

# Modern Slavery Statement.

2017/18

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# Introduction



The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery. We firmly advocate for transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 24 February 2018. It sets out the steps taken by Tesco retail businesses to prevent modern slavery and human

trafficking in our own operations and supply chains.

Our commitment is embedded in the [Tesco Little Helps Plan](#) which we launched in October 2017. The plan builds on the work we have been doing over many years and is about running the business in a way that makes a positive contribution to our colleagues, customers and communities. Our human rights strategy, which covers the most serious labour challenges to workers, is central to the plan's 'products' pillar.

We published our first [Modern Slavery Statement](#) in May 2017. Since then we have further increased our efforts and have particularly focused on:

- Strengthening our work in the areas of greatest risk.
- Building a holistic approach that includes victim support.
- Awareness-raising and capacity building of our internal teams and our suppliers.

Tesco Bank, Tesco Mobile, One Stop, Dunhumby and Booker report and publish separate Modern Slavery Statements.

This statement was approved by the Board of Tesco PLC.

A handwritten signature in black ink that reads "Dave".

Dave Lewis

**Group Chief Executive**

10 May 2018

# Our business and supply chains

Tesco is one of the world's leading multinational retailers. Our largest operations are in the UK, where we have over 3,400 stores. We also have businesses in Republic of Ireland, Czech Republic, Hungary, Poland, Slovakia, Malaysia and Thailand.

Across the Tesco Group, our 440,000 colleagues serve around 80 million customers every week online and in store. At the heart of everything our colleagues do is our core purpose – to serve customers a little better every day.

This purpose is underpinned by our three values:

1.

No one tries harder for customers

2.

We treat people how they want to be treated

3.

Every little help makes a big difference

We believe that our trade with people across the countries we source from should have a positive impact, creating jobs and opportunities for people all over the world.

We have thousands of direct and indirect suppliers who grow and move hundreds of raw materials across global supply chains. These suppliers range from large agriculture businesses, to smallholders and manufacturing companies. We also work with a number of other partners who help run our distribution centres, keep our offices and stores clean and secure, and much more.

The scale of these supply chains, upstream and downstream, gives us the opportunity to promote respect for human rights and to make a positive impact on people's lives.

Starting with our own business operations and service providers, and then increasing the visibility we have of our global supply chains, we have worked to identify actual or potential risks of modern slavery and ensure remediation for any victims.

# Policies in relation to modern slavery

At the heart of our approach to human rights are a number of important internationally recognised declarations, standards and codes. These are the foundations for how and where we work, and include:

- [The UN Universal Declaration of Human Rights](#)
- [The International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [The UN Guiding Principles on Business and Human Rights](#)
- [The UN Global Compact](#)
- [The Base Code of the Ethical Trading Initiative](#)

Our approach to addressing modern slavery sits within this wider human rights agenda. Our strategy is supported by our [Code of Business Conduct](#) and [Human Rights policy](#) which applies to the Tesco Group and sets out our obligations to customers, colleagues and communities in our own operations and supply chain. We take any breach of our policies or allegations extremely seriously. We provide independent and confidential [‘Protector Lines’](#) that enable our colleagues, suppliers and their staff around the world to raise concerns. In the past 12 months we received five alerts related to possible human rights violations.

As part of our membership of the Consumer Goods Forum (CGF), we are one of four companies leading collaborative efforts to combat forced labour. Such collaboration is particularly important in lower tiers of supply chains where we do not have direct commercial relationships. We helped to design and strongly support the CGF’s Priority Industry Principles:

**EVERY WORKER SHOULD HAVE FREEDOM OF MOVEMENT** 

 **NO WORKER SHOULD PAY FOR A JOB**

 **NO WORKER SHOULD BE INDEBTED OR COERCED TO WORK**

*Source: Consumer Goods Forum.*

As members of the Institute of Human Rights and Business Responsible Recruitment Leadership Group, we also support the ‘Employer Pays’ principle that ‘No worker should pay for a job - the costs of recruitment should be borne not by the worker but by the employer.’

Our human rights strategy is led by the Group Responsible Sourcing Director, reporting to the Chief Product Officer. Governance of our human rights work (for all markets and subsidiaries) sits with the Board’s Corporate Responsibility Committee.

Performance against our policies, including on modern slavery, and insights from Protector Line are also reviewed by the Group Risk and Compliance Committee chaired by the Group CEO, plus the business unit Risk and Compliance Committees.

# Due diligence processes

Over the past three years we have put in place a due diligence process, in line with the UN Guiding Principles on Business and Human Rights.

The process was developed in consultation with over fifty internal and external stakeholders, including suppliers, industry bodies such as the British Retail Consortium, civil society groups such as Unseen and the Ethical Trading Initiative, and government bodies and agencies such as the UK Gangmasters & Labour Abuse Authority (GLAA). We also spoke to Trade Union representatives to bring the voice of people in our supply chain to our strategy development.

Risks of modern slavery are dynamic and can change quickly. We regularly reassess and respond to the potential and actual risks in our business and supply chains. Our 45 dedicated Responsible Sourcing Managers, based in the UK and in our sourcing hubs in Asia, the Americas and in Africa, lead this work, alongside our commercial and quality sourcing teams. To do this effectively we use our five stage due diligence framework outlined below.

Our human rights strategy is regularly updated to reflect the outputs of our due diligence process. In the past 12 months our assessment of risk in different sectors, countries and supply chains has continued to evolve. In 2017 we started using the country risk ratings from the Food Network of Ethical Trade (FNET) to help identify areas of highest risk and inform our prioritisation.

Last year we also launched a new audit policy focusing on higher risk countries and supply chains. See page 9, figure 1 for more detail on our audit policy and FNET.

We continue to build our understanding of risk by watching for broader labour trends. For example, a report from [The Association of Labour Providers](#) in January 2018 noted a decline in the number of workers applying to work in the food supply chain. Where there is a shortage of labour, there comes an increased risk of exploitation. Therefore, it is important we continue to monitor trends and work with suppliers to mitigate the risk of forced labour.

## Our due diligence framework has five stages:



# Tackling modern slavery – our business

In our own operations, the majority of our colleagues are employed on permanent contracts. The greatest risks of modern slavery exist for workers not in permanent employment, for example in cleaning and security roles. We work with three main service providers in our UK operations where temporary labour is needed.

We review all our service providers annually to identify those with the highest potential risks of modern slavery. This is based on evolving risk in the sector, their contract type, the level of skill involved in the work, wages, and our visibility of the service provider. This process has enabled us to reconfirm the priority sectors from 2016/17:

- Agency labour in our distribution and logistics operations
- Workers in security and cleaning roles for our offices and stores
- Our car wash supplier (franchise)
- Workers in the construction industry who build our stores and carry out renovations
- We also identified two further priority sectors for 2017/18:
- Independent workers within our distribution operations e.g. Tesco Now
- Workers employed by 3rd parties within rented space on our estate

Based on the risk to our business, we have continued implementing our ethical auditing program with procurement suppliers. Our dedicated head office Responsible Sourcing Team work closely with suppliers, including all service providers, and our internal People Team to help spot potential indicators of modern slavery.

In 2017/18 we worked with our suppliers to investigate three



incidents in our own operations where there were indicators of modern slavery:

- Jobs in our distribution centres that were illicitly advertised on social media with applicants expected to pay a worker recruitment fee
- Deductions made from a workers wages, their bank card withheld and movement prohibited by a friend who had encouraged them to come to the UK
- A landlord seeking additional charges for unregulated transport to site

Where appropriate, these cases were reported to the Gangmasters and Labour Abuse Authority (GLAA). We have also arranged training with our Distribution and Fulfilment Managers on spotting the signs of modern slavery.

We have expanded the use of our Recruitment Charter, first implemented in 2016, to internal People teams as well as additional labour providers in the UK. This

prohibits recruitment fees being charged to workers and sets out our expectations with regards to other areas, such as accommodation standards. In 2017/18, all our UK service providers, including labour providers, attended refresher training that included modern slavery and minimum wage legislation.

All our UK labour providers work closely with the Gangmasters and Labour Abuse Authority (GLAA) to reduce the risk of trafficking and are prohibited from actively recruiting from outside of the UK without prior agreement from Tesco. We work collaboratively with service providers to help ensure all temporary workers receive a reasonable number of paid hours each week and have the opportunity to transfer to permanent employment when vacancies arise.

Sedex is the world's largest collaborative platform where companies can share responsible sourcing data and progress. As part of a Sedex's working group, we are working alongside other major retail

## Tackling modern slavery - our business (continued)

members to develop an ethical trade strategy for goods not for resale suppliers with an initial focus on labour providers. The objective of the working group is to create new tools and guidance for Sedex's members as well as share expertise.

In our international businesses we have engaged with our labour providers on our recruitment principles. In Central Europe, a separate Recruitment charter outlines best practice when recruiting from this region. And our business in Thailand (Tesco Lotus) has moved away from using labour providers to recruit foreign workers into their distribution centres. Instead foreign workers are recruited directly which significantly reduces the risk of exploitation.

We continue to work closely with our UK car wash franchise, Waves, to improve their mitigation of modern slavery risks. In 2017/18 we supported franchisees to move from paper based records to using an online platform where working hours, right to work and worker details can be more effectively stored and monitored. We have focused on building their understanding of responsible employment practices, how to create a good working environment and ensure workers are able to raise any concerns.

This year we have shared our knowledge and experience of running responsible car wash operations with local police forces across the UK, including Lincolnshire and Derbyshire, as well as advocating for stronger regulation of the carwash sector with other government authorities. Our franchise, Waves, have also presented details of indicators of possible exploitation in car washes to the police transformation team.

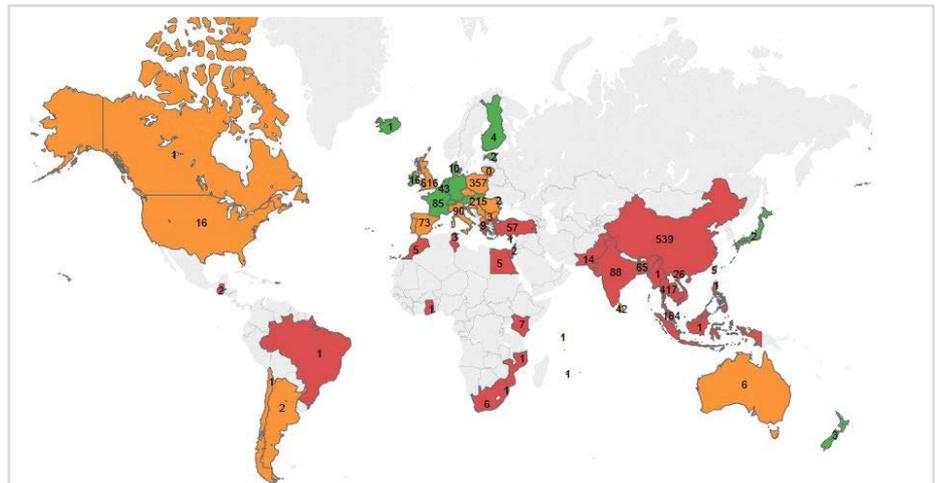
# Tackling modern slavery – our supply chains

We assess the potential human rights risks of our supply chains by considering the country of origin where we are sourcing products or raw materials from. We use FNET risk ratings to inform this, combined with our own understanding of labour rights and human rights risks in our key sourcing sectors.

In the UK, there are 20 key products and ingredients which we are focusing on as part of our broader responsible sourcing strategy. Of these, we are prioritising nine because of the social and human rights risks associated with them.

As the next stage of our risk assessment, we consider the type of work being carried out (mechanical vs. manual) and the type of labour (seasonal, permanent, agency). Stakeholders and our own experience indicate that there are likely to be higher risks of slavery where there is a manual process, such as harvesting or car washing, and that the risks can be compounded where work is seasonal rather than year round. This is because manual processes are labour intensive and tend to rely on unskilled labour. Seasonal work also tends to rely on labour providers which causes complexity in the supply chain. Migrant or refugee workers tend to be at even higher risk because they are more likely to lack support networks, particularly where they may not be legally registered in the country of work.

We also gather intelligence about emerging risks through our strong relationships with local groups, NGOs and organisations such as the Ethical Trading Initiative and the Consumer Goods Forum. Campaigners and media investigations can also play an important role in helping us identify where some of the biggest risks lie.



Low risk, Medium risk, High risk

Figure 1: Number of direct supplier sites for Tesco Group by country, showing relative human rights risk of countries, as of Autumn 2017. Country ethical risk based on FNET risk rating.

Figure 2: Priority products and ingredients and their main origin source countries

## Bananas

Columbia, Costa Rica, Ecuador, Guatemala

## Cane Sugar

Belize, Fiji, Brazil, Guyana, South Africa

## Citrus

South Africa, Morocco, Peru, Spain

## Cocoa

Ivory Coast, Ghana

## Coffee

Vietnam, Brazil, Colombia, Indonesia, Malaysia, Tanzania, Uganda

## Cotton

India, China, Pakistan

## Palm oil

Malaysia, Indonesia

## Prawns

Thailand, Vietnam, Indonesia

## Tea

Kenya, Malawi, India, Argentina, China

## Tackling modern slavery – our supply chains (continued)

Our Responsible Sourcing Managers across eleven key sourcing countries, all local to their country of operation, are well placed to gather on the ground intelligence through their own grassroots networks. This combined risk and intelligence approach helps us identify where the most salient and material risks are in our supply chains.



We have adopted a ‘three pillar’ approach to our human rights work as a whole. These are also relevant for our work to tackle the risks of modern day slavery.

**Assurance programmes**  
to reduce the risk of slavery in our supply chains through audits and certification schemes

**Improvement programmes**  
to address systemic issues which cause or contribute to slavery

**Empowerment programmes**  
to work with the wider community to reduce people’s vulnerability to modern slavery

## Tackling modern slavery – our supply chains (Continued)

**“We know that the most serious and hidden risks of human rights abuses, such as modern slavery, tend to occur further down the supply chain”**

**Giles Bolton, Responsible Sourcing Director**

### Assurance

In summer 2017 we reviewed and updated our audit programme for food supply chains. While well conducted audits can play a useful role in identifying some human rights abuses, they are only one part of the answer. We have therefore focussed audit on high risk locations whilst focussing most resource on alternative approaches.

In line with this approach, annual audits of our direct supplier sites are required in high risk countries only. In addition, we also ask for ‘upstream’ audits (that go beyond our direct suppliers) for priority supply chains. For example, produce sites in high risk countries are audited to grower level. Produce is a priority sector because the labour used is typically manual, low skilled and seasonal, where we know there is greatest risk of exploitation.

Sites are audited by recognised audit bodies and suppliers are supported to address any non-compliances by dedicated Responsible Sourcing Managers and Technical Managers.

When we receive intelligence through ethical audits or our Protector Line we immediately investigate. We have escalated two incidents within our UK supply chain to the Gangmasters & Labour Abuse Authority (GLAA) this year, where we believe workers had paid recruitment fees.

Where our suppliers identify possible indicators of modern slavery within their own operations we support and monitor their investigations. In the past 12 months, we were made aware of one case where six individuals were being housed and transported to site at over inflated costs, while being held through financial controls.

One issue we monitor particularly closely in key sourcing countries is that salaries are paid on time and in full. We do this because we know how important it is for workers, and also because ensuring workers are not in debt means they are less vulnerable to any risk of forced labour. Through our own checks, we occasionally find cases where this has not been the case. This may happen for a number of reasons. Where we identify a shortfall in payment, we require suppliers to pay back any avoided wages. In the rare occurrence that suppliers do not agree, we look to exit our relationship with them in a responsible manner. In 2017/18 we identified 142 cases of concern involving 116 sites. 7,506 workers received a total of US\$760,332 as a result of Tesco’s intervention.

We work hard with suppliers to obtain visibility of supply chains beyond first tier. In addition to our own mapping efforts with our suppliers, we also use certification to provide additional visibility and assurance of our sourcing. This won’t solve endemic issues such as modern slavery on its own but is an important tool.

All our bananas are Rainforest Alliance™ certified. In the past year we have also increased the amount of certified tea, coffee and cocoa we sell in the UK.

All our UK Own Brand tea is double certified with Rainforest Alliance certified and the Ethical Tea Partnership – see page 14 for more information. All of our UK Own Brand chocolate confectionary contains

Rainforest Alliance certified cocoa and by the end of 2018 all UK Own Brand products containing cocoa will be responsibly sourced using a [combination of sustainability programmes](#).

Coffee is the second-most traded commodity globally and child labour is known still to be prevalent on some smallholder farms. Currently 25% of our UK green coffee beans are certified. Our decision to certify all our green beans used across the UK business was made to increase our assurance that people who produce our coffee are free to lead decent lives. We have also joined the Global Coffee Platform to make sure we continue to work with other industry players and share best practice on mitigating modern slavery risks.

## Tackling modern slavery – our supply chains (Continued)

### Improve

Working in partnership with others is vital to addressing risks of modern slavery, particularly further up the supply chain where our direct commercial leverage is diluted. Over the past 12 months we have continued to engage in a number of multi-stakeholder improvement projects to tackle systemic issues. Examples include:

#### Sumangali

This is where workers are recruited through contracts under which they are paid a lump sum at the end of a three-year period, and have restrictions placed on their movement, leaving them vulnerable to abuse. Tamil Nadu is a state in India where Sumangali practices prevail. We have continued to monitor our direct suppliers closely and work through the Ethical Trading Initiative to ensure this practice does not exist. We have not identified any cases of Sumangali in our direct supply base in 2017/18.

However, we continue to map our clothing and textile supply chain further upstream to include tanneries, ginning mills and other processing sites to ensure better visibility of any potential risks. In Tamil Nadu we are working with the biggest suppliers to map their supply chains end to end.

In 2018 we will hold a workshop with all our direct suppliers in this region to introduce a supply chain mapping tool. We have also undertaken 11 site visits to value added process sites and where we have concerns we conduct additional due diligence.

#### Food Network for Ethical Trade (FNET)

Tesco, together with our suppliers and other retailers, launched FNET, a platform developed to support collaboration throughout supply chains and to look at what comes ‘after audits’, including addressing priority risks such as modern

slavery. There are currently three work streams:

- Risk Assessment – a tool designed to look at risks within composite food products (using more than one ingredient)
- Collaboration on priority areas of risk – working with suppliers and retailers, who have identified common risks in their supply chains
- Supply Chain Engagement – working with suppliers and retailers to understand the best ways of engaging workers, suppliers, growers, farmers and labour agencies further down the supply chain

#### Migrant labour in the Southern Mediterranean

We continue to participate in the Ethical Trading initiative Working Group for Italian Agriculture to mitigate the risk of exploitation through illegal recruitment practices, including indebtedness and coercion in the tinned tomato sector. Our two key suppliers of tinned tomatoes are members of this group. The group has four work streams, focusing on:

- Responsible Recruitment
- Mapping existing initiatives and understanding the legal context
- Exploring avenues for international advocacy
- Remediation and due diligence

We are also exploring how our learnings can be replicated across all agriculture in the region.

Alongside seven other UK retailers, we also continue to support Spanish Ethical Forums, attended by our first tier suppliers and growers. Eight events were held locally in Spain over the past 12 months, these sought to address discrimination against migrant agricultural labourers and investigate the provision of labour.

## Tackling modern slavery – our supply chains (Continued)



Working collaboratively to end forced labour in the palm oil sector

As a member of the Consumer Goods Forum (CGF) Palm Oil Working Group, Tesco has been supporting work to better understand forced labour issues in the palm oil sector and then to develop and implement a set of actions that CGF can take to drive change, alongside NGOs, governments and other key stakeholders.

### Issara Institute

Our continued partnership with Issara Institute ensures our highest risk supply chains in Thailand are monitored independently. The key focus is on enabling workers to raise their own concerns and ensure they are addressed which is crucial for the empowerment of migrant workers who are often vulnerable to exploitation.

Through multi-stakeholder partnerships, the Issara Institute has been able to reduce labour risks and

strengthen recruitment practices. They are now able to provide support to 20,000 workers across the seafood, poultry and agriculture sectors. Across Issara institute partners, the working conditions of over 6,000 victims of forced labour have also been transformed into decent work in the past three years. Key to this has been allowing worker voice to lead the identification and resolution of labour issues, but also because Issara Institute provides technical support to suppliers to develop solutions around complex issues such as exploitative recruitment, debt bondage, and safeguards for workers in the absence of functioning grievance mechanisms. Alongside the worker voice channels, management interviews, workplace assessments, and worker interviews have also been conducted at Tesco sites in 2017 and 2018.

These are just some examples of how we work with multi stakeholder initiatives, you can find further examples [here](#).

## Tackling modern slavery – our supply chains (Continued)

### Empower

Wider issues such as poverty, conflict and environmental disasters can make workers in our supply chains, as well as their families and communities, more vulnerable to trafficking and exploitation. By working with our suppliers and grassroots organisations in the community, we can play a role helping to reduce this vulnerability. We contribute to number of targeted interventions with key vulnerable groups. Two examples are outlined below.

#### Preventing trafficking of women

Through our 3 year support for UNICEF and the Ethical Tea Partnership (ETP) partnership, we have continued to improve opportunities for tens of thousands of children in Indian tea communities and reduce their vulnerability to trafficking and abuse. The Assam programme targeted families in 350 communities linked to 100 tea estates. To date the programme has:

- Equipped more than 35,000 adolescent girls with the knowledge and life skills that will help them secure a better future

and reduce their vulnerability to violence, abuse and exploitation

- Reached 30,000 community members to protect children from all types of violence, abuse and exploitation
- Influenced national, state and district governments to protect children and review policies affecting women and children living in tea communities.

We have completed a mapping exercise of all our producer groups in each country of origin. All of our suppliers are either certified by Rainforest Alliance or audited by the Ethical Tea Partnership. We then ranked each tea garden on 6 parameters including responsible sourcing. The rating has been used to inform our supplier sourcing strategy to incentivise overall improvement, as well as identify key partners to develop partnerships.

#### Supporting survivors of trafficking in the UK

Regular, safe work is an effective way of reducing the risks to individuals of being re-trafficked and exploited. In partnership with industry experts, we have continued to explore how we can support

victims of trafficking and modern day slavery back into work. First and foremost, there is a need to support victims and empower them with relevant resources, developmental opportunities and choices, before they can successfully re-enter a working environment.

In spring 2017, the Sophie Hayes Foundation, Caritas Bakhita House and Tesco Borough Community Champions worked together to organise a one day workshop where Tesco human resources experts provided a workshop focusing on career, CV and job application advice, along with the importance of dignity at work for female survivors of trafficking. This formed part of the Sophie Hayes Foundation Day Confidence and Employability programme.

In 2017 we also trialled a programme with The Sharan Project, a national charity that supports women who have been or are at risk of domestic violence, forced marriage and honour abuse. The two week programme provided 16 women with specialist ‘wrap round’ support (Sharan), a Customer Service qualification (Learn Direct), in store work experience and a guaranteed interview upon completion (Tesco).

This programme resulted in two women securing full time employment as well as domestic abuse training for our colleagues and partners, and increased confidence and skills for all the candidates.



# Awareness raising and capacity building

Raising awareness of modern day slavery both within our business and our supply chains is an important part of our strategy. We know that identifying potential and actual cases requires upskilling colleagues and suppliers to understand the drivers of modern slavery as well as the possible indicators.

This year we ran targeted training for the colleagues in our business who have direct contact with workers in our supply chains, including:

- Stronger Together Training for UK Technical Managers
- Responsible Sourcing training (which covers the issue of modern slavery) for Technical, Buying and Procurement (buying goods not for resale) Managers
- Creation of a modern slavery e-learning module for all Head Office colleagues
- Tailored modern slavery training for our Product Integrity Unit (PIU) auditors in Europe

responsible sourcing, technical and commercial KPIs. The integration of these plans helps ensure suppliers are recognised for good performance.

We require all Tesco's UK suppliers, including service providers such as labour agencies, to attend Stronger Together training. This year we expanded our requirement to include the 2nd tier suppliers of our key UK food suppliers.

Tesco have also supported the expansion of Stronger Together in South Africa by encouraging all our fruit and wine producers to attend training in the coming year. From the 2017 impact assessment 96% of business respondents said that Stronger Together had increased their understanding of what modern slavery is and 87% stated that it has helped them to prepare and manage potential situations of forced labour.

Improving labour standards in our supply chains is a responsibility we share with our suppliers. This year our 'beyond audit' approach has continued to help build capacity with our suppliers. We have developed Responsible Sourcing Guidelines for suppliers that detail how they can develop their own strategies to ensure human rights throughout their supply chain are respected.

We have developed joint responsible sourcing plans with over 20 of our most strategic UK suppliers. These plans sit alongside our commercial buy and sell plans, and supplier performance is assessed across

# Impact and monitoring

In addition to publishing this Modern Slavery Statement, we report annual progress on our human rights programme to the Tesco Risk and Compliance Committee. This includes any critical breaches of our policies, the results of ethical audits, and progress against our commitments to sustainably source priority raw materials. We share a series of 'heat maps' to ensure that members of the Executive Committee, including the Group CEO, have a strong overview of risks and effectiveness. These heat maps set out the number of supplier sites we have across each market in high risk countries and the level of ethical oversight we have at each site.

We also monitor data pertaining to the training of our colleagues and suppliers on modern slavery. We have now trained over 300 Tesco colleagues on modern slavery including more than 80% of UK Technical Managers and Product Integrity Auditors. We receive quantitative feedback on all the training we deliver.

Financial Year	Attendees	No. Suppliers attended
2013-2014	134	75
2014-2015	200	61
2015-2016	259	174
2016-2017	271	158
2017-2018	250	164
<b>Total</b>	<b>1,114</b>	<b>632</b>

Figure 3: Stronger Together Training figures – UK Suppliers including goods not for resale.

	2016- 17	2017-18
<b>Stronger Together Training</b> <i>predominantly Technical Managers and HR functions</i>	2	46
<b>Responsible Sourcing Training</b> <i>Technical and Commercial colleagues</i>	84	64
<b>Tailored Modern Slavery Training</b> <i>e.g. Product Integrity auditors and Store Managers</i>	3	118

Figure 4: Modern Slavery Training figures – UK own operations.

# Plans for 2018/19

In the next 12 months we will continue to strengthen our approach to managing the risk of modern day slavery within our business and ensure our strategy is responsive to changing risks. In the UK, we also intend to take further action in our own operations and supply chains.

## Own business and operations

- Provide tailored modern slavery training to Supply Chain, Procurement (buying goods not for resale) and People Team Managers
- Roll out bespoke modern slavery training to UK stores in priority modern slavery hotspots
- Continue to identify opportunities to support the reintegration of victims of modern slavery into both our own operations and supply chain
- Continue to work with our international businesses on using the Consumer Goods Forum Priority Industry Principles to identify and mitigate against forced labour

## Supply chains

- Our revised approach has proved successful in providing greater visibility of high risk supply chains. We will continue to work with our suppliers to ensure our policy is effective in managing risk and driving improvements within our supply chain
- Build a greater understanding of the use of migrant labour in our supply chains in order to develop a strategy for empowering refugee communities linked to our supply chains, where we know there is a risk of modern slavery