



# Modern Slavery Statement 2023/24

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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 31/10/2023 to 29/10/2024.

Our modern slavery statement also covers activity at the following wholly-owned subsidiaries: Bos Brothers Fruit & Vegetables B.V., Myton Food Group Ltd, 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

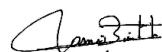
Our business starts with the people who make our products. Whether in our factories in the UK or supplier sites across the world, we are focused on ensuring that everyone who helps to make our products is treated with dignity and respect, in safe and fair workplaces.

Modern slavery is an abhorrent crime and we are committed to fighting it. As a food maker and shopkeeper selling goods from around the world, we are mindful of the risk of forced labour and exploitation in our own operations and global supply chains. Our eighth Modern Slavery Statement details our ongoing work to tackle this, including how we identify and address modern slavery risk in our business and supply chains, and our steps with key partners to support positive outcomes for survivors.

We can make faster and more meaningful progress by working in partnership with suppliers and this remains at the heart of our approach. We are also active participants in a range of industry initiatives which recognise the importance of collective action in delivering change. Our ongoing stakeholder engagement is set out in this statement.

No business, sector, or region is immune to the risk of modern slavery. So we continue to develop our approach, building our resilience and increasing the training and support we provide for our colleagues and suppliers.





Rami Baitiéh,  
Chief Executive

## Highlights of our 2023/2024 activity included:

<p>Recognised as Bright Future's most successful partner after providing further placements for modern slavery survivors</p> <p>page 8</p>	<p>Streamlined our Modern Slavery Partnership &amp; Prevention Plans across our business operations</p> <p>page 12</p>	<p>Participated in collaborative industry action to improve responsible purchasing practices</p> <p>page 14</p>
<p>Conducted more dialogue-based factory improvement visits in higher risk sourcing locations</p> <p>page 15</p>	<p>Modern slavery training and briefings accessed by more than 9,000 colleagues across Manufacturing and Logistics</p> <p>page 17</p>	<p>168 representatives from 114 Morrisons suppliers have attended the Advanced Tackling Modern Slavery in UK Business workshop held by Stronger Together</p> <p>page 18</p>

## 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 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 and has representation across Morrisons and Myton Food Group.

Additional executive-level governance of our human rights strategy is delivered through our ESG programme - Sustain, with the Sustain Governance Committee chaired by our Chief Executive.



### 3. Structure, Business & Supply Chains

**Morrisons is a vertically-integrated business: a major UK supermarket and significant food manufacturer employing almost 100,000 colleagues. We have 497 supermarkets and over 950 convenience stores. In addition to our head office in Bradford, we have separate 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 directly source a significant portion of our fresh goods from farmers and fishers, process through abattoirs and manufacturing sites owned by our subsidiary (Myton Food Group) and handle distribution through our own logistics network. This integrated model allows us to maintain rigorous control over the provenance and quality of the food we sell in our stores. Our dual role as both a food maker and shopkeeper provides us with an unparalleled understanding of the potential challenges and risks within the supply chain.

Myton Food Group operates 18 manufacturing sites producing a diverse range of products including bread, flowers and plants, seafood, fresh

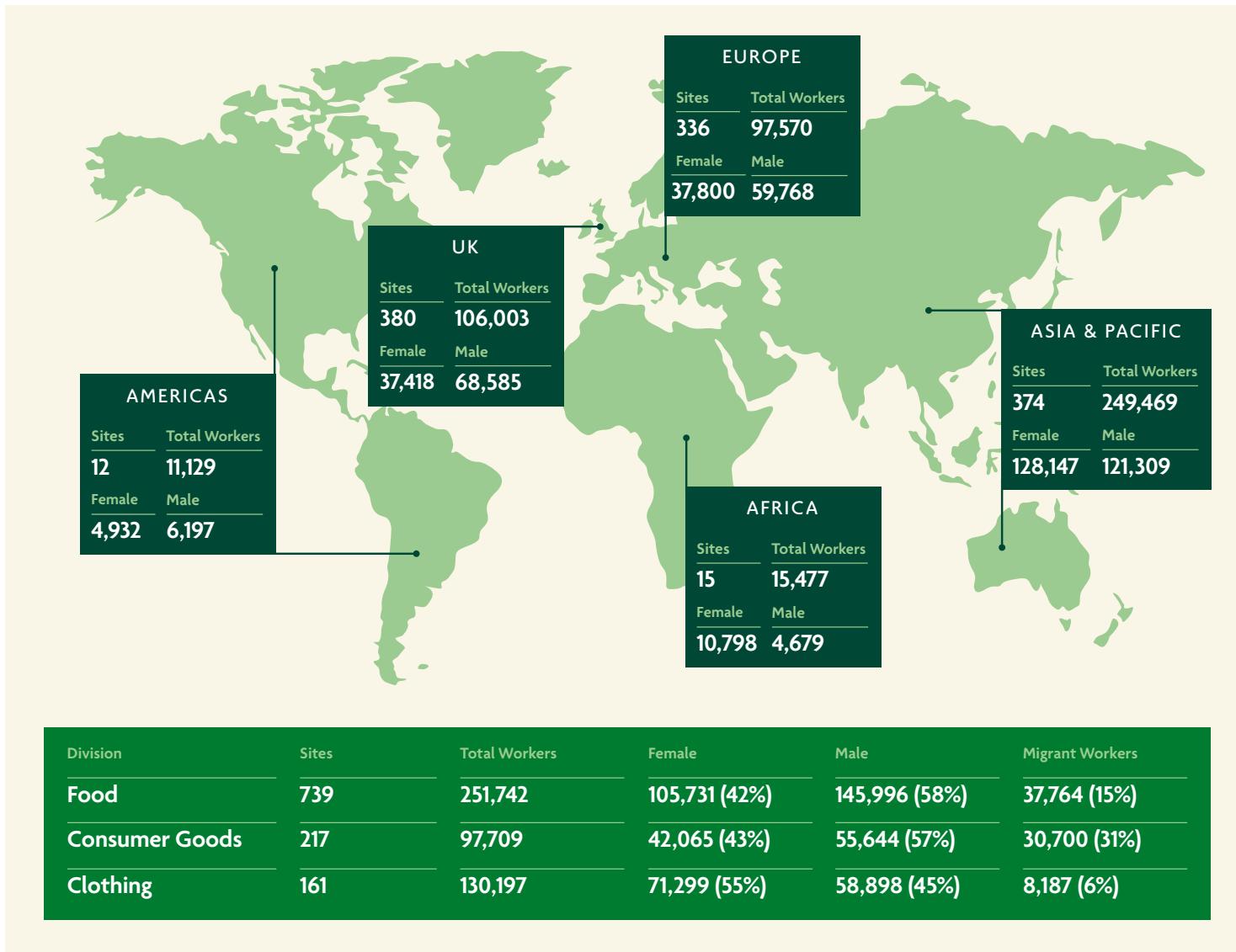
fruit and veg, chilled foods and meat products. Additionally, we operate distribution centres at locations throughout the UK.

A third of our tier one, own brand supply chain is now situated in the UK and a substantial proportion of the fresh food in our stores is manufactured in our own factories. Beyond our vertically-integrated supply model, the majority of our business relationships are managed indirectly through primary suppliers based in the UK or EU, with the exception of goods procured through our Global Sourcing team in Hong Kong where we primarily engage directly with manufacturers. Currently our ethical compliance monitoring programme oversees 1,117 tier one factories and processing locations across 52 countries, employing approximately 480,000 workers.

#### Supply Chain Transparency

We are dedicated to increasing transparency in our supply chains and continue to achieve compliance with the Ethical Trading Initiative (ETI) Corporate Transparency Framework commitment. We publish details of all our tier one manufacturing sites on the [Open Supply Hub](#) site. This will be updated biannually.

### 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 implemented comprehensive policies and processes for our own operations to ensure we conduct our business in a responsible manner, including aspects of modern slavery, 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 readily available to all colleagues through our online My Morri platform. Where appropriate they are translated and displayed around our sites.

Our Employee Relations team has worked with expert stakeholders (including the charity Slave-Free Alliance) to develop our Supporting Survivors of Modern Slavery Policy. The policy affirms our dedication to supporting and providing 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 also enables us to offer workplace opportunities in our operations 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. Continuing this work in 2023/24, we had two further successful placements which also led to permanent roles. We are proud to have been identified once again 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 safe employment opportunities at our sites across the UK for suitable candidates.

### 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 fundamental to how we monitor, manage, and mitigate human rights risks in our supply chain. Morrisons' standard terms & conditions mandate that all suppliers adhere to and disseminate our Code's requirements, which include specific commitments relating to modern slavery, forced labour, and the responsible recruitment of both permanent and agency-provided workers. Additionally, we require suppliers to ensure, to the extent reasonably possible, that their own suppliers, agents, labour providers, and subcontractors who are directly or indirectly involved in the provision of goods comply with these requirements.

Additional specific requirements continue to supplement our Ethical Trading Policy, such as those for fresh produce and for ingredient suppliers through the implementation of a Vendor Assurance Policy. This requires ingredient suppliers to Myton Food Group to join the Supplier Ethical Data Exchange (Sedex), register all tier one supplying sites and complete a comprehensive self-assessment questionnaire.

We have also implemented policies that clearly define our expectations of suppliers regarding the remediation of child labour and the use of homeworkers in our supply chains.

In addition, we have responsible sourcing policies which help to reinforce our approach to addressing modern slavery and exploitation. This includes a requirement to utilise accredited certification schemes through our policies covering Timber, Soy and Palm Oil sourcing. Our Fish and Seafood Sourcing Policy also includes explicit requirements for addressing and managing risks around illegal, Unreported and Unregulated (IUU) fishing, due to the associated risk of forced and bonded labour and migrant worker exploitation.

## 5. Risk Assessment

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

Our Ethical Trading team maintains country and commodity-level risk ratings to support and guide 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 continued to communicate to our own brand suppliers a list of countries and regions from which all sourcing of finished goods, ingredients and raw materials is prohibited. This list comprises 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.

The primary focus of our compliance activity remains our tier one, own brand supply chain, and we continue to utilise the Sedex platform to screen all new suppliers in scope of our Ethical Trading Policy. We continue our close working relationship with Sedex and have actively participated in consultations addressing changes planned for their methodology and data sharing platform.

We acknowledge that it is not possible to completely eliminate the risk of modern slavery. We are committed to strengthening controls over our tier one suppliers and to extending oversight to lower tiers of our supply chain where the risk of human rights abuses is often greatest.

To deepen our understanding, we commissioned Ergon Associates to update their independent assessment of our highest risk commodities in our own brand supply chain. This was completed in 2024 and included new products and countries within Morrisons supply chain. The assessment comprised desk research using recognised data sources to identify key risks including modern slavery across 40 commodities and geographies.

Combining this desk research and stakeholder engagement, we identified specific commodities where there is higher modern slavery and human rights risk. We have prioritised our mitigation and improvement activity in these key supply chains, strengthening our established tier one compliance programme.



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 complex and require sustained effort and collective action. We recognise that effective solutions cannot be achieved independently, 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 recognise that developing effective and sustainable solutions will require time. Further 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 and integrating guidance from our extended network of partners and stakeholders. Our vertically-integrated structure also provides broad insight into evolving risks 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.

To enhance oversight, our site-based People Managers conduct regular audits on our labour provider 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 our approach to mitigate risks in our operations, we proactively share information with migrant workers on their rights in the UK and provide 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 (433 responses were received in 2023/24)

Using feedback from our Manufacturing and Logistics sites and a peer review by the not-for-profit organisation Stronger Together, a revised plan was developed and introduced in January 2023. This focuses on 11 key activities including 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.

We review all incidents on a quarterly basis, looking at all potential incidents of modern slavery recorded by the business. The review looks at all elements of our process for managing potential incidents of modern slavery. This ensures 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.

Partnership working continues to underpin all elements of our approach to modern slavery, including regular engagement with the police and other agencies. The relationship with our third-party resource provider Staffline is a key example of an effective working partnership which is tested regularly.

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

### 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 with our Ethical Trading Code through the provision of third-party social audits.

In 2023/24, 712 audits were undertaken at active sites linked to Morrisons on the Sedex platform, utilising 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. Notably, no significant indicators of forced labour or modern slavery were identified at any sites through these audits during the reporting period.

We have a dedicated, independent whistleblowing service operated by Navex Global, which is available to internal colleagues and all of our suppliers, enabling them to raise concerns with us directly and anonymously. We did not receive any concerns relating to modern slavery or labour exploitation via this route in 2023/24.

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 2023/24.

We encourage all our suppliers to take ownership of issues in their extended supply chains and to implement their own due diligence, mitigation and improvement measures. To support this process, we build relationships with multi-stakeholder and membership initiatives, enabling suppliers to come together to build awareness and develop action plans. Key examples of relationships that are pertinent to our salient modern slavery risks include FNET, ETI, Spain Ethical Trade Forums, the Seasonal Worker Scheme Taskforce and the Centre for Child Rights and Business. 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 joined the two-year Grievance Mechanisms in Agriculture project funded by the UK government, aimed at exploring ways to improve access to grievance mechanisms for vulnerable agricultural workers in Italy and Spain. The project conducted in-depth research in selected regions of both countries to identify the critical challenges faced by migrant workers within the agricultural supply chains when raising grievances. It identified that the practical obstacles existing are language barriers, fear of retaliation, lack of awareness and systems that are employer controlled, hindering their effective use. Underscoring our active involvement with this project, Morrisons was the only UK retailer to participate in the working group focussed specifically on improving responsible purchasing practices.

In response to these findings, the project actively engaged workers to gather their input on the effectiveness of existing grievance mechanisms at two growers supplying the UK market. This feedback informed an action plan aimed at improving existing reporting channels and designing new, more effective ones. The tools and insights generated by the project will be shared with industry stakeholders to enhance supply chain grievance mechanisms.

Additionally, the project established a modern slavery prevention network, Digniwork, to connect local civil society organisations supporting migrants in Morocco, Tunisia, and Côte d'Ivoire with stakeholders in Italy and Spain. This network promotes knowledge sharing on ethical recruitment practices and workers' rights. The project concluded in March 2025.

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ETI's Grievance Mechanisms in Agriculture initiative, supported by the UK Modern Slavery Innovation Fund, has played a vital role in deepening understanding of the risks faced by migrant workers in Spain and Italy. Morrisons has shown strong support and transparency throughout the project – particularly through its active participation in the initiative's task group on responsible purchasing practices. This proactive and collaborative engagement highlights the company's commitment to strengthening human rights due diligence in the agricultural sector.  
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Emile Paradiso  
Head of Global Partnerships - ETI

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

### UK SEASONAL HORTICULTURAL WORKERS

Concerns have been consistently raised around exploitation risks faced by some migrant workers on temporary visas during their recruitment and employment on UK farms throughout 2023/24. In response to this industry-wide challenge, Morrisons has continued to support the Seasonal Worker Scheme (SWS) Taskforce with input and funding, collaborating with other supermarkets and Scheme Operators. The Taskforce, coordinated by Stronger Together, has increased its membership to encompass over 60 members including retailers, growers, suppliers, Scheme Operators, industry and membership associations, non-governmental and inter-governmental organisations. The SWS Taskforce has continued to seek the extension of its impact towards its mission of working collaboratively to help safeguard and ensure access to workers' rights in the UK SWS and wider UK horticulture.

**Morrisons actively, in the reporting year, supported SWS Taskforce activity which has included the delivery of the following activities:**

- **Further development and outreach of the UK seasonal worker version of the Just Good Work worker information app. This is helping individuals make informed choices for better work by providing information of the full recruitment and employment experience. Over 52,000 jobseekers and successful scheme applicants have accessed information via the app**
- **Six in-person, regional grower shows, reaching over 380 delegates**
- **Six in-person, supervisor train-the-trainer sessions reaching over 330 delegates**
- **Developed the Taskforce-funded Independent Seasonal Worker survey, as an ongoing, regular, independent survey of UK seasonal workers, to identify actions that can be taken in-season to address working, living and human rights challenges**

Our commodity-level risk assessment, extending beyond tier one, identified potential forced labour risks in coffee, tea, and cocoa sourcing. As part of our subsequent action plan we have enhanced our collaboration with third-party certification schemes to enhance mitigation at primary producer level. Consequently, all Morrisons own brand tea, coffee, and hot chocolate products are now certified by either the Rainforest Alliance or Fairtrade.

As part of our enhanced due diligence in our clothing supply chains, in 2021 we partnered with The Reassurance Network (TRN), to test a new dialogue-based approach to factory manager and worker engagement. This collaborative approach centres on the needs of all supply chain actors to identify root causes and create sustainable improvements built on mutual trust. Importantly, it also gives workers a chance to report issues that aren't typically uncovered by ethical audits, such as forced labour and exploitation.

The site visits differ from traditional audits, with TRN consultants engaging in open conversations with factory owners, managers, and workers to create a safe space for in-depth discussion. They aim to understand the needs, challenges, and aspirations of these three stakeholder groups, discussing topics like wellbeing, values, diversity, economic security, communities, family, the environment, and general opportunities in life and at work. All parties then work together to improve working conditions through their strengthened relationships. Throughout 2023/24, we continued building our relationship with TRN, revisiting sites where issues were found in the initial reports and supporting them through their remediation plans.

Additionally, our Nutmeg business maintains membership of the [Better Cotton Initiative \(BCI\)](#) and our goal is to source 100% of our cotton as Better Cotton by the end of 2025. This underlines our ongoing commitment to sourcing cotton responsibly and sustainably, ensuring workers benefit from improved conditions and a higher standard of living. It also helps mitigate against sourcing cotton from regions with a known risk of forced or child labour.

We are committed to working closely with local organisations within our Chinese supply chains. Our collaboration with [The Centre for Child Rights and Business](#), provides a strong framework for identifying and addressing child labour issues. Their meetings offer a valuable chance for retailers to share insights and gain new perspectives, which helps us ensure our practices remain effective.

Furthermore, we utilise the Centre's experience to share best practices with our suppliers. This includes providing due diligence guidelines and maintaining a digital chat group to facilitate direct communication and information sharing with local workers on eliminating forced and child labour.

We partnered with the Ethical Trading Initiative (ETI) to investigate how responsible purchasing practices can strengthen our due diligence. With ETI's support, we initiated a multi-stakeholder procurement mapping exercise. This helped us identify internal responsibilities and assess how our current processes impact our suppliers' ability to ensure adequate labour is provided and workers rights are respected.

We received valuable feedback from suppliers, emphasising the importance of clear communication of requirements and expectations. We have shared this feedback within our commercial team to ensure alignment in decision-making and to foster transparent communication with our suppliers. This collaborative approach has led to benefits such as reduced worker stress, less overtime, and a more stable work environment.

## 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 requiring knowledge of modern slavery risk have access to relevant and current information. Modern slavery awareness training is tailored to job roles where relevant and is available to colleagues at all levels of the business in our Manufacturing and Logistics operations through our online learning platform.

Our interactive modern slavery training package has been developed specifically for our vertically-integrated operations, and incorporates content informed by actual cases of modern slavery, together with additional material provided by the GLAA. Our training team regularly reviews and updates the content where necessary.

We have modern slavery champions who support and drive due diligence across the business. They support sites and our leaders with incident management and serve as a key point of contact for guidance and support.

During 2023/24 we developed and launched new training for our senior leaders to help them deal with cases of modern slavery in our Manufacturing and Logistics business, with a total of 109 colleagues receiving this training.

**In 2023/24 our modern slavery training and briefings were accessed by over 9,000 colleagues across our Manufacturing and Logistics operations. The programme was refreshed during 2023/24 to help all our colleagues in Manufacturing and Logistics better understand their rights and the obligations of the business. It is broken down into the following categories:**

Managers' e-learning module

**855**

managers have completed this in 2023/24

Managers' Scenario Training module

**867**

managers have completed this in 2023/24

Face-to-face monthly missions briefings

**7,442**

colleagues have completed this in 2023/24

Every four weeks an in-person training session is conducted for all new colleagues joining our commercial team. The course is designed to give an introduction to ethical trading, supply chain human rights and modern slavery. To reinforce this, we plan to launch an e-learning module which is designed to serve as an annual refresher on 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 sponsors of Stronger Together's Consumer Goods Programme, providing our UK suppliers and labour providers with access to free, industry-leading training. Since we joined as founder sponsors in 2013, Stronger Together has delivered workshops on Tackling Modern Slavery in UK Businesses to 2,829 delegates from 869 Morrisons suppliers, including 413 delegates during 2023/24. In addition, 168 individuals from 114 Morrisons suppliers have attended the Advanced Tackling Modern Slavery in UK Business workshop and 43 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 Responsible Recruitment Toolkit (RRT) since the programme began in 2019, 294 of our suppliers have accessed RRT benefits including 571 individuals completing one or more RRT training sessions. 225 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 since 2019.

Our Ethical Trading colleagues in Hong Kong are working with our suppliers in Asia to address modern slavery and forced labour issues. They stay informed about current and emerging issues through networks of local and regional experts, including the ETI, Sedex, and the Centre for Child Rights and Business. These organisations develop resources, guidance, and tools that are shared with all our suppliers in the region. In 2023/24, we provided training sessions and workshops for suppliers in our Chinese supply chain. These sessions aimed to enhance participants' knowledge of responsible recruitment and management practices, and showcase best practice for reducing child labour and forced labour risk through practical prevention tools. We also conducted in-person and virtual site visits to verify compliance and provide opportunities for suppliers to discuss issues directly with us.

## 8. Collaborative Action

Working with others to enhance our understanding and maximise the impact of our actions to combat modern slavery remains fundamental to our approach. Details of some of the work we have undertaken through collaborative partnerships in 2023/24 can be found here:

### Better Cotton Initiative (BCI)



We are committed to improving cotton farming practices globally through engagement with BCI.

In 2020 BCI reviewed its 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 2023/24 we achieved 98% BCI cotton coverage on all Nutmeg clothing. All cotton used in our Nutmeg clothing range will be Better Cotton certified by the end of 2025.

### 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 in the working group. Since our membership began we have continued our work with the Centre to advocate for child rights and eliminate the risk of child labour.

### 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 and projects to develop effective responses to global human rights challenges.

### Food Network for Ethical Trade (FNET)



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 2023/24 we were members of the FNET working group on responsible recruitment and empowering work.

### 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.

## 8. Collaborative Action Continued

### IDH



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.

### Modern Slavery Intelligence Network (MSIN)



Morrisons is a founding member of the MSIN, a 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 MSIN throughout 2023/24.

### Responsible Recruitment Toolkit (RRT)



Morrisons is a sponsor of 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, our suppliers have free access to training and RRT's online self-assessment tool to embed responsible recruitment standards into their business processes.

### 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 Seasonal Worker Scheme (SWS) and wider UK horticulture.

The Taskforce, coordinated by Stronger Together, is made up of over 50 member organisations including retailers, growers, suppliers, Scheme Operators, industry and membership associations and non-governmental and inter-governmental organisations, who actively contribute to and support the various working groups and activities.

### 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. The SEA Alliance is a pre-competitive collaboration of member companies (retailers and seafood businesses), as well as industry and retail trade bodies, aiming to strengthen human rights due diligence carried out in the global seafood supply chain.

### Slave-Free Alliance (SFA)



We became the first supermarket member of the SFA in 2020 when they completed a gap analysis of our approach to mitigating modern slavery across the business. Throughout 2023/24, as in previous years, we have continued to work with SFA on areas of improvement, and access their services and guidance.

## 8. Collaborative Action Continued

### Spain Ethical Trade Forums (SETF)



Foros Comercio Ético  
Ethical Trade Forums

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. The SETF 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 continue to encourage all our suppliers in the region to engage with the SETF.

### Stronger Together



tackling hidden labour exploitation

Morrisons is a founding sponsor of Stronger Together and their Consumer Goods Programme, a sector-specific programme that empowers companies to take decisive action to tackle forced labour and mitigate modern slavery.

During 2024, Stronger Together launched a combined Consumer Goods Programme with two thematic workstreams to address forced labour and responsible recruitment. As a combined sponsor of both workstreams, our suppliers gain access to the full suite of benefits including free interactive training workshops, resources and tools to support them to take action to tackle hidden labour exploitation and forced labour.

This continues to play an essential role in building modern slavery awareness throughout our UK supplier base.

### The Reassurance Network (TRN)



Our partnership with TRN, a global network of ESG experts, began in 2021 through their FORUM programme. We've conducted over 27 worker-focused, dialogue-based factory improvement visits within our clothing supply chain.

Building on this success, we deepened our collaboration in 2023/24 with an in-depth investigation of our Bangladesh supply chain. This three-step programme goes beyond traditional audits by focussing on:

1. Conducting thorough assessments to identify the underlying causes for non-compliances
2. Providing our factories with the necessary tools, frameworks and expertise for effective remediation
3. Delivering practical recommendations to enhance our human rights due diligence.

### Re-imagining Industry to Support Equality (RISE)



RISE is an initiative to support collaborative industry action at scale to advance gender equality in global garment, footwear and home textiles supply chains.

We have been members of RISE since 2024 and have implemented their Respect programme in our Indian supply chain.

## 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 and investigated seven potential incidences of modern slavery or labour exploitation during the 2023/24 reporting year. This represents two fewer suspected cases than we had in 2022/23. None of these subsequently developed into confirmed cases of modern slavery. As in previous years, 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 provider and receive excellent support from their site-based account managers and compliance 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 cases of modern slavery or labour exploitation in our extended supply chain. These related to migrant labour in fresh produce and the seafood industry in South Asia. In all cases, multiple UK retail supply chains were affected and the issues were addressed collectively.

## 10. Progress against the 2022/23 objectives detailed in our previous statement:

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

Commitment	Update
Rolling out immigration crime training to all colleagues who complete goods in duties across Manufacturing and Logistics	We trialled immigration crime training in Manufacturing and Logistics and took learnings to review and build into our plans for 2024/25.
Working with external specialists to understand the common risks in last-mile delivery providers	Wording has been included in the contracts with last-mile providers (e.g. Deliveroo) whereby they confirm they will ensure all applicable laws are followed, all relevant licenses are obtained and that they adhere to our policies.
Continuing to build our relationship with the Bright Future programme to support victims back into the workplace	We continued to work with Bright Future with two successful placements at our sites in different parts of the country - Gadbrook and Bradford. The success of the partnership has been highlighted by Bright Future at key events such as the Bright Future AGM and the Scotland Launch 2024, showing the importance of our partnership in providing safe employment opportunities.
Strengthening our approach to third party requirements, specifically within popular and useful services and site-based cleaning and security	Morrisons ensures that right-to-work checks are completed on all site-based cleaning service providers and that the contractor has GLAA licences for applicable areas. We also ensure that contractor colleagues are receiving at least the minimum wage.
Using intelligence from MSIN to create quarterly learnings to share with relevant stakeholders	While we received information from MSIN about a number of modern slavery incidents during the year, our internal investigations confirmed that there were no connections between the evidence provided to us and activity at Morrisons. MSIN also provided information, insight and support to our resourcing team in relation to fraudulent job adverts, what to look out for, and how to report them.
Continuing to strengthen colleague training on modern slavery and labour exploitation risks	We have updated the content of our annual refresher training module on modern slavery and labour exploitation risk to focus on ensuring that our colleagues understand what they should receive in terms of their contract and other working arrangements. We also launched a Senior Manager modern slavery scenarios e-learning module for colleagues who are in job roles at Operations Manager work level and above.
Updating our supply chain risk assessment to ensure we maintain focus on the highest-risk supply chains	We updated our supply chain risk assessment in 2024 with Ergon Associates. The scope was increased to include 40 commodities and 60 sourcing countries across eight thematic issues. This has enabled us to target actions where they can have the most impact by prioritising our risks.
Expanding our programme of supplier engagement to identify and mitigate the risk of modern slavery and exploitation in lower tiers of the supply chain	The expansion of our supplier engagement programme includes the development of a human rights and modern slavery questionnaire targeted at our strategic and higher risk suppliers. The questionnaire covers policies and governance, responsible recruitment and proactive checks, training and awareness, monitoring working conditions, identifying and minimising risk, and collaborative action and initiatives.
Monitoring our primary suppliers' compliance with Modern Slavery Act reporting requirements	We continue to monitor the compliance of our primary suppliers with the reporting requirements of the Modern Slavery Act.
Continuing engagement with specialist third parties to increase access to worker voice as part of our wider audit programme	We have continued our work with the TRN with further deep-dive audits, concentrating on our supply chains in Bangladesh and India. We are actively strengthening our relationships with our suppliers and the TRN to ensure complete collaboration on their FORUM programme. This involves providing incentives for factory management and workers to actively participate in human rights due diligence. We are observing positive engagement, and remediation plans are being implemented as a result of these visits. Further details can be found in the Collaborative Action section of this report.
Developing relationships with established organisations to train our suppliers on the importance of gender equality and prevention of gender-based violence and harassment (GBVH)	Nutmeg is a member of RISE. Our focus is on the RISE Respect programme and we have successfully implemented this in our Indian supply chain. We aim to roll the programme out to more regions where we have identified the need for training on GBVH. In collaboration with the ETI, we have also committed to participate in a collaborative project addressing GBVH in specific high-risk sourcing countries.
Publishing details of our tier one manufacturing sites for own brand food products on the Open Supply Hub	This has been published and is accessible via the <a href="#">link</a> - this will be updated biannually.

# 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 2024/25 we will continue to deliver improvement and progress in our own operations by:**

- 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
- Completing a review of Myton Food group and our Convenience division with the support of the SFA
- Development of a penetration test to identify and strengthen our resources and capability across Myton Food Group
- Reviewing and developing our current worker questionnaire to ensure our colleagues have the right platforms to be able to understand their rights and what they should expect from us as a business

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

- Strengthening our supplier engagement and risk mitigation with the roll out of the modern slavery and human rights questionnaire to our strategic and higher risk suppliers
- Creating a framework for benchmarking suppliers on their approach to modern slavery and assisting in the creation of action plans
- Establishing a recurring e-learning module for relevant internal colleagues on the topics of modern slavery and human rights risks within the supply chain
- Evolving our work on gender equality and prevention of gender-based violence and harassment
- Increasing our focus on the most prevalent risks in our supply chains to ensure that exposure is minimised while enhancing supply chain due diligence through collaboration with internal and external stakeholders



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