

Modern Slavery Statement 2021/22

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 Kursery 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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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.

Risk Assessment

Due Diligence

Training

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

Our Policies

Highlights of our 2021/22 activity included:

SUPPORTING THE ESTABLISHMENT OF THE UK MODERN SLAVERY INTELLIGENCE NETWORK	UNDERTAKING A GLOBAL ASSESSMENT OF HUMAN RIGHTS RISK IN OUR SUPPLY CHAIN	PROVIDING WORK PLACEMENTS FOR SURVIVORS OF MODERN SLAVERY		
IMPLEMENTING MODERN SLAVERY PARTNERSHIP & PREVENTION PLANS ACROSS OUR BUSINESS OPERATIONS	LAUNCHING OUR NEW MODERN SLAVERY SURVIVOR SUPPORT POLICY	CONDUCTING WORKER-FACING, IMPROVEMENT VISITS IN HIGHER- RISK SOURCING LOCATIONS		

2020 Progress Report



Introduction

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

Governance

Our Structure

Our Policies

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.

Risk Assessment

Due Diligence

Training

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:

Our Performance

Regulatory Compliance

Collaboration

- 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.

2022 Interim Update

New Objectives

2020 Progress Report

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

Our Policies

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 familyowned 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

Risk Assessment

Due Diligence

Training

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.



Governance

Introduction

Our Structure

3. Structure, Business & Supply Chains Continued

		Sites 539	UK Total Workers	Sites 432 Female	Total Workers 128,088 Male 74,262	-	J	
AM	ERICAS	Female	146,390 Male 92,948		3		ASIA 8 Sites 567	PACIFIC Total Workers 299,863
Sites	Total Workers	5		•			Female	Male
42	21,428						150,233	149,630
Female	Male				AFRICA			
9,450	11,978			Sites	Total Worker			
				165 Female	71,833	-	v	Job .

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%)

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.

Our Policies Risk Assessment

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Training

Collaboration

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.



in February 2022.

OPEN

Garments and Apparel

APPAREL REGISTRY

clothing in 2021. This list was last updated



Training

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 <u>here</u>.

Tea

2020 Progress Report

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.

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Business & Human Rights

Resource Centre



Risk Assessment Due Diligence

Collaboration Our Performance

46 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 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' <u>Standard Terms & Conditions</u> 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

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 <u>UK Government Modern Slavery</u> Statement Registry.

of goods comply with these requirements.

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 <u>Bright Future</u> 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 <u>child labour</u> and the use of <u>homeworkers</u> 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.

4. Our Policies Related to Modern Slavery & Human Trafficking

Risk Assessment

We are committed to ensuring that

products is treated with dignity and

respect, in safe and fair workplaces.

United Nations Guiding Principles on

Business and Human Rights (UNGPs)

Human Rights and core International

Trading Initiative (ETI) and use their

and underpinned by the principles

of the Universal Declaration of

Labour Organisation standards.

We are members of the Ethical

internationally recognised Base

Code as the foundation of our

supplier expectations.

everyone who helps to make our

Our approach is informed by the

5. Risk Assessment

Our Structure

Our Policies

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.

2022 Interim Update

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.

Training

Collaboration

Our Structure

Our Policies

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.

Governance

Introduction



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.

Due Diligence

Training

Collaboration

Risk Assessment

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.

Our Performance

2020 Progress Report

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.

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 multistakeholder 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 <u>Due Diligence</u> and <u>Collaborative</u> <u>Action</u> section of this statement.

6. Due Diligence in our Business & Supply Chain

Our Policies

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.

Our Structure

Morrisons Operations

Risk Assessment

Due Diligence

Training

Collaboration

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 <u>Complyer tool</u> 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 <u>Responsible Recruitment Toolkit</u> (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.

Our Structure Our Policies R

Risk Assessment Due Diligence

Training Collaboration Our

2022 Interim Update

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. **97**

Susan Banister Account Director at Slave-Free Alliance

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6. Due Diligence in our Business & Supply Chain Continued

Risk Assessment

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 <u>Performance Reporting</u> section for more details.

Our Structure

Our Policies

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 <u>Collaborative</u> 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 thirdparty 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.

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Training Collaboration

Our Performance 2020 Progress Report

Risk Assessment Due Diligence

Training

Collaboration Our Pe

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 <u>Better Cotton Initiative</u> (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.



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

7. Training, Awareness & Capacity Building

Our Policies

Our Structure

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:

Risk Assessment

Due Diligence

Training

Collaboration

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.

Our Performance

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

2020 Progress Report

New Objectives

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 <u>Stronger Together</u> 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 <u>Stronger Together Business Partners</u> 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

2022 Interim Update

nt Due Diligence

Training

Our Performance 2020 F

2020 Progress Report New Objectives

7. Training, Awareness & Capacity Building Continued

Through our sponsorship of the <u>Responsible</u> <u>Recruitment Toolkit</u>, 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.

3	76	12
webinar sessions delivered to	suppliers from	provinces in China

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 supplierfocused 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. Introduction

Governance

Better Cotton Initiative

Our Structure

o better cotton

Our Policies

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Due Diligence

Ethical Trading

Initiative (ETI)

Ethical

Trading

Respect

for workers

worldwide

Initiative

Training

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.

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 <u>here</u> 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 <u>Training</u>, <u>Awareness &</u> Capacity Building section. Gangmasters and Labour Abuse Authority (GLAA)

We have a well-established

them throughout the year.

In 2021 our Loss Prevention

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

Supermarket Protocol. to

increase the impact of these

relationships going forward.

relevance of the GLAA

relationship with the GLAA and

continued to work closely with

and People teams collaborated



IDH

the sustainable trade initiative

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.



Collaboration

Food Network for

Ethical Trade (FNET)



nance 2020 Progress Report

ress Report New Objectives

2022 Interim Update

Sourcing team in Hong Kong

improvements to our regional

strategy and share resources

suppliers in China. In 2021 we

member events to address

the emerging risks of forced

labour in our China based

supply chains.

also supported workshops and

meet regularly to discuss

and tools with our direct

8. Collaborative Action Continued

Our Policies

Risk Assessment

Due Diligence



Training

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 www.msin.org.uk

slavery investigation.

the UK's largest ever modern

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.

supporters of the Responsible Car Wash scheme in 2018 and require all franchises to meet the requirements of their Code of Practice

Collaboration

Our Performance

In 2021 we supported the development of a multistakeholder 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 https://rcws.org.uk/

and training workshops.

2020 Progress Report

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.

2022 Interim Update

New Objectives

Introduction

Governance

Standards

We encourage all our suppliers in the region to engage with the Forums and retained a seat on the Governance Group in 2021.

We have been members of

the labour challenges in the

Spanish agricultural sector.

on topics including:

Responsible Use of

Grievance Mechanisms

Worker Accommodation

Labour Providers

They operate several working

groups and have produced best

practice guidance for members

the SETF since 2019 and actively

support their work, facilitating grower-led responses to

Further details of their work can be found on the SETE website

of Stronger Together, a multistakeholder, 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.

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 Training. Awareness & Capacity Building section.

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.

Collaboration

Our Performance

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.

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.

TRN is a global network of experts that work with companies and their supply chains to improve environmental, social and

2020 Progress Report

governance (ESG) performance. We have been working with TRN since 2021 on the

development and delivery of worker-focused, dialogue based factory improvement visits in our clothing supply chain Over 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.

8. Collaborative Action Continued

Our Structure

Our Policies

Risk Assessment

Slave-Free Alliance	Spain Ethical Trade Forums (SETF)	Stronger Together	The Centre for Child Rights and Business	The Reassurance Network (TRN)
S SLAVE-FREE ALLIANCE Working Terroria Standber Supply Chain	Foros Comercio Ético Ethical Trade Forums	stronger together tackling hidden labour exploitation	THE CENTRE FOR CHILD RIGHTS AND BUSINESS	THE REASSURANCE NETWORK

Morrisons is a founding sponsor

Due Diligence

Training

t Due Diligence Training

Collaboration Our Per

2020 Progress Report New Objectives

2022 Interim Update

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:

Introduction

- 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 <u>Due Diligence in our Business</u> and Supply Chains section
- Colleagues and suppliers who have undertaken modern slavery awareness training – see <u>Training</u>, <u>Awareness & Capacity Building</u> section
- Collaborative improvement action undertaken in specific areas of our supply chain – see <u>Collaborative</u> <u>Action</u> 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 <u>Retailer Protocol</u> <u>on Handling Cases of Modern Slavery</u>, 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.

We set objectives across our	Commitment
business and supply chain on	Deliver training on modern slavery i
an annual basis, these targets are	Technical colleagues who undertake

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.

Governance

Introduction

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	٠	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	0	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	٠	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	٠	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	٠	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	٠	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	٠	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 <u>Due</u> <u>Diligence</u> section of this statement.

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

On going Complete

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

Commitment	Status	Comment
Publish the results of our global supply chain risk assessment and prioritising commodities for enhanced due diligence	•	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 <u>Ethical Trading</u> section of the Morrisons corporate website.
Map selected high risk commodity supply chains back to primary processing level	0	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.
Undertake a pilot human rights impact assessment on a priority risk commodity	0	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.
Support and fund the continuing development of the Modern Slavery Intelligence Network (MSIN)	•	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.
Support our UK growers to manage labour shortages and associated risks	•	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.
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	0	Commitment to be communicated to suppliers via an update to our Ethical Trading Policy in the second half of 2022.
Offer further capacity building training on responsible recruitment and forced labour risk to all tier one manufacturing sites in China	•	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 <u>Training, Awareness & Capacity Building</u> section of this statement.
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	•	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 <u>Due Diligence</u> section of this statement.



Risk Assessment

Due Diligence

In 2022/23 we will continue to

Training

Collaboration

Our Performance

2020 Progress Report

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.

deliver improveme in our own operatio		approach to tackling in our wider supply
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	Publishing details of our first human rights impact assessment and implementing improvement plans
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	Expanding our use of dialogue based workplace assessments in high risk sourcing countries
Commencing live data sharing through the Modern Slavery Intelligence Network	Implementing enhanced due diligence requirements for labour and service providers	Improving access to effective worker representation at tier one sites
Completing third-party ethical audits at all Morrisons Manufacturing operations		Rolling out digital solutions to support migrant workers entering the UK via the Seasonal Agricultural Worker scheme

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

> on enhanced worker communication for suppliers in China in collaboration with an expert third party

Delivering in-depth training

Increasing UK supplier engagement with modern slavery and responsible recruitment resources

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

12. 2022 Interim Update

Our Structure

Our Policies

This update should be read in conjunction with the Morrisons Modern Slavery Statement 2021/22 and provides an update on activity between 01/02/2022 and 31/10/2022. This aligns reporting on our efforts to address the risks of modern slavery in our business and supply chains with our revised financial year. Our next full statement will cover the period from 01/11/2022 - 31/10/2023. The existing information on our Business Structure, Policies, Risk Assessment, Due Diligence and Training in our 21/22 statement remains relevant. However, a more detailed update on corporate activity and operations during the period covered by this update can be found in our 2022 Annual Report.

Due Diligence

Training

Collaboration

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Risk Assessment

Up to date information on our tier-one supply chains including gender disaggregated worker detail is published on our corporate website and reviewed on a regular basis. Our most recent disclosure can be found here.

We continued our efforts to address modern slavery risk throughout the year, against a backdrop of global events that have significantly impacted food supply chains. The extended effects of the COVID-19 pandemic and the ongoing conflict in Ukraine have exacerbated existing vulnerabilities and created new emerging risks for businesses to consider.

Our focus remains on building awareness, enhancing our due diligence and working in close collaboration with others to increase our leverage and ability to influence positive change. Highlights of our activity in the period from February to November included:

OFFERING WORK PLACEMENTS TO SURVIVORS OF MODERN SLAVERY THROUGH THE BRIGHT FUTURES INITIATIVE	PROVIDING LIVE SCENARIO TRAINING TO OVER 650 MANAGERS AT 19 OF OUR MORRISONS MANUFACTURING AND LOGISTICS SITES
PARTNERING WITH SLAVE FREE ALLIANCE AND THE RUSSELL TRUST TO DEVELOP TRAINING FOR MORRISONS COLLEAGUES AND FOOD BANK VOLUNTEERS	SUPPORTING ENHANCEMENTS TO THE JUST GOOD WORK APP, TO PROVIDE MIGRANT WORKERS WITH KEY INFORMATION THROUGHOUT THE RECRUITMENT AND EMPLOYMENT PROCESS

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Due Diligence Training

Performance Reporting - Update

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

Introduction

- Reported incidences of modern slavery in our business and supply chains, and our response
- Third-party ethical audits undertaken at our own-brand and exclusive sites
- Colleagues and suppliers who have undertaken modern slavery awareness training
- Collaborative improvement action undertaken in specific areas of our supply chain

Reported incidences of modern slavery in our business

We identified eight potential incidences of modern slavery or labour exploitation in our vertically integrated manufacturing and logistics operations during the period covered by this update. None of the incidents subsequently developed into confirmed cases of modern slavery.

The majority of cases in our business related to agency provided labour and our internal teams conducted detailed investigations in close collaboration with our primary labour providers. The Police and GLAA were involved in four of these cases and we provided full support wherever requested. Victims in all cases remain predominantly migrant workers from Eastern Europe, with Romania and Bulgaria continuing to be the main countries of origin for both victims and perpetrators.

Accessing meaningful intelligence on the indicators of modern slavery underpins our ability to take action at an early stage and mitigate the impact of potential cases. Maintaining strong links to law enforcement and support agencies at a regional level is key, and we continue to develop these relationships through our Modern Slavery Champions programme. We also commenced the sharing of live intelligence through the Modern Slavery Intelligence Network (MSIN) in 2022 and accessed information shared by others in the Network to inform due diligence activity at site level.

Reported incidences of modern slavery in our supply chains

In addition to issues raised in our own operations, we were also made aware of two potential incidents in our UK supply chain, and one at a branded supplier based in Italy.

The incidents in our UK supply chain related to alleged issues concerning recruitment fees and working conditions in the Government-run Seasonal Agricultural Worker visa scheme (SAWS). Specifically:

- Seasonal migrant workers from Southeast Asia paying illegal and unfair recruitment fees in their home countries to access work in the UK
- The use of unlicensed subcontractors in the overseas recruitment process
- UK growers not following the scheme rules in relation to minimum wages, working conditions and zero hour contracts

Prior to the 2022 season, 65% of workers entering the country on SAWS visas were from Ukraine or Russia. These numbers dropped significantly in 2022 due to the ongoing conflict in the region, requiring Scheme Operators (labour providers) to source workers from further afield at relatively short notice. This included several Central and South East Asian countries where levels of institutional corruption are higher and the Scheme Operators had limited experience of recruitment.

In both of the cases reported to us, we worked closely with our growers, primary suppliers and other stakeholders to ensure that full investigations were carried out and resolution plans implemented where required. We are supportive of wider investigations by the GLAA and Home Office into practices in the lower tiers of recruitment overseas and await the results of their findings. To leverage our influence and reach, we worked with FNET and other UK supermarkets to organise two roundtable events (hosted by the British Consortium) which included representation from all key stakeholders in the scheme. These events aimed to identify and deliver meaningful improvements in several key areas of SAWS process ahead of the 2023 horticultural season. A full update on the outputs from the roundtables and subsequent improvement actions will be provided in our next full statement.

The third case in our supply chain related to allegations of migrant worker exploitation at a supplier of branded tomatoes based in Italy, raised following an investigation by local law enforcement and regulatory teams. We conducted an investigation in collaboration with other ETI members, third party audit bodies and our UK importer. The subsequent investigation did not find any evidence to corroborate the allegations, but did identify discrepancies with the most recent SMETA audit report that were rectified by the audit body. All the original charges against the supplier were subsequently dropped by Italian authorities.

Introduction Governance Our Structure

Performance Reporting - Update Continued

Our Policies

Third Party Ethical Audits

793 audits were undertaken at active sites linked to Morrisons on the Sedex platform in the period covered by this update, using either the Sedex Members Ethical Trading Audit (SMETA), Sedex Virtual Assessment (SVA) or Business Social Compliance Initiative (BSCI) methodologies.

This third-party audit activity identified 10 tier one factories with Major, Critical or Business Critical non-compliances raised under the heading of 'Employment is Freely Chosen'.

These issues related to the charging of unfair (but in some cases legal) recruitment fees, requesting workers to make financial contributions towards protective equipment or access cards, involuntary overtime, agency labour provider assessment and a lack of procedures to adequately protect workers. There were no significant, confirmed indicators of forced labour or modern slavery raised at any sites. Seven of the sites have now fully closed their non-compliances. The remaining four sites have implemented corrective actions that are pending auditor verification. These will be monitored by the Morrisons Ethical Trading team and escalated where required.

Training Update

Training for Colleagues

We continue to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant and current information.

Risk Assessment

Due Diligence

Training

In the period covered by this update 1716 colleagues in our Manufacturing and Logistics operations received our bespoke training on Modern Slavery and Labour Exploitation. This included:

Colleagues who received our face to face induction training

1467

759

Managers who completed our internally developed e-learning module

A further 654 managers in our vertically integrated sites took part in a series of live scenario training exercises developed by our Training team in conjunction with the GLAA. These interactive workshops were delivered by our internal Modern Slavery Champions, who attended in-depth "Train the Trainer" sessions with GLAA before hosting the scenario sessions across 19 of our sites.

We also continue to make the training workshops delivered by Stronger Together available to relevant members of our People and Operations teams. Over 100 of our colleagues have now attended the Tackling Modern Slavery in UK Business workshop, including a further 8 in 2022. Senior colleagues from our People team also attended the Advanced Tackling Modern Slavery in UK Business workshop to assess its suitability for wider roll out to our internal teams.

Training for Suppliers

Collaboration

Morrisons were founder sponsors of both Stronger Together and the Responsible Recruitment Toolkit (RRT) and continue to offer their training free of charge to all our suppliers and labour providers in the UK. Over 2000 of our supplier colleagues have now attended Stronger Together training workshops, including 227 in the period covered by this update.

During the same period 81 supplier colleagues attended training sessions provided by the RRT to build their understanding of responsible recruitment practices and build capacity to drive improvement in their people supply chains. This brings the total number of supplier colleagues who have accessed this training to 347, which represents an increase of 30% over the past 8 months.

In 2022, we also collaborated with 4 other retailers and 3 suppliers to co-fund training workshops and resources to increase the number of effective worker representation committees in our UK and global food supply chains. The outputs of this work included the creation of Manager and Worker Representative training decks (suitable for online or in person delivery), a train the trainer manual and 2 short films; Introduction to Worker Committees and Tackling the Barriers to Effective Committees.

The training was delivered to 40 supplier representatives across 4 online and in-person sessions in 2022. The materials have now also been shared with our wider supply chain via the Food Network for Ethical Trade (FNET). We continued to work in partnership with The Reassurance Network (TRN) to develop training for suppliers in China to improve worker dialogue and access more effective grievance mechanisms. 4 workshops were delivered covering attendees from 20 factories to build our suppliers' capacity to recruit and retain workers in a responsible manner, against a backdrop of increasing labour shortages in mainland China.

Collaborative Activity Update

Working in partnership with others to maximise our influence and leverage to affect meaningful change remains a key component of our approach to tackling modern slavery and exploitation.

Highlights of collaborative activity in the period covered by this update included:

- Continued engagement with the Modern Slavery Intelligence Network (MSIN), including the formal launch of this initiative, commencing the sharing of live intelligence with data partner Stop the Traffik, and preparing the Network to receive new member applications in 2023.
- Working with Slave Free Alliance and the Trussell Trust to develop training for Morrisons colleagues and food bank volunteers on spotting and reporting the signs of modern slavery. This programme was launched on UK Anti-Slavery Day 2022 and will be rolled out throughout 2023.
- Supporting the development of a UK supermarket coalition on payment of living wages in banana supply chains. A final 5 year commitment has now been agreed by all key stakeholders and will be launched in 2023, building on existing commitments in Germany and the Netherlands.
- Building our engagement with the Rainforest Alliance certification standard to increase oversight and risk mitigation in the lower tiers of supply chains such as Tea, Coffee, Bananas and Cocoa.

Training

Progress Against 21/22 Objectives

Commitment	Status	Update (November 2022)
Trial a worker voice solution to complement existing worker welfare monitoring	٠	An enhanced worker feedback solution using interactive technology has been trialled at 3 of our Manufacturing and Logistics sites. We are reviewing the findings of the trial and considering options to complement our existing "Your Say" colleague listening and engagement process.
Offer further work placements to survivors of modern slavery through the Bright Future programme	0	We continued to support the Bright Futures programme throughout the year and reinforced our commitment to offer placements to victims of modern slavery. We were able to offer 3 placements at 2 of our Manufacturing sites, all of which resulted in the workers being offered permanent roles with Morrisons. We remain committed to supporting this initiative and aim to provide further placements throughout 2023.
Complete the implementation of Modern Slavery Partnership & Prevention (P&P) Plans	0	P&P plans have been implemented at our sites throughout 21/22 with support from our People and Loss Prevention teams. This will continue throughout 2023 and individual site plans will be externally reviewed to ensure they reflect current best practice.
Engage an expert third party to assess risk in international people supply chains for our Morrisons Manufacturing business	0	We worked in close collaboration with the Responsible Recruitment Toolkit (RRT) and a locally based human rights expert to develop and trial an innovative approach to assess operators sourcing workers via the UK Skilled Worker Visa scheme from the Philippines. This will continue in 2023 with post- employment worker interviews and improvement plans for UK and overseas labour providers.
Commence live data sharing through the Modern Slavery Intelligence Network	٠	We commenced the sharing of intelligence and data through the MSIN platform in 2021/22 and remain actively engaged in the development of this initiative.
Implement enhanced due diligence requirements for labour and service providers	0	We launched new requirements for existing labour and service providers to link via the Responsible Recruitment Toolkit platform and share details of their due diligence and management systems. This will be supported in 2023 with enhanced requirements for new suppliers.
Complete third-party ethical audits at all Morrisons Manufacturing operations	0	Independent SMETA audits have been undertaken at all Morrisons Manufacturing sites in 2022, except for our Rathbones Bakery site (which will be completed in early 2023).
		All audits and corrective action plans have been published on the Sedex platform and follow-up visits are planned for 2023 (where required by the audit body).



Risk Assessment Due Diligence

Training

Progress Against 21/22 Objectives Continued

Commitment	Status	Update (November 2022)
Publish details of our first human rights impact assessment and implementing improvement plans	0	Human Rights Impact Assessments undertaken by an expert third-party consultant on our in-store cafe and barista bar coffee supply chains in Brazil and Peru. Full details and action plans will be published in 2023 following a period of internal review.
Increase UK supplier engagement with modern slavery and responsible recruitment resources	0	New requirements established for all suppliers in scope of our Ethical Trading Policy to engage with the tools and training made available via Stronger Together and the Responsible Recruitment Toolkit. A requirement for all applicable suppliers in scope to publish their Modern
		Slavery Statements on the UK Government Registry will be rolled out in 2023.
Expand our use of dialogue based workplace assessments in high risk sourcing countries	0	The Reassurance Network (TRN) delivered 4 in-depth assessments at factories in Turkey and China between Feb 2022 and November 2022. This was limited by ongoing travel restrictions but visit frequency will increase throughout 2023 and include additional visits in India and Bangladesh.
Deliver in-depth training on enhanced worker communication for suppliers in China in collaboration with an expert third party		Training delivered by The Reassurance Network (TRN) to employees from 20 factories in China.
Improve access to effective worker representation at tier one sites	٠	We co-funded and supported the development of materials and training to increase the number of effective worker representation committees in our food supply chains. Four pilot workshops were delivered online and in-person for managers and workers throughout 2022.
Supporting training and capacity building for suppliers in the Italian agricultural sector	0	We continued to actively support the ETI Italy Working Group throughout 2021 & 2022. Membership of this group was expanded in 2022 to include wine and produce suppliers, and in-country workshops on responsible recruitment practices were successfully delivered.
Rolling out digital solutions to support migrant workers entering the UK via the Seasonal Agricultural Worker Scheme (SAWS)	0	We provided funding and support to develop and enhance the Just Good Work app, which provides workers with critical information and access to help at every stage of the recruitment and employment journey. We also collaborated with the operators of the UK Seasonal Agricultural Workers Scheme to actively promote the app to applicants in 2022.



This update was approved by the Board

New Objectives

Governance

Introduction

In addition to the activities carried over from our 21/22 statement, in 2022/23 we will continue to deliver improvement and progress in our own operations by:

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

Increasing the relevance and impact of modern slavery training through regular sitelevel briefings

Recruiting additional, dedicated resource to oversee and advance our work on addressing modern slavery and labour exploitation risk

module for Logistics colleagues on the risks of organised immigration crime

Developing an e-learning

Implementing management information processes to regularly review indicators of risk at colleague level

Supporting collaborative industry initiatives to make improvements to the **UK Seasonal Agricultural** Worker Scheme

Improving access to modern slavery and exploitation resources for growers and processors in the agricultural sector

Increasing engagement with human rights and sustainability certification standards in higher risk supply chains

Commencing work to improve living wage levels in priority commodities and geographies

Due Diligence

Training



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