

Modern Slavery Statement 2020/21

Wm Morrison Supermarkets PLC

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, covers our financial year from 01/02/2020 to 31/01/2021, and was approved by the Board of Wm Morrison Supermarkets PLC on 01/07/2021. 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, Safeway Ltd, Wm Morrison Growers Ltd and Wm Morrison Produce Ltd.

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1. Introduction

This is Morrisons fifth Modern Slavery Statement, and details continuing progress in our efforts to identify and address the risk of modern slavery and labour exploitation in our business and supply chains, whilst enhancing our ability to support positive outcomes for victims.

2020 was an unprecedented and challenging year for our business, our customers and everyone in our extended supply chains. COVID-19 significantly impacted all our operations and presented wide-ranging challenges across our food, non-food, and Nutmeg divisions. The pandemic exacerbated existing vulnerabilities and created new issues relating to working conditions and human rights that will continue to evolve over time.

We committed to respond to the global crisis by playing our full part in feeding the nation, and to do this in a responsible and sustainable manner. Our core purpose, “to make and provide food we’re all proud of, where everyone’s effort is worthwhile, so more and more people can afford to enjoy eating well”, remains at the heart of this approach.

Working collaboratively to maximise the impact and reach of our actions, we adapted and evolved core activities, adopting new ways of working to assess risk and providing extensive guidance and support for our colleagues and suppliers.

We will continue to review our approach, build awareness, and monitor the effectiveness of our programmes. This will be supported from 2021 through the establishment of our new “Sustain” governance framework, and a clearer focus on identifying and mitigating human rights impacts throughout all tiers of our supply chain.



David Potts,
Chief Executive



Highlights of our 2020/21 activity included:

<p>HOSTING AN AWARENESS RAISING EVENT TO SUPPORT THE LOCAL BUSINESS COMMUNITY</p> <p><i>page 13</i></p>	<p>COMMITTING OUR SUPPORT FOR THE BRIGHT FUTURE INITIATIVE</p> <p><i>page 7</i></p>	<p>DELIVERING BESPOKE TRAINING TO OVER 10,000 COLLEAGUES IN MORRISONS MANUFACTURING AND LOGISTICS OPERATIONS</p> <p><i>page 12</i></p>
<p>BECOMING FOUNDING MEMBERS OF THE MODERN SLAVERY INTELLIGENCE NETWORK</p> <p><i>page 14</i></p>	<p>PUBLICATION OF OUR TIER ONE, OWN-BRAND SUPPLIER DETAILS</p> <p><i>page 6</i></p>	<p>PROVIDING SUPPORT FOR MODERN SLAVERY CHARITIES THROUGH THE MORRISONS FOUNDATION</p> <p><i>page 14</i></p>

2. Governance & Oversight

Our Corporate Compliance & Responsibility Committee (CCR) acts as a custodian of the policies and practices that define and safeguard the reputation of Morrisons. This committee includes our CEO and COO and meets at least three times a year to assess our performance in key areas including our approach to tackling modern slavery in our business and supply chains.

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, in collaboration with colleagues from all relevant internal departments.

Our senior level Modern Slavery Steering Group continues to oversee and direct activity in our own operations, ensuring that effective controls are in place to identify and mitigate modern slavery and labour exploitation risk 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.

Governance has been further strengthened this year with the formation of a “Sustain” group and executive sub-committee with responsibility for ensuring we deliver sustainable growth with a positive supply chain impact. Several working groups have been established to coordinate work on the specific elements of our sustainability ambitions, including a group dedicated to mitigating human rights risk in our supply chain.

Further detail on the activity of the CCR can be found in our [Annual Report and Financial Statements 2020/21](#).

3. Structure, Business & Supply Chains

Morrisons is a British born and bred food retailer. We have grown from a single market stall to become the UK's fourth largest supermarket. We're both food makers and shopkeepers, which makes us different from our competitors.

We employ more than 118,000 colleagues in 497 stores, and an annual turnover of £17.6bn. 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.

During the reporting period covered by this statement, we have acquired the Lansens Nursery horticulture business in Lincolnshire, which has subsequently been renamed Lowlands Nurseries Ltd. Lowlands activities will be included in our reporting from 2022.

Food is 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, 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 also have more skilled specialists on hand to prepare fresh food in store than any other retailer, with over 5,500 fully trained craftspeople including butchers, bakers and fishmongers.

We are also the UK's largest single food manufacturer, with 19 production sites and 8 distribution centres at locations throughout the UK, employing over 15,000 people.

We are committed to delivering a fair day's pay for a fair day's work, and in January 2021 we published details of our new, sector leading deal for colleagues, which was negotiated with the USDAW union. All permanent colleagues in our stores, manufacturing and logistics operations will receive a £10 per hour basic rate, which is 50p an hour above the voluntary Living Wage Foundation rate.

We remain British Farming's biggest direct customer and recognised that this sector faced significant additional challenges in 2020 as the COVID-19 pandemic progressed. From March 2020, we took the decision to pay all our small suppliers (including over 1,750 farmers) immediately to help them weather the difficulties they faced. We also set up dedicated promotions to help farmers find a market for products that would normally have been sold into the hospitality sector.

In 2020, we expanded on work to map over 700 primary ingredient suppliers into our vertically integrated manufacturing sites by asking all these suppliers to join the Supplier Ethical Data Exchange (Sedex) and complete a detailed self assessment questionnaire (SAQ). Over 55% of these suppliers have now completed this request and the remainder will be completed in 2021. This will enable us to identify inherent commodity and country based risk in these lower tier supply chains and develop appropriate mitigation.

Over a third of our tier one own-brand supply chain is now based in the UK and more than 50% of the fresh food in our stores is produced in our own factories. Outside of our vertically integrated supply model, most of our business relationships are operated indirectly through a UK or EU based primary supplier, with the exception of goods purchased through our Global Sourcing team in Hong Kong where we predominantly deal directly with manufacturers. Our monitoring programme currently covers 1,654 tier one factories and processing locations in 53 countries, employing over 650,000 workers.

1899

Year established

497

stores across the north, central and south

8.6%

Group like-for-like sales (exc. fuel)

19

manufacturing facilities

£254m

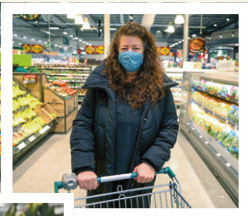
Operating profit

8

regional distribution centres

9m

customer transactions each week

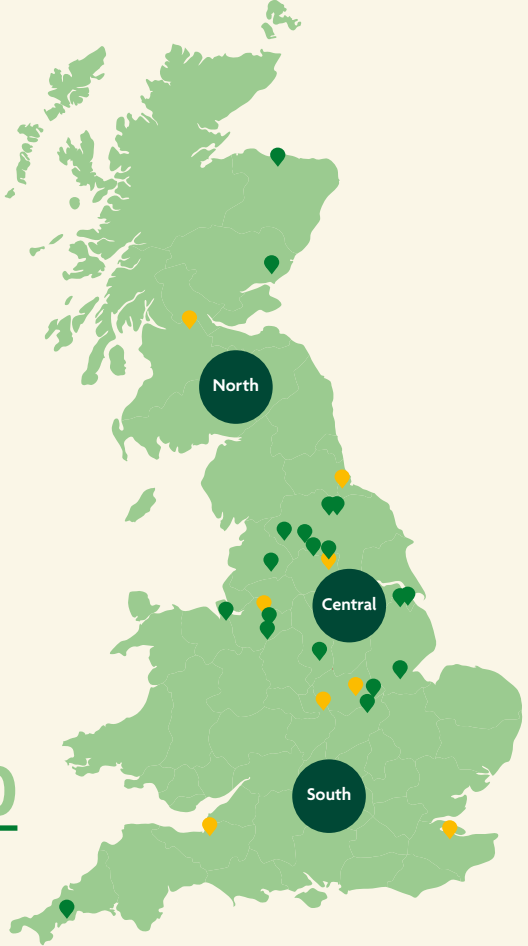


118,000

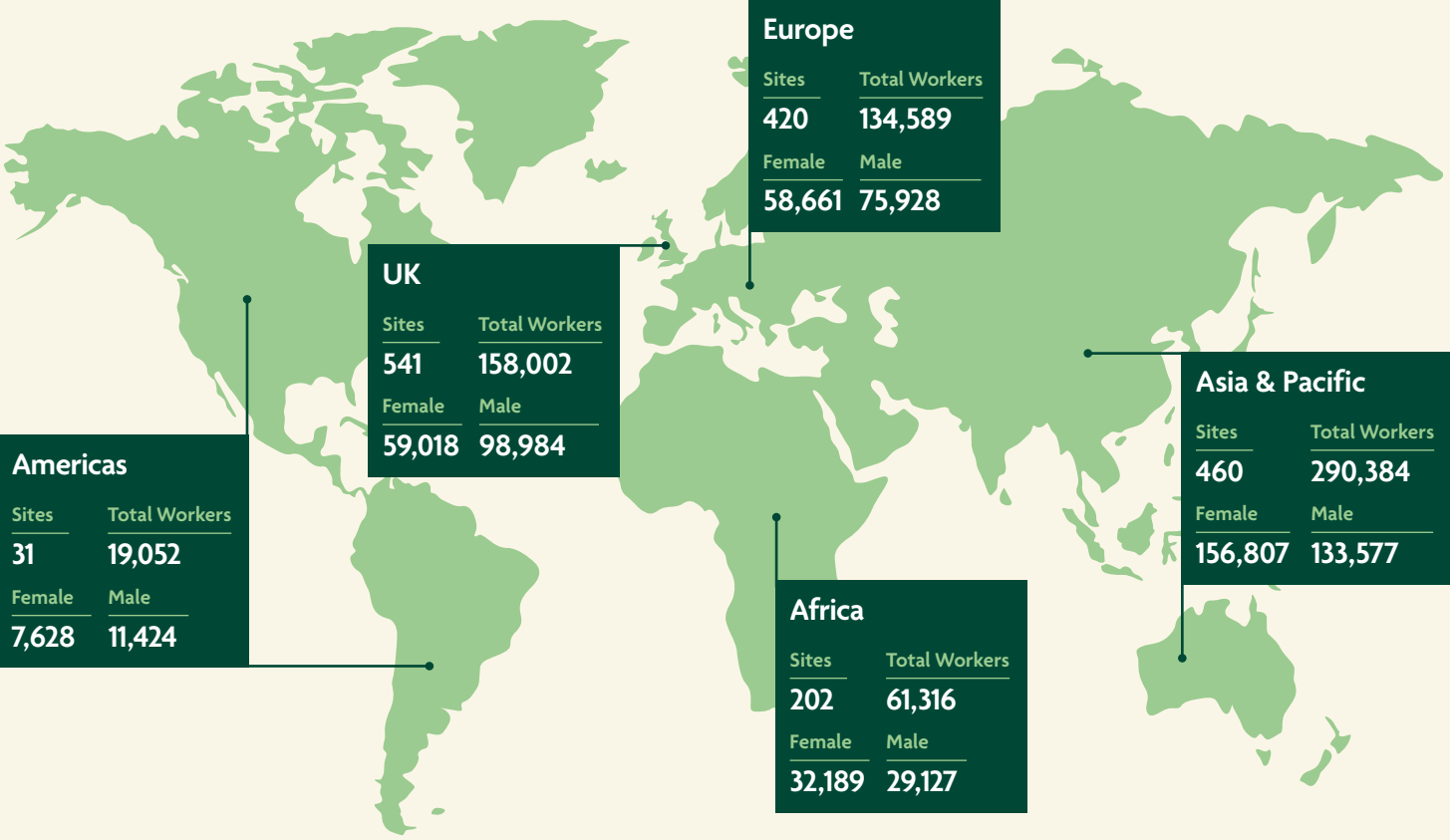
colleagues

5,500

trained butchers, bakers and fishmongers



3. Structure, Business & Supply Chains Continued



We are committed to increasing transparency and want to make it possible for our customers and other stakeholders to raise concerns they may have about these sites directly with us. Delivering on a commitment from our previous statement, in April 2020 we published details of our tier one, own-brand factories across our food, general merchandise and Nutmeg clothing supply chains, including a breakdown of gender and whether workers have access to representation, either through a trade union or worker committee.

We are taking steps to share this data more widely and the detail of our Nutmeg supply chain is now also published on the [Open Apparel Registry](#) site. All publicly available supply chain information will be reviewed and updated on an annual basis.

Over the next three years, we plan to expand our commitment by publishing additional detail on some of our higher risk supply chains back to primary producer level. We have started this process in 2020 by conducting a mapping exercise of fabric sources in our Nutmeg clothing supply chain, giving us visibility of fabric mills and their locations, and the countries of origin for our key fibres. We are building on this in our food business by trialling a new process to map priority higher risk commodity supply chains using the Authenticate IS platform and will report on our progress in subsequent statements.

Division	Sites	Total Workers	Female	Male	Agency/Temporary	Migrant Workers
Food	1,116	372,211	165,937	206,274	79,629	39,292
Consumer Goods	357	172,691	75,378	97,313	9,310	3,485
Clothing	181	118,441	72,978	45,463	206	3,159

4. Our Policies Related to Modern Slavery & Human Trafficking

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

We are also members of the Ethical Trading Initiative (ETI) and utilise their internationally recognised Base Code as the foundation of our supplier expectations.

Our [Ethical Trading Policy](#) and [Ethical Trading Code](#) are at the heart of our approach to monitoring, managing and mitigating human rights risk in our supply chain. [Morrisons' Standard Terms & Conditions](#) require all suppliers to meet and cascade our Code which 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 our Code. From mid-2021 our Policy will also include a specific requirement for applicable suppliers to comply with the reporting elements of the Modern Slavery Act and upload statements to the [UK Government Modern Slavery Registry](#).

Policies in our Business

In addition to our core requirements, 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. In our own business this includes 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.

Recognising the continuing risks relating to the sourcing of workers, in 2020, we developed a Labour and Site Services Procurement Policy in consultation with the [Gangmasters and Labour Abuse Authority \(GLAA\)](#). This provides clear guidance for all colleagues involved in the procurement of agency labour to ensure that suppliers meet applicable requirements for supplying the food sector and requires an active check to be placed on all new and existing providers. The policy launched at the end of 2020 and will be supported with e-learning for relevant colleagues in 2021.

We continue to assess the need for clarity in our approach to victim support and remediation. Survivor Support policies and procedures have been drafted by our Employee Relations team in conjunction with internal and external stakeholders including NGOs and charities, and will be rolled out across our operations in 2021. These resources will enable us to provide more meaningful immediate and longer term support for survivors of modern slavery offences in our business. Our commitment to the Bright Future initiative will also ensure that we can utilise our manufacturing and logistics operations to offer workplace opportunities to a wider range of UK survivors.

Policies in our Supply Chain

Our Ethical Trading Policy is complemented by additional policies in specific supply chains. Fresh Produce suppliers must meet the requirements detailed in our [Raw Material Sourcing Policy](#), and we have expanded oversight in our manufacturing ingredient supply chains through the implementation of a [Vendor Assurance Policy](#). Both policies require all suppliers to these divisions to join the [Supplier Ethical Data Exchange \(Sedex\)](#) and complete a detailed self assessment questionnaire (SAQ) in full, providing increased visibility of their risk profile. Higher risk suppliers are required to provide additional due diligence information prior to supply.

We also have several 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](#) and [Palm Oil](#) sourcing, which provide increased visibility and require third party verification. Our [Fish and Seafood Sourcing Policy](#) has explicitly defined requirements for our supply chain on 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. We developed these criteria to help establish management processes on IUU and support implementation of [PAS 1550 guidance](#) on due diligence.

We also remain committed to supporting suppliers experiencing cases of modern slavery by signing up to two core external 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](#). These were developed with regulatory authorities and external stakeholders to support good practice and collaboration in addressing incidents in our UK supply chains. We were engaged in preliminary discussions with the GLAA on a wider food sector protocol and will continue to support this work throughout 2021.

“We have committed our support to the Bright Future initiative and will welcome the first survivors of modern slavery on to work placements in our business in 2021.”

5. Risk Assessment

We have an established approach to assessing risk in our global supply chains which is continuously reviewed to take account of emerging challenges and updated information sources. The potential risks posed to workers are continuously evolving and may have been exacerbated by the COVID-19 pandemic at a time when restrictions on movement made it more challenging to deliver effective oversight. We responded by adapting existing practices and working collaboratively to both identify new solutions and ensure suppliers could access guidance and resources to manage risk in their own supply chains.

98%
of all suppliers in scope of our policy completed the updated Sedex SAQ in 2020

We maintain country and commodity level risk ratings to support and inform purchasing decisions which utilises and aggregates 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
- Sedex RADAR Tool

This country level tracker is reviewed regularly to account for updates to the contributing indices, information from site visit reports and insights from the media and civil society. Additional due diligence and mitigation is required for suppliers and sources flagged as higher risk prior to commencement of business with Morrisons. We do however understand that it will not always be possible to identify, manage and mitigate all the potential risks in all tiers of our extended supply chains.

Morrisons has also led the development of a human rights risk assessment tool across wild capture fisheries that are supplying the UK, as part of our work with the Seafood Ethics Action Alliance (SEA Alliance). The tool uses publicly available data to create a baseline assessment and provide an indicator of the potential exposure to human rights risk. This also allows for disaggregation by species and country of origin, which can identify areas where resources can be allocated to best manage potential risks. We are working to develop the tool with other SEA Alliance participants before sharing with the wider sector.

In our tier one, own-brand supply chain, we continue to utilise the Sedex platform to undertake preliminary screening on all new suppliers in scope of our Ethical Trading policy. In 2020, we supported the roll out of a new and updated Self Assessment Questionnaire which requires the provision of far more detailed information and enables the platform to more accurately assess both risk and primary mitigation at supplier level. 98% of manufacturing sites in scope of our policy had completed the updated SAQ by the end of 2020, and we are expanding this requirement to cover Produce and Morrisons Manufacturing ingredient suppliers in 2021.

Looking beyond our goods for resale business, we have commenced work to review the risks associated with warehousing, transport and international logistics, particularly in the context of organised immigration crime. Following an introduction from the Office of the Anti-Slavery Commissioner, we engaged with Kent Police to access the findings and learnings from the Operation Melrose investigation into the deaths of 39 migrants in the back of a refrigerated lorry in 2019. A cross-functional working group with representation from our Supply Chain and Loss Prevention teams is planned for 2021 and will develop guidance and resources that can be shared with our teams and suppliers.

We acknowledge that the risks increase exponentially as you progress down the down the supply chain. This is compounded by a reduction in both visibility and leverage for action if issues are identified. In our previous report we committed to complement existing tier one, own-brand supply chain oversight and compliance activity with targeted risk assessment and mitigation in the lower tiers of supply.

We delivered this in 2020 by engaging the services of the expert third party, Ergon Associates, to design and deliver a global assessment of material human rights and sustainability risk in our supply chain. The project included a specific focus on modern slavery, exploitation, forced and child labour.

Work commenced on this project in the second half of 2020 with full results expected in early 2021. We will publish the results on our corporate website and use the data to identify and prioritise higher risk commodities for additional due diligence. This will include mapping key products back to primary processor level and selecting one commodity and source geography to trial our first human rights impact assessment. We will also use the data generated to complement our existing risk assessment process and make it easier for our Buying teams to take preventive action to reduce our exposure to supply chain risk at an earlier stage.

Pending completion of the third party assessment, we still consider our most salient and tractable 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 well established, complex and complicated. We cannot effectively tackle them alone so choose to work in close collaboration with external partners including NGOs, social enterprises, charities and multi-stakeholder initiatives to build our understanding and capacity to act. Even with this assistance, we acknowledge that effective and sustainable solutions will not be delivered in the short term. More detail can be found in the Collaborative Action section of this statement.

6. Due Diligence in our Business and Supply Chain

Our approach to due diligence, risk mitigation and remediation starts in our own business and flows through into our supply chains. Our core objective remains to develop effective approaches to address issues that can be tried and tested before deployment with our suppliers. Our vertically integrated structure provides broad insight of evolving risk in both our UK operations and global food supply chains, but also means we must face directly into the issues at hand.

Morrisons Operations

In our own business, we consider our vertically integrated manufacturing and logistics operations, which rely on temporary, agency provided and migrant labour to manage peak demand, to present the most significant risk. This was compounded in 2020 by the COVID-19 pandemic as the food industry faced unprecedented fluctuations in demand which resulted in significant challenges relating to the availability of labour. As a result, we were required to recruit temporary workers in much greater numbers than in previous years, many of whom would only be employed for a limited amount of time.

In the early stages of the pandemic, our Procurement team worked with labour providers to ensure that temporary GLAA licensing requirements were followed when secondary sources were required to complement labour supply. This approach was complemented by new processes and resources to prepare sites for large influxes of agency provided workers, which included:

- Holding regular briefings on key risks and indicators of exploitation
- Handing out of information cards to all new workers providing guidance on their rights in the UK, minimum wages, holiday pay and benchmark costs of accommodation and travel
- Forced labour and exploitation awareness raising posters for all sites, available in 21 languages
- Multi-language, modern slavery specific versions of our “Tell Us” whistleblowing hotline posters

In addition, we manage our exposure by only using a limited number of approved labour providers, working closely with them to ensure a consistent approach to risk identification, investigation and incident management. Our providers have extensive experience of managing modern slavery investigations and provide vital support to our site teams and external authorities when addressing potential issues. We are updating our supply agreements with these providers in 2021, to include specific requirements on intelligence sharing and incident management protocols.

To provide additional oversight, we continue to conduct regular audits on our labour providers using the Complyer tool developed by the Association of Labour Providers (ALP). Our newly implemented Labour & Site Services Procurement Policy also ensures that any new providers must be fully compliant with GLAA licensing requirements. This requires an “Active Check” to be established for all labour and service providers in scope, which ensures that our Procurement teams receive live updates on any material changes to the licence status or business operations.

Loss Prevention colleagues have engaged with the Modern Slavery & Human Trafficking teams within all regional police forces where Morrisons operates a manufacturing or logistics facility. All our site People teams now have a dedicated contact within their local force that they can access for advice or to report intelligence and concerns. We plan to expand on these relationships by collaborating with local police teams and the GLAA to run modern slavery incident scenario exercises at our sites in 2021.

Our Modern Slavery Steering Group continues to oversee all the activity undertaken in our own operations, meeting on a quarterly basis to review incidents, assess emerging risk and deliver actions covering 5 key areas:

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

We expanded the membership of this group in 2020 to include representation from our Procurement team and our regional Modern Slavery Champions. Core activity in 2020 included the planning and delivery of our online anti-slavery day event, the roll out of an expanded training offer, enhanced victim support resources and the development of Modern Slavery Partnership and Prevention Plans (PPPs) for implementation in 2021.

These plans have been developed to enable the business to enhance our partnership and prevention approaches and further our commitment to tackling modern slavery and labour exploitation in our manufacturing and logistics operations. The site process takes into account learning outcomes from Operation Fort and will be undertaken twice a year across the estate. It was developed in conjunction with People Managers and with consultation from the GLAA and Stronger Together.

6. Due Diligence in our Business and Supply Chain Continued

The partnership element of these plans will see working relationships developed and progressed with colleagues in UK Policing and other agencies. The prevention approach will see new ideas being explored to reduce the opportunity for incidents through problem solving theory and adaptations to the working environment where feasible.

The Independent Anti Slavery Commissioner's Maturity Framework is referenced throughout the plan documentation and requires sites to ensure that activity is aligned to achieve our objective of progressing into the highest tier of this Framework.

We built on a commitment from our previous statement by establishing a network of Modern Slavery Champions across our manufacturing and logistics sites. These colleagues are existing People Managers in our business, and many have experienced forced labour and exploitation investigations and incidents. The Champions will undergo more detailed training and provide additional support for site teams across their regions in both the roll out of site PPPs and with the management of any potential incidents on site.

The Champions will also support our continued engagement with regional modern slavery partnerships, building on our existing relationships 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 have also enhanced the due diligence undertaken in our own operations in 2020 by launching an expanded and updated worker questionnaire in the second half of the year. This takes place every 3 months and is communicated to over 5,000 colleagues on each cycle.

The questionnaires have not uncovered any significant modern slavery or exploitation issues to date but have highlighted opportunities for us to clarify key employment terms, address training needs, and respond to health & safety concerns. This process will continue in 2021 and include more face to face discussions as COVID-19 restrictions are eased.

Our Supply Chains

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. However, restrictions on travel into and within countries due to COVID-19 presented a challenge for our normal audit process during 2020. We addressed this by allowing suppliers to defer site ethical audits for up to 6 months, supporting the development of virtual assessments and utilising questionnaires to ensure that we retained oversight of risk in our supply chain. By the end of 2020, 97% of planned audits had gone ahead and the remainder were completed in early 2021.

937 audits were undertaken at active sites linked to Morrisons on the Sedex platform in 2020 using either the Sedex Members Ethical Trading Audit (SMETA), Sedex Virtual Assessment (SVA) or Business Social Compliance Initiative (BSCI) methodologies.

This includes over **98%** of the High Risk manufacturing sites in scope of our compliance programme.

“Hope for Justice support a huge number of survivors of modern slavery; many of whom we’ve helped face significant barriers to obtaining groceries, and our specialists spent a lot of time food shopping for them. The Morrisons Foundation grant allowed our team to focus on longer-term support such as legal assistance, benefits, housing, and helping survivors through the criminal and civil justice processes. This grant has made a huge difference!”

Hannah Symons
Corporate and Supporter Relations Manager
Hope for Justice

6. Due Diligence in our Business and Supply Chain Continued

Third party audit activity identified 9 tier one factories with Major, Critical or Business Critical non-compliances raised under the heading of “Employment is Freely Chosen”. Of these, 5 sites have been verified as having closed their non-compliances, 2 sites have implemented corrective actions that are pending auditor verification and 2 sites no longer supply Morrisons (for reasons unrelated to these issues).

We continued our trial of an online reporting tool to assess working conditions in agriculture supply chains, building on this work in 2020 by upgrading the tool to operate on a dedicated audit application. This upgrade enabled us to build in increased capabilities, such as corrective action planning and live alerts, giving our field based At Source Technical Managers the ability to monitor issues and work with suppliers on improvement activity. The project was placed on hold due to travel restrictions in the second half of the year but will be revisited in 2021.

We operate a dedicated whistleblowing hotline called “Tell Us”, 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. In 2020, our People team rolled out multi-language, forced labour and exploitation specific versions throughout our own manufacturing and logistics sites as we managed a significant increase in temporary agency workers.

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 include: the Spain Ethical Trading Forum working group on Modern Slavery and ETI working groups on vulnerable workers in Italian agriculture and social dialogue in Peru. We expanded on this in 2020 through a collaborative project to support supply chains in East Africa that were heavily affected by the COVID-19 pandemic – see Training, Awareness & Capacity Building section for more details.

As covered in previous statements, we know that South East Asian fishing operations face a high risk of both IUU-related practices and modern slavery in general. Due to our limited sourcing from this region, we work collectively to advocate for better practices with other brands and NGOs, as well as through the SEA Alliance, to affect change. We have endorsed several statements in the past calling for governance reforms and the implementation of transparency measures to effectively address these issues. We continued this work in 2020 by endorsing the International Buyers’ Open Letter on Preserving Thailand’s Fishery Reforms which was communicated to the Thai Minister of Agriculture and Cooperatives in February.

To enhance due diligence in our clothing supply chains, we have entered into a partnership with The Reassurance Network (TRN) to conduct in-depth, worker dialogue centred visits within our Nutmeg clothing factory base. This will enable us to identify indicators of risk, highlight good practice and better understand emerging challenges in this sector. Crucially, this process will also give workers the opportunity to highlight issues that are not commonly reported through ethical audits, including those related to forced labour and exploitation. We will formalise our agreement in early 2021 and commence site visits once COVID-19 travel restrictions allow.

We also became members of the Better Cotton Initiative (BCI) in 2020 and achieved 27% sourcing of Better Cotton in our first membership year. We have established a longer term target to source 100% of our cotton as Better Cotton by 2025. In 2020 BCI reviewed the current Better Cotton Standard System globally, to highlight gaps and develop recommendations to improve the effectiveness of the system in identifying, preventing, mitigating and remediating forced labour risks. Our aim is to utilise our BCI certification requirements to take tangible action in tackling forced labour in the lowest tiers of our clothing supply chains.

In previous years, our unannounced factory visit programme has played a key role in our approach to due diligence and risk mitigation across our China based manufacturers. This activity could not be undertaken during the 2020 as the COVID-19 pandemic removed the possibility of our Hong Kong based teams travelling to the mainland. Our Ethical Trading team responded by conducting virtual visits as part of the new supplier approval process, and we temporarily increased our reliance on third party audit visits.

We recognise the ongoing risks posed in the region relating to recruitment practices, forced labour and working conditions, and took further steps to manage this in collaboration with external partners. In 2020, this additional work included distributing a questionnaire to all suppliers to assess risk in their recruitment practices and identify opportunities for improvement. This was supported by a subsequent communication reiterating the core components of our Ethical Trading Code and signposting tools and resources available to suppliers through our partnerships of the Mekong Club and The Centre for Child Rights and Business (The Centre).

We further collaborated with The Centre to offer a dedicated training workshop for all China based suppliers on responsible recruitment practices and child labour risk mitigation – further detail can be found in the [Training, Awareness & Capacity Building](#) section of this statement.

7. Training, Awareness & Capacity Building

Training and awareness programmes continue to be at the forefront of our approach to addressing modern slavery risk in our business and supply chains. By providing training to our colleagues and suppliers, we can build the capacity to effectively manage incidents in a way that supports positive outcomes for victims. We have reviewed and updated our approach continuously since 2016, enhancing the options available through the development of in-house courses and accessing third party training through external partnerships.

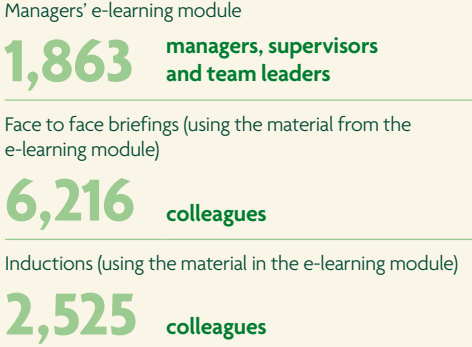
Training for Colleagues

In our own business, we work to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant information, and make this available through our online learning platform. Facing into the challenges and increased risks posed by the COVID-19 pandemic, we focussed our efforts in 2020 on delivering enhanced training to colleagues in our manufacturing and logistics sites.

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 that we have managed, and material provided by the GLAA.

Initial feedback from colleagues has been extremely positive and we will gain further insights by undertaking a more detailed impact assessment in 2021, which will inform further development of our approach.

In 2020 we exceeded our expectations by delivering training to 10,604 colleagues in our manufacturing and logistics operations. This is broken down into the following categories:



We continue to utilise our external partnerships to provide access to training for internal colleagues and added new options in 2020. The Stronger Together "Tackling Modern Slavery in UK Business", one day training course is mandatory for Morrisons Manufacturing and Logistics Site Managers and People teams, and 12 new colleagues attended in 2020. Additionally, we have made Responsible Recruitment Toolkit (RRT) training courses available to centrally based colleagues in our People and Procurement teams.

Training for Suppliers

The impact of the COVID-19 pandemic on global supply chains has been significant. National and regional lockdowns, the closure of international borders and variations in demand resulted in factory shutdowns, workforce reductions and unforeseen changes to supply chains and transport routes. These changes can disproportionately affect vulnerable workers and increase their risk of exposure to forced labour and exploitative practices.

We listened to the needs of our suppliers during this time and responded quickly to provide guidance and support.

This included working in collaboration with other UK supermarkets and the Food Network for Ethical Trade (FNET) to fund and develop a series of 8 free capacity-building webinars on topics including furloughing staff responsibly, impacts on worker mental health and managing recruitment and labour exploitation risks. The webinars covered issues in both UK and global supply chains and included contributions from the Advisory Conciliation and Arbitration Service (ACAS), Public Health England and the Spain Ethical Trade Forum.

The programme eventually reached 3,993 participants in 56 countries and was supported later in the year through the establishment of the www.foodfarmhelp.com website to provide additional guidance for the UK food sector during subsequent waves of the pandemic.

We also funded a series of TV and Radio slots in Latin America through the NGO Bananalink to raise awareness of COVID-19, that reached an estimated 50,000 agricultural workers.

Workers and suppliers in fresh produce and flower supply chains in East Africa were also heavily affected by the COVID-19 pandemic. Through our relationship with the Ethical Trading Initiative, we were able to provide support and funding for a collaborative Foreign, Commonwealth & Development Office (FCDO) sponsored project in the region to address immediate needs, deliver targeted training workshops and establish a stakeholder network to deliver improvement over a longer term.

"The most important tool we have addressing these issues is education.

Building awareness of the subtle signs of exploitation means we can all play a part in tackling modern slavery and helping to support victims."

Inji Duducu
People Director
Reward and Employee Services



7. Training, Awareness & Capacity Building Continued

From 2021, this project aims to provide support for the health and wellbeing of around 10,000 workers and increase the resilience of vulnerable workers in the sector against future impacts. To expand the reach and impact of the programme, we are extending invites to the online workshops to all applicable suppliers in Sub-Saharan Africa and distributing all resources and guidance generated by the working group.

To mark UK Anti-Slavery Day and build on our ambition to support local businesses to develop their awareness and resilience, we organised a virtual event in partnership with Invest in Bradford. Our Ethical Trading and Loss Prevention teams shared detail on our experience of tackling modern slavery issues within our vertically integrated operations and we invited several external experts to contribute. Speakers included Bradford Council, Stronger Together, Hope For Justice, Slave Free Alliance, and Bright Future with the session being closed by the West Yorkshire Police and Crime Commissioner, Mark Burns-Williamson OBE. The event was attended by over 60 delegates from local businesses and followed up with the communication of supporting information and resources.

We continue to utilise our sponsorship of Stronger Together to offer free, industry leading training 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 1,539 delegates from over 400 of our suppliers, including an additional 172 delegates in 2020. This training has been comprehensively reviewed and updated for 2020 and we will continue to encourage all suppliers to access the various training sessions now offered. Supply partners of our UK warehousing and in-store Nutmeg colleagues also attended the Stronger Together Conference on Tackling Labour Exploitation Supply Chain Risks Together (Warehousing and Logistics) in February 2020.

We were also founding members of the Stronger Together programme in South Africa and supported the initiative in 2020 through our role as steering group members. Since our last statement a further 487 individuals from 313 organisations have attended one of the 30 Tackling Forced Labour in Agri-Businesses workshops across 6 provinces and pledged that an estimated 69,389 workers will hear the Stronger Together message.

Through our sponsorship of the Responsible Recruitment Toolkit, 119 of our suppliers have accessed the benefits of the Toolkit and over 130 individuals have attended RRT training sessions since 2019. We are expanding our engagement with this initiative in 2021 as we seek to roll out a dedicated Responsible Recruitment policy and mandate membership of the Toolkit for our strategic suppliers.

We maintain a supplier engagement programme with key first tier, own-brand suppliers, conducting biannual review meetings to understand their approach to managing human rights risk in their own operations and supply chains. These sessions were conducted virtually during 2020 and play a key role as we seek to complement our existing compliance programme with elements of human rights due diligence in our extended supply chains.

Ethical Trading colleagues operating out of 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, Mekong Club and the Centre for Child Rights and Business (The Centre).

We worked with the Mekong Club to develop a briefing for suppliers on the risks associated with indirect labour recruitment, and the potential impact of the COVID-19 pandemic on working conditions. This included links to numerous tools and resources available free of charge to all our suppliers in the region through our relationships with both the Mekong Club and The Centre.

Together with The Centre, in 2020 we developed and delivered 4 online training sessions to 120 participants from 87 of our Chinese suppliers from 13 provinces. Attendees were grouped based on their province of operations, to enable more detailed discussion of contextualised regional issues.

The webinar sessions covered the following areas:

- Wm Morrison Ethical Trading Code, and international standards on child labour and forced labour
- Recruitment challenges and risks related to child labour and forced labour
- Impacts of COVID-19
- Risk prevention mechanisms and measures
- Child labour remediation and best practices for child labour prevention

Participant research following the training sessions found that:

- 86%** clearly knew the ILO definition and key indicators of forced labour
- 80%** were able to correctly identify the 11 forced labour indicators
- 85%** were able to correctly identify hazardous work for juvenile workers
- 98%** said the knowledge and skills learnt during the training will greatly change how they think about and handle child labour related issues in the future

We are developing further practical training sessions with The Centre for roll out in the first half 2021.

“The online Anti-Slavery Day event held in collaboration with Morrisons was a great success. It provided a platform for us to engage local businesses on these pressing issues, building their capacity to identify risk and respond to concerns in their workplaces and the wider community.”

Councillor Susan Hinchcliffe
Leader of Bradford Council

8. Collaborative Action

Working collaboratively to increase our understanding and maximise the impact of our actions to tackle modern slavery remains a cornerstone of our approach. We have built on our existing collaborative work throughout 2020 and established new partnerships as we faced into the additional challenges presented by the COVID-19 pandemic.

Hope for Justice



We continued to work with Hope for Justice (HFJ) throughout 2020, accessing their expertise to support the development of our strategy and approach. The Morrisons Foundation also made a £25,000 donation to the charity in 2020 to support their Modern Slavery Advocates to manage the significant increase in the demand for their services resulting from the COVID-19 situation.

This enabled them to provide additional time and resources to assist their clients who are struggling to access basic food supplies, including provisions to self-isolate and protect themselves during the pandemic.

Hope for Justice and Slave Free Alliance both presented at our Anti-Slavery Day online event, and we facilitated ongoing engagement with them for the local businesses in attendance.

Slave-Free Alliance



We became the first UK supermarket to join Slave-Free Alliance (SFA) at the start of 2020 and built this relationship further throughout the year. SFA carried out a gap analysis of our approach across the business and provided guidance on potential areas of improvement that will be addressed over the medium term. We have also been able to attend multi-stakeholder meetings and gain insight from other members in sectors outside of retail grocery.

Spain Ethical Trade Forums (SETF)



We have been members of the SETF since 2019 and actively support their work, facilitating grower-led responses to the labour challenges in the Spanish agricultural sector.

We took a place on the Forum's Governance Group in 2020, and our locally based suppliers and Technical colleagues regularly attend working groups and regional meetings. Output in 2020 was focussed primarily on supporting members with the additional challenges posed by COVID-19, with individual working groups developing specific resources and tools to provide contextualised guidance.

With face to face meetings not possible, the Forums quickly moved online and provided 20 online events and working groups throughout the year, with over 1,400 attendees taking part.

Further details of this work can be found on the [SETF website](#).

Modern Slavery Intelligence Network (MSIN)

Morrisons is a founding supporter of the Modern Slavery Intelligence Network (MSIN), a collaboration between UK food retailers and producers created in response to the findings of Operation Fort, the UK's largest ever Modern Slavery investigation. Formed in the second half of 2020, this group is working on an 18 month pilot to create an effective platform for gathering and sharing intelligence across the UK food sector. The information generated by this network will be used to detect, prevent and disrupt modern slavery and labour exploitation activity, protecting workers and improving outcomes for victims.

We are co-funding the development of the pilot in conjunction with the Institute of Grocery Distribution (IGD), and colleagues from our Loss Prevention and Ethical Trading teams will actively contribute to the project throughout 2021.

8. Collaborative Action Continued

Stronger Together



Morrisons is a founding sponsor of Stronger Together, a multi-stakeholder, business led initiative that aims to reduce forced labour, trafficking and other hidden third party exploitation of workers. We are a founder sponsor of the initiative and 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 and South Africa. This was delivered to 172 delegates from 68 of our suppliers in 2020 and continues to play an essential role in building awareness throughout our UK supplier base.

We also support their regular capacity building workshops and our Ethical Trading Manager presented at a joint Stronger Together/ Responsible Recruitment Toolkit webinar on Remedy in July, sharing our experiences with the wider membership.

We are expanding requirements for our larger, strategic suppliers to increase engagement with Stronger Together in 2021, building on the 28 who have already completed their online Progress Reporting Tool and committed to Business Partner membership.

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. We helped to form the organisation in response to concerns around human rights in the seafood sector and have had a representative on the steering group since its inception.

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 have worked with the SEA Alliance to help establish a human rights risk assessment across all fisheries supplying UK participants. We are working with the group to refine and improve methodology in the coming year.

Ethical Trading Initiative (ETI)



We are active members of the ETI's Modern Slavery working group and supported their work in this area throughout 2020. This included a stakeholder workshop on potential forced labour issues in Chinese manufacturing and supporting a COVID-19 related Modern Slavery Due Diligence project undertaken by Liverpool University.

We also worked with the ETI and other members on a collaborative response to allegations of involuntary prison labour at a farm in Zimbabwe. This included co-funding a detailed investigation undertaken by a local third party and will lead to the creation of clearer guidance on this issue for all suppliers in 2021.

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. They played a key role in the development and distribution of COVID-19 support materials and resources for our suppliers throughout 2020 – see Training, Awareness & Capacity Building section for further details.

Mekong Club



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

We have been members since 2018 and our Global Sourcing team in Hong Kong meet regularly to discuss improvements to our regional strategy and share resources and tools with our direct suppliers in China. This group also provides us with valuable insight from other non-food businesses and the opportunity to share good practice on tackling forced labour and exploitation challenges specific to the region.

8. Collaborative Action Continued

Responsible Recruitment Toolkit (RRT)



We are founding sponsors of the Responsible Recruitment Toolkit (RRT) and provide free access to all our suppliers and their labour providers, at any tier of our chain, to their online resources portal and training workshops.

We confirmed our continuing support for the initiative in early 2021 and will be encouraging more of our strategic suppliers to utilise the RRT online assessment tool as we expand our ambitions in this area.

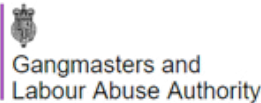
The Centre for Child Rights and Business



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.

In 2020 our Hong Kong based Ethical Team collaborated with The Centre to deliver 4 sessions of webinar based training on Responsible Recruitment & Child Labour Risk to our suppliers and factories in China. 120 delegates from our China based General Merchandise, Nutmeg Clothing and Food suppliers attended these sessions.

Gangmasters and Labour Abuse Authority (GLAA)



We have a well established relationship with the GLAA and continued to work closely with them throughout 2020.

We maintain regular contact with the GLAA's Compliance and Prevention teams and accessed their expertise to complete the development of our new Labour and Site Services Procurement Policy.

Our Loss Prevention and People teams also supported the GLAA with an investigation into potential modern slavery offences occurring outside of our business, which resulted in the issuing of a Slavery and Trafficking Risk Order for two individuals.

Police Modern Slavery & Human Trafficking Teams

Through our Loss Prevention team, we have built relationships with regional police force Modern Slavery and Human Trafficking teams to provide support and guidance to People Managers in our manufacturing and logistics sites.

We plan to build on this further in 2021 by engaging these teams to support modern slavery and exploitation scenario exercises across our sites.

Responsible Car Wash Scheme (RCWS)



Morrisons have over 35 franchised hand car wash operations in store car parks across our estate and we recognise the risks associated with this sector and labour profile. We were founding supporters of the Responsible Car Wash scheme in 2018 and require all franchises to meet the requirements of their Code of Practice.

Activity was limited in 2020 as many of these operations were closed due to COVID-19 restrictions. Despite this we continued to fund the RCWS and supported the development of a regional trial with local authority partners to prove the case for formal licensing requirements in the sector.

9. Performance Reporting

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

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

Reported incidences of modern slavery in our business operations

We identified 13 potential incidences of modern slavery or labour exploitation in our business during the 2020/21 financial year. These issues were communicated to us from a variety of sources, and we are pleased to report that this includes the direct reporting of concerns from potential victims to our site People teams. We also continue to receive 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 case 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 these 13 cases we identified potential indicators of several modern slavery related offences as well as unlicensed gangmaster activity and evidence of impostor swaps where legitimate workers are substituted by a third party. Victims in most cases were migrant workers from Eastern Europe with Romania being the main country of origin for both victims and perpetrators. The GLAA and/or police were directly involved in 12 of the investigations, with the remaining case resolved by our People and Loss Prevention teams without the requirement for external support.

Three of the incidents we investigated in 2020 were confirmed as formal cases of modern slavery by the GLAA and police, all of which related to the exploitation of agency provided workers by a third party.

CASE 1

The police contacted us directly to inform us that a worker had been named as a victim of exploitation during an investigation (unrelated to our operations) which led to the prosecution of two confirmed perpetrators.

The worker's finances had been controlled during this time, but they did not identify as a victim when later questioned by the police.

We supported the police investigation through the provision of evidence relating to payroll information and site attendance and offered support to the victim.

CASE 2

An agency worker directly informed our site team that they did not have access to their documentation and had not eaten for two days. The Police attended our site and removed the colleague to a place of safety whilst a wider investigation was undertaken in conjunction with the GLAA.

The victim chose not to enter the National Referral Mechanism (NRM) and was supported by our labour provider to relocate and take up a position at another site.

CASE 3

Our labour provider's site based Account Manager was engaged in a conversation with a worker who mentioned they did not have enough money to buy cigarettes.

This raised concerns with the Account Manager who requested the worker attend a welfare meeting, where it was established that the worker's finances were being controlled by a third party. The GLAA and police were informed and a formal investigation commenced.

The victim chose to enter the NRM and was supported by both the labour provider and our site teams.

9. Performance Reporting Continued

In all cases, we worked closely with both the GLAA and police to support subsequent investigations and establish any links with other permanent colleagues and agency provided workers. Both sites conducted full post-incident reviews to identify learnings that could be shared across our other operations and refresher training was undertaken in conjunction with enhanced questionnaires and welfare conversations.

We saw an increase in the number of potential incidents reported across our sites in 2020 compared to the previous year, which can in part be attributed to the increase in our use of temporary agency labour to manage fluctuations in demand as we responded to COVID-19. We ramped up our due diligence accordingly, rolling out new and updated colleague training and communications across all sites. We continue to be reassured that in most cases our teams are approached directly by potential victims, demonstrating that they trust us to provide support.

We have been reducing our reliance on agency provided migrant workers as part of our preparations for the UK's exit from the EU, and would expect the level of incidents to fall accordingly in 2021. We are not complacent however, and our plans to roll out site based Modern Slavery Partnership and Prevention Plans and undertake live scenario exercises in 2021 will further increase our resilience to these issues.

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 4 potential incidents in our supply chain, 3 of these were in the UK and 1 was in Zimbabwe.

All cases were raised via whistleblower channels and either reported directly to us or through an external source, including other UK supermarkets and the Ethical Trading Initiative. In line with the principles of the Retailer Protocol on Handling Cases of Modern Slavery, we chose to undertake collaborative investigations in all cases to reduce duplication of effort and support consistent, clear communications for the suppliers involved.

Of the UK cases, one related to food processing and the others to farm operations. The food processing incident involved allegations across two sites operated by the same supplier relating to issues including excessive working hours, health & safety concerns and unlicensed gangmaster activity. In collaboration with other UK supermarket partners, we commissioned independent, unannounced audits to take place concurrently with support from the GLAA and local authorities. The most serious allegations were found to be uncorroborated, but the visits did identify several lesser issues. We supported our supplier to take action and all non-compliances raised during the visits were closed out and verified by an independent audit body.

The farm related cases were flagged to us through competitors who had received whistleblower communications through their channels. Allegations included minimum wage payment, poor sanitation, tied accommodation and irregularities with payment systems which could be associated with exploitative employee relationships. In the first case we supported audits by a second party supplier and an independent party, both of which found the claims to be unfounded. A supplementary module undertaken in addition to a standard SMETA audit did however uncover some additional concerns for further investigation and remedy. We supported our primary supplier to oversee these actions, and all were either complete or demonstrating significant progress by the end of the year.

In the second case, the Police and GLAA carried out a site visit to investigate the whistleblower's concerns in more detail, but found no evidence to support the allegations. A subsequent Sedex Virtual Assessment was conducted by an independent audit body and did not report any non-compliances.

In the Zimbabwe case, we were informed of an allegation of involuntary prison labour at a farm via an external partner. We fully supported a collaborative investigation, which concluded that, based on the evidence available, it could not be conclusively determined how many times the prisoners had visited the farm or what they did whilst there, i.e. whether this was unpaid work or training as part of a rehabilitation programme. We continue to work with our primary supplier to support improvement at the farm, but any decision on future supply will be dependent on the site's ability to demonstrate that they have robust management systems in place to manage these risks. Our supplier has additionally worked with an independent third party to develop a supplementary audit module to assess prison labour risk that will be rolled out across all their sites in the region from 2021.

10. Progress against the next steps detailed in our 2019/20 statement:

We set objectives across our business and supply chain on an annual basis, these targets are purposefully ambitious and can evolve over time. The COVID-19 pandemic presented unforeseen resource challenges in 2020 but we are pleased to report that good progress has still been made. 11 objectives from 2020 have been completed, 5 are ongoing with activity carried over into 2021 and 1 is on hold pending the easing of global travel restrictions.

Our commitment	Status	Comment
Host a capacity building event to share learning with local business community	●	See “Training, Awareness & Capacity Building” section for details.
Deliver bespoke training on managing modern slavery incidents to Morrisons Manufacturing & Logistics Site Managers and People Managers	●	Bespoke e-learning and face to face training delivered to 10,604 colleagues in 2020/21. Training on “Tackling Modern Slavery in UK Business” remains mandatory for all People Managers and Site Managers in our manufacturing and logistics operations.
Launch updated policies and guidance to support enhanced victim remediation	○	Enhanced policies and operating procedures have now been developed by our Employee Relations team and will be rolled out across our operations in 2021.
Implement pre-employment and ongoing checks to identify indicators of modern slavery and exploitation	○	Sample checks currently undertaken on an ad hoc basis pending the full implementation of our new Payroll system. This will allow more detailed and structured checks from 2021 onwards.
Engage with regional police teams and Modern Slavery Partnerships to share intelligence and build site resilience	●	All our vertically integrated manufacturing and logistics operations have established contact with the Modern Slavery & Human Trafficking Teams in their local police forces.
Identify regional champions from our People team to undergo enhanced training on incident management and victim support	●	6 Champions identified from site-based People teams in our regional operations. These colleagues have been offered more detailed training and provide additional support for site teams across their regions.
Commit our support for the Bright Futures remediation programme to provide work placements for victims of modern slavery	●	We formally committed our support for the Bright Futures initiative at the end of 2020 and will welcome the first survivors of modern slavery on to placements in our manufacturing operations during 2021.
Create individual business function action plans to support our efforts to tackle modern slavery risk in our business	●	Individual action plans in place across our People, Business Continuity, Loss Prevention, Employee Relations, Operations & Ethical Trading. Plans are updated annually, and progress is monitored at the quarterly Modern Slavery Steering Group meetings.
Commission an enhanced due diligence study to identify and prioritise human rights risk in our global supply chain	●	Work commissioned with an external third party (Ergon Associates) to review human rights risk in the lower tiers of our global supply chains, including a specific focus on forced and child labour. The results are expected in the first half of 2021 and will inform our human rights due diligence activity over the medium to long term.

○ On going ● Complete

10. Progress against the next steps detailed in our 2019/20 statement: Continued

Our commitment	Status	Comment
Require all ingredient suppliers into Morrisons Manufacturing to join Sedex and share risk information	○	All suppliers were contacted at the end of 2020 and given notice of our updated requirements. 55% of suppliers were linked to us and sharing information with us at the end of our financial year, with the remainder expected to be compliant during the first half of 2021.
Become signatories to the UN Women’s Empowerment Principles to support capacity building on gender related risk	●	Morrisons is now a formal signatory to the Women’s Empowerment Principles https://www.weps.org/company/wm-morrisons-plc
Share our Modern Slavery Incident Management resources with UK suppliers	●	We continue to develop tools and guidance that we share with our suppliers on an ad hoc basis. We also provide free access to numerous resources via our sponsorship of Stronger Together and the Responsible Recruitment Toolkit.
Review forced labour risk in supply chain using updated tools on the Sedex platform	●	All suppliers were required to complete the new, updated Self Assessment Questionnaire (SAQ) on the Sedex platform. This will enable Sedex to launch more detailed Forced Labour Indicators in 2021 that we can build into our supplier and site risk assessment process going forward.
Implement online site risk reporting tools for use by our internationally based Technical Managers	○	Tools developed in collaboration with our At Source Technical team and an external IT provider. These tools were trialled remotely during 2020 but roll out of the field based process is on hold due to COVID related travel restrictions.
Support the establishment of supplier forums in Italy to address the risks of labour exploitation in the agricultural sector	○	We continued to fund and support the development of the ETI Italy Working Group throughout 2020. Activity was restricted due to COVID, but plans are in place for 2021 which include building the capacity of local cooperatives to mitigate issues and drive positive change in the sector.
Publish details of our own-brand, tier one supply chain	●	In 2020, we published details of all first tier factories producing our Nutmeg branded range of clothing and our own-brand food and non-food products. This information includes the factory name, address, workforce gender split and accessibility of worker representation. The data will be reviewed and updated on an annual basis.
Produce and distribute guidance on forced and prison labour risk in China	●	Guidance created and shared with all China based suppliers and manufacturers. This was supported by bespoke training on Responsible Recruitment Practices delivered in December to over 120 delegates from 87 factories by the Centre for Child Rights and Business.

○ On going ● Complete

11. New Objectives

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

In 2021/22 we will continue to deliver progress in our own operations by:

Delivering training on tackling modern slavery in global supply chains to Technical colleagues who undertake site visits

Undertaking live modern slavery scenario workshops at Morrisons Manufacturing and Logistics sites in collaboration with the GLAA and police

Continuing to develop our network of Modern Slavery Champions

Establishing a working group to identify and mitigate the risks of organised immigration crime in our transport and logistics operations

Rolling out Modern Slavery Prevention and Partnership Improvement Plans across our vertically integrated site operations

Launching a “Supporting Survivors of Modern Slavery” policy

Welcoming the first survivors of modern slavery on to placements in our manufacturing operations through the Bright Future initiative

Reviewing and updating our Modern Slavery Incident Management Checklist

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

Publishing the results of our global supply chain risk assessment and prioritising commodities for enhanced due diligence

Undertaking a pilot human rights impact assessment on a priority risk commodity

Supporting our UK growers to manage labour shortages and associated risks

Offering further capacity building training on responsible recruitment and forced labour risk to all tier one manufacturing sites in China

Mapping selected high risk commodity supply chains back to primary processing level

Supporting and funding the continuing development of the Modern Slavery Intelligence Network

Communicating 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

Conducting detailed site visits within our Nutmeg clothing factory base with an external partner to highlight issues that are not commonly reported through ethical audits



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Our 2020/21 Annual Report and
Financial Statements can be found at:
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