



MODERN SLAVERY & HUMAN RIGHTS IMPACT STATEMENT 2025



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This Modern Slavery and Human Rights Impact Statement outlines Asda's approach to addressing Modern Slavery risks and promoting Human Rights within our operations and supply chains. It has been prepared to report on our obligations under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken in relation to Section 54, 'Transparency in Supply Chains' by Asda Stores Limited and, where appropriate, other relevant group companies to prevent Modern Slavery and human trafficking in our business and supply chains.

It relates to our fiscal year ended 31 December 2025 and covers the activities of Asda Group Ltd, Asda Stores Ltd, International Procurement and Logistics Ltd., Forza Foods Ltd, Kober Ltd. (References to IPL include where relevant Forza Foods Ltd. and Kober Ltd.), McLagan Investments Ltd, The Burwood House Group Limited, Arthur Foodstores Ltd, and Asda Express Ltd (both trading as Asda Express). It reflects our ongoing commitment to transparency, accountability, continuous improvement and reporting the impacts experienced by rights holders from the operation of our business and supply chains globally.

This document was completed within Asda's Legal and Compliance function, with engagement from stakeholders across the business. It was reviewed and approved at the Board delegated forum of the Compliance, Ethics, Risk and Audit Committee (CERA) on 16 June 2026, before approval via the Asda board and published on 30 June 2026.

a Message FROM allan

In 2025, we focused on getting our business ready for the future. We completed some major infrastructure projects and strengthened our Formula for Growth so we can keep meeting the everyday needs of our customers and deliver great value every time they shop with us.



A key part of this is continuing our work to tackle Modern Slavery and protect Human Rights across our business and global supply chains. Over the past year, we've worked closely with suppliers, colleagues and other partners to better understand and address the risks involved that could be associated with our business.

Highlights from this period include

- Delivering our new Transparency and Supply Chain Monitoring Policy including a 90-day detailed supplier consultation. Focusing on improving risk information, better addressing known issues, and protecting rights holders.
- Developing and implementing new data and dashboard solutions to enable improved insights and risk management of our supply chains, driving remediation of issues and ensuring capacity building is prioritised.
- Enhanced Human Rights Due Diligence requirements for suppliers of high-risk commodities associated with priority geographies and issues.
- Leading by example – working with suppliers to publish in-scope supplier relationships on Open Supply Hub, improving our data quality and accountability across supply chains.
- Supporting and building capacity with our suppliers to focus on Saliency, due diligence processes and engagement with impacted rightsholders.
- A continued focus on rights holders, the impacts from the operation of our business and ensuring they are central to conversations and considerations to address these.

The success of our business relies on treating people fairly and ensuring the rights, freedoms and values we expect are afforded to those who enable our operation. Asda is committed to following the United Nations Guiding Principles on Business and Human Rights, and this report shows how we are making progress, as well as the challenges we still face.

Creating supply chains that protect vulnerable people is not easy, and we can't do it alone. We encourage everyone to work together to raise standards and make a positive difference worldwide.

Allan

Allan Leighton
Executive Chairman, Asda
30 June 2026

OUR COMMITMENT TO HUMAN RIGHTS

Our approach is aligned with international frameworks, including the United Nations Guiding Principles (UNGPs), and is underpinned by our core values, which are the foundation of everything we do. Integrity, respect, and collaboration guide our decisions, fostering an environment where care for people comes first. In 2025, we advanced transformative initiatives to simplify work for our colleagues, improve customer experiences, and build a future-ready business rooted in ethics and innovation. These values inspire us to champion Human Rights and create a positive impact, as outlined within our [Human Rights Policy](#).

OUR IMPACT IN 2025

OBJECTIVE AREA	2025 OBJECTIVES	UPDATE	STATUS
Ethical recruitment & migrant workers	We are reviewing the implementation of the principles that support the responsible recruitment of migrant workers.	In 2025, we evolved our approach to supporting suppliers to understand the fundamental steps that need to be taken to commit to and deliver responsible recruitment in-line with the Employer Pays Principle. This includes guidance broken down into five areas; Policies and governance, risk assessment, integrate and act, communicate and remedy. This has been included within our revised Standards for Suppliers and the overarching requirement to commit to the Employer Pays Principle.	 COMPLETE
Supply chain transparency	Expand the integration of supply chain data – Transparency In Supply Chains (TISC Report) used to strengthen supplier accountability and risk identification.	Our focus on data has continued with the establishment of new risk dashboards and reporting driving insights into our supply chains. This year we have further driven compliance with our expectations through new tools and ways of working, including enhancing our use of automation. Via TISC we have integrated a sample of GFR (Goods For Resale) and GNFR (Goods Not For Resale) suppliers in to our dashboard to better understand the compliance information presented and how we can integrate this into our understanding of risk.	 PROGRESS MADE
Supply chain transparency	Share the findings of our Landscape Assessment into meat and poultry supply chains whilst expanding the disclosure of this supply chain beyond Tier 1 to Tiers 2 and 3.	All participating suppliers have received a summary of the findings and planned actions we intend to take collaboratively. Activity to disclose the Tier 2 and 3 supply chains is underway following further communication and engagement alongside capacity building. This will take place in 2026.	 PROGRESS MADE
Training & capability	Assess the training needs of Commercial, Sourcing and Technical Teams around the topic of Human Rights.	In 2025, training was provided to priority colleagues based on enhancing their understanding of Human Rights issues such as conflict and responsible entry and exit. Colleagues were prioritised based on proximity to risk, or challenges present in the supply chains they manage.	 COMPLETE

2025
OBJECTIVES

OBJECTIVE AREA		UPDATE	STATUS
Training & capability	Implement harassment training to address gender-specific risks in supply chains.	Collective action is essential to drive meaningful change on topics like Gender. To support this, we part funded the development of the Gender Action In Agriculture (GAIA) Principles to Address Gender-Based Violence and Harassment (GBVH) in Commercial Agriculture and Fisheries. The Ethical Trading Initiative (ETI) launched the GAIA Principles on 25 November, establishing clear and consistent expectations for addressing GBVH across supply chains. This framework will guide future training and capacity building on harassment and gender-specific risks. Our next step is to work with the ETI and our peers on a collective second phase to maximise impact and ensure consistency across shared supply chains.	 COMPLETE
Due diligence	Expand mandatory pre-onboarding risk assessments for GNFR suppliers and define and consult on the scope of GNFR suppliers.	We continue to work on the implementation of our GNFR scope. We have worked closely with strategic suppliers, and those which may need additional support to become integrated into our programme. This work has focused on getting suppliers who have synergies with current ways of working on to the correct platforms, and cadence of providing data whilst working with suppliers to assess the best tools to understand risk and compliance within the existing landscape.	PROGRESS MADE
Remediation and support	Develop capacity-building training with Slave-Free Alliance for franchisees and concession partners.	The delivery of our gap analysis work alongside our existing partner has enabled us to assess where there are opportunities to develop suitable tools for sharing with GNFR partners. At present we require more information to map suppliers, and their needs before working with Slave-Free Alliance to develop the required tools and learnings for delivery. Concessions remain one of our key focus areas for 2026, with our initial investigation phase now complete.	PROGRESS MADE
Child labour prevention	Strengthen child labour prevention via partnerships and collaboration on Saliency themes.	We have continued to work with the Centre for Child Rights and Business and deliver remediation where incidents have occurred. In addition, we have also undertaken child labour specific reporting within our programme to ensure we are focused on young workers, their needs, and ensuring our suppliers are actively monitoring and managing this issue effectively. We continue to support and engage with the Fair Labour Association project in Madhya Pradesh focusing on eradicating child labour from cotton fields.	 COMPLETE
Recruitment practices	Communicate the outcomes of the Employer Pays Principle Feasibility Study as part of the Seasonal Workers Taskforce.	In-line with the work of the Seasonal Workers Taskforce, Asda have continued to fund and support the dissemination of this work and attended and supported the Employer Pays Principle working sessions across 2025. The final report is available here.	 COMPLETE
Supply chain transparency	Instruct all suppliers to disclose in-scope sites to Open Supply Hub and claim their sites, ensuring data accuracy and ownership.	On May 12 2025 we launched our new Transparency and Supply Chain Monitoring Policy, which brought this Policy into effect (following a detailed 90-day consultation period). We have worked with Open Supply Hub, suppliers, agents and sites to ensure the flow of information is suitable, suppliers understand the steps they need to take and that we are ultimately validating information and data which is generated. At the end of 2025 we have >990 sites 'claimed' within the platform which represents around 31% of our disclosed in-scope supply chain across GFR and GNFR. We are currently the only business that requires 'claiming' on Open Supply Hub.	 COMPLETE
Due diligence	Strengthen supplier due diligence for high-risk commodities (such as tomatoes or paprika) by Geography.	Asda communicated that we expect a framework of Enhanced Human Rights Due Diligence to be implemented by suppliers sourcing high-risk products for specific geographies – tomato, paprika, seafood, solar and cotton across products, components and ingredient levels. We have continued this due diligence further focusing on mapping supply chains, high risk entities and supporting suppliers to assess these complex risks.	 COMPLETE

Asda made substantial progress in 2025, to strengthen supply chain transparency, enhance due diligence, prevent modern slavery, and build capability across colleagues and suppliers.

The following summarises the key achievements and activities across five strategic focus areas and includes quantitative and qualitative data to demonstrate the effectiveness of our programmes.

OUR IMPACT FOR 2025

1 SUPPLY CHAIN TRANSPARENCY & DUE DILIGENCE

Following a **90 day supplier consultation** a revised Transparency & Supply Chain Monitoring Policy was launched.

Became the first global retailer to mandate site '**claiming**' on Open Supply Hub.

>990

claimed sites across 3,167 disclosed.

Introduced new risk dashboards and automation, increasing supplier compliance led by General Merchandise (GM) compliance sitting at **92% at the end of 2025.**

Embedded Enhanced Human Rights Due Diligence (EHRDD) for tomato, paprika, seafood, cotton and solar supply chains. **(234 suppliers in scope).**

Conducted pre-onboarding checks assessing State-Imposed Forced Labour.

Completed a Landscape Assessment of protein supply chains, assessing **80 sites across 43 suppliers.**

Issued six formal strikes for non-compliance including unauthorised production and due-diligence failures.

2 MODERN SLAVERY PREVENTION & SURVIVOR SUPPORT /REMEDY

113 incidents

reviewed across salient themes, including **27 modern slavery** concerns.

Ethics Hotline received

3,038

contacts (40% increase) improving visibility of risk themes.

Coordinated remediation in multiple cases, including:

- Wage repayment and safe return for a fishing vessel worker.
- Rights holder centred engagement to assess impact.
- Continued support for repayment-of-fees work streams and delivery of our Responsible Recruitment for Migrant Workers guidance.

Conducted quarterly **Modern Slavery checks** across labour-provider and colleague populations.



3 POLICY COMMITMENTS, IMPROVEMENTS & INCIDENTS

Updated & expanded key policies Standards for Suppliers (2026), including new guidance on responsible entry/exit, purchasing practices and overtime.

Managed complex incidents

Including unauthorised production, child labour risk disclosures, and high-risk sourcing route extrication.



Advocated publicly for Mandatory Human Rights. **Due Diligence in the UK.**

Increased clarity of expectations through updated escalation frameworks, policy training and supplier engagement drop-ins. **150+ attendees.**



4 INDUSTRY COLLABORATIONS

Active contributor to the Seasonal Workers Taskforce, reaching

425+ growers through roadshows & supporting **45,000+ users** via the



Funding of the Employer Pays Principle Feasibility Study, informing national discussions on responsible recruitment in UK horticulture.

Partnered with the Centre for Child Rights and Business on child-labour remediation in seafood supply chains.

Continued cross-industry engagement on GAIA Principles for gender-based violence and harassment.



Collaborated with Matrix to strengthen labour-provider oversight.

5 TRAINING & CAPACITY BUILDING

stronger together

380 individuals

from 207 Asda-linked businesses attended Stronger Together 'Tackling Modern Slavery' workshops.

Seasonal Worker Taskforce training reached

60+ growers and **425+ delegates** through roadshows.



Delivered targeted training for Commercial, Sourcing and Technical teams on human rights, conflict-affected contexts, and responsible entry/exit.

96.61%

of designated colleagues **completed Modern Slavery training** in 2025.

Ran colleague training on modern slavery through Workday modules, and delivered supplier sessions for new policy rollouts.



OUR BUSINESS & SUPPLY CHAIN

Asda is the third largest retailer operating in the UK and serving 16 million customers a week, in stores, express formats and online. Our primary operation focuses on groceries, but we have a thriving George clothing and general merchandise business alongside this.

We are enabled by more than 127,000 talented and hard-working colleagues across our stores, distribution centres, fulfilment centres, pack houses and home offices.

Asda has several key subsidiaries which are integral to its success such as International Procurement Logistics Ltd., Forza Foods Ltd., and Kober Ltd. 2024. These organisations focus on providing and packing products for customers as well as world-class sourcing and technical expertise in fresh produce and proteins.

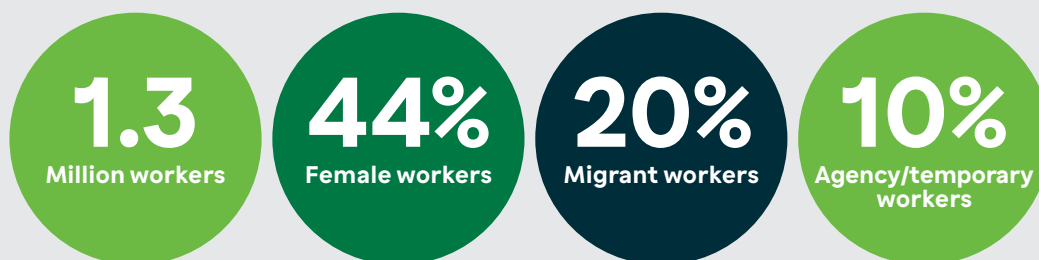


As a business we source diverse products to meet customers' daily needs, providing them with value, an unmatched mix of products, that is sold with personality they expect from Asda.

We work with suppliers and agents to bring in exciting and quality products that deliver value for our customers. We do this on a direct and in-direct basis across varied supply chains which stretch back to farms, small holdings, vessel and mines many time zones from our Head Office. These expansive supply chains cover a wide variety of products, commodities, manufactures, farms and small holdings and contain complex processes that produce many of the products we use on a daily basis. Whilst these sourcing practices enable us to delight customers, it also presents risks and challenges to our business that we must be mindful of when considering our potential impact on rights holders.

Our network of 1348 Goods For Resale (GFR) suppliers operating across 2872 sites presents us with leverage and relevance in some of the largest sourcing markets in the world. We are directly sourcing from 68 countries, commissioning audits, working with suppliers to self-certify information and providing detailed support to those who need it though insights generated via our dashboards and analysis of trends.

Based on self-certified supplier information this includes



Our whole supply chain can be reviewed, including worker numbers, contract types and gender breakdown within our embedded Open Supply Hub map – [here](#).

Asda also has a significant GNFR supply chain consisting of labour providers, printing and packaging, operational consumables from trollies to till roll, warehousing and logistics, services providers, concessions, franchises, tenants, all of which underpins the operation and function of our business. This expansive network of varied suppliers has been a real focus for our work in 2025. Mapping and understanding their function, engagement with the business and how best we assess, and address risk consistently has been a priority for us. In certain areas, we have been able to apply our GFR approach successfully due to similarities in operation and physical infrastructure e.g. uniforms and printing, but in areas such as concessions and service providers with a distributed workforce this has not always been as simple.

Asda is committed to working across both GFR, GNFR and our own business to assess risks in accordance with the Modern Slavery Act 2015. In response to this, we are continually reviewing and amending the ways we assess risks and the suppliers who are considered in-scope. This has been a key part of our Transparency and Supply Chain Monitoring Policy, which was updated in May 2025.

POLICIES & GOVERNANCE

Policies set the expectations of how our colleagues operate, the conduct of our suppliers and drive meaningful change across our operations and global supply chains.

Our Human Rights Policy is central to this, it is an endorsement of the United Nations Guiding Principles on Business and Human Rights and represents a commitment to it in terms of the operation of our business setting out. Our focus areas, our commitments and expectations, the governance that underpins this work and how whistle blowing should work in relation to Human Rights concerns.

Our Modern Slavery Policy sits within a broader Human Rights framework, designed to protect workers' rights, promote responsible recruitment, and prevent exploitation. Across our business, we have specific policies that either directly address modern slavery risks or incorporate human rights protections as part of our wider ethical commitments:

- Human rights policy
- Standards for Suppliers (new version due 2026)
- Transparency and Supply Chain Monitoring Policy (revised for 2025)
- Agency worker policy
- Domestic abuse policy
- Grievance policy

- Recruitment policy
- Right to work policy
- Modern slavery policy (colleague and supplier)
- Forced labour policy
- Safeguarding policy
- Whistle blowing policy
- Cotton Policy

By linking policy, training, and action, we aim to create a culture where ethical business practices are embedded at every level, ensuring that workers' rights are protected, risks are mitigated, and our supply chains operate with integrity.

We realise that Policies must be effectively implemented to make a difference to our business, how it operates, and limit the impacts on rights holders. As a result, in 2025, we took time to better understand the resources colleagues require to understand complex human rights risks and impacts associated with the operation of our business.

In response to this we generated and cascaded new guidance to support colleagues in delivering their business objectives whilst operating in complex human rights contexts. The purpose of this is to ensure suppliers and rights holders are central to any decisions, that colleagues are actively communicating with the suppliers and the Responsible Sourcing and Human Rights team and are utilising our leverage to ensure suitable outcomes.

In 2025, we established and cascaded detailed guidance on



Under our Responsible Sourcing programme, we have enhanced requirements based on risks and working practices within certain markets. For example, where we see excessive overtime being used and it is noted within audit findings, we have provided detailed guidance around thresholds we will accept, the process for managing this to suitable levels and the requirement for ongoing management and oversight. Once these thresholds have been met and the supplier has a suitable and monitored plan in place, we will enable onboarding. Based on this approach and continued focus, working with one of our strategic General Merchandise suppliers we have seen a reduction in excessive overtime findings of more than 30% across the sites they manage on our behalf (229 sites).

Via this guidance we aim to have informed, empowered colleagues who support suppliers and understand the potential impacts that can result from business decisions whether caused, contributed to or directly linked to our business and its operation.

Our Responsible Sourcing and Human Rights Team lead Asda's work across our global supply chains and focus on key topics such as gender, vulnerable workers, worker representation, modern slavery and decent work. The team sits within Asda's Legal and Compliance function headed up by our Legal Counsel and Company Secretary.

Our Responsible Sourcing and Human Rights programmes seek to address labour standards, increase compliance and protect rights holders and communities around the operation of our business globally. We do this through collaboration and capacity building with suppliers, engagement with Multi-Stakeholder Initiatives (MSIs) and partnering with Non-Governmental Organisations (NGOs) to increase the leverage and impact we can have. The scale of our business provides us with a unique opportunity to improve working conditions globally.

Key governance groups

- Executive board
- Compliance, Ethics, Risk and Audit Committee (CERA)
- Environmental, Social and Governance (ESG) Steering Committee

Asda’s governance processes ensure that the subject matter of Human Rights and Modern Slavery is reviewed, assessed, steered and supports our ongoing work in these areas.

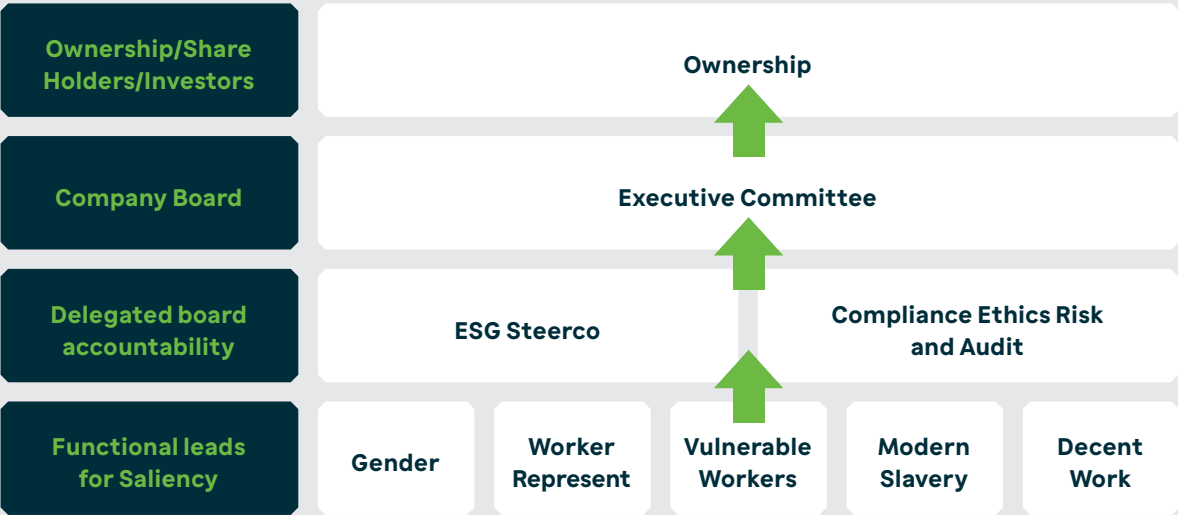
We are committed to ensuring that our policies and governance structures are aligned with internationally recognised frameworks and best practices, such as the UNGPs and Organisation for Economic Co-operation and Development (OECD) Guidelines for Responsible Business Conduct.

We recognise the State’s duty to protect Human Rights and comply with national laws applicable to

our business. Through our policies and due diligence processes, we strive to respect the Human Rights of all rightsholders connected to our operations and supply chains, including the communities around them and are committed to emphasising sustainable development and risk-based due diligence, as well as providing access to an effective remedy and remedies of Human Rights violations as required.

Asda has undergone significant Leadership changes and has taken time in 2025, to assess how to implement corporate governance that is reflective of the business’ operations and ownership. This has meant that, with new colleagues joining crucial roles, we have taken time to re-assess each committee, it’s function and the terms of reference associated with this. Previously the agreement to establish a Human Rights Steering Committee was approved and will again be assessed in-line with the refresh to ensure it is not duplicating other forums and that reporting is gaining the correct oversight and engagement in-line with corporate governance and reporting under ESG.

Asda’s Governance Processes



Our objective for 2026 is to support the business and its governance review to ensure that Human Rights and Modern Slavery is considered within the committees involved with suitable reporting, risk engagement and discussion on these topics to empower colleagues and utilise risk registers suitably, in-line with recommendations under UNGP 23.

Asda currently considers Human Rights as a business fundamental, and we will continue to ensure this work is central to our operations, business decisions and rights holder discussions.

TRANSPARENCY & SUPPLY CHAIN MONITORING

Transparency, consistency and the accountability it brings are central to how we assess risks, prioritise our work and understand the context of our supply chains globally.

By ensuring open, accessible and verifiable supply chain information, we promote and drive accountability globally and it is through this accountability and the visibility it brings that we hope to champion solutions at the local level that are in context. We believe this is where remediation and remedy are most likely to be suitable and meet the needs of those rights holders impacted.

Transparency is the process by which we gain insights to the risks and working environments experienced by those who contribute to the success of our business. It looks at risks associated with topics such as working conditions, pay, benefits, recruitment practices, business ethics and health and safety. We do this via a blend of supplier-self certified information, audit findings and Collaborative Action Requirements (CARs) as well as best practices. Through this consistent reporting we are able to understand which suppliers may need support as well as who may be at risk of impacting rights holders via their operations.

In early 2025, we commenced a detailed consultation period to ensure our proposed Transparency and Supply Chain Monitoring Policy was suitable, understandable and provided suppliers with an opportunity to comment on and influence its content before it came into affect. Through this process we established channels and systems to ensure suppliers were aware of the document, understood the proposed changes, and had time to attend one of our drop-in sessions. The main changes to the policy were designed to improve our data and reflect incidents and learnings where there was an opportunity to provide further clarity. Ultimately, we were looking to simplify our approach, drive continuous improvement and address risks with impact.

Key document changes

- **Changes for Low-risk sites (GFR) – SAQ now valid for 12 months.**
- **All sites must have had an audit within the last five years, high risk sites – annually.**
- **Improved articulation that all audit findings must be closed in-line with the timeline specified by the auditor.**
- **All in-scope locations must be disclosed to Open Supply Hub and their profile ‘claimed’ by the location**
- **If an in-scope location chooses a non-SMETA audit, then the audit will need to be uploaded to Sedex, with the findings mapped to the platform.**
- **All audits must be undertaken on a semi-announced or unannounced basis.**
- **Announced audits will be considered non-compliant and may require a re-audit.**
- **An updated and more detailed escalation process where sites fail to comply with our Policy requirements.**
- **Guidance on where additional due diligence/checks may be undertaken by Asda, beyond minimum standards.**

We were pleased to see strong supplier engagement on these topics and made direct amendments to the Policy based on the feedback received. More than 150 suppliers attended our five drop-in sessions, held both online and in-country.

OPEN SUPPLY HUB

Asda has consistently championed transparency and engagement with our data to enhance our knowledge of risks within our global supply chains, and we are continuing this journey.

In 2025, we disclosed 3,000+ sites to Open Supply Hub from our GFR and GNFR supply chains. This includes all in-scope locations for Responsible Sourcing including lower tiers of our George supply chain.

To further enhance our work in 2025, we took the decision to become the first business to mandate, via our Transparency and Supply Chain Monitoring Policy, that all in-scope locations have to be present on Open Supply Hub, but also that their location must achieve 'claimed' status via engagement with the site, it's senior management or ownership.

Traditionally our engagement will be with a Supplier or Agent who works with the site on our behalf. We wanted to ensure that communications and discussions were forthcoming about our business and expectations, so this new requirement was a really good way of testing how our requirements cut through, the time it takes and how suppliers are supporting the sites they contract with to meet the requirements of our programme. The benefits of doing this are much more than just that, they also:

- Validate our information, the addresses we hold, the number of workers on site, and generate helpful information such as GPS co-ordinates through this process. In addition, via the claiming process we found sites which had moved or shut down through the direct site engagement.
- Provide an opportunity to represent their sites and provide key information such as phone numbers, contact details and what their site does in their own words. Further owning risks, their operations and providing additional context should NGOs or Human Rights Defenders wish to engage or review our supply chains.
- Under the present model, when retailers disclose information about where they operate, there is limited insight and engagement from the site level. Via this step we are empowering sites to stand side by side with us and lean into the risks and issues via their operations.

To date we have claimed >990 sites across our total new disclosure of 3,167 sites associated with GFR and GNFR.

It is an on-boarding requirement that all in-scope sites meet these new requirements and failure to do so may result in non-supply following consultation and engagement. We would like to thank all our suppliers, Open Supply Hub, the sites and the colleagues who have been involved in getting us to this impressive number. In 2026, we will focus refining the accuracy of our data, with our GFR supply chains as a priority and looking to increase the number of claimed sites to 50% of sites.

In-country engagement

Several in-person sessions were held within key sourcing markets like Sri Lanka, Bangladesh and India for suppliers on Open Supply Hub, the requirement of it and the process to be undertaken to ensure compliance. By working with suppliers to discuss the process, where information would sit and our aspirations for this work it encouraged their engagement and collaboration. We also highlighted the positive aspects of being able to promote their business, demonstrate their commitment and validate information which may already be present on the platform.

Unauthorised production

Unauthorised Production can occur when orders are placed in locations outside of the requirements of our Transparency and Supply Chain Monitoring Policy. It not only presents a risk to our brand, but also to rights holders who may be working in factories and farms which do not meet our requirements for suitable working conditions and oversight to these locations.

It can occur for several reasons but is often the result of a break down in communications, poor production planning or a misunderstanding of our requirements. In all instances, Asda investigates, ensures rights holders and protect and that corrective actions are put in place.

CASE STUDY

Unauthorised production

During onboarding, it was identified that the farm supplying one of our vendors had several non-conformances recorded in SEDEX, including a business-critical issue relating to inadequate living conditions connected to informal settlements and indigenous workers. Although the farm initially stated that they had no control or responsibility for these living arrangements, further evidence was later provided to Asda showing that the farmer had in fact supplied loans and tents to individuals living in the settlement.

This information had not been disclosed, placing the site outside the expectations of Asda's Supplier Standards, which require full transparency and proactive management of worker welfare risks.

We worked with the supplier, the farm and SEDEX, to outline how the non-conformance could be remediated and advised that the site must not be used for any Asda-branded production until the issue had been fully resolved and independently verified. Despite this, during the in-loading of finished goods at one of Asda's sites, it was discovered that branded products had been produced using material from the same unauthorised farm while the critical non-conformance was still open.

As this breached Asda's Transparency and Supply Chain Monitoring Policy, the supplier was issued a formal strike in line with the policy consequences, and the finished product was rejected. They were required to respond to the letter with the steps they were putting in place to correct the issues highlighted alongside a commitment to deliver against this.

This case highlights the importance of accurate disclosure, responsible sourcing, and strict adherence to Asda's standards to ensure integrity and traceability across the supply chain and the protection of rights holders.

Consequences

Asda has a robust consequences process which it works with to ensure corrective actions are completed, suppliers are accountable and that there is a suitable approach and record breaches of our programme and Human Rights requirements.

In 2025, we issued a total of six first strikes, which are valid for a two year period, these covered our produce, grocery and clothing businesses. In all instances we have continued to work with the suppliers to drive improvement in the processes, management and implementations of our Standards and Policies.

CASE STUDY

Strike

In 2025, an established George clothing supplier was identified as producing garments in undisclosed facilities. It was discovered when Asda colleagues undertook pre-production checks for a new on-boarding and found products already being produced within the location. We raised this immediately with the supplier who conducted a detailed investigation, and subsequently discovered orders had been moved within two approved sites, contrary to our processes, but also another site which was not disclosed for Asda production.

We met with the supplier and discussed the issue at length and worked to understand the situations which had led to the unauthorised production occurring. Via the issuing of a formal 'strike' we documented the issues we had identified, provided a suitable sanction and gave an opportunity for the supplier to continue to engage around the improvements they had identified. We now have an action plan to improve the management of orders, a commitment to complete this improvement plan and engaged collaborative discussions about the route to achieving this.

This case illustrates the balance Asda maintains between enforcing our Standards and supporting suppliers to improve. While transparency failures and undisclosed legal risks constitute breaches of the Supplier Standards and the Transparency and Supply Chain Monitoring Policy, we continue to work constructively with suppliers where there is genuine intent to remediate. Encouraging honesty, early reporting, and open engagement remains central to how we manage such incidents, and this example reinforces the importance of suppliers coming forward promptly when issues arise so that appropriate action, guidance, and oversight can be put in place.



Transparency In Supply Chains (TISC)

In 2025, we strengthened our approach to modern slavery due diligence by integrating TISC data and reporting into our internal compliance dashboard. We uploaded a list of 678 GFR suppliers and a group of five priority GNFR suppliers to TISC, enabling us to analyse which suppliers have a published modern slavery statement, which do not, and where disclosures are missing or out of date.

Our internal dashboard now tracks statement status, jurisdiction, and TISC compliance ratings, giving us a clearer picture of where targeted engagement is needed to improve standards. As a next step, we are developing automated work flows to contact suppliers directly where a statement is absent or overdue, and we have begun reviewing the quality and rating of statements to help drive continuous improvement across the

Using TISC as a structured data point marks the first phase of building a more proactive, evidence-based modern slavery compliance process.



TISC

RISK assessment & saliency

We have taken time to develop tools and technology that allows us to better assess the biggest risks for us to engage with.

In 2025, this meant we developed new dashboard capabilities which catalogue and organise our data to spot trends, improve reporting and enable our team to effectively flag and engage with priority issues. In addition, via automation, we have seen an increase in our communication driving compliance and improvements in the information we maintain and manage.

More than 3,000 automated reminder and escalation emails were issued to suppliers during 2025, substantially improving response times and driving the closure of outstanding actions. By embedding automation into supplier communication, non-conformances, and overdue action management, we saw notable improvements in the speed, accuracy, and consistency of our compliance processes. Highlighting the operational value of streamlined work flows and improved data transparency.

General Merchandise suppliers demonstrated strong progress during 2025. Compliance rose to 92% in December, supported by enhanced supplier engagement, faster closure of non-compliances/non-conformances, and the increased efficiency provided by automated processes. Collectively, the dashboard has strengthened our ability to identify, manage, and mitigate risks by embedding more consistent, efficient, and proactive compliance practices across our global supplier base.

Improving compliance through smarter processes.

Overall, the dashboard has delivered meaningful improvements across our programme, including:

- **Higher supplier engagement driven by automated communication.**
- **A substantial increase in overall compliance.**
- **Improved General Merchandise compliance, reaching 92% by year end, with agent managed sites achieving an even higher compliance rate of 97%.**
- **Significant time savings through automation replacing manual communication.**
- **Clearer visibility of outstanding non-compliances/non-conformances and real time compliance status.**
- **A more robust audit trail.**

We conduct regular risk assessments (using a combination of country-specific risk information from publicly available sources, self-declared supplier information, social audit trends and incidents that have occurred) to identify areas where Human Rights are most at risk. Our assessments prioritise high-risk regions and industries, ensuring a targeted approach to risk mitigation. We have prioritised our focus based on commodity, geography, impact, and complexity, and are committed to understanding these areas better, to address the risks for the benefit of the rightsholders and communities who make the products we sell.

We are committed to continuously improving our understanding of each of these Saliency risk areas. To do so we require the support of our suppliers, industry partnerships, NGOs, and Trade Unions to establish transparency of our extensive global supply chains, breakdown barriers and identify solutions to address risk. This is why supplier and stakeholder engagement will always remain a significant element of our Human Rights strategy.

Our Salient Themes

- 01

Modern Slavery
Owing to the nature of our business and its operations we predominantly associate this topic with Forced Labour and how it can impact colleagues, rights holders and supplier within our network.
- 02

Worker Representation
Focusing on workers ability to represent their views to management, suppliers and Asda. This might be via formal collective organisation/ bargaining, worker committees or grievance channels but ensures we focus on hearing from workers and engaging in dialogue around remediation, whilst removing barriers and empowering them to share their views.
- 03

Gender
It is well documented that women and girls face additional barriers not only in the workplace, but in accessing their rights and effectively representing their views. This theme ensures they are central to our approach and guiding how we assess their needs, the risks faced and the impacts they experience.
- 04

Vulnerable Workers
Global supply chains have many workers within them who could be considered vulnerable e.g. migrant workers, and offering them the protections, access to rights and fair and decent work is central to our expectations.
- 05

Decent Work
Our definition of decent work includes a spectrum of topics from wages, benefits, overtime and health and safety, to ensuring we consider rights holders in Just Transitions and the associated impacts of this process.



Landscape Assessment
– Proteins

In 2025, in partnership with Slave Free Alliance, we undertook a Landscape Assessment across our animal proteins supply chain to better understand associated risk at lower tiers of the supply chain.

The study involved standardised and bespoke questionnaires sent to lower tier suppliers requesting information on their operation, processes and management approach. From this information 80 sites, across 43 suppliers were selected for an in-depth interview in partnership with an external party to investigate the themes and risks we had identified. From the report, initial findings indicate risks associated with:

- Compliance with the Modern Slavery Act 2015.
- Policy ownership and cascading of Standards.
- Training gaps.
- Responsible recruitment concerns.
- Wages and right to work checks.
- Grievance mechanisms.
- Due diligence and consistency within the supply base.

A full supplier communication and capacity building programme has been designed for delivery in 2026 alongside specialist partners. This is designed to build capacity, address known risks and drive continuous improvement within the supply chain.

We will be publishing a summary of the Landscape Assessment in 2026, alongside disclosing the partners involved in the study to Open Supply Hub.



DUE DILIGENCE

Asda employs robust due diligence measures to identify and address Human Rights impacts, including Modern Slavery across its operations and supply chains. Our due diligence framework includes supplier audits, worker interviews, and collaboration with third-party organisations to assess and mitigate Human Rights impact across our supply chains.



Supplier Self-Assessments

All in-scope suppliers are required to complete detailed questionnaires via SEDEX, covering key areas such as recruitment practices, working conditions, and Human Rights risks.



Audits and Inspections

High-risk suppliers undergo regular third-party audits and on-site inspections to verify compliance with our policies.



Worker Interviews

Where appropriate, we conduct anonymous worker interviews to gain first hand insights into working conditions and identify potential risks of exploitation or coercion.

Our Modern Slavery due diligence includes:

Colleague Modern Slavery Checks

Quarterly monitoring by the Labour and Employment Compliance team flags duplicate or multiple occupancy records (e.g., bank accounts, phone numbers) for investigation for own colleagues and Labour Providers.

Annual reporting

Asda publishes an annual Modern Slavery and Human Rights Impact Statement. This is to comply with Modern Slavery legislation, but to meet expectations as set out under UNGP 15 – where ‘business enterprises need to know and show that they respect human rights’. Here we report on the activities or omissions which may impact rights holders associated with the operation of our business including the communities around our stores, wider estates and supply chains.

Incident management and access to grievance mechanisms

Asda has an Ethics Hotline which is available to colleagues, suppliers, rights holders including workers, within our global supply chains. We work closely with MSIs and industry to ensure that incidents, concerns or feedback are consistently shared and protected from retaliation. This includes collaborative channels such as the Serious Incident Escalation Protocol within the food industry.

Asda ethics

In 2025, Asda received 3,038 contacts to its Ethics hotline which was a 40% increase in volume from the previous year. The three highest categories were – behaviour/conduct concerns (821), unfair labour practices (759) and disciplinary/grievance (349). The hotline is published for, and can receive, concerns relating to the Asda business, our operations and supply chains.

Asda is committed to working with rights holders, through dialogue to understand the impacts they have experienced, what a restorative rights holder centric process looks like and, depending on the causality of impacts, working collaboratively to leverage remedy and drive corrective actions.

In 2025, the Responsible Sourcing and Human Rights team directly reviewed 113 incidents which came to us via multiple channels and through key stakeholder relationships.

Number of contacts vs. Asda's Salient Human Rights themes

- Decent Work: 62
- Modern Slavery: 27
- Vulnerable Workers: 21
- Worker Representation: 3

Over this reporting period we received no new allegations relating specifically to Gender issues. Whilst this is a theme within many of the incidents we have looked at, Asda continues to focus on grievance mechanisms and their sensitivity to this issue to ensure it is inclusive and engaging for all, removing any known barriers.

In 2026, we will work to assess how best we can review any barriers our existing grievance mechanism may face, and how to apply a gender lens to these – increasing visibility, engagement and empowerment with women and girls across our business and supply chains.

Within Asda we worked to improve alignment with Labour and Employment colleagues around our recruitment of Skilled Visa workers, such as Pharmacists. Whilst Asda does not currently directly recruit skilled workers from overseas, the alignment exercise means that we are compliant with our Standards and expectations and that we have communications channels in-place should we wish to undertake this route for engaging with colleagues. In addition, we have undertaken Visa checks and suitability of role assessments, based on the Visa, of temporary labour with one incident flagged in 2025, where there was an issue associated with the role allocation, albeit it in-line with the requirements of the Visa.

Pre-onboarding checks

Owing to risks we have noted in high-risk markets associated with forced labour and specifically State Imposed Forced Labour (SIFL), we have further focused on how we can assess these risks and undertake suitable due diligence on proposed supplier sites.

We have partnered with suppliers to support their understanding of how high-risk products and commodities as noted under our Saliency work, may be entering our business. In practical steps this has meant real-time checks on specific self-certification information to understand where additional data points may be present. For example, we will drill into information to learn more on the oversight of security of sites, where workers are recruited from, if prison labour is present in any form, if labour agents are used and the function, form and suitability of any grievance mechanisms. This approach enables us to better understand risks but also to ask more timely questions of suppliers and their sites in terms of areas where we may require additional engagement to protect rights holders.

We actively work with MSIs, competitors, stakeholders and suppliers to communicate best practices on this topic, and have taken time to communicate one-to-one with suppliers highlighting the impacts and importance of proactive, real-time engagement on this matter.

Proactive child worker reporting

As part of our proactive checks mentioned previously, we are assessing indicators for child or young workers being listed within supplier self-certifications. Whilst this may seem like a simple step it is possible for suppliers to accidentally disclose or make mistakes in these disclosures.

In 2025, seven sites disclosed that they had workers as young as 15 years of age within their operational sites. Asda engaged with the suppliers, supported the reporting and understanding of these issues and ensured that self-certification information was correct and accurate. It was confirmed in all instances that no workers under the age of 15 were present.

Enhanced Human Rights Due Diligence (EHRDD)

Starting in March 2025, we communicated to all suppliers providing tomato, paprika, seafood, cotton or solar products a detailed approach which we expected them to follow to identify, integrate, track, communicate and where required remediate SIFL. Where this is not possible the expectation is that these sites are extricated from the supply chain at any level owing to the impact on rights holders and the limited leverage and ability to remediate, impacted by State oversight.

Our EHRDD expectations are based on the following steps where we will permit sourcing to commence/continue if suppliers can demonstrate that they reviewed and evidenced the following at all known tiers:

- **Understand their supply chains**

By mapping the growing, production, sourcing and processing operations directly or in-directly.

- **Undertake due diligence**

On products, suppliers, and facilities involved in the cultivation, production, and processing of high-risk materials or ingredients. Examine suppliers' ownership structures and facilities to identify sanctioned individuals or any direct and indirect connections to known geographical risks and exercise vigilance and assess risks related to forced labour.

- **Ensure compliance**

Maintain a robust system to monitor adherence to our Standards for Suppliers and applicable laws prohibiting forced or involuntary labour across all known relationships.

- **Non-compliance**

Where issues or human rights impacts are identified during this process remediation should be prioritised in-line with our Standards for Suppliers. Where this cannot be achieved or there are extenuating circumstances extrication should be undertaken, but only as a last resort.

- **Communicate and cascade**

Ensure these expectations are understood and upheld throughout your entire supply chain and report to Asda as required.



CASE
STUDY



These enhanced human rights due diligence expectations were cascaded to all suppliers of products, components and ingredients which fall within scope of the EHRDD requirements.

This represents
234 Asda suppliers

Strategic suppliers

Following a significant investigation by a media outlet in late 2024, Asda worked closely with our supplier to understand their supplier's wider engagement with entities buying products from high-risk areas which may have considerable risk of forced labour. Although Asda is confident that no Asda products contained any relevant material, we continued to work with the supplier on their approach to Human Rights Due Diligence and how they actively manage risks associated with these supply chains.

Via multiple one to one sessions, the Responsible Sourcing and Human Rights team engaged with their counterparts to highlight how we expect due diligence to be undertaken and evidenced across our supply chains when sourcing high-risk products. In addition, we encouraged and informed the supplier as to our expectation that they built and reported on their own Saliency approach, growing their knowledge of these risks and how they should mitigate them. We are pleased to report considerable progress across our key focus areas within our supplier who is now working with Human Rights specialists to risk map, capacity build, demonstrate compliance and enhance Standards within their supply chains.

To achieve this our supplier collated initial data on the supply chain structure and stakeholders; farmer lists and requested suppliers to complete a HRDD questionnaire to get an overview on the activities currently in the supply chains. The supplier also visited all the suppliers and many of their farms to verify data.

In 2026 the supplier will conduct a gap analysis of the data, from this they will develop a focused data collection approach, with verification on the gaps and on systemic country-based issues.

This will be a prioritisation approach depending on the risk rating of each supplier from the data collected in 2025.



Further to the above communications we have applied our learnings and insights to specifications and ingredient suppliers in 2025. Taking known entities, insights from incidents and our own EHRDD requirements and systematically working through our data to ensure suppliers who are using sites are flagged, we actively communicate our expectations and actions are taken to remove them from our supply chain as required.

When new suppliers and sites are on-boarded we proactively identify if high-risk commodities are involved and work with the suppliers to identify the location of components and ingredients before re-iterating, and evidencing the EHRDD requirements as part of the on-boarding process. It is for the supplier to demonstrate they have been met and the threshold is evidenced. Away from the world of GFR we have also worked with our property colleagues to ensure that when large tenders of high-risk commodities are enacted there is considerations to the steps above.

To further build our work in this space and support suppliers in discussions about this complex topic, we have hosted one-to-one meetings with several strategic suppliers in our food and General Merchandise businesses to ensure insights are shared, they are focused on this topic and that they understand we are present to support them in their discussions.

Due diligence in collaboration with strategic partners

When working to address complex and often systemic problems such as Human Rights violations, we realise that collective effort is key. Through effective partnerships we work with other brands, MSIs, NGOs and Human Rights Defenders (HRD) to best address risks and impacts. The collaboration this brings allows us to drive change and continuous improvement whilst sharing best practice and amplifying our impact across our own business and global supply chains.

For example, as part of our on-going enhancements of our Standards for Suppliers, we have this year included specific wording around the protections we expect CSOs and HRDs to be afforded. Their work to raise the views, and concerns for rights holders in and around our business is not always straightforward and can result in real concerns and challenges and Asda wanted to make clear our expectations on this topic.

“

“Respect the role of Civil Society Organisations and Human Rights Defenders in engaging with rights holders and highlighting issues across supply chains. Engage considerably and do not obstruct their operation.”

Asda's Standards for Suppliers.

”

At Asda, collaboration with strategic partners is integral to addressing risks within our supply chains, particularly in the high-risk areas of GNFR. One such valued partner is Matrix, a neutral vendor that manages our engagement with labour providers and ensures consistent application of robust recruitment and employment standards across our operations. Building on a strong 2024, 2025 delivered further engagement and improvement across labour supply chains.



- **Temporary Workforce Oversight**

Number of Temporary Workers Supplied: **3,896**

Labour Providers Engaged: **59**

- **Audits and Compliance Checks**

Full Audits Completed: **75 (59 in-person, 16 remote)**, with 66 clear passes, 7 remedial passes, and 2 fails.

Separate Pay Audits Conducted: **47** – Workers Audited: **553**

- **Pre-Employment Checks**

Matrix completed **4,535 pre-employment checks in 2025**, ensuring rigorous verification before workers were onboarded.

- **Modern Slavery Checks**

Matrix administered **1,046 responses** to timesheet questionnaires and 205 responses to email questionnaires, investigating potential risks of Modern Slavery.





“Our partnership with Asda continues to play a vital role in setting, maintaining, and strengthening the highest standards of compliance, ethical conduct, and legal integrity across their labour supply chain. Together, we remain committed to robust prevention of illegal working, the identification of potential modern slavery risks and the promotion of fair and transparent recruitment practices.

Over the past year, Matrix has continued to enhance our compliance and auditing frameworks to ensure they remain aligned with evolving regulations and industry best practice. This has included the ongoing implementation of regular and thorough identity verification checks within warehouse environments, supporting the early detection of imposter workers and safeguarding vulnerable individuals.

We have also expanded our guidance to suppliers, providing clear, up-to-date expectations that reflect recognised industry standards for responsible recruitment and worker welfare. In addition, we have increased the scope and depth of our audit activity, placing greater emphasis on suppliers' internal training, oversight, and governance processes to ensure rigorous and consistent standards throughout the supply chain.

Our proactive and collaborative approach enables us to identify risks promptly and implement corrective measures that protect Asda, its workers, and suppliers. We are proud to continue supporting Asda in their commitment to combating modern slavery and championing ethical labour practices. This partnership demonstrates what can be achieved when organisations work together with a shared dedication to integrity, accountability, and social responsibility”.



Melissa Trehy, Matrix's Head of Compliance



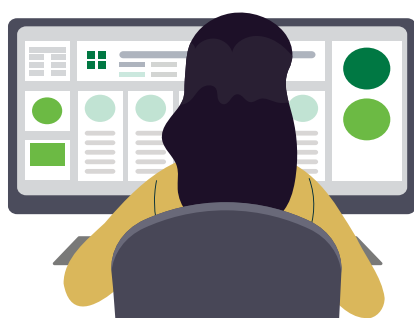
Café partners

Our cafes are a great example of how our stores are hubs for the communities we serve. We offer many great deals from free Ella's baby food pouches to 10% off for over 60s and our £1 'winter warmer' deals. In 2025, we invested in converting 20 coffee shops to cafes meaning we have 208 in total.

In 2025, we continued to invest in this area, completing several refurbishments for the 208 cafes across our estate. In-line with this, our Responsible Sourcing and Human Rights team worked closely with our suppliers to understand more about areas of focus, their priorities in both Responsible Sourcing and Human Rights where we can build collective capacity across shared risks.

This process not only enables us to capacity build within the GNFR space but highlights expectations around how suppliers undertake key Responsible Sourcing activities and consistently manage risks in-line with our expectations. For example, where we are mandating EHRDD in our GFR business, we are ensuring our café supplier applies the same sourcing approach for comparable products and services, with a consistent lens on compliance and reporting. We continue to collaborate with strategic partners enhancing their understanding of compliance programmes, how they can operate to better protect rights holders and generate insights and suitable reporting.





“Compass Group UK & Ireland has engaged closely with Asda’s Responsible Sourcing and Human Rights team in relation to products supplied to Asda cafés. This collaboration has included review of our ethical due diligence framework, including risk assessment, supplier engagement and the use of SEDEX data for relevant suppliers. The engagement supports continued strengthening of how we identify, assess and respond to potential modern slavery and human rights risks within the supply chain.”

Simon Chattock, Head of Vendor Assurance Compass Group UK & Ireland

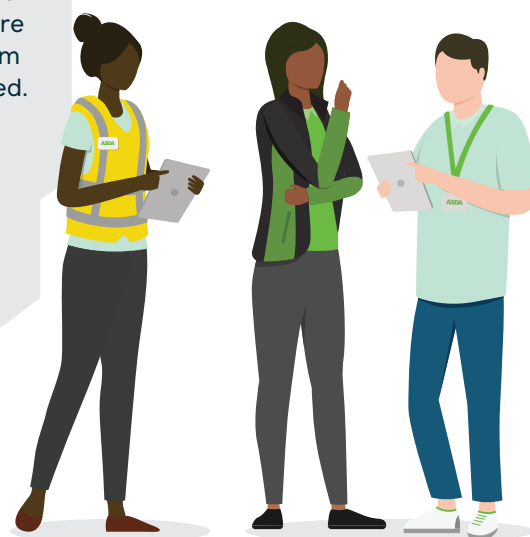
CASE STUDY

Supplier extrication

Via Technical Manager engagement we identified certain products within our core grocery and food to go business unit areas were produced contrary to our Standards and Enhanced Human Rights Due Diligence requirements. By utilising tomato paste from a region of significantly heightened risk through an Agent, our supplier had failed to understand our expectations and undertake the checks we require when sourcing, in-line with Saliency.

Our communications and expectations were clear, we worked with the supplier to highlight the need for compliance with our expectations and highlight the risks involved in sourcing in this way, from a human rights perspective. In addition to this, we communicated a ‘strike’ under our Responsible Sourcing programme to document the issue, highlight the need for improvement and to stop the supplier from sourcing any more product associated with this high-risk region without prior consent from Asda, including documenting that all EHRDD checks had been completed.

The total product production was destroyed, and the sourcing route removed from our specifications and alternative supply found. We continue to support the supplier in their EHRDD and engage with them on our expectations and requirements.



CASE
STUDY

EHRDD with suppliers

Following a Technical review of raw materials, we engaged with our supplier around EHRDD checks for forced labour within high-risk markets.

It was confirmed that the specifications were instead coming from two suppliers, and in-line with our Salient risks, themes and priority geography we looked to request the supplier evidence the steps they had taken to meet this sourcing requirement. The supplier was able to provide the following information relating to ingredients:

- Ownership structures – covering owners, sanctioned individuals, sister sites and group ownership.
- Facilities location (GPS), raw materials and workforce transparency including the regions workforce originated from.
- Policies and assessments of forced labour across this supply chain.

Through this due diligence, the guidance we provide on the steps to take and the administration of our EHRDD we were able to be confident that our supplier had undertaken the required checks and evidenced them effectively to us, back to raw materials.

Colleague checks – new businesses acquisitions

As part of our purchase of Petrol Filling Stations (PFSs) we completed 7,229 Right to Work checks on colleagues TUPEing to Asda, moving them under our colleague terms. This included 3,230 colleagues operating within associated concession's businesses. Right to Work checks were undertaken on all individuals by our Shared Services colleagues and Labour and Employment teams across all nationalities. Human Resources welcome sessions were held to talk through Asda's terms where all new colleagues would hear about the importance of these checks and how they should raise a concern should they have one or be aware of a conflict.

When checks were run, nine colleagues were identified where there was duplicative addresses, next of kin and bank account information. Via engagement with Labour and Employment, Human Resources and Operational Leadership colleagues and specialist support from Slave Free Alliance we delivered in-person one-to-one checks on each colleague to understand their situation, the suitability of it and that there were no further flags or engagement required.

Asda continues to run quarterly checks on all colleagues associated with the checks listed above.

Monitoring and evaluation

We continue to assess our due diligence efforts, to critically understand their effectiveness and identifying the root causes of human rights issues and delivering outcomes for those impacted.

In 2025, we have further evolved our approach with new checks across existing datasets to help build proactive insights in to our supply chains, but also set in place objectives that will enable us to better understand how the key tools we use, such as grievance mechanisms, may be enhanced to remove barriers which could restrict rights holders in raising issues.



REMEDiation & SUPPORTING RIGHTS HOLDERS

At Asda, we recognise that effective remediation is essential to restoring dignity and upholding the rights of individuals impacted by Modern Slavery and Human Rights violations. Our approach is not just about addressing immediate harm but about empowering individuals to rebuild their lives with agency and autonomy.

CASE STUDY

Central to our strategy is meaningful dialogue with affected individuals and key partners to ensure that remediation efforts are informed, sustainable, and tailored to the needs of survivors. By collaborating with expert organisations and implementing worker-centred solutions, we prioritise access to remedy, long-term support, and pathways to sustainable futures. Through partnerships, innovative programmes, and ongoing engagement, we remain committed to ensuring that survivors' voices are heard, their choices respected, and their futures safeguarded.

Modern Slavery has always been an area where we have supported and engaged with third sector charities to ensure we are learning about the needs of survivors, raising awareness and supporting the impactful, rights holder centred work they deliver.

In 2026, we want to continue to assess how we can drive impact and raise awareness via charity partners who work directly with those impacted by the operation of our business. A key area previously for Asda has been working with Modern Slavery charity partners to support their networks of safe houses, and improve the opportunities for those looking to move to independent living via our Ingredients for Life programme. In 2026, we are looking to continue this work, by developing a clear charity strategy to focus our work on the impact rights holders may experience via our businesses operation.

Modern Slavery

We received an allegation involving a crew member on a fishing vessel within our supply chain. The worker had been on the vessel for a short period before needing to return home urgently due to a family emergency. Despite this, they were not paid the wages owed for the time worked and were required to cover the cost of their own flight home.

A cross functional working group was convened including Asda, and a third-party specialist was appointed to undertake an independent investigation. Through contact with the worker, it was confirmed that they had attempted to retrieve the wages from the sub agent but were told they would only receive the payment if they attended in person. This raised fears that the worker might be subjected to a possible threat, making it unsafe for them to try to recover the money themselves.

This situation left the individual in a vulnerable position, returning home without wages, without employment, and without a safe means to claim what they were owed. Recognising the financial and safety risks, the working group prioritised remediation. As part of a repayment package coordinated with supply chain partners, Asda contributed towards covering the worker's unpaid wages and reimbursing the cost of their urgent return flight. This ensured the worker did not need to engage with the sub agent, reducing the risk of harm and providing financial stability at a critical time.

Within our Standards for Suppliers, we specify that suppliers should define the route to remedy, including if Asda has a more direct role to play. Through this supplier led process we collaborate to assist and upskill as required and ensure that rights holders are central and engaged in the discussions and dialogue about their future and the restorative process. Through this approach we believe that solutions in context are more likely to be forthcoming, with local knowledge and ownerships ensuring a reduced chance of reoccurrence and the most suitable outcomes for all parties involved.

CASE STUDY

Modern Slavery

A historic incident occurred within our supply chains where workers were placed within a supplier whilst experiencing unlawful wage deductions, terrible living conditions and their movements and basic freedoms were restricted. It took several years for this complex case to be investigated, and charges brought against the perpetrators with long prison sentences allocated to the exploiters.

Owing to the timeline involved and the complexity of the investigation it took time for a suitable opportunity to be identified to engage with the impacted rights holders via a trusted and familiar route, to engage in dialogue around the exploitation and what a restorative process might look like.

To do this we engaged with stakeholders close to the criminal justice process to enable discussions with those impacted. Through this considered and expert engagement and support and with framing from Asda around key questions and discussion points, we were able to gain insights into the impacts experienced by those in exploitation.

From this work, we were able build business case for remediation with several recommendations based on causality frameworks which are used around Human Rights impacts such as these. It assesses if a business has caused, contributed to or is linked to rights holder impacts and dictates how they should respond in these instances. We reviewed the role and steps taken by our supplier, who is no longer in operation, and Asda to work to assess these frameworks and their application to our role and operations. However, in this instance, we believe that we remain linked to the exploitation rather than being a causer or contributor. We have however taken additional steps to improve our checks, audits and engagement with these sites to better assess risks under our Responsible Sourcing programme as part of our new Asda Responsible Sourcing programme launched in 2022.



In 2026 we will support partners to bring this work to an MSI forum to assess the suitability of other businesses accessing more information on survivors of modern slavery via this route. Asda would like to thank the partners we have worked with on this case and specifically those who provided information, context and considered detail regarding their exploitation and the restorative process they are living with every day – this is truly appreciated.

Conditions of Modern Slavery rob rights holders of basic dignities, and the abhorrent nature of exploitation has no place within our business or supply chain.

CASE STUDY

GNFR Concessions

Following a whistle blower incident we became aware of allegations of exploitation within a franchise operator in one of our Stores. Asda responded with an immediate safeguarding approach and supported the impacted parties to relocate and find new roles within another region. We worked with service providers to support their transition to new roles and continue to engage with them when support is required.

With the Franchise owner we have held multiple sessions to engage around responsible recruitment, the expectations of a business operating within Asda's estate and covered topics like grievance mechanisms, the Employer Pays Principle and assisted and directly funded a third-party gap analysis of their processes including recommendations for areas of improvement. The franchise owner has been actively engaged throughout, investing time and effort to action and respond to areas of opportunity, for which Asda is very thankful.

In 2026 we will continue to engage and assist in the capacity building process, making ourselves and the third party available to the owner and look forward to the conclusion of any criminal investigations of the franchisee to enable us to review the remediation process further.

We are planning to deliver collaborative unannounced visits to assess the implementation of the gap analysis findings and engage with franchise operations and workers around the recruitment process and their awareness of key tools such as grievance mechanisms. In addition, we will look to scale the learnings to other concession operators to ensure the learnings and best practice is shared.

CASE STUDY

Leverage

In 2023, allegations of human rights violations were identified at one of our supplier's locations. In response, we took the decision to suspend supply from the impacted location while the supplier carried out a comprehensive investigation and developed a remediation plan to address the issues raised. Following the investigation, we chose to continue the suspension of orders to allow corrective actions to be fully implemented and embedded before any consideration is given to resuming supply. Orders from this location remain on hold.

We believe that maintaining leverage and supporting meaningful remediation through continued engagement, regular updates, and robust challenge on the effectiveness of proposed actions is the most effective way to drive lasting change for the supplier, its workforce past, present and future, and the wider community. Although this has been a prolonged and complex process, our approach remains consistent with our responsibilities under the UNGPs on Business and Human Rights and with the commitments set out in our Standards for Suppliers. We are focused on using our influence to prevent and mitigate adverse human rights impacts and to seek sustainable, long-term outcomes.



The Employer Pays Feasibility Study

Asda was one of several funding members in 2025, who, alongside DEFRA, commissioned a report into the feasibility of the Employer Pays Principle (EPP) in UK Horticulture. The report sought to establish the feasibility of the Employer Pays principle in UK horticulture and presented several financial models, with various parties funding or de-risking the recruitment journey of migrant workers. The full study is available [here](#).

Subsequently, Asda worked alongside other organisations around the implementation and feasibility of this approach across two in-person sessions and worked to assess and understand all stakeholders views on the suitability of this approach for the growers, suppliers, retailers and workers.

In 2026, we look forward to working with these stakeholder groups to continue to assess where movement towards the EPP model is suitable in UK Horticulture via continued engagement and discussion.



CASE
STUDY

Collaboration with the Centre for Child Rights and Business

Our Responsible Sourcing dashboard flagged a supplier site with several non-compliances, prompting further investigation and collaboration with our supplier. The site was within our Tier 2 and provided seafood to our direct suppliers.

The audit had identified a 15 year old worker who had worked above the legal number of hours, according to local labour standards, across six consecutive days. Following discussions with the supplier, it was confirmed that the work took place during school holidays, involved only non-hazardous tasks such as sweeping floors, and that the child's parent was employed at the site. By the time the audit was published, the child had already returned to school and was no longer working.

Given the potential risk associated with any case involving children and young workers, we sought specialist external guidance from The Centre for Child Rights and Business (CRIB), sharing the incident details and actions taken to date. CRIB confirmed that the site's initial steps appropriately safeguarded the child's well-being and then provided recommendations to strengthen the site's systems. These included implementing a formal Young Worker Policy, enhancing age verification processes, improving awareness of legal working age requirements, and adopting responsible recruitment training. In line with CRIB's guidance, the site implemented the new policy, reinforced documentation and supervisory controls, and embedded a child rights based approach, and supported the site in moving from reactive compliance to proactive risk management and helping to prevent recurrence.

CASE STUDY

India and child labour in cotton

Asda has continued to support the Fair Labour Association's work looking in to child labour concerns in Madyha Pradesh, which was summarised within the **Harvesting the Future Report** in to Cotton.

Through this report we hope to learn more on the conditions risks and impact of child labour within cotton supply chains. Whilst we do not directly source the cotton in question, we have worked with the stakeholder group, including 26 other brands, to ensure the learnings are understood and that we are well placed to assess the issues in the farms and fields of a key sourcing region.

Responsible Recruitment for Migrant Workers Guidance

During 2025, we have worked with specialist consultants to build tools and resources to support suppliers in the delivery of commitments to the Employer Pays Principle, in-line with the Institute for Human Rights and Business definition.

This work helps to ensure that suppliers have the tools and guidance required to make headway into this topic, respond to Collaborative Action Requirement (CAR) findings at audits and are informed of the practical steps they can take.

Our guidance and the steps required are built into our Standards for Suppliers, and require supplier to:

- Maintain an explicit, clear and transparent, recruitment policy that commits to no charging of recruitment fees and related costs to workers in-line with the ILO definition, irrespective of where or how they are recruited. A risk-based approach should be applied that prioritises workers who may be more vulnerable e.g. migrant workers travelling over international borders for work.
- Map the processes and costs associated with worker recruitment, including identifying where recruitment fees and related costs may be occurring, high risk channels and the development of an action plan to address these fees.
- Adopt a responsible recruitment model in which the full cost of recruitment (as per the ILO definition) is borne by the employer.
- Engage with Asda when fees are identified on timeframes and actions plans to ensure supply chains are resilient and collaborative in achieving this standard.



TRAINING

Trained, empowered and informed colleagues, rights holders and stakeholders are key to establish effective tools to combat Modern Slavery and Human Rights issues globally.

Via effective training we hope to raise awareness, insist upon workers rights and improve working conditions globally. Through the cascading of our Standards and the requirements they bring we want to ensure that all workers have access to the right information and training to ensure they know their rights, how to advocate for them and when they are not forthcoming, understand how to effectively raise grievances.



**CASE
STUDY**

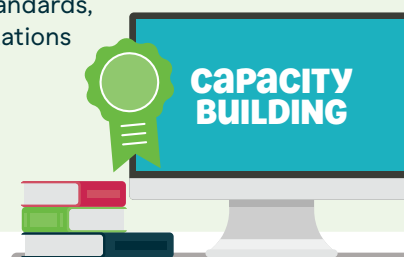
Responsible Recruitment for Migrant Workers guidance – capacity building

In late 2024, reports emerged in the media that one of our newly onboarded suppliers were involved in ongoing court proceedings relating to allegations raised by workers, including the payment of recruitment fees and disputes over working hours and pay. These issues had not been disclosed to us during the onboarding process just months earlier, despite Asda's Standards requiring suppliers to proactively report any ongoing, recent, or historic labour-related legal challenges. This omission placed the supplier in breach of Asda's Transparency and Supply Chain Monitoring Policy, which sets clear expectations for suppliers to disclose all known risks, investigations, and litigation that may affect worker welfare or compliance within their operations.

Once the case became public, we engaged closely with the supplier to understand the nature of the allegations and the legal process underway. In line with our Standards, we did not conduct our own investigation while the case was active in court, but we focused instead on working collaboratively with the supplier to strengthen their internal practices and reduce the risk of recurrence. Throughout this period, we emphasised the importance of full transparency and openness, especially when challenges arise, reiterating that early disclosure enables us to support suppliers more effectively and ensures that issues are managed responsibly.

Given the seriousness of the allegations, we prioritised working with the supplier on improving their recruitment practices, particularly in relation to the risk of recruitment fees being charged to migrant and seasonal workers. We provided detailed guidance on mapping recruitment journeys, written in alignment with the International Office of Migration's (IOM) International Recruitment Integrity System (IRIS) standards, the Employer Pays Principle, and other widely recognised responsible recruitment frameworks. Our aim was to help the supplier identify every step and actor involved in the recruitment process– formal or informal – and to highlight where the risk of fees, debt bondage, or misinformation was most likely to occur.

As a result of this support, the supplier completed a comprehensive recruitment mapping exercise and produced a detailed action plan setting out how they intended to eliminate recruitment fees across their supply chain, with a particular focus on temporary and migrant labour populations. This work demonstrated their willingness to improve and their commitment to aligning with Asda's Standards, even though the initial lack of disclosure had placed them outside our expectations for transparency.



In 2025 we supported the development and delivery of several key tools and training modules.

Use of Just Good Work App– In 2025

There were over 45,000 total users, and 19,000 new jobseekers and workers accessed information in their own language.

Just Good Work
app



Seasonal Workers Taskforce

The Advisory, Conciliation and Arbitration Service (ACAS) was engaged to deliver a series of nine contextualised online grower grievance prevention and management training workshops which reached over 60 grower participants between April and August 2025. The workshops resulted in suggestions of future training and resources that would help inform grower grievance processes.

In the UK horticulture sector, roadshows contacted over 425 delegates including growers, Scheme Operators, retailers, and other businesses in the industry. 92% found the toolkit and training useful and relevant. 91% acted on the content to improve practices and implement practical actions to reduce risks and improve worker experience. At least 300 unique growers have been reached through Taskforce roadshows since 2023.



380 INDIVIDUALS

attended

Tackling Modern Slavery in Business
– UK (TMSIB) in 2025,
from over

186

unique businesses

2025
STATS

430 INDIVIDUALS

who have declared they supply to Asda
attended a core Stronger Together
‘Tackling Modern Slavery’ workshop in 2025,
from 207 unique businesses

This covers:

TMSIUK

Tackling Labour Exploitation in UK Warehousing
(TLEIUKW)



Empowering suppliers through strategic partnerships

At Asda, we believe that collaboration is key to building a future where every worker is treated with dignity, fairness, and respect. We are proud to sponsor and actively support two of the most impactful initiatives in the fight against modern slavery and labour exploitation – Stronger Together and the Responsible Recruitment Toolkit.

Real impact happens
when businesses
come together
to lead with integrity.

Our sponsorship reflects a deep and sustained commitment to creating safer, more transparent supply chains and empowering our suppliers with the tools, training, and guidance they need to embed ethical practices at every stage of the recruitment journey.

These programmes are more than partnerships – they represent a shared mission to eliminate forced labour, promote responsible recruitment, and foster cultures of continuous improvement across global supply chains. By championing these efforts, we help to equip businesses with the skills to identify risks, respond effectively, and engage with workers in a way that is inclusive, responsible, and just.

Stronger Together provides business-led, impact-driven solutions that help organisations prevent modern slavery through practical training and collaborative resources. The Responsible Recruitment Toolkit supports businesses in embedding ethical recruitment practices through structured assessments, guidance, and capacity-building.

Through these collaborations, we are investing in long-term, systemic change – because real impact happens when businesses come together, not just to comply with ethical standards, but to lead with integrity.

We are proud to stand alongside other committed organisations in advancing a global vision: a world where all work is fair, and no worker is exploited.



**stronger
together**

The Responsible Recruitment Toolkit Online Tool

As part of our commitment to responsible recruitment practices, Asda has continued to strengthen its approach by utilising the Responsible Recruitment Toolkit (RRT) Online Tool to assess and improve our own recruitment processes. In our latest review, we have assessed ourselves against all 142 applicable steps of the RRT framework, achieving 94% completion, with:

- **134 steps completed**
- **7 steps in progress**
- **1 step yet to be started**



These steps ensure that we have effective management systems and due diligence embedded, including those to assure:

- No forced labour.
- No child labour.
- No recruitment fees are paid by workers.
- Job information is accurate and transparent and employment status is appropriate.
- All workers are properly recruited and onboarded and legal eligibility to work is established.
- Wages and benefits are paid fairly and properly.
- Regular work is offered and working time is not excessive.
- Work conditions are safe and hygienic.
- Freedom of association is respected.
- Opportunity and treatment are fair equal and dignified.
- Termination rights are provided.
- Access to remedy is ensured and a worker-centred culture is promoted.
- Business conduct is ethical and professional.

In 2026, the existing RRT tool is evolving, expanding the due diligence guidance previously available to cover responsible recruitment and fair work, free from exploitation. The updated framework, which will be known as the Stronger Together 360 Online tool, can be applied across operations, the recruitment chain, and supply chains. In 2026, we will review the updated platform and work with internal stakeholders to complete the revised self-assessment.

When key documents are updated and shared with the supply base we take time to train our colleagues on the changes, what they mean for suppliers and the

aspirations that we have for them in implementation. An example of this is the delivery of our Transparency and Supply Chain Monitoring Policy, which was rolled out in May 2025. We took time to present the approach, why it was required and the key changes for suppliers they worked with. Via this approach we have consistent information and knowledge being provided to suppliers to ensure effective access to lower tiers of the supply chain and implementation of our approach. As previously mentioned, we will be undertaking a similar approach with our Standards for Suppliers in 2026.

In 2025, we committed to assess the training needs of Commercial, Sourcing and Technical Teams around the topic of Human Rights. In response to this, we have updated the training resources we have built, and look to review them with governance structures to ensure further knowledge of human rights and the impacts businesses may have across key roles. In 2025, we have undertaken targeted training and delivery to certain roles based on sourcing products, regions or the evolutions of risks e.g. around civil unrest or natural disaster.

Asda's Modern Slavery Training

In 2025, 96.61% of designated Asda colleagues completed our Modern Slavery Computer Based Learning (CBL) module. Developed in collaboration with industry specialist, this training helps our colleagues understand this complex topic and provides information on the steps they can take should they have concerns for someone's safety.

This high completion rate and broad engagement highlights our commitment to embedding awareness of Modern Slavery risks throughout all areas of our operations, from logistics and retail to corporate functions and fostering a well-informed workforce dedicated to mitigating risks of Modern Slavery. Asda will continue to expand and tailor training initiatives to meet the needs of each business area. We will ensure every colleague is equipped to uphold our ethical standards and aim to achieve full participation, as well as continuing to provide resources to ensure all colleagues are equipped to contribute to this critical effort.

Our training and tools are developed internally with colleagues from our Learning and Development function, as well as alongside specialist subject matter experts who advise on the content and train colleagues directly when their role and responsibilities require this.

awareness

Human rights and Modern Slavery rely on people being able to tell compelling stories to raise awareness.

This can often be about incidents or impacts but also about remediation. It is the role of our Responsible Sourcing and Human Rights teams to bring this important context into our business to inform decisions, share best practices and even instances where we may have got things wrong.

Awareness is also key to ensuring rights holders, suppliers and those who ensure our business is successful understand some of these complex topics, and importantly know how they can get help, should they need it or raise a concern.

In 2025, we undertook several activities to continue to bring to light the work we do and the salient themes we work toward addressing. These included:



National Anti-Slavery Day

This year we hosted a ‘fire side chat’ between Duncan Warner (Senior Responsible Sourcing and Human Rights Manager – Asda) and Paul McNulty (CEO of Rebuild – an anti-trafficking charity which works to help survivors of Modern Slavery to rebuild their lives. The discussions focused on the role businesses can play in combatting Modern Slavery, including:

- Modern slavery is not something that only happens somewhere else, it exists here in the UK and it is much closer than you may think.
- Tackling modern slavery starts with people though honest communication, trusted relationships, and genuine engagement to bring about effective change.
- Businesses need to be brave, ‘lean in’ and proactively look for this issue within their operations and supply chains.
- Modern slavery is deeply interconnected with other issues such as mental health, homelessness, substance dependence and poverty. Where you see these symptoms, you may also be seeing signs of exploitation.
- While someone is trapped in exploitation, they miss chances to build confidence, relationships, and skills that support independence and growth, robbing them of opportunity.
- 97% of survivors of exploitation experience at least one diagnosable mental health condition, yet only 4% access the support they need highlighting the importance of trauma-informed, survivor-centred engagement.
- Remediation must be survivor-centred and trauma-informed. It’s about removing barriers and enabling each person to move toward their preferred future. No two journeys are the same; for one person it may be about being able to make eye contact with someone again, for another, accepting support, or taking their first step toward independent living. Everyone is different.

Sessions such as this are a fantastic way to bring the broader topic of Modern Slavery to life for people in and around our business, ensuring they have access to resources, experts and information to help them understand this complex topic.

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Rebuild
 Living free from modern slavery

“Tackling modern slavery demands a unified approach, where ethical businesses partner with lived-experience-led and frontline organisations like ours. Our recent fireside chat with Asda for National Anti-Slavery Day beautifully illustrated this. By combining human rights due diligence with a deep understanding of both practical steps and profound human impact, we ensure those at risk of exploitation are provided with viable alternatives, and that support mechanisms are truly proportionate and meaningful. This collaboration is vital in fostering genuine change and offering hope to those rebuilding their lives.”

Paul McNulty, CEO, Rebuild East Midlands

The full discussion was shared publicly and is still available here:
<https://lnkd.in/ek5YMKhA>

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Supplier Human Rights Steering Committee

In 2025, we attended the Human Rights Steering Committee of our strategic supplier – Greencore. We were requested to provide insights into what was on a customer’s mind and discuss further our work on EHRDD of high-risk commodities. The session was attended by a cross functional group of Greencore’s senior leaders from Procurement, Technical and Sustainability and highlighted the collaboration that can be driven by an engaged and informed supplier sharing ideas and raising awareness via customers of the challenges and opportunities they face across the complex world of retail.

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Greencore

“At Greencore we recognise that human rights risks in global supply chains are complex and cannot be tackled by businesses working in isolation. Therefore, strong collaboration is vital to the success of our programme.

Asda joining our governance meeting enabled both businesses to share insights and challenges, increasing our shared understanding and perspective across our business. We value such collaborations greatly as they help to drive best practice and continuous improvement in this hugely important area.”

Rick Fletcher, Head of Human Rights, Greencore Group

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In addition to our direct partnerships, Asda engaged with the following organisations either as a member or participating business, including:



Fairtrade has a vision of a world in which all producers enjoy secure and sustainable livelihoods, fulfil their potential, and decide on their future.



Slave Free Alliance support organisations in working towards slave-free operations and supply chains. Part of Hope for Justice's portfolio of preventing exploitation, rescuing victims, restoring lives, and reforming society across five continents.



Stronger Together is an impact driven, not for profit organisation providing businesses with practical training, resources, business services and collaborative programmes to create a world where workers are recruited responsibly and have fair work free from exploitation.



RRT is a not-for-profit, global programme whose mission is to drive ethical and professional recruitment and labour supply that's good for workers, recruiters and clients.



The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGO's that promotes respect for workers' rights around the globe and enables the members to collectively tackle issues that cannot be addressed by individual companies working alone.



The Seafood Ethics Action Alliance (SEAA) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights.



IDH convenes, co-creates, and co-finances inclusive and sustainable solutions that enable people in business, investment, and government to create value for people and the planet.



Food Network for Ethical Trade (FNET) is a collaborative initiative aiming to use collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage, and horticulture supply chains by providing guidance, resources, training, and collaboration.



The British Retail Consortium (BRC) are in place to make a positive difference to the retail industry and the customers it serves.

By working together with our partners, Asda aims to drive meaningful change and create safer, fairer working environments for all.



The Spanish Ethical Forum provides a platform for agri-food supply chain members in Spain to exchange experiences and best practices on labour issues. It also supports supplier learning and capacity building through grower-led working groups, practical tools, and tailored solutions to key labour challenges.



Sedex is a data platform used to provide data-driven insight, tools, and services to help companies continuously improve environmental, social and governance (ESG) outcomes.



Better Work is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect of labour rights for workers and boost the competitiveness of apparel business.



Fast Forward is a not-for-profit, next generation labour standards improvement programme operated by the not-for-profit Stronger Together. Fast Forward uniquely combines a proven forensic auditing methodology with a collaborative beyond audit programme to support suppliers and brands to continuously improve.



The Alliance works to enhance safety in garment factories by addressing fire, building, and electrical hazards, and empowering workers.

2026 OBJECTIVES

COMMITMENT	SALIENT THEME	CONTEXT	PRIORITY
Consult and launch our revised Standards for Suppliers	ALL	In 2026 we will consult extensively with our suppliers across GFR and GNFR, holding detailed drop-in sessions and responding to supplier queries and questions about our Standards and their implementation. We will partner with suppliers to build capacity in-line with our expectation that Policies and Standards are effectively cascaded within the supply chain to all tiers.	HIGH
Concessions rollout	ALL	In concluding our gap analysis and investigative works following an incident we will roll out findings, best practice and resources to our concession partners.	MEDIUM
GNFR Mapping and engagement	ALL	GNFR – continue to focus on establishing our Responsible Sourcing processes and controls to deliver consistent and tangible outcomes. This will include mapping suppliers, engagement to understand risk and collaboration to build capacity.	HIGH
Landscape assessment	Modern Slavery	Deliver tailored workshops for protein suppliers based on the findings of the Landscape Assessment and disclose the sites which were in-scope of the study.	
Human Rights Training for Commercial, Sourcing, and Technical Teams	ALL	Continued assessment of colleagues to capacity build with to ensure awareness of potential human rights impacts and issues. To be understood and implemented in-line with governance.	HIGH
Review Asda grievance channels and cascade learnings	Gender	Assess how best we can review any barriers, our existing grievance mechanism may face, and how to apply a gender lens to these – increasing visibility, engagement and empowerment with women and girls across our business and supply chains.	HIGH
Charity strategy	Modern Slavery	Develop a charities strategy primarily focused with modern slavery and those impacted by the operation of our business.	MEDIUM
Modern Slavery case sharing with MSI	Modern Slavery	Work with MSIs to share learnings from engagement with survivors and enable considered conversations with the topic of improved focus and access to survivors of modern slavery.	HIGH
Corporate governance	Governance	Support the business and its governance review to ensure that Human Rights and Modern Slavery is considered within the committees involved with suitable reporting, risk engagement and discussion.	HIGH
Open Supply Hub	Responsible	Increase the number of claimed GFR sites to 50% of all in-scope locations.	MEDIUM

COMMITMENT	SALIENT THEME	CONTEXT	PRIORITY
FNET Member benchmark survey	ALL	Measure our progress via annual survey and develop an action plan for improvement.	MEDIUM
Stronger Together 360 Online tool	Modern Slavery	Review the updated platform and work with internal stakeholders to complete the revised self-assessment.	MEDIUM
ETI Corporate Transparency Framework	ALL	Channel for regular assessment of our programmes that identifies improvement opportunities to work towards.	MEDIUM





For inquiries about our Modern Slavery statement or programme,
please contact our Modern Slavery team.

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