



Modern Slavery Statement

2025/2026

TESCO

Contents

Introduction from our Group CEO	2
Our key achievements 2025/26	2
Our business and supply chains	3
Our approach to human rights	4
Governance	5
Due diligence	6
Human rights Blueprint	7
Human rights audits	7
Grievance mechanisms	8
Tackling modern slavery risks	9
Investigating modern slavery allegations	9
Strategy	10
Purchasing practices	10
Our operations	11
Our supply chains	13
Collaboration and partnerships	19
Benchmarks	19
Awareness raising and capacity building	22
Impact and monitoring	23
Plans for 2026/27	26



Background

The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. This statement refers to the financial year ending 28th February 2026 and sets out the steps taken by our business, where we have operations in the UK, Republic of Ireland, Central Europe, and relevant subsidiaries, to prevent modern slavery and human trafficking in our own operations and supply chains. Due to the nature of their businesses, Tesco Mobile, dunnhumby, One Stop and Booker publish separate Modern Slavery Statements.

The data in this statement has been reviewed for accuracy and veracity in consultation with a broad range of internal and external stakeholders.

Introduction from our Group CEO

Modern slavery has no place in our business or supply chains. We're fully committed to playing our part to eradicate it, with a comprehensive network of suppliers, we know we have a big part to play. We work tirelessly to ensure our business and the companies we partner with uphold the highest ethical standards to promote fair and safe work environments for all.

We remain focused on ensuring human rights are respected across the globe. Our efforts to address modern slavery risks and other human rights risks across our business are underpinned by our policies and delivered consistently through our Human Rights Blueprint. All Tesco Group Business Units in scope of the programme have been developing and implementing action plans to meet the Group-wide human rights standards established through this blueprint. This work is steered and overseen by a dedicated Governance Group, chaired by our Group Director of Quality, Technical, and Sustainability.

We remain committed to making sure our values are at the heart of what we do, and we embed our human rights due diligence and supplier support to deliver this. This statement outlines the approach we take to manage the risks of modern slavery and details how we check both our internal operations and supply chains, ensuring robust processes are in place to minimise and address issues.

We're committed to an open approach, sharing both our successes and the challenges we face. We continue to collaborate with others to address these risks thoroughly. Through our human rights work we gain deeper insights into the risks and trends related to modern slavery, enabling us to strengthen our approach.

Our collaboration with suppliers and other retailers, through initiatives like the Food Network for Ethical Trade (FNET), our own threat intelligence and colleagues in global sourcing regions, have highlighted the continued risks within supply chains reliant on temporary and migrant labour, such as UK seasonal labour. We recognise there's still more work to be done. Over the next 12 months, we'll continue to monitor these risks as they evolve and ensure our approach continues to address the issues.



Ken Murphy,
Group Chief Executive

This statement was approved by the Board of Tesco Plc on the 15th April 2026 and signed on their behalf by Ken Murphy, Tesco Group Chief Executive.

The drafting of this statement was supported by anti-slavery organisation Unseen, referring to statutory guidance, and incorporated the feedback of colleagues with lived experience to the disclosures made in this statement.

Our key achievements in 2025/26

- Ranked highly in modern slavery benchmarks, including the CCLA Modern Slavery Benchmark and Know The Chain.
- Continued the rollout of our Group Human Rights Blueprint, underpinned by our Human Rights Governance Group.
- Continued participation in the Seasonal Worker Scheme Taskforce, including support of the Just Good Work App, which provides training for growers, due diligence for scheme operators, and engagement with key government bodies such as DEFRA.
- Supported the enhancement of a work injury compensation system for over four million garment industry workers in Bangladesh.
- Launched a supplier guidebook on effective worker grievance mechanisms for home and clothing suppliers.
- Continued support and engagement in the Modern Slavery Intelligence Network, including hosting their 2025 conference.
- Continued to drive improvements in responsible recruitment with our Thai and Malaysian suppliers, building on our successful implementation of the Employer Pays Principle (EPP) in the region.
- Supported suppliers in Thailand and Malaysia to reimburse or pay workers over USD 1.8 million in recruitment fees and costs.

(1) Entities required to publish a statement under the Modern Slavery Act and therefore covered by this Group Statement include: The Tesco Atrato Limited Partnership, The Tesco Passaic Limited Partnership, The Tesco Navona Limited Partnership, The Tesco Property Limited Partnership, Tesco Stores Limited, Tesco Distribution Limited, Tesco Maintenance Limited, Tesco Freetime Limited, Tesco Ireland Limited, Tesco Mobile Ireland Limited, Tesco Franchise Stores CR s.r.o., Tesco International Clothing Brand s.r.o., Tesco Stores CR a.s., Tesco Stores SR, a.s., TESCO-GLOBAL Stores Privately Held Co. Ltd, Tesco Bengaluru Private Limited, Tesco Family Dining Limited, Tesco Corporate Treasury Services PLC, The Tesco Blue Limited Partnership

Our business and supply chains

As a leading multinational retailer, with more than 340,000 colleagues, we aim to serve customers with affordable, healthy and sustainable food.

Colleagues serve millions of customers every week, united in our core purpose of serving our customers, communities, and planet a little better every day. Our purpose is underpinned by three values:

1

No one tries harder for customers

2

We treat people how they want to be treated

3

Every little help makes a big difference

This means we're keeping customers at the heart of what we do, whilst also reflecting our responsibilities to the communities we serve and source from, and to society more broadly. To learn more about our purpose [see here](#).

We want everyone who works for or with Tesco to have their human rights respected and we know our customers, colleagues and suppliers want the same. We believe that our trade should have a positive impact, creating jobs and opportunities for people all over the world and ensuring they work under safe conditions.

Our human rights strategy, which includes addressing modern slavery, delivers against our value to treat people how they want to be treated. As part of this, we:

- Respect international human rights standards throughout our supply chain and operations.
- Prioritise the most serious risks to workers, collaborating transparently with NGOs, unions and others to identify and address these risks.

We have thousands of direct and indirect suppliers who grow, make and move raw materials and finished products across our global supply chain. These suppliers range from large agricultural businesses to smallholders and manufacturing companies. We also work with other partners who help run

our distribution centres, keep our offices and stores clean and secure, and much more. Our human rights agenda covers both our own business operations and supply chains. We work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified. The risk exposure is greatest for our UK business where the scale of our operations and supply chains in higher risk countries and contexts is greatest. Therefore, this is where we have focused our anti-slavery efforts across the Tesco Group.



Our approach to human rights

Our approach to human rights is based on a number of important internationally recognised declarations, standards and codes. These are the foundations for how we work across the Tesco Group, and include:



United Nations

The United Nations (UN) Universal Declaration of Human Rights



United Nations
Global Compact

The UN Global Compact



The UN Guiding Principles on Business and Human Rights



International Labour Organization

The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work



Ethical Trading Initiative

The Base Code of the Ethical Trading Initiative (ETI)

Our human rights approach, including tackling modern slavery, is supported by our [Code of Business Conduct](#) and [Human Rights Policy](#) which set out our obligations to customers, colleagues and communities in our own operations and supply chain. We take any allegation of a breach of our policies extremely seriously. We provide independent and confidential 'Protector Lines', communication channels that enable our

colleagues, suppliers, and their workers in key regions around the world to raise concerns.

In 2025/26 we continued a review of effectiveness and workers' access to our Protector Line in key sourcing countries. Our findings demonstrated the importance of Protector Line to workers in our supply chains on a broad

range of potential issues, including human rights and modern slavery. This year, we piloted new mechanisms in Chile, Kenya, and Peru, and identified opportunities to improve reliability and coverage of Protector Line across all geographies. In 2026/27 we will work closely with our regional human rights colleagues and service providers to ensure continuous improvement to the service.

Our human rights strategy has evolved over time:



Governance

Tesco's Responsible Sourcing Director leads our human rights strategy and chairs an internal modern slavery working group. This group is made up of colleagues from Human Rights and Group Security, meeting bi-annually, at a minimum, to monitor progress against our Group modern slavery strategy and review actions on alleged breaches.

Our Modern Slavery Governance Group complements our Human Rights Governance Group which provides strategic oversight to support effective implementation of our Human Rights Blueprint and wider human rights agenda. This group is chaired by the Group Quality, Technical & Sustainability Director and attended by senior colleagues representing Responsible Sourcing, Commercial, Legal and Security functions. We report on human rights, including modern slavery, at least annually to the Board through the Group Risk and Compliance Committee (GRCC), chaired by our Group CEO, and Sustainability Committee. This includes reporting on current and emerging risks, progress and performance. The GRCC review key risks, KPIs, serious incidents, due diligence and Human Rights Blueprint rollout.

Overall oversight and progress monitoring of our human rights work, for all markets and subsidiaries, sits with the Board Sustainability Committee. This group reviews human rights, including modern slavery, at least annually. Read more about the work of the Sustainability Committee in our [Annual Report and Financial Statements 2026](#).

“Product safety and Responsible Sourcing” is highlighted as a principal risk within our business-wide risk assessment, with the risk of worker exploitation and other human rights breaches as key drivers. Responsible Sourcing is also reported within our Annual Report. We also report any breaches of our policies, including our Ethical Requirements for Tesco Suppliers.

Each business unit also reports to their respective Risk and Compliance Committee.



Due diligence

We follow a risk-based approach to due diligence in line with the **UN Guiding Principles on Business and Human Rights**, and in consultation with internal and external stakeholders.

Our due diligence framework has five stages:



We assess the potential modern slavery risks within our own operations and supply chains by considering the country of origin of the products, raw materials or services we source, as well as the human rights trends of each sector. We also consider the type of labour being used, whether skilled, semi-skilled or un-skilled, and if it is seasonal, permanent, agency or migrant labour.

We use the [Food Network for Ethical Trade \(FNET\)](#) and Sedex country risk ratings to inform this, combined with our own insight into labour rights and modern slavery risks in our key sourcing sectors. We gather intelligence about emerging risks through our regional human rights specialists and strong relationships with local groups, NGOs and cross-industry organisations such as ETI, FNET and the Consumer Goods Forum. Campaigners, whistleblowers, human rights defenders

and activists can also play an important role in helping us identify where some of the biggest risks lie. We seek to engage directly with rightsholders wherever appropriate and gain insight into worker experience through partnerships with organisations such as Unseen and trade unions such as ITF and IUF.

With 44 dedicated specialists based in 14 priority countries, we are well-positioned to gather local intelligence and provide support by directly engaging with suppliers and stakeholders.

We continuously review our priority areas within our operations to identify emerging risks. Our commitment to ongoing due diligence spans across our operations and supply chains. This includes assurance visits, often carried out by independent experts, focusing on direct worker engagement and interviews.

We collaborate with a variety of experienced partners, including consultants and NGOs, supported by our commercial buying and quality teams. The information gathered helps us to continually reassess and address potential and actual risks in our business and supply chains.

Our human rights strategy identifies areas to tackle the fundamental causes of the most salient human rights risks in our supply chain. We regularly review and refine our approach based on due diligence, stakeholder collaboration, and direct feedback from workers.

Human Rights focus areas

Anti-slavery	Gender equity
Sustainable livelihoods	Worker representation

Due diligence continued

Location of Tesco Responsible Sourcing Colleagues



Human Rights Blueprint

In 2025/26, we continued to strengthen our Human Rights due diligence processes and assurance mechanisms across key business units as part of the rollout of our Human Rights Blueprint. This included launching enhanced ethical sourcing requirements for goods for resale supplied into all relevant business units.

We also agreed our Blueprint position for goods and services not for resale. In 2026/27 we will focus on embedding minimum supplier requirements into contracts across all blueprint business units, taking a risk-based approach to additional due diligence such as audits and training on highest priority categories sourced into the UK.

Human Rights Audits

For the supply chains of Tesco UK stores, we require all primary supplier sites (known as 'Tier 1' sites) to link to Tesco through Sedex, a platform for suppliers and retailers to share data on their workforce and working conditions, as well as audit records, giving us full visibility of their human rights audit

performance. In high-risk countries, Tier 1 sites are required to have an independent human rights audit from a Tesco approved auditor before they start supplying Tesco, and then on an annual basis. This represents around 30% of our total Tier 1 suppliers. These audits are conducted against best practice international labour standards as set out in the Base Code of the ETI.

Our audit programme is a key part of our assurance around supplier implementation of relevant ethical policies. In addition, we also require a sample of audits annually at multiple tiers of key supply chains in high-risk countries. This includes for example, fruit and vegetable sites audited to the farm level, animal protein sites audited down to the hatchery, and own brand home and clothing sites to be audited end to end.

We reserve the right to audit on an ad-hoc basis in response to any concerns or allegations.

In 2025/26, 93% of sites have either closed out their non-conformances or are on track to do so within the required timeframe. [For further details, please see our Sustainability Report.](#)

Timeframes are agreed by our human rights and technical teams, who consider reasonable adjustments, mitigating factors, or ongoing investigations. We continue to work with sites to close issues as long as they demonstrate commitment and capability to do so. Our aim is always to ensure issues are remediated for workers and practices put in place to avoid recurrence. However, if we believe sustained improvement will not be achieved, we will seek to responsibly exit the site. In the last year, we suspended seven sites as a result of human rights breaches. We recognise the importance of managing the potential unintended consequences when exiting a site and follow a responsible exit approach.

We monitor the effectiveness and service quality of the audit companies we use on an ongoing basis. In 25/26, we continued to strengthen our commitment to audit excellence through our witness audit programme. Of the witness audits conducted by the Tesco team to assess the performance of our auditors and audit body witnesses, 81% met the required standard. For auditors where enhancement opportunities were identified, improvement plans have been established with the audit body to further build capability. This year, we consolidated the list of approved Tesco Audit Service Providers (ASPs) to ensure third party audits conducted in our supply chain meet our high standards.

Site audits are conducted by auditors and audit service providers approved and trained by Tesco to meet our standards and expectations. After each site audit, at closing meetings with suppliers, all non-compliances with the ETI Base Code are discussed and a Corrective Action Plan Report (CAPR) is agreed between the supplier and the auditor. We categorise non-compliances as critical, major, or minor, as defined by the SMETA ethical audit methodology. If any critical non-compliances are found, the audit company notifies us directly. In 2025/26 critical non-compliances, related to any human rights breach including modern slavery, were identified at 40% of primary high-risk supplier sites. The most common of these were excessive working hours, inadequate health and safety practices, and underpayment of wages. This is similar to the trend in previous years.



Grievance mechanisms

We know that effective grievance mechanisms are often key to identifying human rights allegations and addressing workers' concerns. As part of our broader human rights strategy, in line with the UN Guiding Principles, we continue to drive access to grievance mechanisms within our supply chain and own operations. More detail on our approach to grievance mechanisms can be found [here](#).

In 2025/26 we encouraged targeted Tier 1 suppliers to implement the grievance mechanism toolkit we helped develop in partnership with Reckitt and Oxfam. Reckitt, a key supplier, initially commissioned the practical toolkit to support companies to improve their grievance mechanisms, enabling workers to raise grievances in a safe, trusted and transparent manner. We partnered with them to increase the scope of the pilot to include flowers, produce and packaged foods.

The toolkit is now publicly available on the Oxfam website and provides best practice guidance on the effective implementation of operational grievance mechanisms.

In the last year, we have developed the Guide for an Effective Grievance Mechanism, which is a concise and practical summary of Oxfam's Grievance Mechanism Toolkit for suppliers to use. This guide has been successfully adopted by six additional home and clothing suppliers operating in Türkiye and their sites. Through this initiative, we have established a joint industry approach, fostering collaboration and alignment on strengthening grievance mechanisms across the supply chain.

Last year, we assessed the effectiveness of grievance mechanisms across all primary Home and Clothing sites in Bangladesh, India, Pakistan, Sri Lanka and Türkiye. Where gaps were identified, we worked with suppliers to develop improvement plans and are continuing to verify the completion of these actions.

In China, we completed a pilot across nine home and clothing sites involving more than 3,000 workers to integrate anonymous worker satisfaction surveys into routine management practices. Feedback collected through the surveys has been analysed and addressed, helping drive meaningful improvements in workplace conditions.

During ad-hoc visits at both our own and supplier sites, we conduct worker interviews, which are an important tool for identifying issues, always focusing on workers' needs and remaining voluntary and confidential.

This year we worked to address language barriers we identified in the previous year to accessing mechanisms such as Tesco Protector Line. Our colleagues based in key sourcing regions worked to ensure appropriate translations were provided on sites. We will continue to review and improve accessibility to Protector Line.

Tackling modern slavery risks

In 2025/26 we contributed to work with the Food Network for Ethical Trade (FNET) and members to progress the UK Food Supply Chains Serious Incident Escalation Protocol. This supports industry to align and formalise our collective approach to identifying, reporting and remedying human rights breaches.

In 2025/26 most allegations related to industry-wide challenges, such as recruitment fees incurred by migrant workers. Our focus therefore remains on supporting ongoing collaborative efforts to address those specific concerns raised, as well as underlying root causes. At any point in cases where we are not satisfied with the actions taken, we will consider suspending sourcing and may move to exit relationships.

In the past 12 months, we have identified 48 allegations potentially relating to labour abuse or modern slavery. Six of these were within our own operations and 42 within our supply chains. This is a 23% increase from last year, which were at 14 and 25 respectively, and consistent with the general year-on-year rise in the number of allegations. Four instances of exploitation were partially substantiated within our own operations, 21 cases were either substantiated or partially substantiated within our supply chains. All of these cases were investigated and responded to according to the approach outlined.

Investigating modern slavery allegations

Receiving details of an allegation. We have clear procedures to make senior colleagues aware of incidents, and ensure appropriate action is taken. Allegations involving human rights issues are managed by Human Rights and Group Security teams, including colleagues with appropriate modern slavery expertise, to investigate and provide victim support.

Convening relevant stakeholders appropriate to the details of the case. Whenever we receive credible intelligence, for example through ethical audits, our own site visits, Protector Line, NGO, or media reports, we always review and investigate if appropriate. Where our suppliers identify possible indicators of modern slavery within their own operations, we support and monitor their investigations. Where relevant we will engage with those representing lived experience, such as Unseen or trade unions.

Investigating and reporting to relevant authorities. We engage proactively with the authorities and relevant experts to better understand risks and address issues identified. We are committed to sharing information that will help stop or prevent the exploitation or abuse of workers, whilst ensuring that this information is handled sensitively and within data protection requirements.

Cross-industry collaboration, including intelligence sharing in line with legal frameworks.

Developing a remediation plan for substantiated allegations. Where cases of modern slavery or other human rights abuses are identified, we work to ensure remediation, partnering with suppliers, NGOs and affected stakeholders as appropriate, in line with the UN Guiding Principles.

What we have seen this year	Indicators of Modern Slavery	Indicators of Labour Abuse
Own Operations – Substantiated (incl. partial)	2	2
Own Operations – Insufficient Evidence	0	2
Supply Chain – Substantiated (incl. partial)	5	16
Supply Chain – Insufficient Evidence	3	18

Tackling modern slavery risks – continued

Incident management



The following case study brings to life our approach to incident management and remedy for a case we worked closely on in 2025/26. The case was initially brought to our attention in 2024/25.

During a visit at a UK supplier site by a third-party expert, an agency worker disclosed in a worker interview that they were paying fees to an individual they lived with to obtain and keep their job. With the support of an independent expert, we supported the supplier to safeguard the worker, conduct an initial investigation, and engage with them to understand their support needs. The worker was then supported to leave their exploitative situation and move to alternative accommodation.

Tesco provided ongoing guidance to the supplier and worker throughout the process, with close support from Unseen who ensured our approach was person-centred.

Through further investigation, we confirmed that the worker was paying fees to an individual not associated with the supplier or labour provider, with indicators of debt bondage present. Via the supplier, we supported the worker through engagement with law enforcement, including submission to the government's National Referral Mechanism (NRM) to support potential victims of modern slavery.

We then worked alongside the supplier on appropriate remedy. This included liaising with the agency to provide extended employment with the supplier, financial support, and access to immigration advice. The worker is now considering their next steps with continued support from our experts in close collaboration with our supplier and Unseen.

Strategy

Our approach to preventing, identifying, and mitigating modern slavery is based on the leading factors which are acknowledged by the ILO as root causes of modern slavery in supply chains, such as:

- Debt bondage (e.g. arising from payment of recruitment fees).
- Cultural isolation.
- Restricted movement.
- Working conditions.

These are the root causes that can have the most significant negative impact on workers. Debt related to payment of recruitment fees and costs is the most common modern slavery risk indicator in our industry, including our business and supply chains. Addressing this requires industry collaboration to reduce workers' vulnerability to exploitation.

In 2025/26, we reflected on what we have learned from implementing the Employer Pays Principle (EPP) to address the root causes of debt bondage. In supply chains where we have strong, long term relationships with suppliers, we have been able to successfully introduce zero fee recruitment—particularly in Thailand, Malaysia, and parts of our home and clothing supply chains.

However, in more complex areas such as UK seasonal agriculture, recruitment and labour supply pathways are widely shared across the industry. In these contexts, broader industry collaboration is needed to transition towards a zero fee model. We will continue applying our learnings and leverage to drive progress towards EPP and work with partners across the sector to overcome these barriers.

Further detail on our experiences is provided in the relevant sections below.

Our current modern slavery strategy focuses on the following salient risk areas within both our own operations and supply chains:

- Purchasing practices.
- Labour in our own operations and UK distribution.
- Thailand and Malaysia.
- UK Seasonal Workers.
- Fish and Seafood.
- Home and clothing.

Details of our approach and progress in the last year on each of these areas are below.

Purchasing Practices

Business purchasing practices can directly affect human rights and we're currently reviewing how our policies may impact supplier behaviour. In 2025/26, we continued work we began with the Ethical Trading Initiative (ETI) to review our purchasing practices. ETI's findings show that our commercial teams consider human rights impacts in supplier relationships, including by building stable, long term business relationships to support improvement over time. The findings also highlighted opportunities to further strengthen safeguards and buyer visibility of supplier cost structures and wage impacts, to ensure that pricing decisions support our human rights goals.

This year, we have also committed to working with the ETI on multi-stakeholder responsible purchasing practices projects focused on Vietnamese shrimp and bananas from Latin America. In 2026/27 we will participate in these projects to identify any areas for potential improvement of our practices and support industry wide continuous improvement.

We are also members of ACT (Action, Collaboration, Transformation), an initiative to embed responsible purchasing practices in our home and clothing supply chain. See more detail on page 19.

Our operations

The majority of our colleagues are employed on permanent contracts. Workers most at risk of modern slavery are those not in permanent employment or employed through labour agencies. In the UK, we work with two labour agencies across our entire distribution network, who have their own mature human rights and modern slavery programmes aligned to our expectations.

Our focus areas in our business operations are:

- Agency workers in our distribution and fulfilment centres.
- Workers providing retail labour services, such as security and cleaning for our offices, stores and distribution centres.
- Workers in car washes located within the car parks of our stores.
- Workers in the construction industry who build, maintain and fit-out our stores.
- Goods not for resale manufactured in high-risk countries.
- Couriers working for rapid delivery partners.

In addition to our due diligence, identified high-risk suppliers are expected to undertake robust assurance steps, such as:

- Completing the SEDEX Self-Assessment Questionnaire.
- Conducting independent ethical audits through Sedex SMETA, which include reviewing the supplier's management systems for compliance with the ETI Base Code, interviewing workers, and assessing how worker recruitment is managed.
 - In 2025, we completed the work begun the previous year to identify high-risk goods not for resale suppliers in scope for our enhanced due diligence. Of the nine high-risk suppliers identified, we communicated our expectations to all of them. Eight completed their Sedex registration, and five of the eight underwent a SMETA audit. We continue to work to close any gaps.
- Attending tailored modern slavery training hosted by Stronger Together. This is a UK based multi-stakeholder initiative aiming to reduce modern slavery through guidance and training.



- 60% of in-scope procurement suppliers have completed Stronger Together modern slavery training, down from 77% last year, and 62% of required suppliers have registered for the Responsible Recruitment Toolkit. This decrease is driven by identification of new suppliers in scope for these requirements, who we are working with to reach compliance.
- Completion rates sometimes fall below 100% where new suppliers are onboarded.
- This training includes the impact of exploitation on victims, signs to look out for and response processes.
- Attending bi-annual meetings with the Tesco human rights team to strengthen and coordinate our approach to identifying and mitigating risks of modern slavery. This is also included as a key aspect of ongoing supplier

performance reviews carried out in conjunction with our commercial teams. In 2025/26 we conducted these with four of our largest service providers and both our labour agents (representing 29% of suppliers in these categories) across our operations.

In 2025/26, we continued to monitor the strengthened contractual provisions in our agreements with third-party courier partners to maintain compliance with legal expectations in key areas such as right to work checks, age validation, and subcontracting.

UK distribution centres

In 2025/26, we continued our established model of conducting in-depth site visits and worker interviews within our distribution network, led by an expert human rights consultancy.

Tackling modern slavery risks – continued

In 2025/26, we enhanced our assessments to include a specific focus on facilities support teams at distribution sites. This was in response to concerns raised in the previous year at one site relating to our facilities teams, including risks of bullying and harassment. Whilst this individual incident was thoroughly investigated and corrective actions implemented, we identified the opportunity for further improvement to our due diligence. The findings from these assessments are summarised below.

One advantage of our method for uncovering any risks of modern slavery is that it also allows us to identify other human rights issues. We were alerted to three cases relating to potential labour abuse in our distribution and fulfilment network in 2025/26 such as working hour or right to work issues.

Our assurance visits uncovered isolated instances of:

- Pay discrepancies relating to incorrect absence recording.
- Allegations of discrimination based on nationality.
- Discrepancies with sick and holiday pay policy implementation.
- Allegations of verbal abuse in the workplace.

All these instances were investigated in line with our policies and resolved to the affected worker's satisfaction, where substantiated. These findings highlight the importance of regular site visits and worker engagement by trained colleagues and independent experts, which we commit to continuing into 2026/27. We work closely with our distribution colleagues and labour providers to implement corrective actions where individual occurrences are raised and encourage workers to continue raising issues.



We promote our confidential Protector Line and the UK's independent Modern Slavery & Exploitation Helpline across all our distribution centres.

We closely monitor weekly working hours of all our agency distribution colleagues to keep within the acceptable limits of the ETI Base Code. We meet regularly with our labour providers to ensure worker welfare is maintained while flexing to business needs.

In 2025, we supported a responsible recruitment event convened by one of our labour providers, Staffline, on "Addressing Modern Slavery in Supply Chains," which brought together businesses and stakeholders to share best practices on transparency, responsible recruitment, and modern slavery prevention.

Our supply chains



Thailand and Malaysia

We continue our focus on human rights, including modern slavery, across Southeast Asia. In Thailand and Malaysia, we have a particular focus on responsible recruitment as the most salient risk in the region. Our human rights experts in Thailand and Vietnam maintain close relationships with our primary suppliers and poultry sites across the region to ensure our ethical standards are met and the risks of modern slavery are mitigated, including regular site visits and face-to-face meetings.

This year we have conducted four site visits in Malaysia and 11 site visits in Thailand, including worker interviews, focused on progress against the Employer Pays Principle (EPP). This includes sites beyond our primary tiers, including goods not for resale and farms. In addition to in-person site visits, the team continue regular meetings with suppliers to monitor progress and provide support. We partner with the NGOs across the region to collaborate with suppliers on working conditions, ensuring high standards and providing worker voice solutions.

In 2025/26, our focus has been on embedding the progress suppliers have made in complying with our Responsible Recruitment conditions (UK & ROI) for sites in Thailand and Malaysia. Launched in March 2020, we require all sites to implement the Employer Pays Principle, in line with the ILO definition of recruitment fees and costs. We have now achieved full implementation of this policy.

Our team have supported suppliers to develop stronger requirements with recruitment agents and practices which support the implementation of their zero-fee policies. This has facilitated the progress made to our overall compliance with the policies and the reimbursements made. In 2025/26, a total of USD 1,878,684 represents the amount of recruitment fees and costs our suppliers have either reimbursed to workers or paid upfront. This is in addition to USD 2,779,123 in 2024/25 and USD 3,637,408 in 2023/24. Ongoing reimbursement work is continuing throughout our implementation of this policy, and we will continue to monitor and report fees reimbursed annually. We continue to support suppliers to address the root causes of worker paid recruitment fees rather than rely on continual reimbursement, such as improving due diligence with labour providers. The lower year-on-year reimbursement figures reflect the progress our suppliers have made in this area.

We are moving beyond reliance on supplier data by finalising a verification methodology for implementing EPP. The draft is now under final consultation with relevant stakeholders and is expected to be finalised within 2026.

Engaging suppliers through our EPP approach has helped us to better understand the impacts of the main challenges that have slowed progress:

- **Low awareness and understanding:** While suppliers broadly support the EPP policy, there is a need for ongoing support in implementing it within their companies. Some sites have been reluctant, partly due to the acceptance of some types of recruitment fees and costs.

- **Limited leverage:** As recruitment fees tend to be industry-wide, supply chains require an industry-wide alignment on messages about a collective shift to an EPP approach.

Whilst Tesco endorses the Employer Pays Principle and expects suppliers to align to it over time, we acknowledge that this often requires industry collaboration and alignment is needed in different regions and supply chains. We have specific requirements for implementing EPP in Thailand and Malaysia due to past instances of debt bondage linked to worker recruitment fees in our supply chain and our own operations at that time. Based on our experience since introducing this policy in 2020, we believe that some conditions need to exist to create the opportunity to implement EPP. These can include; a significant volume of business through long-term direct relationships with suppliers, and stability of supply chain and migrant labour availability.

We continue to pursue opportunities for EPP directly with high-risk suppliers where these conditions exist, and work with industry where there are more complex challenges.

The spirit of these conditions, and central to our approach to EPP, is to encourage suppliers to seek recruitment pathways where workers are not incurring fees in the first place, rather than perpetual reimbursement.

This year we began training suppliers on effective grievance mechanisms, with two sessions completed in Malaysia in January 2026. In the coming year, our work in the region will shift to focus on embedding more comprehensive responsible recruitment.

Tackling modern slavery risks – our supply chains continued

UK seasonal workers

The well-documented risks within the Seasonal Worker Scheme remain a priority in our anti-slavery approach. We have identified that the scheme brings higher risks of modern slavery and exploitation, particularly through recruitment fees, discrimination, and poor accommodation standards, among other forms of labour abuse. In 2025/26, we continued to see risks of debt bondage and exploitation. Our greatest concern remains the vulnerability of new workers entering the scheme and the risk of them becoming significantly indebted in the process through both legal and illicit recruitment fees and costs. We continue to seek industry improvements through our participation in the multi-stakeholder Seasonal Worker Scheme Taskforce.

We believe there are significant challenges with the design and enforcement of the scheme which requires government intervention to resolve. The design of the scheme is not aligned with the Employer Pays Principle, due to the requirement for workers to cover significant costs for their own visas and travel. We continue to engage government and stakeholders on three considerations, which we see as vital to addressing these challenges effectively:

1. Recruit from fewer, less risky countries
2. Contractual requirement guarantees of no-fees from licensed scheme operators
 - a. Government and industry support must enable and enforce this
 - b. This will result in higher costs that will need to be shared across the supply chain
3. Clarify and enforce accountability for worker welfare
 - a. Through every step of worker engagement within the scheme
 - b. Include governance and remediation when issues are identified



In the absence of effective scheme reform, our response to this industry-wide challenge in 2025/26 included:

- Continued funding and participation in the Seasonal Worker Scheme Taskforce to address root cause issues and improve worker experience.
- Support for the rollout of the Independent Worker Survey to help identify and respond in-season to any trends in working, living and human rights challenges.
- Support for the Taskforce to deliver nine contextualised online grower grievance prevention and management training workshops alongside ACAS (Advisory, Conciliation and Arbitration Service). These reached over 60 grower participants.

- Support for Taskforce roadshows which reached over 425 delegates including growers, Scheme Operators, retailers, and other businesses in the industry. 91% of participants acted on the content to improve practices and implement practical actions to reduce risks and improve worker experience.
- Support for the Taskforce to deliver Responsible Recruitment Progress Assessments to four scheme operators by the end of 2025, with a further scheme operator undertaking assessment in 2026.
- Support for the Taskforce to work with the International Organisation of Migration (IOM) to deliver training for growers and supervisors on cultural awareness and social inclusion.
- Working with stakeholders following publication of the jointly commissioned Employer Pays Principle Feasibility Study in July 2025. The findings informed collaborative cross sector discussions over the course of two in-person roundtable events in September and October and exploration of alignment areas for 2026.

Fish and seafood

The details of Tesco's seafood sourcing for UK and ROI are publicly available as part of the Ocean Disclosure Project, as are our policy requirements for fish suppliers, including transparency to fleet level. The fishing sector presents significant challenges which heighten the risk of modern slavery and makes it difficult to carry out effective due diligence. These challenges include:

- Relative lack of traceability and visibility of issues in the sector.
- Difficulty in replicating or adapting certain due diligence practices or techniques, including audits to vessel level.
- Lack of worker organisation, awareness of labour rights, or effective grievance mechanisms.
- Aspects of legislation which make workers more vulnerable to exploitation (e.g. flags of convenience, transit visas).

Tackling modern slavery risks – our supply chains continued

These challenges remained apparent in 2025/26, with continued reports of modern slavery and forced labour in the seafood sector. Therefore, we continued to pursue improved visibility of modern slavery risks, improved due diligence with sector specific considerations for 'beyond audit' practices, and risk mitigations of migrant worker exploitation.

To progress these aims in 2025/26 we have renewed our efforts on the following initiatives:

- Collaboration on seafood industry challenges, globally, and at UK level, through the Sea Alliance and Seafish's Seafood Ethics Common Language Group.

- Engagement in the ETI's renewed seafood strategy including engagement with ITF union representing the interests of migrant fishers.
- Participation in the ETI's Responsible Purchasing Practices project focused on Vietnamese farmed shrimp.
- Review of our sustainable seafood strategy with enhanced focus on migrant worker experience.
- Review of our seafood sourcing requirements to drive:
 - Greater visibility and traceability.
 - Better-adapted certification for seafood products.

- Better-adapted requirements for smallholder farms.
- Increased use of effective Vessel Codes of Conduct.

In November 2025 we were pleased to see the publication of new ILO Guidelines for fair labour market services for migrant fishers which lays out responsibilities for each stakeholder, including states, involved in the recruitment of migrant fishers. These guidelines embed expectations for vessel owners and recruitment agents, including assuring freedom of association, zero recruitment fees and grievance mechanisms. We endorse these guidelines and have been working with our suppliers to align to these guidelines to meet Tesco supplier expectations.



Tackling modern slavery risks – our supply chains continued

Home and clothing

Our human rights programme for our home and clothing supply chain includes human rights audits, which are required on an annual basis for primary supplier sites in high-risk countries, and a broad range of support programmes to drive further improvements. The risks of modern slavery and labour exploitation most salient to our home and clothing supply chains include:

- Forced overtime and prohibited leave.
- Withholding of identity documents and wages.
- Restriction of movement, particularly in worker accommodation.
- Excessive working hours.
- Recruitment fees.

We target action in our key sourcing regions including China and Southeast Asia, Indian Subcontinent, Europe, Middle East, and Africa, with key focuses on Bangladesh, China, India, Sri Lanka, Thailand, Turkey and the UK. This includes our approach in cotton, actions beyond Tier 1, building robust compliance monitoring mechanisms, enhancing grievance mechanisms, enabling worker voice and capacity building.

In 2025/26, we continued to evolve the following existing initiatives focused on modern slavery.

Enhanced Due Diligence

This year, we trained 100 auditors who are approved to conduct ethical audits on our behalf on modern slavery. These sessions focused on enhancing their auditing skills in verifying record transparency. We have further upskilled four experienced auditors to begin witnessing our audit programmes to ensure Tesco's standards are upheld.

All critical and major non-compliances identified through our audits or other due diligence processes require remediation, whether related to modern slavery or other human rights breaches. Evidence that corrective actions have been



completed are reviewed to the satisfaction of our approved auditors and our human rights specialists. We provide guidance and support to suppliers to complete the corrective actions.

In cases where non-compliances remain overdue without meaningful progress, we may suspend new orders. In 2025/26, we terminated business relationships with seven supplier sites for serious human rights violations and failure to implement corrective actions.

Ethical Monitoring Beyond tier 1

Our due diligence has identified a greater risk of modern slavery in the lower tiers of our supply chain which are less visible, more labour-intensive, more dependent on vulnerable workers, and subject to intense cost pressures. We continue mapping upstream suppliers in home and clothing, including spinning mills, fabric mills, and processing sites with elevated risks.

In 2025/26, in response to these risks, we have:

- Delivered 21 training sessions to all direct suppliers, factories, and mills on our minimum requirements, the Employer Pays Principle, and responsible recruitment.
- Assessed working conditions at 261 fabric mills, 54 spinning mills, and 71 weaving units, ensuring all critical issues were resolved.
- Continued our collaboration with the ETI to address to address modern slavery risks in Tirupur, India.
- Collaborated with the Tirupur Exporters Association (TEA) to develop a practical implementation plan to address risks related to migrant workers.
- Delivered two webinars to all suppliers and their upstream partners, to support their understanding of our requirements.

Tackling modern slavery risks – our supply chains continued



- Continued our systematic review of upstream ethical audit reports and worked closely with suppliers to drive corrective actions and support ongoing improvements where non-compliances were identified.
- Continued reviewing upstream ethical audit reports, with 93% of beyond Tier 1 sites evaluated.
- Led the establishment of a Tesco-led Responsible Recruitment Working Group, comprising seven other leading brands and retailers, to address systemic recruitment challenges impacting migrant workers in India's garment and textile sectors.

This year we strengthened our Approved Mills strategy to enable more focused engagement with suppliers. In 2026/27, we will start rolling out our anti-slavery measures, such as strengthening recruitment policies, building effective grievance mechanisms to strategic wet processors in the supply chain.

Culture of Respect: Bangladesh and India

We continue our partnership with a local NGO to deliver our RESPECT programme. Launched in 2018, the programme is designed to foster an inclusive and respectful workplace culture in Bangladesh. The ambition of the programme is to ensure there is an harassment-free workplace through encouraging management culture change, sustainable management systems, and embedding worker voice.

In 2025/26, we launched a “quick guide” to help suppliers in Bangladesh monitor implementation more effectively. We continue regular visits to factory sites to monitor continuous improvement. In 2025/26, we expanded the programme to foster inclusive workplace cultures. This has been implemented in all our home and clothing primary sites in Bangladesh. In the coming year, we are supporting a pilot by the Ready-made Garment Sustainability Council (RSC) titled “Respect at Work: Preventing Harassment and Violence”.

Tackling modern slavery risks – our supply chains continued



In 2025/26 we launched the RESPECT Programme in India with primary factories in southern India. In partnership with a local NGO, the programme now operates across 29 factories. All sites held one-day launch events to secure leadership commitment, and baseline assessments were completed in 13 factories to identify culture gaps. We delivered intensive one-day workshops for top and senior management at five key suppliers, engaging over 100 leaders, with additional

workshops underway across other factories. In the coming year, we will work with our local NGO partner to deliver training to supervisors and expand the programme to more regions across India.

Cotton

Cotton remains a priority under our human rights strategy, as a commodity with associated human rights risks, including modern slavery. Tesco has supported the Sustainable Cotton



Communiqué since 2017. When Textile Exchange took ownership and launched the 2025 Sustainable Cotton Challenge, we reaffirmed our commitment to source 100% of our cotton through recognised programmes and initiatives by 2025.

Payment of wages and recruitment fees

Debt bondage significantly increases workers' vulnerability to modern slavery. To mitigate this risk, we monitor that workers in key sourcing countries are paid on time and in full for all hours worked, including any applicable overtime premiums. Where our checks identify wage shortfalls, we require suppliers to reimburse all outstanding amounts to affected workers. In rare cases where suppliers refuse, we responsibly exit the business relationship.

In 2025/26, we identified and resolved 46 cases, impacting 3,283 workers, where payments had fallen below legal or contractual requirements—including overtime premiums, minimum-wage arrears, unlawful deductions, and paid-leave shortfalls. These issues were fully remediated, with a total of USD 232,442 repaid to workers.

We are a member of ACT (Action, Collaboration, Transformation) which champions wage improvements for garment workers. See more detail on ACT under 'Collaboration and Partnerships' on page 19.

Collaboration and partnerships

Collaboration is a key part of our anti-slavery and human rights strategy, recognising that by partnering with others we can go further to address industry-wide issues. We play an important role in improving working conditions for workers, including reducing the risk of modern slavery, through collaboration with suppliers, NGOs, industry bodies and government.

Over the past 12 months, we have continued to engage in several multi-stakeholder initiatives to tackle systemic issues. We continue to prioritise initiatives that align with our strategy and where we have meaningful leverage.

Benchmarks

In 2025/26 we were pleased to be ranked in Tier 1 of companies 'leading on human rights innovation' for a third year running in the Benchmark of the CCLA, an investment management company.

We ranked 4th in Know the Chain's Food & Beverage Benchmark 2026, leading the Benchmark for UK and European retailers.

In 2025/26 we have embedded improvements into our public reporting and internal monitoring programmes. This followed work completed in 2024 with Anthesis, a sustainability consultancy, to conduct industry benchmarking of our human rights approach. The results highlighted some opportunities to improve our transparency in public disclosures, including monitoring and reporting.

ACT Action Collaboration Transformation

We are a member of ACT in which 20 international clothing brands work

together with global unions to take an industry approach to move towards a living wage. This is achieved through supporting collective bargaining between industry associations and unions. In the coming year, we hope to see a collective bargaining agreement for a living wage in Cambodia take effect. In support of this initiative, we will launch open costings with our suppliers in Cambodia, and ringfence labour costs from price negotiations.

Apart from ensuring legal wages are paid to workers, as a member of ACT, we have reached a support agreement with IndustriALL to legally commit to moving towards a collectively bargained living wage between the unions and factories in the garment industry in Cambodia. The support agreement is designed to raise wages and also to fundamentally transform the way industrial relations are managed in the garment sector. By enabling a collective bargaining process which can establish a wage structure that includes regular and predictable increases, the support agreement aims to help elevate living standards for garment workers in Cambodia.



The Consumer Goods Forum

As part of our membership of the Consumer Goods Forum (CGF), we helped to develop and support the CGF's Priority Industry Principles. These principles have underpinned the development of our modern slavery strategy, and we are one of the leading companies supporting collaborative efforts to combat forced labour in the consumer goods sector. Such collaboration is particularly important in lower tiers of supply chains where we do not have direct commercial relationships.

EVERY WORKER SHOULD HAVE FREEDOM OF MOVEMENT >>>>

NO WORKER SHOULD PAY FOR A JOB

NO WORKER SHOULD BE INDEBITED OR COERCED TO WORK

We continue to fund the Human Rights Coalition (HRC) which in 2025 conducted analysis of how member companies are tackling forced labour through implementation of Human Rights Due Diligence.

Clear Voice Interpreting



Many workers, both within our own operations and supply chains, do not speak English fluently and may feel more comfortable discussing their working

conditions in their native language. Clear Voice Interpreting is the trading arm of the NGO Migrant Help, which provides vital interpreting services to those in the UK. Informed by their experience of interpreting needs, Clear Voice Interpreting provides an on-demand phone service and pre-booked virtual interpretation services to those in need. We have worked with Clear Voice Interpreting since 2022 to access independent, professional interpreters adept at working with survivors of abuse when conducting worker engagement and human rights assessments.

In 2025/26 Clear Voice provided us support with:

- 1,010 minutes of phone interpreting services, supporting worker welfare interviews.
- Interpretation in 11 languages: Bahasa Indonesian, Bengali, Bulgarian, Hindi, Nepali, Pidgin English, Polish, Romanian, Russian, Tigrinya and Ukrainian.

Collaboration and partnerships continued



Ethical Trading Initiative

As members of the ETI, we continue to work closely with the ETI team and members on shared human rights priorities. The ETI Base Code is a core foundation of our approach to human rights, including our human rights strategy, requirements for suppliers and audit assurance programme. See page 10 for more details.

We benefit from the ETI's tripartite nature, allowing us to collaborate on priority issues closely with NGOs and trade unions.

Whilst we engage ETI closely across the entirety of our human rights programme and anti-slavery efforts, in 2025/26 we have worked with them on key projects:

- Responsible Purchasing Practices (RPP) review: we engaged the ETI on an internal review of our purchasing practices against their framework, which is informing our continuous improvement in this area. See page 7 for more details.
- We confirmed participation in two additional multi-stakeholder projects on RPP, focusing on Vietnamese shrimp and bananas in Latin America. We look forward to contributing meaningfully to these projects in the coming year, working with our peers to overcome shared challenges and embed high standards.
- Contribution to the development of ETI's renewed seafood strategy, including engagement with the ITF union representing the rights and experiences of migrant fishers across the globe.



Food Network for Ethical Trade (FNET)

Together with our suppliers and other retailers, we continue to participate in FNET, a network developed to support collaboration throughout supply chains, including addressing priority risks such as modern slavery. Tesco supports the mission of this cross-industry initiative by sitting on the Board of Directors for FNET, contributing to the strategy of FNET in 2026 and beyond.

This year FNET has continued bi-monthly calls to serve as a forum for members to share knowledge on emerging risks around modern slavery and broader ethical challenges. In 2025 we continued to co-lead FNET's Responsible Recruitment working group, where we supported members navigating complex challenges such as tackling worker paid recruitment fees through Sedex's new SMETA 'Collaborative Action Required' finding.



International Accord

The International Accord for Health and Safety in the Textile and Garment Industry is a legally binding agreement between global apparel brands and trade unions, designed to strengthen building, fire, and electrical safety, as well as overall worker health and safety, across garment supply chains—particularly in Bangladesh and Pakistan. More than 100 brands, including Tesco, have signed onto the Accord. All covered factories in Bangladesh and Pakistan are subject to Accord safety inspections and are required to implement the necessary corrective action plans.



IUF Partnership

Since 2022/23, Tesco has maintained a strategic global partnership with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF). This collaboration is founded on a shared commitment to improving working conditions in global supply chains, particularly by supporting workers to exercise their rights to freedom of association and collective bargaining. These rights are essential for enabling workers to raise concerns, participate meaningfully in decisions that affect their working lives, mitigating the risks of modern slavery.

Following on from the success of training delivered with IUF in Zimbabwe on safe working environments in 2024/25, in 2026/27 further training initiatives are planned in Spain.

Leadership
Group for
Responsible
Recruitment



Leadership Group for Responsible Recruitment (IHRB)

As a member of the Responsible Recruitment Leadership Group, an initiative of the Institute for Human Rights and Business, we support the Employer Pays Principle that 'No worker should pay for a job – the costs of recruitment should be borne not by the worker, but by the employer.' It is a policy requirement that all suppliers of food, home and clothing, and goods and services not for resale into Tesco UK align with the Employer Pays Principle over time. We remain committed to rolling out this requirement, recognising that for many suppliers the EPP transition to 'no fees' recruitment will take time, due to the difficulty in addressing the complex challenges associated with the root causes, including recruitment fees being endemic cultural norms.

Collaboration and partnerships continued



MODERN SLAVERY INTELLIGENCE NETWORK (MSIN)

Modern Slavery Intelligence Network
The Modern Slavery

Intelligence Network (MSIN) is a non-profit collaboration in the UK food sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation. We have taken leading roles in the legal and external stakeholder workstreams of MSIN, sit on the Board of Directors, and are active participants. Information generated by the network is used to detect, prevent, and disrupt modern slavery and labour exploitation in the food industry, protecting workers and improving outcomes for those directly impacted.

In 2025 we continued live intelligence sharing through MSIN, including broad trends of exploitation in specific geographic regions highlighted to us through internal investigations. We also hosted the annual conference of MSIN, focused on bringing members and the wider sector together to collectively disrupt modern slavery in the food industry.



Foros Comercio Ético
Ethical Trade Forums

Spanish Ethical Trade Forums

The Spanish Ethical Trade

Forums were established in 2015 as a collaborative initiative to address ongoing human rights risks and promote better working conditions within the agri-food sector in Spain. The Forums improve the wellbeing of workers by embedding sustainable and ethical good practice. We participate in the Forums and Governance Group, along with 12 supermarket brands and more than 100 associate members, including importers and producers.

We continue supporting "Canal Foros"; a grievance mechanism project launched with the aim of providing a common grievance channel to all workers in the Spanish fresh food industry.

Canal Foros ensures, through face-to-face training for workers, that the mechanism is understood and trusted by workers before launch, increasing effectiveness and accessibility.

In 2025/26, Canal Foros delivered:

- Training to workers at 35 companies, including launching the grievance mechanism.
- Direct training to 2,692 workers by the Forums.
- Training to 82 trainers.
- Grievance mechanism coverage to 10,688 workers.
- Continued collaboration with Appellando, a global grievance initiative.

In 2025/26 the Spanish Ethical Trade Forums delivered six online seminars, four regional events and one international event, reaching 789 sector representatives. The Forums have also delivered two in-person training sessions to management and workers to tackle issues related to poor social dialogue, management systems, leadership skills, and remedying modern slavery cases. These training sessions are delivered by experienced trainers selected by the Forums who adapt and prepare each session, focusing on the company characteristics and common challenges.

We will continue working closely with our suppliers and stakeholders in the Forums across Spain in 2026/27.



unseen

Unseen

Since 2019 we have supported the anti-slavery charity Unseen, who operate the UK's independent and confidential Modern Slavery & Exploitation Helpline. The Helpline's trained advisors support potential victims of modern slavery as well as offer a way for businesses and the public to raise concerns. Real-time translation is available in over 180 languages. We encourage our primary supplying sites in the UK to promote the Helpline, enabling us to continue to raise awareness of modern slavery. Through the Unseen business portal, which provides us with information about concerns reported to the Helpline, we have gained visibility of one potential case relating to our own operations and six linked to our supply chains in 2025/26. Where these issues are brought to our attention by Unseen, we work closely with them on the investigation and remedial actions from a victim and worker centred approach.

Awareness raising and capacity building

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

This year, we reviewed our Group-wide Human Rights training programme and developed a plan to enhance it for both Tesco colleagues and suppliers. As part of this, we renewed and expanded our partnership with Stronger Together to ensure that all suppliers based in the UK and ROI across all our key Business Units have access to training on responsible recruitment, forced labour, and modern slavery. We also delivered foundational Human Rights Training, including modern slavery, to over 800 colleagues across our key Business Units.

Training was provided for upskilling 64 auditors who are approved to conduct ethical audits on our behalf in our home and clothing supply chain.

We continue to require all Tesco suppliers based in the UK, including service providers such as labour agencies, to attend Stronger Together training on tackling modern slavery once every three years. This requirement also includes the second tier of our key UK food suppliers. Since the programme began, 4,324 representatives from our supply chains have attended this training. This is an increase from 3,801 in 2024/25, representing a 14% increase year-on-year.

We sponsor Stronger Together's South Africa programme, and we strongly encourage all fruit and wine producers to attend Stronger Together training in South Africa, with 3,843 individuals trained to date, compared to 2,229 individuals in 2024/25, representing a 72% increase year-on-year.



Tesco Ethical Change Makers (TSEC)

Recognising that strong ethical capability at supplier level is essential to driving lasting improvements in working conditions, we continue to deepen our engagement through the Tesco Ethical Change Makers (TSEC) programme across our Home and Clothing supply base.

Established in 2019, the programme has evolved from promoting awareness of our values and Responsible Sourcing standards to equipping suppliers with the practical skills required to drive sustained improvements within their factories.

Over the past two years, we have delivered face-to-face training sessions across key sourcing hubs. These in-person sessions have created an open platform for suppliers to exchange best practices, discuss challenges and learn from peers across the industry. The format has been highly valued by participants, who consistently recognise the benefits of deeper collaboration and shared learning.

In 2025/26, 68 participants have been newly certified as TSEC, with 234 successfully renewing their qualification across supplying sites in Bangladesh, China, Egypt, India, Pakistan, Sri Lanka, Southeast Asia, Turkey and the UK.

Impact and monitoring

We will continue to report annually within this statement on the below additional metrics and measures of success:

Measure	Status 2025/26
Number of primary suppliers in the UK trained on modern slavery.	497 new suppliers in 2025/26.
Number of Tesco colleagues trained on modern slavery.	804 office colleagues (including those in Procurement and Technical functions) received training on modern slavery through the Human Rights Foundation module.
Number of cases with modern slavery indicators identified in own-operations and supply chains.	10
Number of cases with labour abuse indicators identified in own-operations and supply chains.	38
Number of modern slavery cases successfully remediated.	7
Amount of recruitment fees remediated in our supply chains.	USD 1,878,684.

Impact and monitoring continued

We also monitor progress against the commitments we make within our Modern Slavery Statement each year.

Measure	Status 2025/26
Complete a review of our purchasing practices to understand opportunities for improvement.	This has been completed. See more detail on page 10.
Continue site-level human rights due diligence across our distribution network, supported by independent experts.	We continue due diligence across our distribution network. See more detail on page 11.
Provide modern slavery training to colleagues as required.	This year we have focused on expanding group-wide human rights training. In 2025 we trained 804 technical and procurement colleagues. See more detail on page 23.
Continue rollout of Group Human Rights Blueprint.	This year we launched enhanced ethical sourcing requirements for goods for resale supplied into all relevant business units. We also agreed our focus for goods and services not for resale in 2026/27. See more detail on page 7.
Update our fish and seafood responsible sourcing requirements.	We have reviewed our requirements with a renewed focus on embedding human rights due diligence. See more detail on page 14.
Continue participation in the Seasonal Worker Scheme Taskforce to improve conditions for scheme participants, including continued support and promotion of the Just Good Work app.	Our active support in the Taskforce continued throughout the year, including support of the Just Good Work app. See more detail on page 14.
Pursue advocacy opportunities with UK government and other stakeholders for reform of the Seasonal Worker Scheme.	We continued to make the case this year for scheme reform, including at the roundtables we sponsored through the Taskforce. See more detail on page 14.
Continue supporting and promoting Unseen and the Modern Slavery & Exploitation Helpline.	Our close partnership with Unseen and the helpline they operate has underpinned our modern slavery effort this year and will continue to do so in 2026/27.

Impact and monitoring continued

Measure	Status 2025/26
Continuously improve coverage and access to grievance mechanisms for workers across our supply chain.	We continued our review of Protector Line accessibility in global sourcing regions in 2025, identifying opportunities to improve. We will continue to collaborate with our suppliers to improve access in 2026.
Continue work with FNET at Board level, including strategy development to support progress against members' modern slavery aims, and co-leading the Responsible Recruitment working group.	We continued to participate in FNET and board level and have continued to co-lead the Responsible Recruitment working group in 2025. In 2026 we will hand off leadership of the group to other FNET members.
Finalise 100% compliance with our Responsible Recruitment Requirements in Thailand and Malaysia (UK & ROI) and monitor implementation across the region.	We have completed implementation of our requirements and monitor performance of our suppliers against these expectations. See more detail on page 13.
Continue participation in the ETI Grievance Mechanism in Agriculture project to drive improved access to grievance mechanisms for migrant workers in key produce supply chains.	We participated in this project with the ETI until its conclusion in 2025. Our focus with ETI is now looking at Responsible Purchasing Practices. See more detail on page 10.
Continue our partnership with the IUF, including trialling the incident reporting tool in priority countries.	We renewed our MoU with IUF in 2025 and continued implementation of worker empowerment training, including socialisation of incident reporting tools. See more detail on page 20.
Work with Oxfam to disseminate the grievance mechanism toolkit to home and clothing suppliers.	We continued to promote the toolkit to key suppliers particularly across our Home and Clothing supply chains. See more detail on page 8.
Expand our Home and Clothing ethical monitoring programme to tier 2 and tier 3 of our supply chain.	We continued to expand and monitor beyond tier 1 sites. So far, the working conditions of 261 fabric mills, 54 spinning mills, and 71 weavers have been assessed.

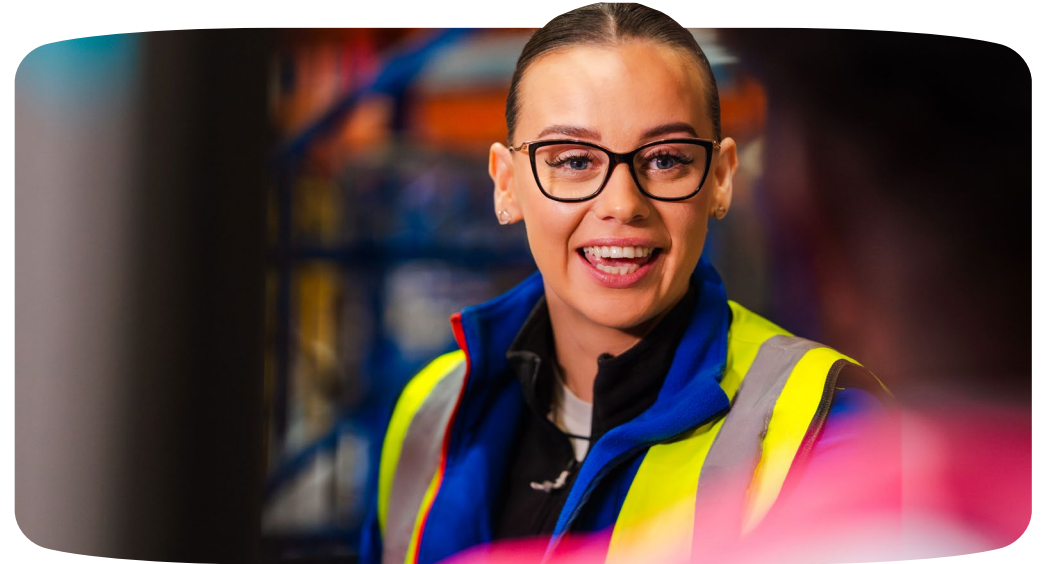
Plans for 2026/27

In the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chains and ensure our strategy is responsive to changing risks.



Own business and operations

- Roll out updated Human Rights Foundational Training to all supplier-facing colleagues as part of a programme of essential training.
- Develop and deliver a practical Modern Slavery training module designed to upskill relevant colleagues on recognising and appropriately responding to signs and indicators of modern slavery in our stores, distribution centres, as well as supplier sites.
- Work closely with our regional human rights colleagues and service providers to ensure continuous improvement to the Protector Line service in global sourcing regions.
- Further build capacity of our auditors through the audit witness programme.
- Continue to conduct enhanced due diligence within our distribution network, focused on worker experience and continuous improvement.



Our supply chains

- Continue site visits by regional experts, including worker interviews and supplier training on key risk topics such as human rights due diligence and responsible recruitment.
- Continue funding and participation in the Seasonal Worker Scheme Taskforce, collaborating with a full range of stakeholders to improve worker experience, such as a dedicated grievance reporting line.
- Continue engagement with Sedex directly and alongside FNET to represent member experience and delivery against shared due diligence aims.
- Continue to support and promote the Just Good Work app to workers via our suppliers.
- Commence rollout of work with wet processors in our home and clothing supply chain to strength recruitment policies and build effective grievances mechanisms.
- Continue rollout of the 'RESPECT' programme to Home and Clothing suppliers in India.

TESCO