labour or modern slavery raised at any sites. Eight sites have fully closed their non-compliances (including all Critical and Business Critical Issues), three sites have implemented corrective actions that are pending auditor verification and 1 site has yet to upload satisfactory evidence that the issue has been resolved.

1,002 audits undertaken at active sites linked to Morrisons on the Sedex platform in 2021 using either the Sedex Members Ethical Trading Audit (SMETA), Sedex Virtual Assessment (SVA) or Business Social Compliance Initiative (BSCI) methodologies

This includes over 99% of the High Risk manufacturing sites in scope of our compliance programme

“ ADDRESSING THE RISKS OF MODERN SLAVERY AND LABOUR EXPLOITATION IS CLEARLY A PRIORITY FOR MORRISONS, AND THEY HAVE DEMONSTRATED AN ONGOING COMMITMENT TO DELIVERING MEANINGFUL CHANGE IN THEIR INDUSTRY. SLAVE-FREE ALLIANCE ARE PROUD TO BE A TRUSTED PARTNER THIS PROCESS, PROVIDING CONTINUING SUPPORT TO ENSURE WORKERS ARE PROTECTED AND TREATED WITH FAIRNESS, DIGNITY AND RESPECT. ”

Susan Banister  
Account Director at Slave-Free Alliance

## 6. Due Diligence in our Business & Supply Chain Continued

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 and Compliance teams. We did not receive any concerns relating to modern slavery or labour exploitation via this route in 2021. We did however collaborate with other supermarkets to address issues raised at shared suppliers through their whistleblowing channels – see [Performance Reporting](#) section for more details.

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 Food Network for Ethical Trade (FNET), the Ethical Trading Initiative (ETI), Spain Ethical Trade Forum (SETF), 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.

### MODERN SLAVERY INTELLIGENCE NETWORK

**To increase the effective sharing of intelligence in our sector, in 2020 Morrisons became a founding member of the Modern Slavery Intelligence Network (MSIN) and continued our support throughout 2021. The MSIN is a pioneering non-profit collaboration between UK food and agriculture businesses created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.**

Members have come together to develop effective ways of working and to ensure, as far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation. In 2021, the network appointed international NGO, Stop the Traffik as a data sharing partner to develop an online platform and undertake a trial using dummy data.

Throughout the year, members have conducted 27 meetings with priority stakeholders, including NGOs and law enforcement agencies, to share plans and seek guidance on the approach the MSIN should take in order to achieve successful outcomes. Live intelligence sharing is due to start in early 2022 with plans for a formal launch in the second half of the year.

We have supported the ETI Italy Fresh Produce working group since 2019 and were actively involved throughout 2021. This group was established to address long standing issues relating to the treatment of migrant workers and risks associated with the use of unregulated labour providers known as ‘caporalato’. The work is led by a locally based consultant and includes engagement from several major retailers and brands, including Morrisons key suppliers of both branded and own-brand canned tomatoes.

2021 activity focused on increasing engagement with regional stakeholders such as unions and sector representatives, and expanding the scope of the project to include wider agricultural supply chains. This creates a foundation for further activity in 2022, including improving access to grievance mechanisms for workers and holding a series of in-country training sessions for growers.

Beyond tier one, our commodity level risk assessment has identified new potential risks in our supply chain, including forced and child labour in coffee, tea and cocoa sourcing from Africa, Asia and South America. We are taking steps to build transparency in these supply chains and gain greater visibility of existing regional and local initiatives that we can partner with to enhance our due diligence, but acknowledge that our ability to directly impact change could be limited. Our initial research did however identify an opportunity to improve engagement with third-party certification schemes to add an additional layer of mitigation at primary producer level. We have established internal targets to increase participation in Rainforest Alliance and Fairtrade certification as a result and will provide an update on progress in our next statement.

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 collaborated with the Dutch sustainability initiative IDH throughout the year to increase our understanding of the living wage and living income risks in our supply chains. We initially focused our resources on a detailed assessment of the living wage gap in our banana supply chains, starting with growers with whom we have a direct commercial relationship. The IDH Salary Matrix was completed in 2021 by all our growers in Colombia, Costa Rica and Ecuador, and will be validated by an external third party in early 2022. Once this process is complete, we plan to commence work to close the gap and publish frameworks and timescales to support our ambition. Collaboration across the sector will be key to achieving this and we support the establishment of national coalitions to take positive action in this area.



# 6. Due Diligence in our Business & Supply Chain Continued

## WORKER-FOCUSED IMPROVEMENT

To enhance due diligence in our clothing supply chains, we entered into a partnership with ESG consultancy, The Reassurance Network (TRN) in 2021 to trial an innovative, worker-focused approach towards factory manager and worker engagement. Through collaborative dialogue, this approach focuses equally 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 very 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.

We piloted this new approach at 20 of our sites located in Bangladesh, China, India and Turkey. The findings include the following, among many others:

- Identification of labour shortage issues, their root causes and opportunities to improve recruitment strategies
- Recognition that communication channels need to be strengthened to consider the needs of all employees, including migrant workers
- Improvements required around worker awareness of their rights to health care, social security, COVID-19 support and other wellbeing programmes
- Recognition of how unequal pay can lead to worker dissatisfaction and poor performance, leading to wider quality and hygiene issues

During 2022, we will develop improvement plans around these findings, in consultation with the factories and identify additional sites for the next round of visits. This approach provides us with a much higher level of confidence in working conditions and a more robust method of due diligence to enable us to better understand, remedy and report on human rights within our supply chain.

Our Nutmeg business also maintains membership of the Better Cotton Initiative (BCI) 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. This also provides a degree of mitigation against sourcing cotton from regions where there is known risk of forced or child labour.

In our China based General Merchandise and Clothing supply chains, we continue to work in close partnership with local organisations including the Mekong Club, The Centre for Child Rights and Business, ETI and Sedex to enhance our approach to due diligence.

We acknowledge the ongoing risks posed in the region relating to recruitment practices, forced labour and working conditions, and the emerging issues relating to the internal movement of workers under conditions of modern slavery. We engaged with the British Retail Consortium on a project to gain deeper insight into the ownership structures of our factories to establish whether there are any links to sanctioned individuals or known areas of heightened forced labour risk. This research did not reveal any significant issues in our existing supply base. The tool we used for the exercise (Sayari) proved highly effective and is now being reviewed for wider risk mitigation applications in our business.

100%  
of the cotton in Nutmeg clothing  
will be Better Cotton by 2025

# 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 current information. Modern Slavery Awareness training is available to colleagues at all levels of the business through our online learning platform and tailored to job roles wherever relevant.

We operate a bespoke, interactive modern slavery and human trafficking training package developed specifically for our vertically integrated operations, which includes content informed by actual cases of modern slavery, and additional material provided by the GLAA. This is regularly reviewed by our Training team and updated where necessary.

In 2021 this training was accessed by over 5,000 colleagues across our Manufacturing and Logistics operations. This is broken down into the following categories:

Managers' e-learning module

422

managers, supervisors and team leaders

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

4,810

colleagues

To build awareness and address the increasing 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 and completed by 38 colleagues in 2021. 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.

We continue to utilise our external partnerships to provide access to training for internal colleagues. The Stronger Together 'Tackling Modern Slavery in UK Business', one day training course remains mandatory for Morrisons Manufacturing and Logistics Site Managers and People teams, and we will be offering the Advanced Course for relevant colleagues in 2022.

We have also made the expanded suite of Responsible Recruitment Toolkit (RRT) training courses available to all colleagues who are directly involved with the recruitment of temporary or permanent workers to any of our businesses.

Recognising the increasing risk of people trafficking and organised immigration crime following the UK's exit from the European Union, our Loss Prevention team developed a new training module based on material provided by the Police, National Crime Agency and Crimestoppers. An initial trial at our Sittingbourne Logistics site in 2021 was well received and we plan to roll out to additional sites throughout 2022.

Building on a commitment from 2020, we developed innovative, modern slavery live scenario training workshops in collaboration with the Prevention & Partnerships Team at the GLAA. The key learning outcomes for this training are:

- Increased confidence in identifying indicators of modern slavery and taking action
- Understanding our escalation process and what to do if an incident is reported
- Knowing what internal and external support is available for site teams
- Understanding the roles of the GLAA and Slave Free Alliance

A pilot session was delivered in 2021 to evaluate the format, and used to review the final content, which has now been agreed and finalised ahead of formal roll out. The GLAA will deliver an upskilling session to our Modern Slavery Champions, who will then cascade the training to People teams at all our Manufacturing & Logistics sites during 2022.

## Training for Suppliers

We maintain a supplier engagement programme with key first tier, own-brand suppliers, conducting biannual review 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 as we complement our existing compliance programme with elements of human rights due diligence in our extended supply chains. They also give us the opportunity to communicate the details of available training and ensure that suppliers are cascading these details 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 with the initiative in 2013, Stronger Together have delivered workshops on Tackling Modern Slavery in UK Business to 1,853 delegates from over 400 of our suppliers, including an extra 333 delegates in 2021. In addition, 66 supplier delegates have now attended the Advanced Tackling Modern Slavery in UK Business training and 26 of our primary UK suppliers are registered as [Stronger Together Business Partners](#) to demonstrate their continuing commitment to tackling these issues.

1,853

Since 2013, 1,853 delegates from 400 of our suppliers have accessed Stronger Together training



# 7. Training, Awareness & Capacity Building Continued

Through our sponsorship of the [Responsible Recruitment Toolkit](#), 169 of our suppliers have accessed the benefits of the Toolkit and over 266 individuals have attended RRT training sessions since 2019. 103 suppliers and labour providers from across our Food, Non-Food and Good Not for Resale divisions have also now subscribed to the RRT Online Tool, and we will be actively seeking to increase this throughout 2022. We also plan to mandate linking to Morrisons on the RRT platform and completion of the self-assessment tool for all new suppliers of labour and site services into our Manufacturing business from 2022 onwards.

Ethical Trading colleagues from our Global Sourcing office in Hong Kong continue to engage with our suppliers in Asia around 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 and the Centre for Child Rights and Business (The Centre). 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.

In 2021 we engaged The Centre to develop a new training session for our Chinese suppliers focusing on the continuing risk of child labour and forced labour and the need for responsible recruitment practices.



A total of three webinar sessions were delivered to 76 suppliers from 12 provinces. The core outcomes included clarifying the definition of child labour and forced labour, enhancing participants' knowledge on responsible recruitment and management practices, and showcasing best practices for eliminating child labour risks among producers. Participants received valuable insights on child labour and forced labour as well as practical prevention tools that they can apply after the training.

99% of respondents to a subsequent impact survey (128 delegates) agreed that after the workshop, they were more confident to take measures to keep their factory child labour and forced labour free.

In 2022 we are shifting the focus of our training in the region to focus on improving communication between workers and management and increasing access to effective grievance mechanisms. These sessions will be delivered by The Reassurance Network in the second half of the year.

## SUPPORT FOR UK FARMING

**In 2021 we specifically focused on supporting our UK growers through ongoing labour shortages and providing tools, resources and guidance on how this can be addressed responsibly. This included partnering with members of the Food Network for Ethical Trade (FNET) to fund and support a supplier-focused webinar and Q&A session covering changes to immigration rules and right to work checks. We provided additional funding to make the Association of Labour Providers (ALP) Expert helpline available to all applicable suppliers. This enabled growers and farmers to access support and guidance on how to source labour responsibly.**

We built on this by supporting the development of a second webinar for growers and farmers that was delivered in January 2022. This included representatives from the National Farmers Union (NFU), Association of Labour Providers, UK Growers and a keynote from Sir Roger Gale MP.

The webinar focused on several pressing concerns, including:

- Recruitment and retention of workers
- The Seasonal Agricultural Workers Scheme (SAWS)
- Managing working hours
- Controlling costs and wages

198 delegates attended the training and 99% of respondents to a subsequent survey rated the session as Good or Excellent.

These targeted sessions were complemented by our support for the Food Farm Help website, which was originally designed to provide guidance and tools in response to the COVID-19 pandemic. Growers continued to access this resource throughout 2021, with over 10,000 unique visitors and 260,000 hits to the site recorded in 2021.

## 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. Detail of some of the work we have undertaken through collaborative partnerships in 2021/22 can be found [here](#):

### Better Cotton Initiative



We are committed to improving cotton farming practices globally through engagement with the Better Cotton Initiative.

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 take tangible action in tackling forced labour in the lowest tiers of our clothing supply chain. All cotton used in our Nutmeg clothing range will be Better Cotton certified by 2025.

### Ethical Trading Initiative (ETI)



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.

In 2021 we also supported a coalition of food retailers, suppliers and NGOs working together through ETI to provide technical assistance and build resilience at twelve farm sites across four countries in Africa in response to the impacts of COVID-19. Further detail on this work can be found [here](#)

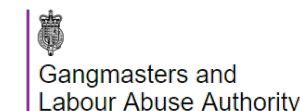
### Food Network for Ethical Trade (FNET)



Through our FNET membership we work with over 50 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 addition to our attendance at working groups, in 2021 we also supported an interactive online event for horticulture growers across the UK to tackle the unprecedented labour challenges that continue to impact the sector. This was attended by over 190 growers – further detail can be found in the [Training, Awareness & Capacity Building](#) section.

### Gangmasters and Labour Abuse Authority (GLAA)



We have a well-established relationship with the GLAA and continued to work closely with them throughout the year.

In 2021 our Loss Prevention and People teams collaborated with the GLAA to develop live, scenario based training exercises that will be rolled out across our sites in 2022. We also supported a review into the effectiveness and relevance of the GLAA Supermarket Protocol, to increase the impact of these relationships going forward.







### IDH








IDH (the Sustainable Trade Initiative) is an organisation that works with businesses, financiers, governments and civil society to realise sustainable trade in global value chains.

We worked with IDH throughout 2021 to build our understanding of living wage issues in global supply chains, and accessed their tools and support to conduct an assessment of living wage levels in our direct sourced banana business.

# 8. Collaborative Action Continued

Mekong Club	Modern Slavery Intelligence Network (MSIN)	Palm Oil Transparency Coalition	Responsible Car Wash Scheme (RCWS)	Responsible Recruitment Toolkit (RRT)	Seafood Ethics Action Alliance (SEA Alliance)
					
<p>Mekong Club are a Hong Kong based initiative supporting the private sector in the fight against modern slavery across the Asia-Pacific region.</p> <p>We have been members since 2018 and our Global Sourcing team in Hong Kong meet regularly to discuss improvements to our regional strategy and share resources and tools with our direct suppliers in China. In 2021 we also supported workshops and member events to address the emerging risks of forced labour in our China based supply chains.</p>	<p>Morrisons is a founding member of the Modern Slavery Intelligence Network (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.</p> <p>We continued to actively support the development of the Network throughout 2021 and maintained positions on both the Technical and Strategic Advisory Groups. Full details of MSIN activity can be found at <a href="http://www.msini.org.uk">www.msini.org.uk</a></p>	<p>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 large global commodity traders on key sustainability issues, including the protection and respect of workers' rights.</p>	<p>Morrisons have over 35 franchised hand car wash operations in store car parks across our estate and we recognise the risks associated with this sector and labour profile. We were founding supporters of the Responsible Car Wash scheme in 2018 and require all franchises to meet the requirements of their <a href="#">Code of Practice</a></p> <p>In 2021 we supported the development of a multi-stakeholder trial with funding from the Home Office to develop and pilot a blueprint for a national industry accreditation scheme for the hand car wash sector. Further detail on this activity can be found at <a href="https://rcws.org.uk/">https://rcws.org.uk/</a></p>	<p>We are founding sponsors of the Responsible Recruitment Toolkit (RRT) and provide free access to all our suppliers and their labour providers, at any tier of our chain, to their online resource portal and training workshops.</p> <p>We continued to share and access their guidance throughout 2021 and several Morrisons colleagues attended online training sessions alongside our suppliers. We also accessed their insight and guidance to support our overseas recruitment of butchers (via the Seasonal Agricultural Workers Scheme) to mitigate the risk of unfair and exploitative recruitment practices.</p>	<p>The SEA Alliance is a collaboration of UK seafood companies and stakeholders established to share information on emerging issues, agree best practice solutions and provide a forum for pre-competitive action. We remain actively engaged with this initiative and attended meetings throughout 2021.</p>

# 8. Collaborative Action Continued

Slave-Free Alliance	Spain Ethical Trade Forums (SETF)	Stronger Together	The Centre for Child Rights and Business	The Reassurance Network (TRN)
				
<p>We became the first supermarket member of Slave-Free Alliance (SFA) in 2020, and continued to support the initiative and access their services throughout the previous year. In 2021 their Technical Services team helped us to review and update our internal escalation processes (see Due Diligence section) and provided ad hoc risk updates. We continue to attend multi-stakeholder events and colleagues from the Morrisons People team presented during one group session in 2021 to share our experiences of managing increased risk at peak production times with other members.</p>	<p>We have been members of the SETF since 2019 and actively support their work, facilitating grower-led responses to the labour challenges in the Spanish agricultural sector. They operate several working groups and have produced best practice guidance for members on topics including:</p> <ul style="list-style-type: none"> <li>• Responsible Use of Labour Providers</li> <li>• Grievance Mechanisms</li> <li>• Worker Accommodation Standards</li> </ul> <p>We encourage all our suppliers in the region to engage with the Forums and retained a seat on the Governance Group in 2021.</p> <p>Further details of their work can be found on the <a href="#">SETF website</a>.</p>	<p>Morrisons is a founding sponsor of Stronger Together, a multi-stakeholder, business led initiative that aims to reduce forced labour, trafficking and other hidden third-party exploitation of workers. We are also a steering group member of the UK Consumer Goods programme.</p> <p>Through our sponsorship, we offer free Stronger Together Resources and training for all our suppliers in the UK, which continues to play an essential role in building awareness throughout our UK supplier base. Further detail can be found in the <a href="#">Training, Awareness &amp; Capacity Building</a> section.</p>	<p>The Centre for Child Rights and Business (The Centre) supports businesses to deliver improvements within their supply chains that not only benefit workers, families and children, but also deliver positive business outcomes.</p> <p>In 2021 we continued our work with the Centre to enhance the capacity and awareness of suppliers in China on child labour, forced labour, responsible recruitment and management of young workers and other vulnerable groups.</p> <p>The Centre also supported us with the development of our Child Labour Policy and we made strong progress on our commitments under their Joint Action Pledge Towards the Elimination of Child Labour.</p>	<p>TRN is a global network of experts that work with companies and their supply chains to improve environmental, social and governance (ESG) performance.</p> <p>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 20 visits have taken place to date and we will expand our relationship with TRN in 2022 to include worker communication workshops for strategic suppliers in China.</p>

## 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 below.**
- **Third-party ethical audits undertaken on our own-brand and exclusive sites – see [Due Diligence in our Business and Supply Chains](#) section**
- **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 2021/22 reporting year. This represents a 30% decrease in cases compared to 2020 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. Across the nine cases we identified potential indicators of modern slavery related offences as well as unlicensed gangmaster activity and organised immigration crime. We have also seen an increase in more opportunistic exploitation such as allegations of workers being charged unfair recruitment fees prior to travel and to access specific shifts once in work.

Victims in all cases were predominantly migrant workers from Eastern Europe, with Romania continuing to be the main country of origin for both victims and perpetrators. The GLAA and/ or police were directly involved in six of the investigations, with the remaining cases resolved by our People and Loss Prevention teams without the requirement for external support.

In January, we also uncovered an additional issue relating to our sourcing of workers from Uzbekistan through the Seasonal Agricultural Worker Scheme which related to the payment of fraudulent recruitment fees. During welfare interviews undertaken on arrival at our site in the UK, four workers reported that they had paid approximately \$1,000 each to a third party in return for accessing the recruitment process in Uzbekistan. All workers were fully reimbursed and an investigation is ongoing in collaboration with our labour provider and the GLAA. A further update will be provided in our next statement.

### Reported incidences of modern slavery in our supply chains

In addition to activity in our own operations, this year, we were also made aware of three potential incidents in our UK supply chain, one of which included confirmed victims of modern slavery offences. All of these cases were reported either directly to us or through an external source, including the UK Modern Slavery Helpline and the Ethical Trading Initiative. In line with the principles of the [Retailer Protocol on Handling Cases of Modern Slavery](#), we chose to undertake collaborative investigations in all cases to reduce duplication of effort and support consistent, clear communications for the suppliers involved.

The two cases that were not subsequently confirmed as modern slavery related to issues occurring in food processing and manufacturing operations. These allegations included bullying, harassment, unsafe working conditions and exploitative fees being charged for work or shifts. In response, and in collaboration with other UK supermarket partners, we commissioned independent, unannounced site visits to conduct detailed investigations and interview workers.

The most serious allegations were found to be uncorroborated, but the visits did identify opportunities for improvement in other areas and progress will be continually monitored through future site visits and third-party audits.

The third case took place at a poultry supplier and was communicated to us once a Police investigation had been concluded. The case involved the exploitation and control of five East European migrant workers by a third party, who was later prosecuted and sentenced to six years in prison. Our supplier was instrumental in bringing concerns to the attention of relevant authorities and provided full support for the investigation in conjunction with their primary labour provider. All victims were fully supported throughout the process and accessed government provided remediation facilities.

We inevitably face challenges addressing human rights risk in our supply chains, it is therefore important that we continually review processes as our programme develops. In 2019 our unannounced site visit process identified an underage worker in a Chinese factory supplying us and other major UK retailers with electrical appliances. We worked closely with our competitors, the ETI and Centre for Child Rights to protect the child and develop a long term remediation plan. This plan concluded in 2021 after 29 months when the child reached the legal age to work in China and started a role in a local hospitality business.

The child was supported financially for the full period, with a stipend equivalent to the legal minimum wage in the applicable province, and regularly visited by NGO representatives to oversee and ensure the process was effective. This included the provision of education, vocational training and ongoing counselling support during a challenging period of readjustment back into family life. We built on our learning from the case to develop a dedicated Child Labour Policy and process, which was drafted in collaboration with The Centre and rolled out in 2021.

## 10. Progress against the next steps detailed in our 2020/21 statement:

We set objectives across our business and supply chain on an annual basis, these targets are purposefully challenging and can evolve over time. We are pleased to report that good progress has still been made to address key challenges in both our business and wider supply chains. 12 objectives from 2021 have been completed, and four are ongoing with activity carried over into 2022.

Commitment	Status	Comment
Deliver training on modern slavery in global supply chains to Technical colleagues who undertake site visits	●	19 colleagues from our Technical team attended a training session on 'Tackling Modern Slavery in Global Supply Chains'. This included six of our internationally based At Source Technical Managers who regularly undertake farm visits.
Roll out Modern Slavery Partnership and Prevention Plans across our vertically integrated site operations	●	Template and supporting materials developed and launched at all Morrisons Manufacturing & Logistics sites. 12 month implementation schedule in place with regular site based performance reviews.
Undertake live modern slavery scenario workshops at Morrisons Manufacturing and Logistics sites in collaboration with the GLAA and police	○	Format developed in conjunction with the GLAA and West Yorkshire Police. These two hour sessions will focus on how our sites manage challenging situations and ensure adequate contingencies are in place. Roll out was delayed due to COVID-19 restrictions on site but will commence in 2022.
Launch a 'Supporting Survivors of Modern Slavery' policy	●	Policy created with contributions from multiple internal and external stakeholders, including Slave Free Alliance. Launched in October 2021 as part of our Anti-Slavery Day communications.
Continue to develop our network of Modern Slavery Champions	●	Four Modern Slavery Champions in place across our Manufacturing and Logistics operations to lead engagement and provide support to other sites in their region. Enhanced training and development plans in place to ensure Champions have access to current best practice.
Welcome the first survivors of modern slavery on to placements in our manufacturing operations through the Bright Futures initiative	●	First survivor entered a work placement at our Cutler Heights Fresh Produce processing site in Bradford. The placement was successful and led to the offer of a permanent role. We plan to offer further opportunities to survivors in 2022.
Establish a working group to identify and mitigate the risks of organised immigration crime in our transport and logistics operations	●	Working Group established with representation from our Supply Chain, Ethical Trading and Loss Prevention teams. Output in year one included the development and roll out of e-learning materials to help Logistics colleagues recognise and report indicators of organised immigration crime.
Review and update our Modern Slavery Incident Management Checklist and process in collaboration with a third-party expert	●	Full review of our existing process undertaken in conjunction with input from Employee Relations, Loss Prevention, People and Business Continuity teams. This was undertaken with the support of Slave Free Alliance and launched across our estate in October 2021. More detail can be found in the <a href="#">Due Diligence</a> section of this statement.

○ On going ● Complete



## 10. Progress against the next steps detailed in our 2020/21 statement: Continued

Commitment	Status	Comment
<b>Publish the results of our global supply chain risk assessment and prioritising commodities for enhanced due diligence</b>	●	Risk assessment completed in conjunction with Ergon Associates in the first half of 2021. Results and outputs from this work can be found in the <a href="#">Ethical Trading</a> section of the Morrisons corporate website.
<b>Map selected high risk commodity supply chains back to primary processing level</b>	○	Supply chain mapping of selected priority commodities commenced using the AuthenticateIS platform following completion of the commodity risk assessment. This activity is ongoing and will continue into 2022/23.
<b>Undertake a pilot human rights impact assessment on a priority risk commodity</b>	○	Human Rights Impact Assessment commissioned and commenced on our coffee supply chains in Brazil and Peru. Results and action plans will be published on our corporate website.
<b>Support and fund the continuing development of the Modern Slavery Intelligence Network (MSIN)</b>	●	We continued to actively support the establishment of the Modern Slavery Intelligence Network throughout 2021 and maintained positions on both the Technical and Strategic Advisory Groups.
<b>Support our UK growers to manage labour shortages and associated risks</b>	●	Support delivered throughout 2021, including continued funding of the Food Farm Help website and communication of resources via our Fresh Produce team. We also funded and supported the development of grower focused webinars to address continuing labour challenges and develop solutions for the coming year.
<b>Communicate our requirement for all applicable suppliers to comply with the reporting requirements in the Modern Slavery Act and upload statements to the UK Government Modern Slavery Registry</b>	○	Commitment to be communicated to suppliers via an update to our Ethical Trading Policy in the second half of 2022.
<b>Offer further capacity building training on responsible recruitment and forced labour risk to all tier one manufacturing sites in China</b>	●	In depth training delivered to 76 suppliers across 12 Chinese provinces in partnership with the Centre for Child Rights and Business. Full detail can be found in the <a href="#">Training, Awareness &amp; Capacity Building</a> section of this statement.
<b>Conduct detailed site visits within our Nutmeg clothing factory base with an external partner to highlight issues that are not commonly reported through ethical audits</b>	●	20 in depth, dialogue focused visits undertaken at supplier sites in China, Turkey, India and Bangladesh by The Reassurance Network (TRN). Further detail of this work can be found in the <a href="#">Due Diligence</a> section of this statement.

○ On going ● Complete



# 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 2022/23 we will continue to deliver improvement and progress in our own operations by:**

Trialling a worker voice solution to complement existing worker welfare monitoring

Offering further work placements to survivors of modern slavery through the Bright Future programme

Completing the implementation of Modern Slavery Partnership & Prevention Plans at all sites

Engaging an expert third party to assess risk in international people supply chains for our Morrisons Manufacturing business

Commencing live data sharing through the Modern Slavery Intelligence Network

Implementing enhanced due diligence requirements for labour and service providers

Completing third-party ethical audits at all Morrisons Manufacturing operations

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

Publishing details of our first human rights impact assessment and implementing improvement plans

Increasing UK supplier engagement with modern slavery and responsible recruitment resources

Expanding our use of dialogue based workplace assessments in high risk sourcing countries

Delivering in-depth training on enhanced worker communication for suppliers in China in collaboration with an expert third party

Improving access to effective worker representation at tier one sites.

Supporting training and capacity building for suppliers in the Italian agricultural sector

Rolling out digital solutions to support migrant workers entering the UK via the Seasonal Agricultural Worker scheme



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