

Modern Slavery Act Statement 2019/2020

Wm Morrison Supermarkets PLC



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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and covers our financial year to 02/02/2020. It details the steps that Morrisons has taken to tackle modern slavery and human trafficking within our group businesses and supply chains.

At Morrisons, we continue to be guided by our underlying core purpose to “make and provide food we’re all proud of, where everyone’s efforts are worthwhile so more and more people can afford to enjoy eating well”. We recognise the increasing threat that modern slavery and labour exploitation presents in our efforts to deliver this and reaffirm our commitment to act.

We want to act as a beacon to suppliers, and our vertically integrated, “farm to fork” structure provides broad insight of evolving risk both in the UK and global food supply chains. This enables us to develop and trial initiatives in our own manufacturing and logistics operations that can be shared with our wider supply chain.

We complement this activity by engaging with a wide range of external stakeholders and partners to develop collaborative solutions, increasing the leverage and impact of our actions. We expanded this approach in 2019, forming new relationships with several UK and global initiatives.

This is Morrisons fourth Modern Slavery Statement, and we made significant progress in the past year, building on previous efforts and increasing our focus on preventing slavery, increasing resilience and enhancing our ability to deliver positive outcomes for victims.

Highlights of our 2019/20 activity:

Establishing our internal Modern Slavery Steering Group

p12 For more detail

Becoming the first UK supermarket member of the Slave-Free Alliance

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Funding and hosting awareness training for UK farmers and growers

p17 For more detail

Developing bespoke e-learning and induction materials for over 10,000 colleagues in our manufacturing and logistics operations

p15 For more detail

Our modern slavery statement also covers activity at the following wholly owned subsidiaries: Farmers Boy Ltd, International Seafoods Ltd, Neerock Ltd, Rathbone Kear Ltd, Safeway (Overseas) Ltd, Safeway Stores Ltd, Wm Morrison Growers Ltd and Wm Morrison Produce Ltd.



Governance & Oversight

Our Corporate Compliance & Responsibility Committee (CCR) is responsible for our commitments on tackling modern slavery and managing human rights risk in our business and supply chains.

The CCR meets at least three times a year and performs an oversight, monitoring and advisory role for key areas of corporate governance and development, including health and safety, environment, competition, regulatory ethical compliance and corporate responsibility.

Day to day management of the modern slavery programme is overseen by our Group Corporate Services Director, who is a member of the CCR, and implemented by the Morrisons Ethical Trading team, who update the Committee on the effectiveness of our approach and highlight any emerging risks.

In 2019 we increased oversight through the establishment of a senior level Modern Slavery Steering Group created with the stated objective of “ensuring that effective controls are in place to identify and mitigate modern slavery and labour exploitation risk in Morrisons Manufacturing and Logistics operations, and support positive outcomes for victims”.

This group meets 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 and Corporate Affairs.

For more detail

On this group please see the following sections of this statement:

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Risk Assessment

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Due Diligence

Structure, Business & Supply Chains

Morrisons is one of the UK's largest retailers of food, clothing and general merchandise with more than 95,000 colleagues in 492 stores, and an annual turnover of £17.5bn.

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.

There have been no significant changes to the structure of our business since the publication of our previous statement.

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, the only British supermarket to do so.

This gives us more control over the provenance and quality of the food we sell in our stores. We have more skilled specialists on hand to prepare fresh food in store than any other retailer, with over 9,000 fully trained craftspeople including butchers, bakers, fishmongers and cheesemongers.

We are also now the UK's largest single food manufacturer, with 18 production sites and 9 distribution centres at locations throughout the UK. Our modern slavery strategy in these operations is delivered by our People team with central support from Loss Prevention, Manufacturing Operations and Corporate Services.

Our UK Operations

492

Supermarkets

95,000+

Colleagues

18

Manufacturing sites

10,000+

Over 10,000 workers in our own manufacturing & logistics operations

9

Distribution centres



Number of stores by area



Distribution centre



Manufacturing site



Structure, Business & Supply Chains continued

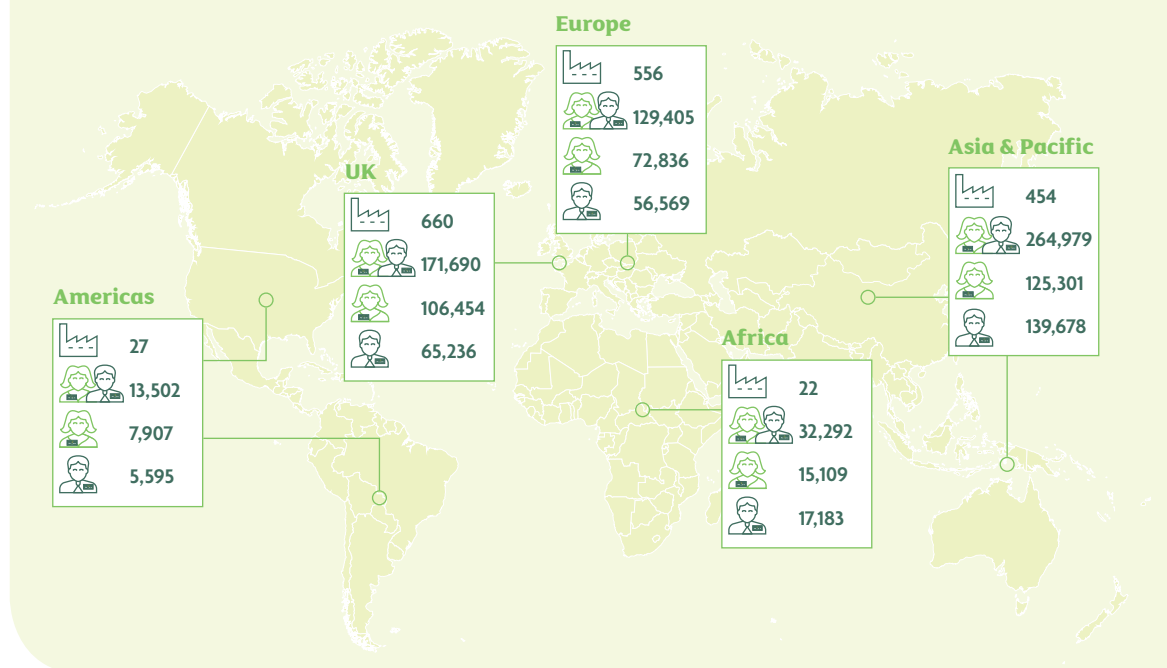
Our vertically integrated business model and continuing commitment to British and local sourcing makes us less reliant on imported goods. Over 35% of our tier one own brand supply chain is now based in the UK and a significant amount of the fresh food in our stores is produced in our own factories. However, we still purchase own-brand products and ingredients from over 60 countries and our global supply chains are complex and extensive.

In addition to our in-house manufacturing, we continue to source own brand food, clothing and consumer goods from over 1700 tier one factories. Using the Sedex platform we can access information on workforce demographics which provides high level data we can utilise to inform our strategy.

This will be improved further in 2020 with the roll out of a revised and updated supplier assessment questionnaire (SAQ) and improved risk assessment tool which includes specific metrics on the likelihood and prevalence of forced labour in our supply chains.

We completed work in 2019 to map over 700 primary ingredient suppliers into our production sites and will build on this in 2020 by requiring all these suppliers to join the Supplier Ethical Data Exchange (Sedex) and complete a detailed self assessment questionnaire. This will enable us to identify areas of forced labour and exploitation risk in these lower tier supply chains and develop appropriate mitigation.

Our own-brand, tier one suppliers



			
1,719	611,868	327,607	284,261
Total sites	Total workers	Female workers	Male workers

Structure, Business & Supply Chains continued

Our own-brand supply chain by category



Division	Sites	Total Workers	Female	Male	Agency/ Temporary
Food	1,161	357,722	160,276	197,446	117,683
Consumer Goods	397	152,765	63,343	89,422	17,277
Clothing	194	101,381	60,642	40,739	2,994

Outside of our vertically integrated supply model, most of our business relationships are operated indirectly through a UK based primary supplier, with the exception of goods purchased through our Global Sourcing team in Hong Kong where we predominantly deal directly with manufacturers.

Whilst we currently only maintain detailed risk data on suppliers in scope of our Ethical Trading Policy, we have comprehensive site visibility throughout the lower tiers of our food supply chain. Our fresh produce is tracked to farm level through the Greenlight Grower Management system and core ingredient supply chains are maintained for all own-brand food products by our Technical teams.

We acknowledged in our 2018/19 statement that there was still work to be done in identifying and mitigating risk in the lower tiers of supply and took steps to address this in 2019.

For more details on this group, please see our [Risk Assessment](#) section on page 11, and our [Due Diligence](#) section on page 12.

Issues relating to modern slavery in some source countries are compounded by a reliance on migrant and temporary workers in agriculture and the challenges presented in ensuring that recruitment is managed responsibly. We also acknowledge that women are often disproportionately affected and will continue to work with the Ethical Trading Initiative (ETI) and other external partners to build our knowledge and capacity in this area.

Structure, Business & Supply Chains continued

We continue to make progress in supply chain compliance management through collaborative relationships with partners such as the Food Network for Ethical Trade (FNET) and the Responsible Recruitment Toolkit (RRT) which enable us to share resources and tools more effectively through our supply chains. For more details on this initiative, please see our [Collaborative Action](#) section on page 18.

We rely on a significant proportion of temporary, agency provided labour to operate our Morrisons Manufacturing and Logistics operations and acknowledge that this is an area of risk. We seek to limit our exposure by only dealing with two primary agencies for the majority of workers sourced in this way, and work closely with both to ensure they have robust processes in place to manage risk in their operations. We supplemented this in 2019 by working with the GLAA to develop a detailed Labour & Site Services Procurement Policy to ensure compliance with applicable legislation. More details can be found in our [Policies](#) section on page 9.

As a responsible retailer we understand that our customers and stakeholders expect us to be transparent about our structure, business and supply chains. We work closely with our suppliers to ensure they operate in a responsible manner, and therefore want to make it possible for customers and civil society organisations to raise concerns directly with us, particularly in relation to modern slavery and labour exploitation.

We commenced this process by publishing details of our tier one Nutmeg clothing suppliers on the Morrisons Corporate website in 2018, who together produce over 34 million items of clothing for us each year.

The next logical step in this process is to publish details of the remaining tier one, own-brand suppliers across our food and non-food divisions. Work commenced on this in 2019 and we have committed to publish the information in the first half of 2020. Over the next three years we plan to publish greater detail on some of our higher risk supply chains back to grower level. We trialled this process with our supplier of own brand tea in 2019 and full detail of the plantations and estates supplying Morrisons can be found here:



<https://www.morrisons-corporate.com/globalassets/corporatesite/corporate-responsibility/ethical-trading/morrisons-own-brand-black-tea---march-2020.pdf>

Our Policies Related to Modern Slavery & Human Trafficking

We have well established policies and processes in place throughout our operations to ensure we conduct our business in a responsible manner, including all aspects of modern slavery, human trafficking, forced labour and exploitation. We remain committed to upholding the UN Guiding Principles on Business and Human Rights and have aligned our Corporate Responsibility reporting with the UN Sustainable Development Goals.

Core requirements for suppliers are contained in our Ethical Trading Code which is aligned to ILO core conventions, and supported by our Ethical Trading Policy. Compliance with our Code is built into our standard terms for all suppliers and includes specific commitments relating to modern slavery, forced labour and the responsible recruitment of both permanent and agency provided workers. We also require suppliers to ensure, as far as is reasonably practicable, that their suppliers, agents, labour providers and subcontractors who are directly or indirectly involved in the provision of goods comply with these requirements.

All suppliers of own-brand products are required to demonstrate continuing compliance to our Ethical Trading Policy and implement effective action in any areas identified through third party audit as being non-compliant. We understand our suppliers may need time and support in this process, but our priority is always to stay and fix issues, and never to simply cut and run.

Our Ethical Trading Policy and Code are publicly available, clearly communicated to all suppliers and will be fully revised and updated in 2020 to strengthen our expectations relating to modern slavery. This will include modern slavery specific additions to our Code and express requirements for suppliers to demonstrate compliance with the transparency in supply chains reporting section of the Modern Slavery Act.

We supported our Ethical Trading Policy in 2019 with the launch of a revised Raw Material Sourcing Policy, with increased detail on respecting the human rights of workers in the lower tiers of our fresh produce supply chain. This will require all suppliers in the value chain to demonstrate additional due diligence by joining Sedex and linking to Morrisons to give us increased visibility of their risk profile.

Higher risk suppliers will be required to provide additional due diligence information prior to supply.

We also commenced implementation of a Vendor Assurance Policy designed to increase oversight and governance of tier two ingredient suppliers into our vertically integrated manufacturing operations. In 2020 all these suppliers will also be required to join Sedex, complete a self assessment questionnaire and link to Morrisons.

Internally, our People team have developed several policies to support and enhance our commitment to operating responsibly and ensuring that all our colleagues are treated with dignity and respect, including Anti-Bribery and Corruption, Right to Work, Respect in the Workplace and Whistleblowing. We additionally developed a specific policy on Preventing Hidden Labour Exploitation in Manufacturing & Logistics to provide clarity and guidance for all colleagues on our approach. This includes detail on our requirements for labour providers, prohibition of recruitment fees, support for colleagues to report issues and our commitment to work openly with the GLAA. These policies are regularly updated and made available to all colleagues through our online "My Morri" platform.

Our People team identified a need for us to review our approach to victim remediation in response to the incidents we experienced during 2019. This process has commenced, and we are seeking guidance from external stakeholders including the GLAA and Hope for Justice to ensure our policy is deliverable and reflects good practice in the sector. We expect to publish in the first half of 2020 and will provide a further update in our 2020/21 statement.

We are conscious that there has been a steady reduction in the number of migrant workers available in the UK food and agriculture sector, driven by several external factors. This potentially creates an environment conducive to an increase in unlicensed gangmaster activity as businesses compete over a shrinking pool of available workers in the GLA licensed sector. In response to this our Legal team worked in collaboration with GNFR Procurement colleagues and the GLAA to develop a new Labour and Site Services Procurement Policy to ensure we have robust controls in place to manage recruitment of affected workers across all Morrisons sites. This policy is in the final approval phase and will be launched in 2020, supported by e-learning for all applicable colleagues.

Our Policies Related to Modern Slavery & Human Trafficking continued

Key policies

- Ethical Trading
- Raw Material Sourcing
- Vendor Assurance
- Labour & Site Services Procurement
- Preventing Hidden Labour Exploitation
- Anti-Bribery & Corruption
- Right to Work
- Respect in the Workplace
- Whistleblowing
- Fish & Seafood Sourcing
- Retailer Protocol for Handling Cases of Modern Slavery
- Apparel & General Merchandise Public & Private Protocol

We have recently updated our Fish and Seafood Sourcing Policy to include defined requirements on managing risks around Illegal Unreported and Unregulated (IUU) fishing in our supply chain. IUU fishing is closely associated with the risk of human rights abuse in seafood supply chains, particularly forced and bonded labour and the exploitation of migrant workers. Our approach was developed to support controls aligned to PAS 1550 guidance on IUU fishing, which Morrisons originally helped develop in collaboration with several external stakeholders including the Environmental Justice Foundation (EJF) and World Wide Fund for Nature (WWF).

We also have several responsible sourcing policies which indirectly support our approach to tackling modern slavery and exploitation through the requirement to use accredited certification schemes, including policies on Timber, Soy and Palm Oil.

We have publicly demonstrated our commitment to supporting suppliers experiencing cases of modern slavery by supporting and signing up to two core protocols. The Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain and The Apparel and General Merchandise Public and Private Protocol were developed in collaboration with regulatory authorities and key external stakeholders.

They commit us to work together with enforcement bodies such as the GLAA to tackle modern slavery risk and collaborate with our competitors to provide consistent guidance and support in the event of an issue occurring in our shared supply chain. Crucially, the Retailer protocol also includes an express declaration that commercial relationships will not be affected if the supplier acts in good faith and in compliance with applicable legislation.

The sharing of intelligence across our sector and through our supply chains is key to making meaningful progress in tackling these issues and the Protocols are undoubtedly improving reporting of incidents by our suppliers. We are pleased to note that many of our suppliers are now actively sharing their experiences and this is beginning to be reflected in their annual modern slavery statements. This represents a genuine shift in attitudes and demonstrates an appetite in the UK food sector to openly collaborate on tackling these issues.

We continue to support the British Retail Consortium (BRC) Better Retail, Better World initiative and made our first reporting submission in 2019. A core element of this commitment is to continually develop our approach to ensuring responsible recruitment practices are applied throughout our global supply chains. This is already expressly covered in our Ethical Trading Code, and our planned policy update for 2020 will expand on our current requirement with increased clarity for suppliers. This will be informed by our relationship with the Responsible Recruitment Toolkit, whose tools, resources and training workshops were rolled out to our suppliers in 2019.

Finally, we formalised our relationship with the China based social enterprise, the Center for Child Rights and Corporate Social Responsibility (CCR-CSR) in 2019 in acknowledgement of the increasing risk of child and young worker exploitation in Asia. This has enabled us to draft a Child Labour Remediation policy with their input, which will be launched alongside our updated Ethical Trading Policy in 2020.

Risk Assessment

Modern slavery and forced labour risk in food supply chains remains linked to a workforce demographic that is susceptible to exploitative practices. Informal, temporary, seasonal, and low skilled work is prevalent throughout food supply chains, particularly in agriculture.

Our approach to due diligence and supply chain risk assessment is informed by UN Guiding Principles on Business & Human Rights (UNGPs) and our Ethical Trading Policy. We seek advice and guidance from established subject matter experts and utilise our relationships with multi-stakeholder initiatives such as the Ethical Trading Initiative and Food Network for Ethical Trade to gather information on emerging risk.

We assess ongoing modern slavery risk in our supply chains using a combination of country level information sources, audit results, NGO insight and regular consultation with external stakeholders. We strengthened our approach in 2019 through partnerships with the Food Network for Ethical Trade (FNET), the Spain Ethical Trade Forum and Slave-Free Alliance.

We have been members of Sedex since 2013 and continue to access their data and tools to undertake preliminary screening on all new suppliers in scope of our Ethical Trading policy. We complement the risk assessment provided by Sedex using an internal, high level country risk tracker to identify where there is a likelihood of human rights and modern slavery risk, and flag additional due diligence requirements prior to commencement of business with Morrisons. The overall country risk scores are based on information from several external 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 list of Goods Produced by Child Labor or Forced Labor
- Food Network for Ethical Trade Risk Tool

The country level tracker is reviewed regularly to account for updates to the contributing indices, inclusion of information from site visit reports and insights from the media and civil society.

We continued to work in close collaboration with multi-stakeholder initiatives to access additional insight and intelligence on modern slavery risk, most notably through participation on working groups at the Ethical Trading Initiative and the Food Network for Ethical Trade. We also joined new initiatives relevant to risk in our wider supply chains including the Spain Ethical Trade Forums and Slave-Free Alliance. More detail can be found in the Collaborative Action section of this statement.

Where risk is identified in our first tier food, non-food, and 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. In addition, where our country risk tracker flags a fresh produce sourcing region as high risk, we request supplementary due diligence information from potential new suppliers and engage with external parties for further insight. We aim to reinforce this activity in 2020 through investment in supply chain mapping technology which will increase visibility in the lowest tiers of our supply chains.

Based on our tools and resources

We consider our most salient and tractable modern slavery risks in our wider supply chain to be:

- Forced labour and exploitation in UK agriculture and food processing
- Migrant worker exploitation in European, Latin American and South African agriculture
- Forced, child and prison labour in the Chinese manufacturing sector

Due Diligence Processes in our Business and Supply Chain

Morrisons Operations

In our own business, the primary risk exists in our vertically integrated manufacturing and logistics operations, which require temporary, agency provided and migrant labour to manage seasonal increases in capacity. Our objective has always been to develop effective and innovative approaches to address this issue that can be shared with our wider supply chain.

We made significant progress in 2019 to identify and mitigate risk through the establishment and operation of an internal Modern Slavery Steering Group. This group includes representation from all key central functions and meets on a quarterly basis to review incidents in our business and assess emerging risk based on internal and external intelligence. The group also oversees an ongoing action plan with defined tasks across five key areas:

- Regulatory Compliance
- Operations
- Training
- Incident Management
- Remediation

The cross-functional and senior nature of this group ensures a holistic approach to addressing modern slavery risk in our business and means that decisions can be made quickly where action is required. We intend to develop this group further in 2020 with representation from additional functions, and expansion to review risk in other areas of our business.

To identify and mitigate the risks posed by our use of third party labour providers, we worked with the GLAA and our Legal team to conduct a full review of all providers managed by our Goods Not For Resale (GNFR) Procurement function.

All roles were assessed to determine whether they should be covered by GLA licencing requirements and additional gate controls were added to our supplier approval process. We supported this with face to face training for all colleagues involved in the process and will develop a bespoke e-learning module in 2020 to ensure ongoing awareness.

Since 2016, our site teams have conducted biannual audits on labour providers using the Complyer tool developed by the Association of Labour Providers (ALP). Based on our own experiences of modern slavery cases, the most successful outcomes are achieved when workers are empowered to come forward and disclose what has happened to them. We therefore reviewed our audit process in 2019 to increase the time spent speaking with workers. This included conducting worker questionnaires and welfare interviews every quarter, capturing 25% of the workforce each time rather than a 10% sample twice per year.

We also continued to develop our internal modern slavery incident management process and resources throughout 2019. These were originally developed by our Business Continuity, Loss Prevention and Ethical Trading teams, with review and oversight from expert third parties including the GLAA and Hope For Justice. Our process was updated throughout the year in response to colleague feedback and output from post incident reviews, ensuring it delivers effective and practical support for colleagues managing incidents and investigations, whilst ensuring victims are protected at all times. At the heart of this process is our Labour Exploitation and Modern Slavery Risk Incident Response Checklist. This includes step by step guidance on how to manage incidents, including key internal and external contact details, escalation information, templates for recording information, activity checklists and additional information sources. We intend to create a generic version of this document in 2020 that can be shared with our suppliers and tailored to their individual requirements.

Key Activity in 2019:

Established an internal Modern Slavery Steering Group

Increased frequency of worker welfare questionnaires and interviews

Carried out independent, third party Ethical Audits at all Morrisons Manufacturing sites

Updated our Labour Exploitation and Modern Slavery Incident Response process

Due Diligence Processes in our Business and Supply Chain continued

We meet regularly with the Compliance and Licencing team at the GLAA to review our approach, share intelligence and provide updates, and continued our engagement with regional modern slavery partnerships in West Yorkshire and Derby. These networks provide the opportunity for businesses, local authorities, and NGOs to review current intelligence and share best practice relevant to individual regions and local authorities.

We built on this further in 2019 by engaging with the Office of the West Yorkshire Police and Crime Commissioner (who is the national PCC lead on Modern Slavery), and the Modern Slavery and Human Trafficking team within West Yorkshire Police. We intend to expand these relationships across the UK in 2020 and build partnerships at local level between relevant police teams and our regional site operations.

Finally, in 2019 we commissioned independent, third party ethical audits at all our own UK Manufacturing sites to verify the effectiveness of our actions. These audits did not reveal any issues relating to modern slavery, forced labour or exploitation.

Our Supply Chains

Third party audit remains the primary due diligence activity in our tier one, own-brand supply chain. Audits provide independent verification of the labour standards at our supplying sites, including potential and actual risk of modern slavery related practices. Where issues are raised, we require suppliers to provide a corrective action plan and will support them to address the root causes. New suppliers are not approved for supply until they can demonstrate that any significant issues (as defined by our grading process) have been effectively mitigated and corrective actions have been verified by an independent third party.

There were 811 audits undertaken at active sites linked to Morrisons on the Sedex platform in 2019 using either the Sedex Members Ethical Trading Audit (SMETA) or Business Social Compliance Initiative (BSCI) methodology. Our third party audit programme identified 5 tier one factories with

“In my role as the National PCC lead on Modern Slavery I really welcome Morrisons efforts as a major West Yorkshire business and employer throughout the UK to engage with local and national Police teams in tackling modern slavery. By working together and sharing intelligence, we can increase awareness of the modern slavery risk and make it more difficult for criminals to operate in food supply chains.”

Mark Burns-Williamson, Police and Crime Commissioner for West Yorkshire

Major or Critical non-compliances raised under the heading of “Employment is Freely Chosen”. All issues have now been resolved.

Recognising the limitations of social audit in effectively identifying modern slavery, we take additional steps in higher risk areas of our supply chain to increase oversight. In 2019 we developed and trialled an online site reporting tool for use by our internationally based Technical Managers to capture working conditions, labour rights and modern slavery risk information live at source during site technical visits. This is supported by enhanced due diligence requirements for growers and processors detailed in our updated Raw Material Sourcing Policy, which requires all operators in our value chain to join Sedex and share risk information.

Factory Audits & Visits

811

Ethical audits undertaken at tier one factories

45

Factory visits undertaken in China by our Ethical Team

Due Diligence Processes in our Business and Supply Chain continued

We operate an externally provided whistleblowing hotline called “Tell Us” which is available to all suppliers, enabling them to raise concerns directly and anonymously to our head office Risk and Compliance teams. In 2019 our People team developed modern slavery specific versions of our Tell Us posters in multiple languages to be displayed throughout our manufacturing sites.

We are conscious that our suppliers have a key role to play in delivering due diligence activity and our reliance on them increases as we move into the lower tiers of supply. We work with collaborative initiatives to achieve this, providing support for suppliers to come together at a local level to build awareness and develop action plans with support from NGO facilitators.

We also recognise that there is continuing risk in the lower tiers of our seafood supply chain and our team made further progress in 2019 through engagement with multi-stakeholder initiatives and through support for advocacy at government level. We focused much of our effort on addressing illegal, unreported and unregulated (IUU) fishing practices, which are an enabler of exploitation and abuse, particularly towards vulnerable migrant workers.

Through our work with the Seafood Action Alliance we supported the development of an IUU fishing audit checklist and protocol that will be rolled out in our higher risk seafood supply chains during 2020.

We are also working to develop a comprehensive UK fishery list which will inform our ongoing approach to risk assessment in this area.

We also acknowledge that fishing operations in South East Asia remain at particular risk of both IUU practices and modern slavery but given our limited sourcing from the region we do not have the influence or leverage to drive meaningful change.

This does not preclude us from action however, so in support of collective advocacy Morrisons endorsed two joint statements with several other brands, NGOs and multi-stakeholder initiatives. These statements called for the preservation of fisheries regulations and reforms in order to prevent IUU fishing practices and were communicated directly to the Royal Thai Government.

Finally, in support of both enhanced due diligence and preventive action, our Hong Kong based Ethical Trading colleagues continued to implement a factory visit programme in China. In 2019 we carried out 19 announced and 26 unannounced visits across our main sourcing regions. Through these visits we identified issues relating to the recruitment of dispatch (agency) workers and unfair employment terms at one site. We provided support to the factory to implement improvement actions and used these visits to provide wider training on labour and human rights risk.

Collaborative Due Diligence

Spain Ethical Trading Forum working group on Modern Slavery

ETI working group on vulnerable workers in Italian agriculture

ETI working group on social dialogue in Peru

First UK supermarket member of Slave-Free Alliance

Training, Awareness & Capacity Building

Training and awareness programmes continue to be at the forefront of our approach to building the capacity in our business and supply chains to effectively manage incidents in a way that supports positive outcomes for victims. We have reviewed and updated our approach continuously since 2016 and added several new initiatives in 2019.

Training for Colleagues

In our own business we continue to work to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant information. This means targeted programmes at differing levels of the business, in 2019 we have focussed our efforts on the following groups:

- Workers at all levels in Morrisons Manufacturing & Logistics, included agency provided labour
- Centrally based colleagues in Commercial, Technical and GNFR Procurement functions
- People teams in regional Manufacturing & Logistics sites
- Internationally based colleagues in our Technical, Commercial and Ethical Trading teams

We have thousands of colleagues in our Manufacturing and Logistics operations across 27 locations, so our approach needs to be flexible and easily accessible. We consider e-learning to be the most effective delivery method and completed the roll out of our previous training in 2019. The reach of this programme was limited by the number of licences available, but eventually reached over 800 colleagues. An impact assessment undertaken at our Wakefield Logistics depot demonstrated that workers found the e-learning useful and effective, and highlighted the demand for further training. We acted on this in 2019 to develop a new programme with greater context, depth and reach.

Working in collaboration with an external partner, we built a bespoke, interactive modern slavery and human trafficking e-learning module specifically for our Manufacturing and Logistics operations.

Highlights

- Developed a bespoke online Modern Slavery Toolkit for our Manufacturing and Logistics Operations
- Developed UK temporary accommodation guidance in collaboration with competitors, NGOs and Sedex.
- Organised awareness training for UK flower growers, delivered by the GLAA
- 150+ colleagues from suppliers in South Africa attended Stronger Together training
- 1,060 colleagues trained on modern slavery awareness to date including:
 - 870 e-learning modules completed
 - 142 Commercial colleagues (face to face)
 - 48 Manufacturing & HR colleagues (face to face)

The content was informed by the limited number of modern slavery cases we have experienced and includes a detailed knowledge check to verify understanding. We also built in the ability for colleagues to click a “help” button at any time during the training to alert our People team that they consider themselves to be at risk.

Development of the module was completed at the start of 2020 and it will be rolled out to all colleagues with management responsibility throughout the year. We have complemented the e-learning with face to face sessions for non-management and hourly paid colleagues based on the same material to ensure we can cover as wide an audience as possible. Without the limitations of the previous e-learning, we hope to deliver this material to over 5000 colleagues in 2020. We have also planned a comprehensive impact assessment to review effectiveness once the programme has been implemented.

Bespoke Modern Slavery e-Learning



Training, Awareness & Capacity Building continued

Our Ethical Trading teams in the UK and Hong Kong continued to design and implement training for our centrally based colleagues, delivering over 20 separate sessions on human rights and modern slavery, including:

- Induction sessions for all new starters in Commercial roles
- Ethical trading update workshops for Technical colleagues, including our internationally based At Source Technical Managers.
- GLA Licencing Compliance workshops for GNFR Procurement teams
- Forced labour awareness sessions for Hong Kong based Commercial, Technical and Supply Chain colleagues.

We utilise our external partnerships to remain up to date on the latest trends and emerging risks in modern slavery and use this knowledge to continually update our training offer for colleagues. Our central Ethical Trading team completed in depth training provided by Stronger Together on Investigative Interviewing and Managing Modern Slavery Incidents, and these sessions will be offered more widely to other colleagues in 2020. We also plan to build on our new relationship with Slave-Free Alliance to deliver focussed development for our People team.

Finally, 32 colleagues from our Global Sourcing office were also able to benefit from an in depth session on modern slavery and forced labour awareness delivered by the CEO of Mekong Club.

Training for Suppliers

We continue to utilise our sponsorship of Stronger Together to offer free, industry leading training to all suppliers and labour providers in the UK and South Africa. Since we commenced our relationship with the initiative in 2013 this has enabled us to provide training on Tackling Modern Slavery in UK Business to 1237 delegates from over 400 of our suppliers, including 250 in 2019. This training is also mandatory for all Morrisons Site Managers and People Managers with over 46 of these colleagues completing the training since 2013. This training has been comprehensively reviewed and updated for 2020 and we will continue to encourage all suppliers to access the workshops.

We were also founding members of the Stronger Together programme in South Africa and support its development through our role as steering group members. Since 2017 this initiative has delivered 62 free 'Tackling Forced Labour in Agri-Businesses' workshops across 7 provinces (Western Cape, Eastern Cape, Mpumalanga, Northern Cape, Limpopo, Kwazulu-Natal & Gauteng), to 961 individuals from 534 South African (SA) agri-businesses and stakeholder organisations. We continue to encourage all suppliers to attend the workshops and will promote the additional sessions on providing effective remedy for victims in 2020.

In 2019 we became a Founding Sponsor of the Responsible Recruitment Toolkit (RRT), supporting labour providers and suppliers in our supply chain to embed ethical and professional recruitment and labour supply practices. All our supply chain partners, at any tier, can benefit from free access to the Responsible Recruitment Toolkit online portal and training workshops delivered by leading experts in the field of responsible recruitment and the elimination of work related fees. In 2019 over 50 of our key suppliers and labour providers accessed either the "Introduction to Responsible Recruitment" or "Eliminating Worker-Paid Recruitment Fees" training and over 1000 businesses accessed the online toolkit. We have recently confirmed our ongoing sponsorship and support for this initiative in 2020.

We maintain a supplier engagement programme with key first tier food and non-food suppliers, conducting biannual review meetings to understand their approach to managing human rights risk in their own operations and supply chains. We use these sessions to provide regular updates about our own modern slavery programme including an overview of the investigations we have conducted to share key learnings from suspected and actual cases. These meetings are incredibly valuable for improving our understanding of the end to end supply chain and identifying opportunities where we can collaborate to address risk.

Training, Awareness & Capacity Building continued

Morrisons is British farming's largest direct supermarket customer and the largest single fresh food manufacturer in the UK, so support for agriculture in the UK is fundamental to our business. We recognise that awareness and compliance levels are lower in this sector and commenced a programme to address this at the start of 2019. We developed a grower specific workshop on modern slavery and Gangmasters Licencing Act compliance in conjunction with the GLAA and delivered a pilot session to daffodil growers in Cambridgeshire. Building on the positive feedback from attendees we funded and hosted two further sessions in Northamptonshire in September 2019, delivered to over 80 delegates by an experienced trainer from the GLAA. The training was very well received, and we will seek to expand the offer in 2020 to cover more regions in the UK.

2019 also saw the launch of training developed in conjunction with our UK supermarket competitors, ETI, the Fresh Produce Consortium and Sedex on Temporary Accommodation Standards in UK Agriculture. This online training can be accessed via Sedex website and has been shared with all Morrisons Produce and Livestock suppliers. The initiative was nominated in the Best Collaborative Effort category at the 2019 Sedex Awards.

We remain in continuous dialogue with our suppliers in Asia on the topic of modern slavery and forced labour through the Ethical Trading team based at our Global Sourcing office in Hong Kong.

In 2019 our team developed their awareness of issues and mitigation strategies through engagement with local and regional experts including the ETI, Mekong Club and the Center for Child Rights and Corporate Social Responsibility (CCR-CSR). We delivered fourteen sessions on tackling forced labour to 33 of our largest suppliers, and a further two hour session to 64 additional suppliers later in the year. 70 of our suppliers also attended our 2019 Asia Supplier Conferences in Shanghai and received detailed briefings on risk trends and regional modern slavery typology.

We will utilise these collaborative relationships further in 2020/21 to develop more focussed training in the region and enable free access to additional tools, resources and expertise for all our suppliers. Building on media and NGO reporting of the increased risk of forced, child and prison labour, we will also develop and distribute specific guidance on this topic to all suppliers.

Finally, in recognition of the key role that academia can play in building awareness and driving improvement in the fight against modern slavery, our Ethical Trading team supported two separate studies in 2019, providing insight on our approach and experiences. The first of these, undertaken by researchers from the University of Exeter Business School, Wageningen Universiteit, and Kobenhavns Universitet was published in January 2020 and can be viewed here.



www.journals.sagepub.com/doi/full/10.1177/0007650319898195

Collaborative Action

Modern slavery issues in global food supply chains are often complex and challenging. We acknowledge that we cannot deliver meaningful impact on our own and remain committed to working with others in an open and collaborative manner to leverage change. Working in this way enables us to maximise the resources we have available and ensures that guidance is delivered consistently through our shared supply chains.

Throughout 2019 we continued to identify and select suitable partners to work with on the development of our approach. Our engagement with our suppliers, competitors, NGOs, charities, Trade Unions and multi-stakeholder initiatives (MSIs) forms a key part of our strategy and in 2019 we worked with the following organisations on projects relevant to modern slavery:

Hope for Justice and Slave-Free Alliance



We continued to work with Hope for Justice (HFJ) throughout 2019 as they completed our planned series of modern slavery threat assessments at selected Morrisons Manufacturing and Logistics sites. These reviews proved to be extremely useful in both highlighting the good practices in place and identifying opportunities for improvement. Our site teams have implemented corrective action plans and we will review the effectiveness of our response throughout 2020.

Our relationship with HFJ led us to become the first UK supermarket to join Slave-Free Alliance (SFA), an anti-slavery social enterprise and membership initiative that was established by Hope for Justice in 2018. Membership gives us access to a wide range of tools and resources to support our programme and the opportunity to collaborate with SFA members from sectors outside of retail grocery. It also provides access to HFJ's expert Technical Services Managers, enabling our site teams to discuss concerns and inform our response to potential issues.

We are initially working with SFA on the development of our incident management and victim remediation processes in Morrisons Manufacturing and Logistics and are also utilising their support to identify and resolve any gaps in our wider approach.

Spain Ethical Trade Forums (SETF)



With the support of retailers and suppliers, the SETF facilitates and hosts regional grower forums to share resources, training and guidance. They promote a common approach to improving labour standards, including tackling exploitation and communicating details of protection available for migrant workers. We formalised our membership of the SETF in April 2019.

Morrisons colleagues from the UK and Spain attended their annual conference in Murcia, where growers presented working group activity including the creation of best practice guidance for accommodation standards and case studies for promoting worker wellbeing and engagement.

We intend to build on this relationship further in 2020 and will sit on the initiative's Governance Group for the next year.

Stronger Together



Stronger Together is a multi-stakeholder business-led initiative that aims to reduce forced labour, trafficking and other hidden third party exploitation of workers. We are a founder sponsor of the initiative and steering group member of the UK Consumer Goods programme.

Stronger Together produce a wide range of training workshops and resources that our suppliers and their labour providers can access free of charge. Our suppliers in the UK and South Africa continued to benefit from this in 2019 with over 250 supplier delegates attending workshops.

We provided continued support for the initiative throughout 2019, hosting two of their training workshops at our Manufacturing and Logistics sites and supporting the development of their updated Business Partner offer.

Collaborative Action continued

Ethical Trading Initiative (ETI)



ETI membership gives us the ability to join forces with other businesses, trade unions and civil society organisations to support wider advocacy at government level. We have been full members of the ETI since 2018 and actively participate in and fund a number of initiatives relevant to our modern slavery strategy. In 2019 this included:

- Vulnerable workers in Italian agriculture
- Social dialogue in Latin America (Peru, Colombia & Mexico)
- Avocado growers in Kenya

We are active contributors to the ETI working group on Modern Slavery and attended the wider stakeholder meeting with the Anti-Slavery Commissioner in September to discuss and agree our response to consultations on the Modern Slavery Act and Labour Market Enforcement.

Gangmasters and Labour Abuse Authority (GLAA)



We have a well established relationship with the GLAA and continued to work closely with them throughout 2019. We hold regular meetings with the GLAA Compliance team and in 2019 they supported the development of our new Labour and Site Services Procurement Policy to ensure a consistent and robust approach to the recruitment of workers at our Manufacturing and Logistics sites.

We also commissioned the GLAA to deliver bespoke modern slavery training for growers and farmers following a successful pilot in 2018. Two further workshops were held in 2019 reaching over 80 attendees from our fresh produce supply chain.

Seafood Ethics Action Alliance (SEA Alliance)



The SEA Alliance is a collaboration of UK seafood companies and stakeholders established to share information on emerging issues, agree best practice solutions and provide a forum for pre-competitive action.

Over the past year the group developed and trialled a draft Illegal, Unreported and Unregulated (IUU) fishing audit checklist and protocol that will be rolled out in our higher risk supply chains during 2020. The group has continued to engage with standards developers including Global Seafood Assurances regarding the development of their Responsible Fishing Vessel Standard, and the Marine Stewardship Council (MSC) on their approach to human rights within specific sections of the fishing industry. We are also working to develop a comprehensive UK fishery list which will inform our ongoing approach to risk assessment and supply chain due diligence.

Food Network for Ethical Trade (FNET)



FNET is a collaborative initiative which brings together major UK supermarkets and over 50 large UK food suppliers to improve human rights in global supply chains through a common approach to managing ethical trade. The initiative provides tools, support and guidance for our tier one suppliers to assess risk in their global ingredient supply chains and take ownership for driving improvement.

2019 was our first full year of membership and we contributed to several working groups, including Risk Assessment and Ethical Engagement. We also supported the development of an FNET & Stronger Together event to raise awareness of Modern Slavery Risk in Warehousing and Logistics, which will take place in early 2020.

Responsible Car Wash Scheme (RCWS)



The Responsible Car Wash Scheme and its associated code of practice seeks to ensure that all member car washes operate legally, treat workers fairly and respect the environment. We collaborated with our competitors, suppliers, and regulatory bodies including the GLAA and Environment Agency to formally establish the scheme in 2018 and remain active members of the Advisory Panel.

Morrisons currently operate 35 franchised hand car wash operations across our estate and all are required to maintain compliance with the code of practice. We will continue to engage with this initiative in 2020 and support the expected calls for licencing in this sector.

Collaborative Action continued

Mekong Club



Mekong Club are a Hong Kong based initiative who support the private sector to lead in the fight against modern slavery across the Asia-Pacific region.

We became the first UK supermarket member in 2018 and formally signed their Business Pledge Against Modern Slavery in 2019.

Our Global Sourcing team in Hong Kong meet regularly to discuss improvements to our regional strategy and share resources and tools with our direct suppliers in China. In 2019 we also commissioned Mekong Club to deliver an in depth training session for all Commercial, Technical and Supply Chain colleagues in our regional office to build awareness of the risks in our sector and highlight the responsibility we share to take action.

Center for Child Rights and Corporate Social Responsibility (CCR-CSR)



We formalised our relationship with CCR-CSR in 2019 after working closely with them on the remediation of an underage worker in China. We are now members of their working group and regularly access their meetings and services via our Global Sourcing office in Hong Kong.

CCR-CSR provides support to the worker we identified in 2018 as part of an ongoing remediation effort, which will continue until he reaches legal working age. This includes regular visits and updates by the CCR-CSR team and access to specialist youth support services where required.

Representatives from CCR-CSR also presented at our annual supplier conference in Shanghai and provided details on their Child Friendly Spaces programme which provides migrant workers in China the opportunity to spend more time with their children in a safe environment.

Finally, we continue to engage with CCR-CSR on the development of our Child Labour Remediation Policy and plan to launch this in 2020.

Indirect Procurement Human Rights Forum



In 2018 we joined with nine other UK retailers and suppliers to establish the Indirect Procurement Human Rights Forum. This group works collaboratively to drive positive change and reinforce the human rights of workers in indirect procurement supply chains including security, cleaning, catering services, transport and waste management. Many of these sectors are at high risk of exploitation due to their worker profile.

In 2019 one of the working groups, supported by the GLAA, hosted a workshop for waste management and recycling suppliers to raise awareness of the risks in this sector. Plans are in place to hold another larger industry event in collaboration with Stronger Together in 2020.

Responsible Recruitment Toolkit



We became a founding sponsor of the Responsible Recruitment Toolkit (RRT in 2019), supporting labour providers and suppliers in our supply chain to embed ethical and professional recruitment and labour supply practices. All our suppliers and their labour providers, at any tier of our chain, can benefit from free access to the Responsible Recruitment Toolkit.

This includes an online resources portal and training workshops delivered by leading experts in the field of responsible recruitment and the elimination of work related fees.

In 2019 over 50 of our key suppliers and labour providers accessed either the "Introduction to Responsible Recruitment" or "Eliminating Worker-Paid Recruitment Fees" training and over 1000 businesses accessed the online toolkit. We confirmed our continuing support for the initiative in early 2020.

Office of the West Yorkshire Police & Crime Commissioner (WYPCC)



Building on a relationship established by our Loss Prevention colleagues, in early 2020 we met with the WYPCC team and officers from the West Yorkshire Police Modern Slavery and Human Trafficking team to discuss our approach and identify opportunities to collaborate.

We plan to build on this further throughout 2020 and will expand our reach to engage with Police forces and PCC offices across the UK to share intelligence and provide support for our regionally based Manufacturing and Logistics colleagues.

Performance Reporting

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

Reported incidences of modern slavery in our business and supply chains, and our response – see below:

- Third party ethical audits undertaken on our own brand and exclusive sites; see our [Risk Assessment](#) section on page 11 and [Due Diligence](#) section on page 12.
- Colleagues and suppliers who have undertaken modern slavery awareness training; see our [Training, Awareness & Capacity Building](#) section on page 15.
- Collaborative improvement action undertaken in specific areas of our supply chain; see our [Collaborative Action](#) section on page 18.

We identified seven suspected cases of modern slavery in our business during 2019/20 and conducted detailed investigations with the support of internal People and Loss Prevention teams, the GLAA, and regional Police forces. These incidents typically related to the exploitation of both agency workers and directly employed colleagues by an external third party.

Across the seven cases investigated we identified potential offences related forced labour, unlicensed gangmaster activity, human trafficking and exploitation. Victims in the majority of cases were migrant workers from eastern Europe, including Romania, Lithuania and Poland. The GLAA and Police were directly involved in 5 of the investigations, with the remaining cases resolved by our People and Loss Prevention teams without the requirement for external support.

Two of the incidents we investigated this year were confirmed as formal cases of modern slavery by the GLAA and Police, with victims being offered support through the National Referral Mechanism. In both cases we worked with our labour providers to provide remediation and financial support in line with the requests of the workers. One victim chose to return to their home country and the two other victims opted to return to their roles.

We maintain a close working relationship with our primary labour providers and meet regularly to review intelligence and share good practice. We rely on these providers to ensure their approach to due diligence and incident management is robust and supports the actions we are taking to build resilience against criminal activity. Our labour providers provided excellent support in both confirmed cases we experienced in 2019 and we will continue to develop these relationships in 2020.

We were additionally made aware of a potential incident at one of our fresh produce suppliers following receipt of a whistleblower communication.

We worked in conjunction with another retailer who also sourced produce from the same supplier and commissioned an investigation by an independent third party. The investigation revealed no corroborating evidence to support the original claims and we provided full details of the incident to the GLAA. The supplier involved was fully engaged and supportive of the process, and their colleagues attended the grower training hosted by Morrisons and the GLAA later in the year.

We take the continuing increase in cases of modern slavery in the UK very seriously, and we are now experiencing almost one investigation per month on average at our Manufacturing and Logistics sites. We are reassured that in most cases our teams are approached directly by potential victims, which clearly demonstrates that they trust us to provide support and protection during any subsequent investigation.

We are significantly enhancing both our training offer and the provision of awareness materials in our sites in 2020 and expect this to result in an increase in reported incidents. We recognise that this will require us to dedicate additional resources to support our sites and have a comprehensive plan in place. This includes greater engagement with regional police teams and modern slavery partnerships, access to technical experts via our membership of Slave-Free Alliance and the launch of new guidance and policy on victim remediation.

Case Study

An agency colleague at one of our manufacturing sites approached a Morrisons Team Manager to ask if they could be paid in cash that week. When our manager investigated further, the colleague revealed that they did not have access to their own bank account and had concerns over the amount they should be paid.

The colleague's bank account had been set up on their behalf by his landlord, who also coerced the colleague to travel to the UK from his home country with the promise of work. For almost a year, the colleague's wages were paid directly into the account controlled by their landlord, who then provided him with just £50 a week to live on. Our colleague had no idea that they should have been paid over £300 per week as his landlord was also intercepting his payslips.

Our People Manager immediately reported this case to the Gangmasters & Labour Abuse Authority (GLAA), who attended our site and interviewed the colleague. The GLAA confirmed that our colleague was a victim of modern slavery, relocated him to a safehouse and offered access to the National Referral Mechanism (NRM). The colleague chose to enter the NRM and upon leaving the programme, at the colleague's request, was provided with financial compensation and a flight ticket so they could return home. All intelligence gathered was shared with the Police and the perpetrator was arrested at Leeds Bradford airport as he attempted to flee the country with his family.

Progress against the next steps detailed in our 2018/19 statement

Commitment	Complete	Comment
Establish a Manufacturing & Logistics Modern Slavery Working Group with representation from key internal stakeholders and chaired by a People Director.	✓	Our Modern Slavery Steering Group was established in June 2019 and meets on a quarterly basis. This group is chaired by our People Director: Group Reward and Employee Services and includes representation from Loss Prevention, People, Training, Employee Relations, Operations, Business Continuity and Corporate Affairs.
Deliver bespoke training on managing modern slavery incidents to Manufacturing & Logistics Site Managers and People Managers.	→	All new People Managers and Site Managers in our Manufacturing and Logistics operations attend a full day Stronger Together workshop. Bespoke e-learning module developed for roll out to all Management roles in 2020.
Develop a formal remediation policy and process for victims of modern slavery in our business.	→	Scoping discussions undertaken with Hope for Justice and the Morrisons People team. Full policy and process to be formally developed and implemented in 2020.
Develop online monitoring and reporting tools to enable our At Source colleagues to monitor conditions in our global Produce supply chain.	✓	Produce Site Visit report developed and trialled in Spain and Italy during 2019. We are currently exploring a more efficient IT solution that will simplify the information gathering process and improve data analysis for roll out in 2020.
Develop and communicate a child labour remediation policy	→	Policy drafted with input from the social enterprise, CCR-CSR. The policy will be formally launched alongside our updated Ethical Trading Policy in 2020.
Expand visibility of supply chain into lower tiers of Produce and Manufacturing	✓	All ingredient suppliers into Morrisons Manufacturing have been identified and are covered by our Vendor Assurance Programme. This will be expanded in 2020 to require all suppliers to join Sedex, complete the new SAQ and link to Morrisons, enabling us to assess risk and inform next steps from 2021. Produce suppliers are fully mapped back to farm level and additional due diligence requirements are being rolled out into the lower tiers of supply following the implementation of our updated Raw Material Sourcing policy.
Collaborate with the GLAA to fund and deliver further modern slavery awareness training to UK growers	✓	Two sessions were funded in 2020 and hosted at the Morrisons Manufacturing site in Rushden. The sessions were attended by over 80 delegates and feedback was very positive. Further sessions will be planned for 2020/21 to include growers from other UK regions.
Embed the employer pays principle with our tier one suppliers to reinforce the importance of responsible recruitment practices.	→	We confirmed our continuing sponsorship for the Responsible Recruitment Toolkit (RRT) in 2019 and will continue to use this platform as a foundation for embedding the employer pays principle throughout 2019/20, in line with our commitment to the BRC Better Retail, Better World initiative.

 Complete
  Ongoing

Progress against the next steps detailed in our 2018/19 statement continued

Commitment	Complete	Comment
Map the tier two suppliers in our garment and apparel supply chain.	✓	<p>Through our Nutmeg clothing brand, we now have significant visibility below tier one, including all packaging suppliers, who have used Sedex to share ethical information and audit data with us.</p> <p>We are working to increase this further in 2020, with a specific focus on suppliers of trims such as buttons and zips.</p>
Support key suppliers in high risk regions with additional training, awareness and capacity building activity	✓	<p>We hosted, delivered or sponsored several initiatives in 2019 including GLAA training for UK Growers and the provision of Mekong Club resources to suppliers in Asia.</p> <p>We also provided access to free training on modern slavery to suppliers in the UK and South Africa through our sponsorship of Stronger Together and on responsible recruitment practices through the RRT.</p>
Increase oversight of labour providers in Morrisons Manufacturing & Logistics through updated procurement practice and continuous monitoring.	✓	<p>Following the delivery of detailed training sessions in 2018, we consulted with the GLAA on the development of an in depth Labour and Site Services Procurement Policy which will be rolled out in early 2020.</p> <p>This required us to identify all providers across Morrisons Manufacturing and detail all roles that are covered by GLAA licensing requirements. The implementation of this policy will be supported by a bespoke e-learning module developed in conjunction with an external provider.</p>
Utilise collaborative partnerships to embed responsible recruitment policy and practice in our business and supply chain.	✓	<p>Delivered through our sponsorship of the Responsible Recruitment Toolkit initiative which provides free access to training and resources to all Morrisons suppliers and their labour providers.</p> <p>In 2019 over 50 of our key suppliers and labour providers accessed either the "Introduction to Responsible Recruitment" or "Eliminating Worker-Paid Recruitment Fees" training and over 1000 businesses accessed the online toolkit.</p>



Complete



Ongoing

New Objectives

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

We will continue to deliver meaningful progress against this in 2020/21 by:

- Hosting a capacity building event to share learning with local business community
- Implementing pre-employment and ongoing checks to identify indicators of modern slavery and exploitation
- Engaging with regional Police teams and Modern Slavery Partnerships to share intelligence and build site resilience
- Delivering bespoke modern slavery e-learning and face to face training to all applicable colleagues in Morrisons Manufacturing & Logistics
- Launching updated policies and guidance to support enhanced victim remediation
- Identifying regional champions from our People team to undergo enhanced training on incident management and victim support.
- Committing our support for the Bright Futures remediation programme to provide work placements for victims of modern slavery
- Creating individual business function action plans to support our efforts to tackle modern slavery risk in our business

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

- Commissioning an enhanced due diligence study to identify and prioritise human rights risk in our global supply chain
- Requiring all ingredient suppliers into Morrisons Manufacturing to join Sedex and share risk information.
- Becoming signatories to the UN Women's Empowerment Principles to support capacity building on gender related risk
- Sharing our Modern Slavery Incident Management resources with UK suppliers
- Reviewing forced labour risk in supply chain using updated tools on the Sedex platform
- Fully implementing online site risk reporting tools for use by our internationally based Technical Managers
- Supporting the establishment of supplier forums in Italy to address the risks of labour exploitation in the agricultural sector
- Publishing details of our own-brand, tier one supply chain
- Producing and distributing guidance on forced & prison labour risk in China

This statement was approved by the board of Wm Morrison Supermarkets plc on 30/04/2020.

Signed



David Potts, Chief Executive