

ASDA

MODERN SLAVERY & HUMAN RIGHTS STATEMENT 2024

Our purpose is to bring brighter
living within everyone's reach

ASDA

Asda House lit up red to mark
National Anti-Slavery Day
18 October 2023



This statement has been published in accordance with the **UK Modern Slavery Act 2015**. It sets out the steps taken in relation to **Part 6, 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 2023 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 (collectively referred to as Asda, except where the report specifically refers to an individual entity or where explicitly stated otherwise), and newly acquired businesses including Arthur Foodstores Ltd., Euro Garages Ltd. (both trading as Asda Express), and Leon Restaurants Ltd.

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ABOUT THIS STATEMENT

At Asda, we continue to be committed eradicating modern slavery and human trafficking in all its forms and to uphold human rights, promoting fair labour practices. This statement outlines our approach, policies, and actions to prevent and address modern slavery and human rights within our operations, supply chains, and business relationships.

FOREWORD

MOHSIN ISSA



As we look forward to 2024, we can see a challenging year ahead of us. But it is one that I am very excited about, as we move forward on our journey of becoming the UK's number two grocery retailer continuing our commitments to tackling modern slavery and human trafficking.

Asda seeks to continue our journey and evolve to address modern slavery risks within our business and supply chains and we are committed to continuously improving our modern slavery approach. We dared to try a first for our business by introducing Lived Experience Consultants (LECs) into our work around Modern Slavery by holding on **National Anti-Slavery Day** a 'Taste of Freedom' webinar to raise aware of wider forms of modern slavery.

We've continued to put our customers at the heart of everything we do and we've supported our colleagues and customers through what was a challenging financial time for many families, investing in keeping prices low, while at the same time improving the quality of key-own brand ranges, such as bakery, fresh meat and produce. We introduced innovative offers such as our Food Hub, alongside exciting new partnerships. We've also put almost £400 million back into our customers' pockets through our loyalty proposition, Asda Rewards, since launch.

We completed the acquisition of former Co-op stores, as well the majority of Euro Garages (EG) Group's UK business, and are proud that to date we have now opened over 200 Asda Express stores, and we appreciate that these changes need to be established into our existing ways of working and business wide approach to Modern Slavery. We're also continuing to support our colleagues. We've invested in our hourly paid colleagues' pay, to ensure they receive a fair and competitive rate. Our apprenticeships go from strength to strength, and over the past two years we've offered

over 60 different programmes, funding 496 colleagues. Plus, we've run more colleague special discount events than ever before to help budgets go further.

Over the course of 2023, we've worked closely with our local communities and national charity partners. We raised more than £10 million for national causes such as Tickled Pink, BBC Children in Need, and the Royal British Legion's Poppy Appeal. Our Community Champions have also continued their great efforts, donating time through volunteering, products to groups that need them, and space in stores. In November, we pledged our support for HRH King Charles' Coronation Food Project, by donating the equivalent of one million Christmas dinners to good causes during the festive period.

In addition, our corporate charity, the Asda Foundation, has given over £3 million in grants to help thousands of grassroots groups continue their vital work. In addition, we've supported charities and social enterprises with a modern slavery focus including **Causeway** and **The Snowdrop Project**.

In 2023, we reset our business and moved forward on our journey of becoming the UK's number two grocery retailer. We relaunched our values to provide us with the focus needed to achieve this purpose; putting the customer at the heart of everything we do, daring to try, not waiting to make good stuff happen, loving what we sell and working together as all colleagues, one team.



Mohsin Issa CBE
Asda Co-Owner

OUR MODERN SLAVERY COMMITMENTS

LEGAL COMPLIANCE

We adhere to all relevant laws and regulations related to modern slavery, including the **Modern Slavery Act 2015** and similar legislation, where applicable, worldwide.

RISK ASSESSMENT

We conduct regular modern slavery risk assessment to identify areas where modern slavery risks may exist. This includes evaluating our suppliers, business partners and supply chains.

DUE DILIGENCE

We require our suppliers to comply with our Modern Slavery Policy. Before engaging with new suppliers, we seek to assess their practices and conduct due diligence to ensure alignment with our **Standards for Suppliers**.

TRAINING & AWARENESS

We provide training to our employees, suppliers, and partners on recognising and reporting signs of modern slavery. This continues to include workshops and free training and access to resources for our suppliers by key partners such as **Stronger Together** and the **Responsible Recruitment Toolkit**, online Modern Slavery and Human Rights e-learning, and ongoing awareness campaigns.

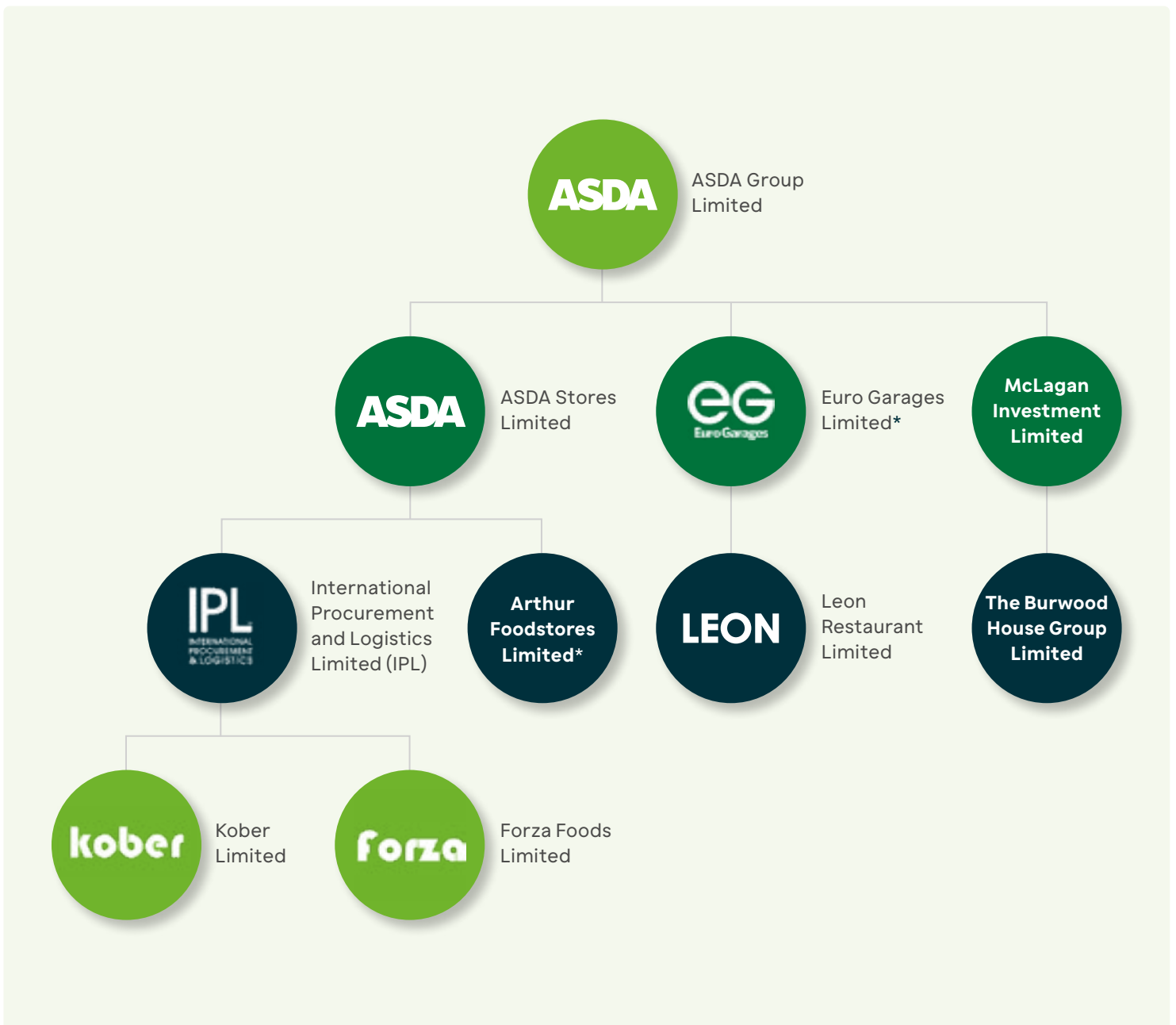
SURVIVOR SUPPORT

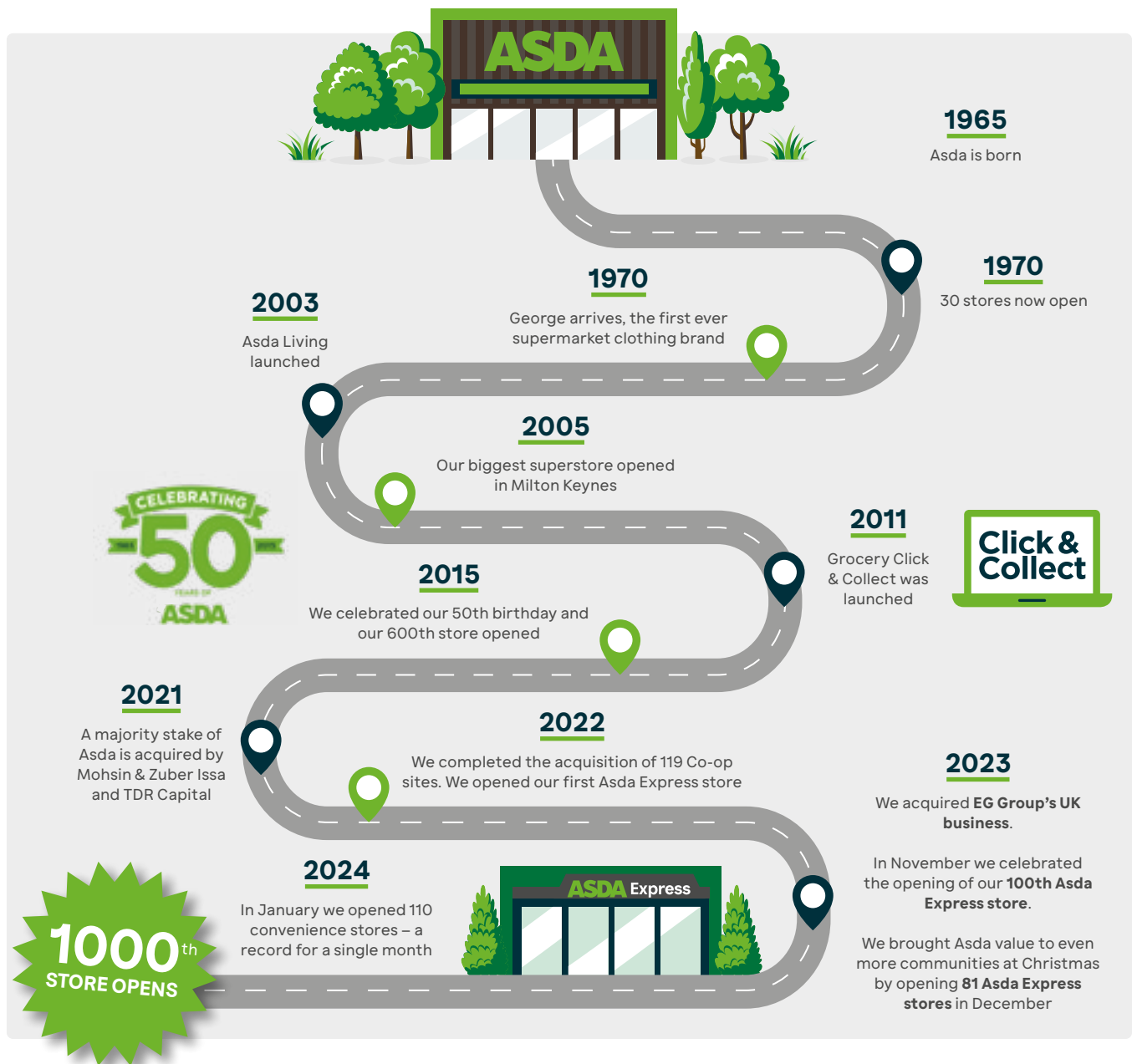
We seek opportunities to support remedy where possible, and look for survivor focussed partners who we can work with to provide support.

Approved by IPL Board on behalf of IPL, Forza Foods Ltd. and Kober Ltd. on 23rd May 2024
Approved by Asda Board on 30th May 2024 on behalf of Asda Group Ltd., Asda Stores Ltd, Arthur Foodstores Ltd., The Burwood House Group Ltd., Euro Garages Ltd., Leon Restaurants Ltd. and McLagan Investments Ltd.

OUR ORGANISATION & STRUCTURE

In 2022, and during 2023, our corporate organisational structure changed with the acquisition of Arthur Foodstores Ltd., Euro Garages Ltd. and Leon Restaurants Ltd. sites supporting our ambition to become the UK's second largest grocery retailer.





ACQUISITIONS

Euro Garages

In October 2023, Asda announced it had completed the acquisition of the majority of EG Group's UK business to support accelerating growth in convenience and foodservice. Buying the EG UK business is key to Asda's strategic plan to create a value-led convenience offer by rolling out Asda Express across EG UK's 356 sites which included modern convenience stores on Petrol Filling Stations (PFS).

Arthur Foodstores

In October 2022, Asda completed the purchase of Arthur Foodstores Ltd. consisting of petrol stations with attached grocery stores, from The Co-Op as part of our strategy to enter the convenience retail space and create an exciting new part of the Asda business that brings Asda value to more Asda communities.

ABOUT OUR BUSINESS

Asda Group Limited (AGL)

Registered office – ASDA House, South Bank, Great Wilson Street, Leeds, LS11 5AD, UK. Asda is ultimately owned and controlled by the Issa Brothers (Mohsin and Zuber Issa) and TDR Capital LLP, a leading private equity firm.

Asda Stores Limited (ASL)

Asda is a British grocery retailer headquartered in Leeds, UK. With roots dating back to a family business in the 1920s in West Yorkshire. Our primary operations include the sale of groceries, clothing, general merchandise and fuel through our stores and online. We also offer a range of other services including Asda Money, Asda Mobile, Pharmacy and Optical Services. Asda was the first UK grocer to open a clothing range in its stores, with the George brand introduced into our supermarkets in 1990. Today George is an icon of the British high street.

International Procurement and Logistics Limited (IPL)

The principal activity of IPL is the sourcing of fresh produce, grocery products, wine, house plants and flowers for ASL.

Forza Foods Limited (Forza)

The principal activity of Forza is the procuring, slicing and packing of processed meats for ASL.

Kober Limited (Kober)

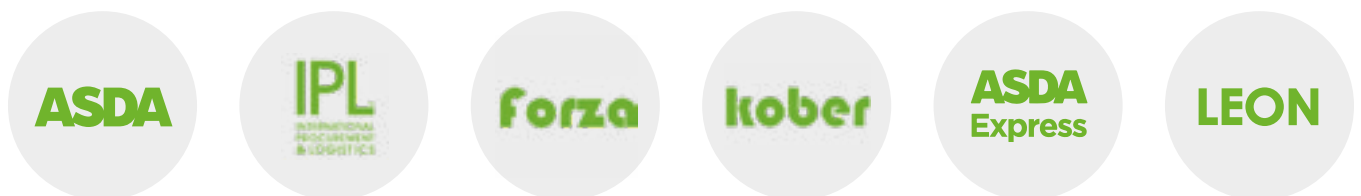
The principal activity of Kober is the procuring, slicing and packing of processed meats for ASL.

Asda Express

Asda Express provides three primary categories of products and services: retailing of fuel, convenience retail and food service.

LEON Restaurants Limited (LEON)

LEON is a pioneer in the rapidly evolving contemporary fast-food market, and refers to offerings as 'naturally fast food'.



| | ASDA STORES | ASDA EXPRESS | LEON | IPL | FORZA | KOBER | TOTAL |
|---------------------------------|-------------|--------------|-------|-------|-------|-------|---------|
| Head offices | 2 | 1 | 1 | 1 | 1 | 1 | 7 |
| Retail sites | 747 | 417 | 51 | 0 | 0 | 0 | 1,215 |
| Manufacturing Operational sites | 0 | 0 | 0 | 7 | 1 | 1 | 11 |
| Hand car wash | 70 | 1 | 0 | 0 | 0 | 0 | 71 |
| Colleagues | 144,219 | 11,100 | 1,217 | 2,068 | 1,185 | 457 | 160,246 |
| Agency | 4,387 | 0 | 0 | 3,457 | 400 | 0 | 8,224 |
| Overseas locations | 0 | 0 | 0 | 2 | 1 | 0 | 3 |
| Suppliers | 3,191 | * | * | 210 | 10 | | 3,191 |
| Supplier sites | 2,994 | * | * | 486 | 41 | | 2,994 |
| Labour providers | 41 | 0 | 0 | 18 | | 0 | 59 |

Colleagues: Asda figure includes all direct colleagues for Asda, IPL, Forza and Kober.
Agency: Asda figure based on maximum no. of agency workers across 2023. IPL/Forza agency numbers based on total number of workers deployed in 2023 via temporary labour providers.
Suppliers: Asda – All suppliers to Asda Stores Limited including IPL, Forza and Kober data.
Supplier sites based on sites within the scope of Asda Responsible Sourcing programme.
*- 2024 focus.

OUR PURPOSE AND VALUES

2023 has seen significant change at Asda. We're focussed on becoming the second biggest grocery retailer in the UK, and we set our purpose to bring brighter living within everyone's reach and underpinned this purpose with five new Asda values.

From a business organisation and structure perspective 2023 saw a continuation of our huge transformation programme 'Future'. The Future programme is part of the biggest transformation in our history, converting over 22 years of Walmart systems and processes to a new and independent way of working.

ASDA SUPPLY CHAIN

Our supply chains are vast and complex; we buy an extensive range of products and services from all over the globe which we either sell or use within our own business operations. This is managed across four key business areas: Grocery, Apparel (George), General Merchandise and Goods & Services Not For Resale. The supply chains for each of these areas vary but can include the following at different stages: processing factories, farms, fishing vessels, abattoirs, packing and storage facilities, dye houses and fabric mills.

Asda's has a dedicated Modern Slavery, Responsible Sourcing and Human Rights team managing our programmes and risks across these areas. Our approach to modern slavery and human rights in our global supply chains is led by this team, structurally within our Legal and Compliance business function.

Our Responsible Sourcing programme seeks to address labour standards risks and compliance within Asda's own brand supply chain. Based primarily on risk and the introduction of the **Modern Slavery Act 2015**, we have brought new suppliers, sites and categories into the scope of this programme to provide increased due diligence in higher risks areas of our supply chain associated with increased modern slavery risk, such as elements of our Goods Not For Resale function.



We're building the foundations to grow our business, by creating brand new systems that are flexible and sustainable. Future will transform the day-to-day operations of our business.

Our Future Transformation gives us a unique opportunity unlike any other grocery retailer, where we'll have no legacy systems. By upgrading every piece of our technology, we'll simplify how our colleagues work and improve our offer for customers.

In 2023, we have now also incorporated all Asda and IPL labour providers into the programme, where we have continued to evolve and address our approach to risk and where labour provision is known to be higher risk for modern slavery issues.

Overall, Asda has nearly 3,200 suppliers in total, across all business areas and functions, 952 of these suppliers are in scope for our Responsible Sourcing programme across their 2,994 sites and facilities (including sites supplying IPL, Forza and Kober). Over time Asda will look to identify and assess modern slavery risk and responsible sourcing compliance for EG and Leon suppliers and their sites, providing greater transparency as appropriate.

MODERN SLAVERY PROGRAMME ACTIVITY OVERVIEW 2023 HIGHLIGHTS

110

Investigations completed from colleague modern slavery duplicate records quarterly checks

2000+

Supply chain site locations shared via Open Supply Hub improving Asda's level of transparency

448

Asda colleagues trained on Modern Slavery e-learning

56

Participants signed up to attend our 'Taste of Freedom' lived experience webinar

FOODIES FIGHTING SLAVERY



1894

Ethical/Social Audits completed on supplier sites*

6,000

visits of our Modern Slavery Statement page on our corporate website

77%

'Taste of Freedom' event attendees shared their understanding of how someone close to them could become a victim of Modern Slavery or exploitation had improved

2130

Suppliers compliant with MSA 2015 Section 54 TISC



5

Survivors participants in Asda Ingredients for Life lessons

2023 ACTIVITY

Q1

JANUARY, FEBRUARY, MARCH

- £40,000 worth of bedding was donated to Asda to modern slavery survivors through **Causeway's LifeSupply Hub**, supporting more than 300 survivors across 15 safehouses and outreach programmes.
- Asda ESG Strategy Conference - set out Modern Slavery, Human Rights and Responsible Sourcing as a 'Business Fundamental' and a critical foundation step in Asda's ESG Strategy.
- Asda makes **Banana Living Wage Commitment**.

Q1

Q2

APRIL, MAY, JUNE

- Delivered our **Ingredients for Life programme** to five further modern slavery survivor participants and in partnership with **Causeway** supported the launch event for our Ingredients for Life programme, attended by over 50 people and businesses.
- Asda supported **Foodies Fighting Slavery** alongside ex-independent Anti-Slavery Commissioner Dame Sara Thornton with the launch event and panel discussion promoting the **new SME toolkit resource** to support smaller business in their efforts to address modern slavery.
- Supported academia via participation in Cardiff University PhD research project on Modern Slavery collaboration.

Q2

Q3

JULY, AUGUST, SEPTEMBER

- Asda received **ETI Corporate Transparency Framework** results meeting 7 of 9 criteria. ETI spotlighted **Asda's Human Rights Policy** in the member resource pack.
- Asda published supply chain site location details on **Open Supply Hub**.
- Asda completed a review of suppliers and supply chain focussed on specific risks relating to state imposed forced labour in China.
- Asda one of several retailers co-funding an independent investigation into allegations relating to conditions for migrant workers on vessels in the UK fishing industry.
- Modern Slavery assessment questions and associated training integrated into a new incident and case management system for Asda's Security teams to support improved identification of potential modern slavery issues.

Q3

Q4

OCTOBER, NOVEMBER, DECEMBER

- Asda hosted 'Taste of Freedom' a lived experience event to improve awareness of modern slavery for colleagues and suppliers and Asda House turns red to mark **National Anti-Slavery Day**.
- Asda makes a donation supporting West Yorkshire Police with their **Modern Slavery Victims' Voices Exhibition**.
- Members of Asda's Legal and Compliance teams volunteered for **The Renovation Club** and **The Snowdrop Projects** making a house into a home, and helping survivors feel settled, safe and comfortable.
- Asda supported **Causeways Big Causeway Regift** a campaign to support survivors via the donation of unwanted Christmas gifts.

Q4



Asda has delivered across all 2023 statement objectives. Below is a brief summary of the key developments made. Our forward-facing objectives were:

| AREA | OBJECTIVE | 2023 PROGRESS |
|---|---|--|
| Organisation structure, business and supply chains. | Continue to maintain and develop existing controls and processes to improve modern slavery risk mitigation. | All existing controls and processes have been maintained, and further new processes put in place, including a new process for our own brand suppliers via our onboarding system that flags new suppliers and enables modern slavery compliance assessment to take place prior to the suppliers being onboarded by Asda. |
| Policies | Update and enhance business policies relevant to modern slavery risk mitigation. | Our Modern Slavery Supplier Policy has been significantly enhanced and improved to include a wider view on how Modern Slavery fits into our overall approach to Human Rights and this revised policy is now progressing through our internal stakeholders reviews and governance processes with a view to implementation in 2024. In June 2023, Asda updated our Standards for Suppliers – these changes represent some of the most considered builds since we wrote them originally and further enhances the relevance to our salient risks and the themes we see. |
| Risk Assessment | Review and update business risk assessments related to modern slavery to support continuous improvement and meaningful Key Performance Indicators. | Our modern slavery risk assessment has been completed and updated in line with our internal risk management programme. |
| Due Diligence | Maintain and develop existing modern slavery controls and processes in place to address risk. | Our existing due diligence processes remain ongoing and 2023 has seen the addition of a new measure put in place with the aim of improving our understanding of non-supply chain related modern slavery issues in our business. This has been achieved via the implementation of Modern Slavery questions and elements now being required as part of our store security teams incident management for incidents occurring in stores. |
| Training and Awareness | Continue to review and develop training related to Modern Slavery and Human Rights. | Asda has trained a further 448 colleagues via our bespoke Modern Slavery e-learning module , and continued to raise awareness of Modern Slavery via a number of awareness activities, including supporting donations requests for charities supporting survivors and delivering a lived experience webinar event focussed on modern slavery from a wider perspective beyond forced labour. |
| Effective, Goals and Key Performance Indicators | Under Asda’s ESG strategy, set and commence measurement of meaningful modern slavery KPIs. Deliver further cooking lessons for modern slavery survivors via Asda’s Ingredients for Life programme and to support Causeway to transition the programme to a sustainable model to benefit increasing numbers of survivors. | Asda delivered a further set of Ingredients for Life lessons supporting five modern slavery survivors and through The Snowdrop Projects Renovation Club supported the renovation of a survivors new home through Asda’s volunteering programme where across three days 11 Asda colleagues volunteered to paint and decorate the home. |

OUR ESG APPROACH

We believe our ESG programme supports our business growth strategy, providing accessible and affordable solutions for the growing number of customers who want to shop in a healthier and more sustainable way, and developing a more efficient and resilient value chain so that we grow sustainably. We reassess our material issues regularly to ensure we continue to address the most relevant topics to our stakeholders and make a meaningful impact.



HEALTHY & SUSTAINABLE CHOICES

Developing healthy and sustainable, affordable products and providing customers access and responsible marketing to support healthy and sustainable choices.



NET ZERO CARBON

An end-to-end net zero carbon emissions business.



NATURE

More sustainable and resilient supply chains, driving a positive impact on key natural resources.



ZERO WASTE

Reduce, reuse and recycle waste across the supply chain and operationally.



RESPONSIBLE BUSINESS FUNDAMENTALS

Health & Safety, quality, DEI, modern slavery, human rights and responsible sourcing, charitable fundraising (including Tickled Pink), corporate giving and local community outreach.

Our priorities are underpinned by our responsible business fundamentals: areas which stakeholders expect Asda to be managing and disclosing transparently. In August 2023, Asda published its third Environmental, Social and Governance (ESG) report. Both Human Rights and Modern Slavery form part of our agenda as a 'Business Fundamental'.

POLICIES

We recognise that having policies in place to set out clearly our expectations is essential. Our approach to modern slavery is no exception to this, and across our business we have specific policies in place either specifically to address modern slavery and as elements in other key policies across the business that have connection to or importance for elements of modern slavery risk.



In 2023, our Modern Slavery Policy for suppliers has been updated, and is subject to approval alongside further Human Rights policies in 2024. For details of the other policies please refer to our previous 2022 statement.

Internal

- ✓ Agency Worker Policy
- ✓ Domestic Abuse Policy
- ✓ Grievance Policy
- ✓ Recruitment Policy
- ✓ Right to Work Policy
- ✓ Modern Slavery Policy
- ✓ Safeguarding Policy
- ✓ Whistleblowing Policy
- ✓ Statement of Ethics

External

- ✓ **Human Rights Policy**
- ✓ **Modern Slavery Policy**
- ✓ **Standards for Suppliers**
- ✓ **Transparency Policy**
- ✓ Statement of Ethics
- ✓ Cotton Policy

RISK ASSESSMENT

Asda's approach to risk assessment is thorough and supported by governance processes to mitigate risks to Asda our subsidiary businesses, our colleagues and workers in our supply chains. Our risk assessment approach for modern slavery is delivered by our Modern Slavery Subject Matter Expert (SME) in partnership with key stakeholders across the business.

Risk assessment is key to our overall approach to modern slavery, as the risks relating to modern slavery vary for each of our businesses, functions, business areas and activities, and equally differ across products, services, suppliers and sites. Thorough risk assessment enables Asda to proactively take steps to mitigate our risks and stay informed where new risks may arise, or existing

risks become elevated or less relevant, influenced by ever changing factors internally and externally. As an example, our risks in relation to State Imposed Forced Labour globally is a key area of focus.

COMPLIANCE RISK ASSESSMENT PROCESS

Risk Assessment (RA) is one of the five 'building blocks' of the Asda compliance programme. It is the foundation on which the programme is built, and used for planning purposes, allowing resources to be utilised in a risk-aware way, facilitating continuous improvement and simplification, and demonstrating good governance and due diligence.

Asda has an overall approach to risk assessment for all compliance programmes and Modern Slavery risk assessment is included within this. We have a dedicated Risk and Assurance team who co-ordinate the risk assessment and horizon scanning processes within our Legal and Compliance function, and these are completed by Subject Matter Experts (SMEs) for each Subject Matter Area (SMA). This feeds into our Enterprise Risk Management (ERM) process led by our Internal Audit team. Risk and Assurance positions and insight are reported to Legal and Compliance Leadership and to the Compliance, Ethics, Risk and Audit (CERA) committee.



cera

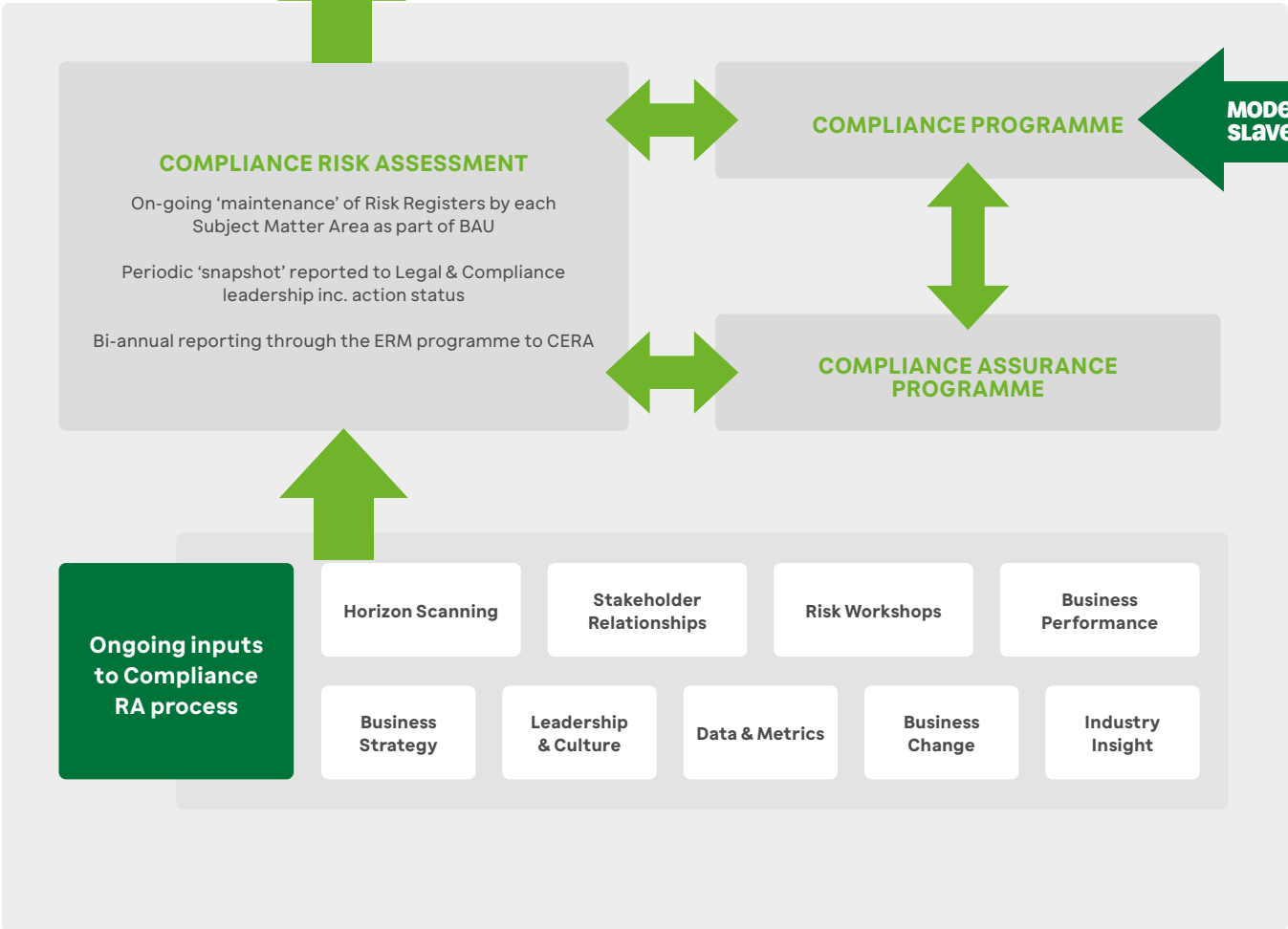
Compliance, Ethics, Risk & Audit Committee

- Sub-committee of the Asda Exec Board
- Chaired by General Counsel, attendees inc CFO, Head of Audit, Compliance leadership

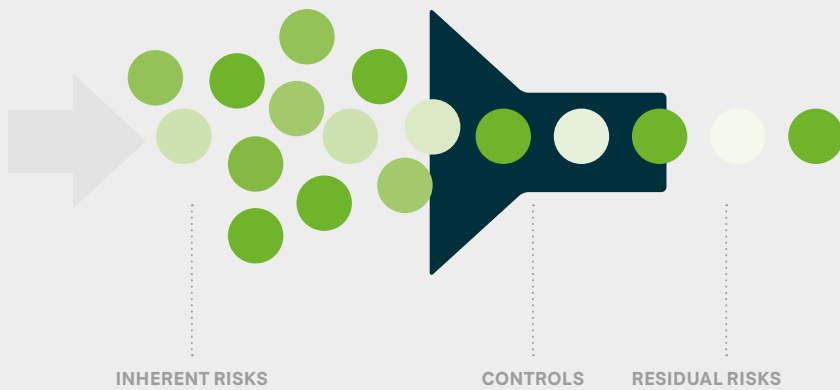
ASDA ENTERPRISE RISK MANAGEMENT PROGRAMME (ERM)

ERM managed by Internal Audit

- Corporate and functional risk management framework



GROSS RISKS



COMPLIANCE CONTROL



HORIZON SCANNING



What is Risk Assessment?

Our risk assessment identifies and documents Modern Slavery risks within our Compliance risk register. Each risk is analysed for likelihood of occurrence and impact to Asda at a Gross (before risk mitigation has been applied) and Net (once process and controls have been factored in) Level. Actions are put in place for any risks where the net level of risk is higher than the desired level with accountable and responsible owners assigned.

A summary of compliance controls is also documented within the risk register against each Modern Slavery risk. This outlines the type of assurance activities in place to a) mitigate against the specific risk and b) ensure adherence to relevant laws and regulations. The effectiveness of these controls helps to inform the analysis of net risk.

Horizon scanning is also part of risk assessment with the aim to spot emerging risks. The output of this process is documented and reported along with risk assessment results. This helps to ensure that Asda has enough time to prepare and act in advance of a risk materialising.

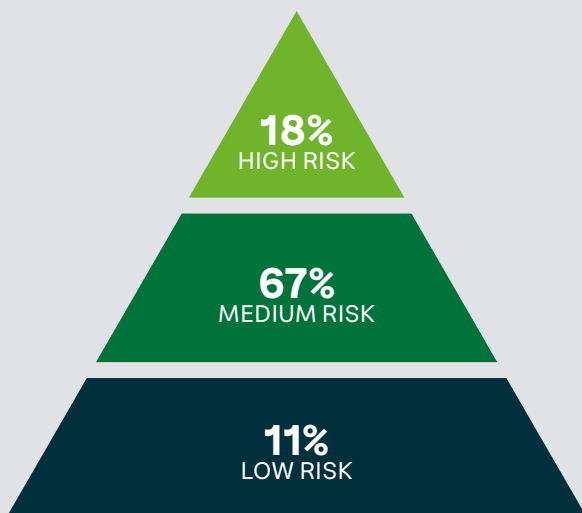
EXPLOITATION SPECTRUM

Modern Slavery is at the extreme end of a spectrum that extends from basic decent working conditions and minimum legal compliance, worsening through a range of substandard, unethical and unscrupulous practices, to ultimately non-compliant and illegal practices.

As a business, Asda seeks to provide good, safe and decent work always, for our colleagues and workers in our supply chains. We however understand that for a wide and varied range of reasons this may not always happen, and Asda will take action where necessary to rectify and remedy instances where this does not happen. Since the introduction of the **Modern Slavery Act 2015**, and even before this Asda has experienced issues across the exploitation spectrum across our business and supply chains and has introduced a wide range of policies and processes in place to ensure that the likelihood of reoccurrence is minimised.



SUPPLY CHAIN RISK MANAGEMENT



Through our Responsible Sourcing programme in 2023, across the 1894 audits undertaken (based on data from **Sedex**) on our suppliers sites, an almost typical risk profile is present with the majority (67%) of our supplying sites categorised in medium risk, with the reminder fairly well split between high and low risk.

For those suppliers found to be categorised as high-risk, our team works with these suppliers to close out their business critical or critical non-conformances identified as the priority and requires that all non-conformances are closed out and fully remediated, with a view to support transition to a lower risk profile.

DUE DILIGENCE

Asda undertakes a variety of due diligence measures to support risk mitigation, ensure our legal compliance is met and to contribute to effective decision making across our organisations by providing a detailed understanding of the matters and issues at hand. Where modern slavery continues to be a highly complex subject matter with far reaching potential impacts across our business it is vital we continue to our approach in this regard.

GOVERNANCE & COMMITTEES

Asda continues to have strong governance structures and processes in place to steer and support our overall approach to modern slavery and human rights. Key governance groups are detailed below:

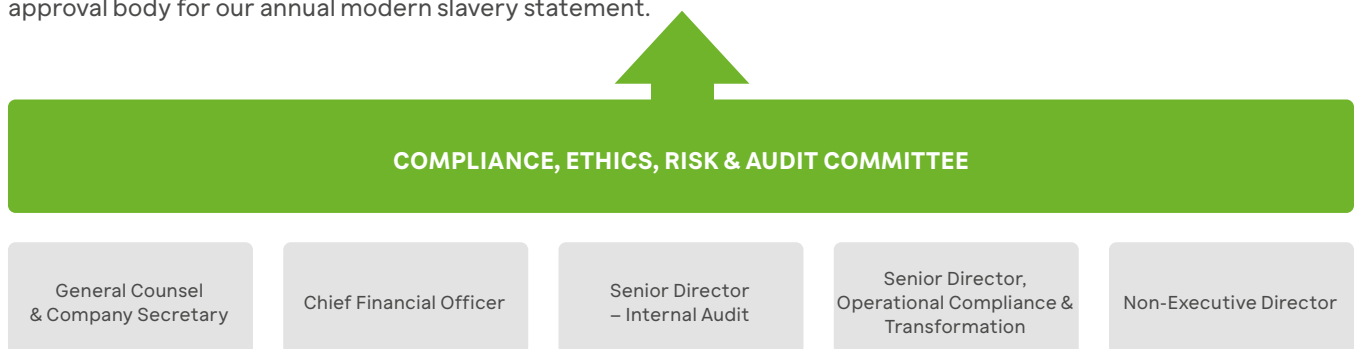
Executive Board

Our executive board oversees Asda’s strategic planning and key decision making. The Asda board meets monthly and has the final approval for our annual Modern Slavery Statement.



Compliance, Ethics, Risk & Audit committee (CERA)

Asda’s CERA committee meets monthly, and assists the Asda Board in relation to reviewing and monitoring Asda’s system of internal controls and risk management, our internal audit process and compliance with law, regulations and ethical codes of practice. CERA is a key stakeholder group for our approach to modern slavery, and an internal approval body for our annual modern slavery statement.



ESG Steering committee

Under our ESG strategy Asda has an ESG Steering Committee (ESG SteerCo) which meets monthly and has board level representation through our General Counsel, Chief People and Corporate Affairs Officer, Chief Financial Officer and Chief Commercial Officer. The steering committee is in place to monitor the delivery of our ESG strategy, approve new initiatives and propose overall strategic direction. Asda's annual modern slavery statement is reviewed by the steering committee as part of our internal approvals process.



IPL MSSG

IPLs Modern Slavery Steering Group (MSSG) meet quarterly and forms part of wider group business governance structures covering IPL, Forza and Kober and supporting Asda's overall approach to modern slavery and forms part of the overall group annual modern slavery statement approval process. In 2024, to strengthen this group further, IPLs HR Director will join.



Supplier compliance KPI

We recognise that when the **Modern Slavery Act 2015** was launched it was a world leading piece of legislation, however over time, other countries have introduced similar or more advanced legislation, and some observers would say that the UK is no longer leading in this area. The EU is looking to introduce legislation supporting Human Rights more widely with expectations for businesses and product bans are under consideration where it is found to be identified that products are associated with forced labour.

In 2023, we have taken steps towards introducing our first Modern Slavery Key Performance Indicator (KPI) to measure our success quantifiably relating to working with suppliers and partners who themselves take seriously the issue of Modern Slavery and respect and comply with UK law. Asda is committed to upholding the objective of the **Modern Slavery Act 2015 (MSA2015)** with our suppliers and across our supply chains, and as such has commenced work that, over time, will seek to ensure that we only work with suppliers who themselves are compliant with MSA2015.

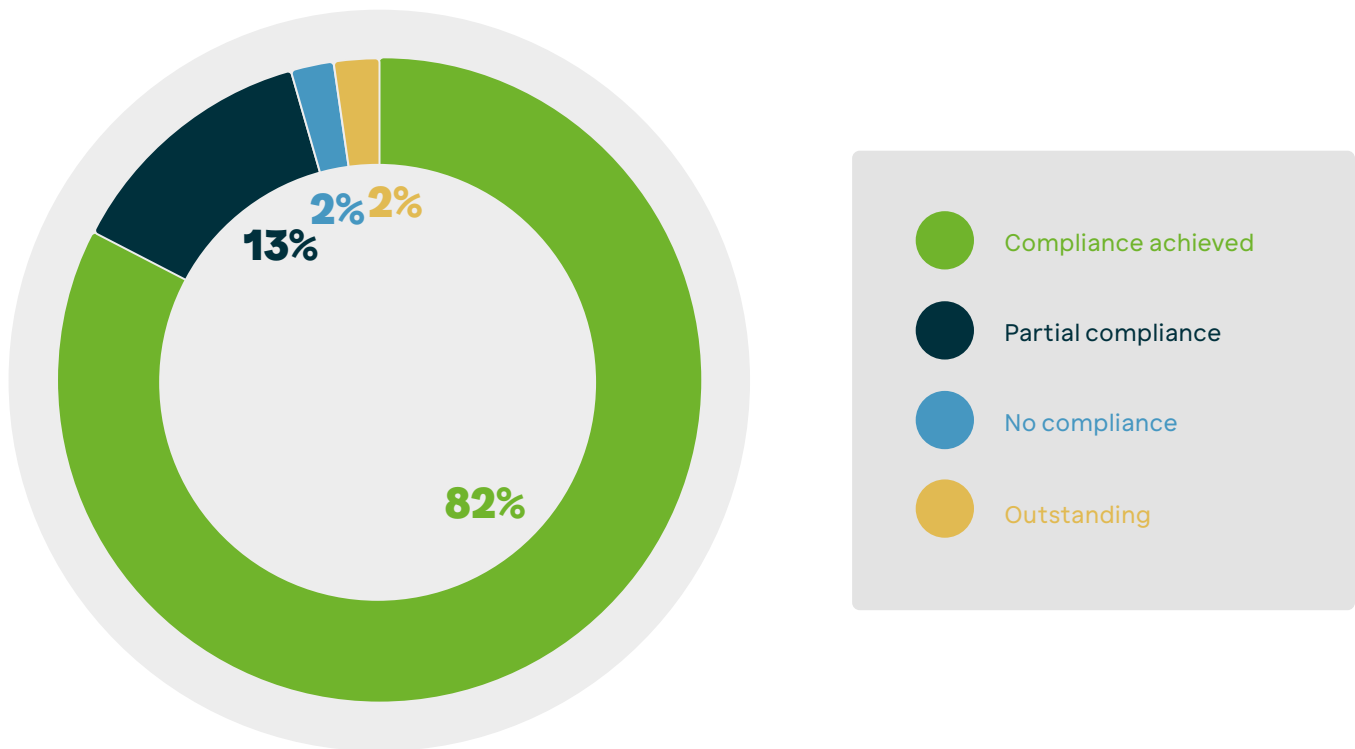
We have our KPI based on several factors and in line with the full legal compliance requirements:

- Suppliers with annual turnover in excess of £36m p.a. and in line with the requirements of **Section 54 Transparency in Supply Chains** require that our suppliers Modern Slavery Statements are:
 - Updated annually
 - Published on their UK website in a prominent place on the homepage.
 - Approved by the board of directors (or equivalent management body).
 - Signed off from a director (or equivalent).
 - Overseas suppliers to publish a statement where they have a demonstrable business presence in the UK.

In 2023, we have implemented some of the first steps to support this due diligence process on an ongoing basis, including:

- commencing assessment on all existing suppliers – this is done based on reporting supplied via our Finance team and our initial steps have been to, on a quarterly basis assess suppliers that have been identified as financially higher risk. Where businesses known to be struggling with financial pressures may be susceptible to modern slavery risks.
- initiating weekly reporting on new suppliers from our own brand system – Hive. This is put in place to provide a due diligence check for MS compliance for all new first tier food suppliers Asda and IPL are onboarding. Each week any new supplier identified in this reporting is assessed. Firstly, identifying if their turnover requires them to publish a MS statement. If found to be required, they are then reviewed in more detailed to determine if a statement exists and whether it is fully or partially compliant. If compliance is not found, follow up with the suppliers is undertaken by the relevant Responsible Sourcing and Human Rights Manager to address and seek correction. This is tracked and logged via maintained weekly reporting. Following implementation in July 2023, 45 new suppliers have been assessed, most were found to fully or partially compliant with MSA2015. For suppliers that were identified as partially compliant or non-compliant, Asda has provided support to these suppliers to move them towards full compliance. 82% of these new suppliers were fully compliant when assessed or supported in 2023. Non-compliant and partially compliant suppliers were mostly non-UK/overseas suppliers, and as such the reason for partial or non-compliance is attributed to lack of understanding or awareness of UK law (MSA2015) in most cases. Where possible Asda always works with suppliers to seek compliance, however should circumstances arise where suppliers refuse to comply, Asda will review future business or partnership.

HIVE – NEW SUPPLIER MSA 2015 COMPLIANCE



COLLABORATIVE DUE DILIGENCE

Seasonal Workers Scheme Taskforce

Asda is a Funding Member of the **Seasonal Worker Scheme Taskforce**, consisting originally of Industry trade bodies, retailers, growers, recruiters and non-profits who came together in March 2023.

The Taskforce's mission is to 'work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme (SWS) and wider UK horticulture.

The Taskforce set out to do this in two key ways:

- By developing practical actions that can be implemented within current Scheme design to improve the responsible recruitment and employment of seasonal workers; and,
- By engaging relevant Government departments on potential changes to Scheme rules, regulation, oversight and enforcement to address structural issues within the Seasonal Worker visa which may exacerbate worker exploitation risks and undermine efforts to safeguard workers' rights.

SWS Taskforce workstreams

| WORKSTREAM | OBJECTIVE |
|--|---|
| <p>1 Education, information and grievance mechanisms</p> | <p>To support and enable provision of appropriate, comprehensible information to workers pre-decision, pre-departure, on-arrival, and on farm to inform decision making, managing expectations and drive a positive Scheme experience. To review access to and effectiveness of existing grievance mechanisms and recommend future actions.</p> |
| <p>2 Due diligence and good practice during recruitment</p> | <p>To increase understanding of country-specific risks, improve the quality and integrity of Scheme Operator assessment, and increase supply chain transparency to enable more effective due diligence.</p> |
| <p>3 Due diligence and good practice on-farm</p> | <p>To support growers to reduce risks and enhance the recruitment and on-farm experience of seasonal workers.</p> |
| <p>4 Improving worker finances</p> | <p>To make tangible progress on improving the overall finances of workers recruited to work in the Seasonal Workers Scheme including through eliminating worker-paid recruitment fees, and related costs, maximising overall retained earnings and having a rights-compatible clear process and defined responsibilities for recruitment fee remediation including root cause analysis to avoid reoccurrence and abuse.</p> |
| <p>5 Policy development, enforcement and stakeholder engagement</p> | <p>Refining Policy Asks of Workstreams and emerging areas, to be approved and authorised by Governance Committee.</p> |

Progress made by the Taskforce in 2023 can be found [here](#), along with details on 2024 plans.

MONITORING, REPORTING, INCIDENT MANAGEMENT & INVESTIGATIONS

Colleague Modern Slavery Duplicate Records Checks:

Asda continues to maintain its modern slavery monitoring on a normally quarterly basis via Asda's Labour and Employment Compliance team. Reporting is carried out on all colleague data and flags cases for investigation based on duplicate or multiple records for bank accounts, telephone numbers, addresses and emergency contacts. In 2023, 110 cases have been flagged for investigation by our internal teams.

Security Incident Management System:

In 2023, Asda introduced a Modern Slavery section and training on modern slavery into a bespoke new system delivered for our Security team, with questions aimed to flag store-based incidents with the potential to be indicators of modern slavery issues. Going forwards it is hoped this will enable improved intelligence relating to potential modern slavery issues to be

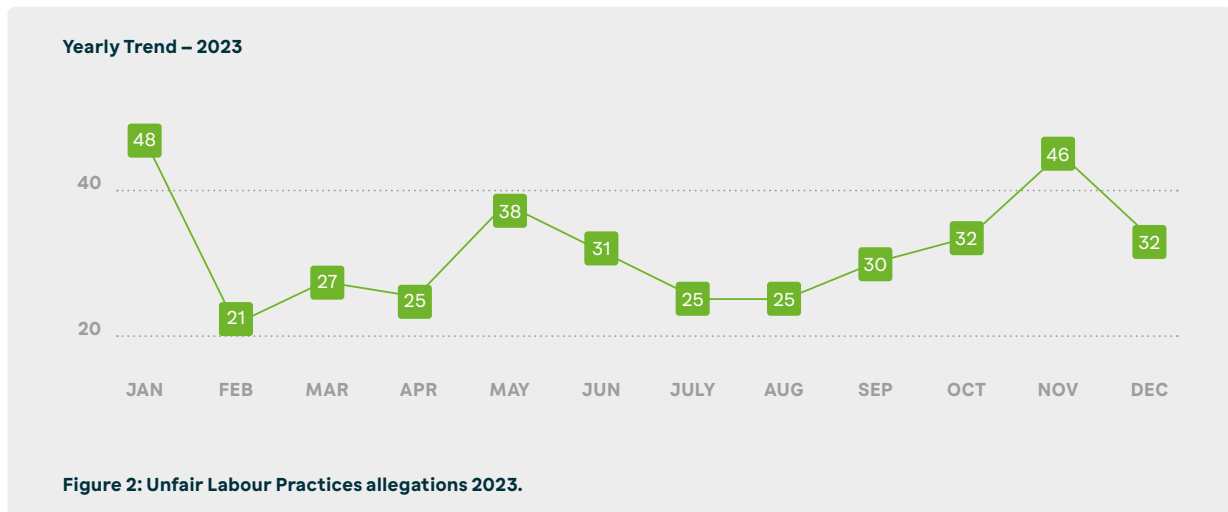
communicated, escalated and if required reported to relevant authorities.

Internal Audits:

Asda conducts regular internal audits to assess compliance, and our approach to Modern Slavery is included and audited as required. Should any issues be identified, these will be reported internally and a plan to address actioned.

Whistleblowing Mechanism:

Our Ethics team, within our People function maintain a confidential whistleblowing channel for employees, suppliers, and other stakeholders to report concerns related to modern slavery. Issues relating to allegations of Unfair Labour Practices was the second highest category in 2023. All reports are thoroughly investigated, and appropriate actions are taken as required.



Annual Reporting:

We publish an annual Modern Slavery Statement, detailing our efforts, progress, and challenges. Statements are published via our [corporate website](#), with a link to the current and all previous statements prominently available on the homepage. Asda also voluntarily publishes our annual statement on the UK Government's [Modern Slavery Registry](#), since its introduction in 2021.

Incident Management & Investigations:

Asda receives intelligence in relation to issues,

incidents and allegations in a variety of ways. Internally our colleagues and suppliers can access Asda's confidential third-party Ethics Helpline which provides a confidential and anonymous way of reporting breaches of law, Asda policies or Asda's Statement of Ethics. Modern Slavery and Human Trafficking concerns are always reportable.

In 2023, 19 cases with potential modern slavery indicators were reported and investigated across Asda businesses and our supply chains.

CASE STUDY DIRECT LABOUR

As an example of Asda's incident management process in March 2023, an operational HR team member at an IPL site, raised potential modern slavery concerns to the IPL MSSG lead in accordance with the IPL and Asda incident management processes. Asda's Modern Slavery SME was informed enabling guidance to be sought via our partner Slave Free Alliance on the businesses proposed approach to investigate. The concern related to a new starter (potential victim - V) of Romanian nationality at the site who had attended site for an interview who was accompanied by their cousin (a current IPL colleague – potential perpetrator - P), the cousin requested they be included in the interview but was kindly refused and it was requested that they wait in reception, they (P) however went back to work as it was found that they were actually on shift at the time.

Following the interview, it was understood that the worker (V) just interviewed then had to wait in the IPL colleagues (P) car for the entirety of the remainder of their shift (circa 10 hours). When a shift leader asked the cousin (P) if the new colleague (V) was able to find their own way home or if they have alternative transport, they replied, "No, they understood they would have to wait and they are fine." The IPL shift leader also remembered the IPL colleague (P) mentioned that the new colleague (V) owed them money, and had required the new colleague (V) to work at a car wash until they commenced work at IPL to pay back debts owed to them.

As these concerns were raised to operational HR at IPL after the event, no action/welfare check could be done at the time of the interview, and as such the new colleague (V) was offered the job and commenced work at IPL. On the new colleagues (V) 1st shift a welfare interview was conducted by site HR, with a translator offered, under the guise of a new worker interview so as not to highlight to the IPL colleague (P) who was also on the same shift there may be any issue. As part of this welfare check and in addition IPL reviewed a number of other sources of information for the new colleague including:

- Reviewing their application form to identify how it was claimed they found out about the job vacancy.
- If the new colleagues first day ID checks were completed sufficiently and Right to Work documents were all in place and acceptable, including whether they had access to these freely.
- If the new colleague had their own bank account, and it was accessible to them.
- If their next of kin and emergency contact was their cousin, and if their addresses were the same.

The new colleague was welcoming of the interview, and answered questions positively and the responses shared enabled IPL to be satisfied that no issues of modern slavery were substantiated.

Following this and previous incidents, IPL have updated immediate victim support guidance providing details to support a confirmed survivor of modern slavery. This updated guidance will be subject to approval by the IPL Modern Slavery Steering Group and aligned with the issue of modern slavery 'Go Bags' across operational sites and be shared across IPL, Forza and Kober along with a help and support information pack for colleagues and managers.

HUMAN RIGHTS

Modern Slavery, specifically Forced Labour is one of Asda's salient Human Rights Risks. Details of Asda's approach to Human Rights can be found below and is also available online [here](#).

In 2023, our responsible sourcing and human rights team have developed a number of Human Rights policies to support Asda in its overall approach to Human Rights, these policies are currently under discussion for implementation across key stakeholder groups and via our governance processes. This also includes an updated Modern Slavery policy for suppliers.

Our Responsible Sourcing & Human Rights approach

As a responsible retailer we are committed to the principles of sourcing responsibly, respecting human rights, and promoting the dignity of all those who contribute to our business. We collaborate across industries and organisations around the world to help combat risks including but not limited to, forced and child labour, unsafe working conditions, restricted freedom of association, violence, harassment, and discrimination. Our commitment extends to all individuals impacted by Asda and our subsidiaries' business activities and relationships, including colleagues, customers, suppliers, workers within our supply chains, and the communities in which we operate. [Asda's Human Rights Policy](#) outlines the steps we take to respect internationally recognised human rights and formalises our expectations across our global supply chains.

Transparency of the supply chain is key to our approach. We map and collect data on our supply chains through [Sedex](#), an online responsible sourcing management platform which helps us to identify our

salient labour risks. We monitor and investigate issues in the supply chain, we enable colleagues within the business to understand their role in human rights and its impacts, and engage in initiatives to find root cause solutions that can transform entire supply chains. Partnering with our suppliers and their global facilities, we work to mitigate risks, drive remediation, and improve standards for workers via our risk-based approach.

We are active members of external collaborations such as the [Ethical Trading Initiative](#) (of which we are a founding member), [Stronger Together](#), and the [Food Network for Ethical Trade](#) which continue to support their members to drive continuous improvement. Through these partnerships we engage with other retailers, NGOs, Trade Unions, and suppliers to address risks, share best practice, investigate issues where appropriate, and establish initiatives to achieve collective goals.

Our Partners



Monitoring our supply chain

Improving labour standards is a responsibility that should be shared with all our suppliers. We expect suppliers to operate responsibly, abiding to applicable local labour and employment laws and adhering to our **Standards for Suppliers**. These standards are the cornerstone of our programme and lay out how we expect our suppliers to respect foundational worker rights across the globe. Our Standards for Suppliers are aligned to the **ETI Base Code**; an internationally recognised code of labour practice. Our Supply Chain Monitoring Requirements and Guidance policy details how we monitor supply chain compliance with our standards and how we will support suppliers to demonstrate continuous improvement through the provision of guidance and resources.

We currently use third party social, safety, and environmental compliance audits to help us evaluate our suppliers' compliance to our standards and to manage risk in the supply chain. These audits seek to monitor whether, among other things, workers are properly paid for the work they do, labour is voluntary, working hours are not excessive and are consistent with local laws, and facilities meet health and safety laws and regulations. Whilst social audits still have a place within our programme, we recognise their limitations and the need to move beyond audit to identify root cause. We will continue to work with

suppliers to help upskill and improve standards within their facilities through the provision of guidance and access to tools and resources. For example, we have partnered with suppliers from our George, Food and GNFR supply chains, to pilot a worker voice application to improve understanding and gather additional data on the worker experience, including temporary labour. We will compare the outputs from this exercise against audit data to identify any potential gaps and areas of risk not previously considered.

Where an issue is identified in the supply chain, we are committed to working with suppliers and third parties to understand the root cause and provide relevant guidance and resources to support thorough investigation and remediation for impacted workers. We ask suppliers to close any non-compliances raised in a social audit within the timelines recommended by the auditor. If this is not possible, we will discuss the circumstances on a case-by-case basis and where there is both commitment and a clear action plan to resolve the outstanding issues, we may agree an extension. We encourage our suppliers to apply the same principles when working with their supply chain. Further examples of our approach to incident management can be found in our annual Modern Slavery Statements, available on the Asda Corporate website.



Living wage

In March 2023, we made a public commitment along with eight other UK retailers to **address the living wage gap that exists in international banana supply chains**. This initiative aligns with our broader commitment to social responsibility and ethical sourcing practices.

Our journey began in 2022 with the initial aim of exploring the feasibility of aligning our operations with the initiative being proposed by IDH. IDH is a not-for-profit organisation convening collaborative initiatives in different commodity sectors to improve sustainability practices. This presented us with several challenges ranging from gathering accurate and reliable information to navigating the complexity of what may be needed to compare wages and in-kind benefits within a global supply chain, such as:

- Cost of Living variations between countries and regions, along with variances in access to healthcare, housing, food, childcare and in-kind benefits.
- Legal and regulatory frameworks that govern wages, working hours and benefits.
- Inflation and exchange rates that impact purchasing power and wages.
- Productivity and efficiency variances.
- Environmental sustainability investment.

Despite these complexities, with support from IDH, collaboration with the other retailers and a firm commitment from our leadership team, we were able to align with this commitment. We then began to measure the living wage gaps in our banana supply chains using the **IDH Salary Matrix**. The IDH Salary Matrix calculates the average living wage gap for farm-level workers by comparing actual payroll data against recognised living wage benchmarks, such as the Anker Methodology, for a given region. To ensure the required information is captured within the tool, the Salary Matrix follows the Anker Methodology guidance to calculate prevailing wages enabling accurate comparison against the living wage benchmark.

Throughout 2023, we worked to lay the foundations for achieving the goals of this commitment. This included identifying and implementing a dedicated internal steering group to consult when key decisions are required, such as joining a project to fund data validation audits. These audits were designed to verify the data submitted within the completed salary matrices for 10% of our supply chain. We deemed it essential to be involved in this collaboration with other retailers to reduce the burden of multiple data validation requests to producers and to maximise the coverage of the validated data for the overall commitment. These audits are taking place between January and April 2024 and will help to determine:

- The accuracy of our indicative living wage gap which will provide a base line understanding of our current position and can be used to monitor our progress
- Whether further training and capacity building on the use of the Salary Matrix is needed within the supply chain.

Once we have the validated data, our next steps are to determine whether these findings can be generalised by supplier and region whilst exploring the potential unintended consequences of a sample-based approach to data collection and validation. We also aim to seek a sustainable solution to ongoing verification so that it becomes a business-as-usual process that does not add additional cost and audit burden to the banana supply chain.

Looking ahead, our long-term plans continue to involve working closely with suppliers to discuss any gaps identified and in collaboration with our supply chain partners determine where enhancements can be made to close these gaps.

Transparency

Our supply chains are vast and complex; we buy an extensive range of products and services from all over the globe which we either sell or use within our own business operations. This is managed across four key business areas: Grocery, Apparel, General Merchandise and Goods & Services Not For Resale. The supply chains for each of these areas vary but can include the following at different stages: processing factories, farms, fishing vessels, abattoirs, packing and storage facilities, dye houses and fabric mills.

Transparency of the supply chain is essential to identify and manage our salient risks. Below we have published a list of our Tier 1 Food, Non-Edible Grocery, Produce and General Merchandise sites, supplying Asda branded or exclusive products.

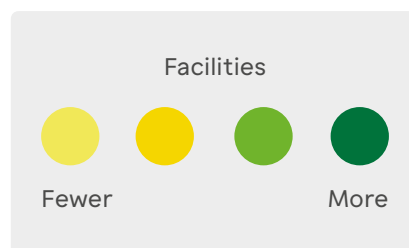
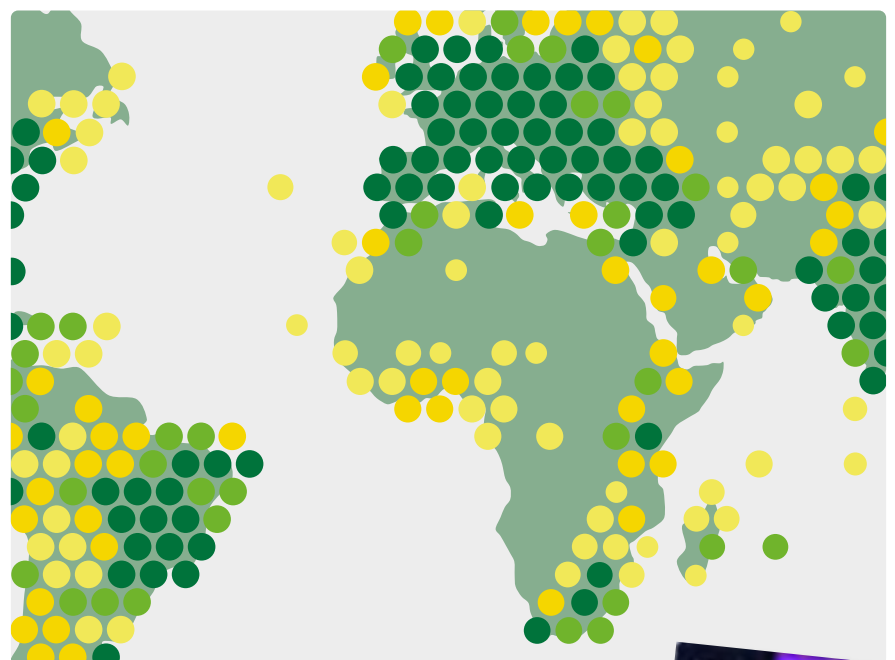
In July 2023 we have partnered with **Open Supply Hub** (OSH) whose mission is to make supply chain data open, accessible and trusted for the public benefit, in our effort to provide more datapoints publicly. With more interactive and user-friendly information we hope to drive accountability and awareness of where Asda operates globally.



OSH Map

This data is based on self-declared information disclosed by our suppliers on **Sedex** and Asda/IPL internal management systems. Where 'data is not available', the information has not yet been disclosed to us through these platforms. Where a supplier has requested that their information is not included, we have removed reference to their facilities in this list. Whilst we make every effort to ensure published information is accurate, we acknowledge that with any large dataset errors can occur. We will review and update this information on an annual basis.

In certain areas of higher risk, we recognise the need for further transparency beyond Tier 1 suppliers and we will continue to work towards greater visibility of the challenges faced at lower tiers of the supply chain. For example, George have mapped and published a list of Tier 1 and Tier 2 Apparel supplier sites.



Salient Human Rights Risks & Themes

To identify the salient labour and human rights risks in our supply chains we have used a combination of country-specific risk information from publicly available sources, self-declared supplier information, social audit trends and incidents that have occurred. Using this data, we have formulated the salient risks which are pertinent to the operation of our business and require attention from Asda, our suppliers, and colleagues, to address root cause. 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 people who make the products we sell.

| SALIENT HUMAN RIGHTS RISKS & THEMES | |
|-------------------------------------|-----------------------|
| | Forced Labour |
| | Worker Representation |
| | Vulnerable Workers |
| | Gender |
| | Working Hours |
| GEOGRAPHIES | |
| | United Kingdom |
| | China |
| | Spain |
| | Bangladesh |
| | India |
| | Kenya |
| | Turkey |

Our five priority salient risk themes, relating to the following geographies and categories:

| CATEGORIES | |
|------------|-----------------------|
| | Toys, Games & Plastic |
| | Bananas |
| | Citrus |
| | Stone & Top Fruit |
| | Berries |
| | Coffee |
| | Meat & Poultry |
| | Tea |
| | Waste Management |
| | Car Washes |
| | Fish & Seafood |
| | Plants & Flowers |
| | Textiles |
| | Wine |
| | Avocado |
| | Logistics |

We will continue to explore the salient human rights risks identified and utilise our emerging data science led approach, to better understand and address root cause, whilst constantly reviewing our scope and human rights impact across all tiers of our supply chains. Action plans have been developed for these risks with early phases of risk mapping and stakeholder engagement being undertaken to better understand the role Asda can play in delivering change.

Forced Labour

We have continued to evolve our approach to addressing Forced Labour risk via our overall approach to modern slavery detailed within this 2024 Modern Slavery statement.

A key focus area for Asda in 2023 has been refining our approach relating to modern slavery and forced labour where it is understood to be as a result of State Imposed Forced Labour (SIFL). State-imposed forced labour is when governments force their citizens to work, for example, as a method to mobilise labour for

economic development, to punish political dissents, or to discriminate against religious and ethnic minorities. It can also include the exploitation of conscripts and forms of prison labour.

Our default approach for other ethical and human rights issues is to work with our suppliers to remediate issues identified. However, Asda recognises that in cases where allegations of SIFL exist, remedy is not possible, and immediate exit is the recommended approach.

| SALIENT HUMAN RIGHTS RISK | |
|---------------------------|----------------|
| | Forced Labour |
| GEOGRAPHIES | |
| | United Kingdom |
| | China |

| CATEGORIES | |
|------------|-----------------------|
| | Toys, Games & Plastic |
| | Berries |
| | Meat & Poultry |
| | Waste Management |
| | Car Washes |
| | Fish & Seafood |
| | Textiles |
| | Logistics |

Worker Representation

We recognise the individual’s right to have their voice heard which can include their right to join, form, or assist a trade union and require all suppliers to respect workers’ rights to freedom of association and collective bargaining in accordance with applicable laws and practice (as set out in our **Standards for Suppliers**). It is therefore important that we are aware of circumstances where workers in our supply chain face barriers to effective worker representation. Through our responsible sourcing programme, we collect data to identify the availability of trade unions and worker committees in our supply chain. In 2023 we improved the transparency of this information through our partnership with the **Open Supply Hub**; we now include whether a trade union is present within our published list of tier-one Food, Non-Edible Grocery, Produce and General Merchandise supplier sites.

There are areas within our supply chain where we have identified an absence of independent representation available to workers. Where our suppliers do not have recognised Trade Unions present or a functioning workers committee in their operations, we will engage these suppliers to understand the value and advantages of effective representation and grievance channels in the workplace. Where Trade Union representation is not possible, we will encourage the establishment of worker committees appointed and facilitated by workers themselves. Building on our existing Standards for Suppliers we have created a Worker Representation policy to clarify our position and communicate our expectations of suppliers. This policy is due to be published in 2024.

Asda operates an ethics helpline and reporting mechanism that is available, in multiple languages, to anyone wishing to raise any questions or concerns they may have. Through our dedicated supplier portal, we signpost open-source and subsidised tools to support our supply chain to build capacity and drive demonstrable continuous improvement. We will continue to identify and include resources that support suppliers to measure the effectiveness of the grievance mechanisms they have in place (e.g., **AIM-Progress Grievance Mechanisms Maturity Framework**) and share best practice to ensure that the channels available are accessible by and represent all workers.

| SALIENT HUMAN RIGHTS RISK | |
|---------------------------|-----------------------|
| | Worker Representation |
| GEOGRAPHIES | |
| | China |
| | Spain |
| CATEGORIES | |
| | Toys, Games & Plastic |
| | Stone & Top Fruit |
| | Berries |

We are committed to working with external stakeholders to identify tools that improve our understanding of worker experience and barriers to worker and employer dialogue. In partnership with **ES3G**, we are piloting a real time worker voice tool in our George, General Merchandise and Goods Not For Resale supply chain to obtain live, direct feedback from workers about their working conditions. Outputs of this project will be reviewed against the labour standards data we collect through our responsible sourcing programme to identify any gaps we need to explore. We will continue to use our programme data to focus our activity on geographies and commodities that present the biggest gap and map Trade Unions and other third parties who can support us to improve representation in these areas of the supply chain.

Vulnerable Workers

All workers are subject to varying degrees of vulnerability; some may be considered at greater risk due to factors such as contract status or salary, or protected characteristics such as age, gender, race, and religion. Throughout our risk assessment of our global supply chain including both Goods for Resale and Goods Not For Resale we have identified several groups of workers across different industries who may be more vulnerable to labour exploitation. These include young and older workers, migrant workers, temporary and seasonal workers, and pregnant women.

Through our ongoing work with our external partners, we are continuing to enhance our knowledge around the risks vulnerable workers face. For example, we have identified increasing instances of seasonal, migrant workers entering the UK who have been charged excessive recruitment fees by third parties who have infiltrated the labour supply chain, have limited understanding of their rights, and enter employment with unmatched expectations of their working hours, pay and working conditions. To address these issues, we are supporting **Just Good Work**, an initiative that provides migrant workers with critical information to migrate to the UK and find fair and safe work. We also continue to be active members of the **Seasonal Worker Scheme (SWS) Taskforce**, a collaboration of industry trade bodies, retailers, growers, recruiters and non-profits focussed on implementing tangible actions to help safeguard and ensure access to workers’ rights in UK horticulture.

Worker vulnerability can increase when working in a hazardous environment. We can use our risk assessment data to identify suppliers who demonstrate best practice, comprehensive management systems for health & safety including training, storage of hazardous materials and fire safety plans. We will then promote and share this best practice with other suppliers who we identify as needing additional support in this area. An example of further due diligence is illustrated through our engagement with **Nirapon**, a non-profit organisation focussing on improving and maintaining high safety standards and management systems in Bangladesh facilities. Through Nirapon we are ensuring the health and safety of vulnerable workers improves in a geography we know has heightened risks.

| SALIENT HUMAN RIGHTS RISK | |
|---------------------------|-----------------------|
| | Vulnerable Workers |
| GEOGRAPHIES | |
| | United Kingdom |
| | China |
| | Spain |
| | Bangladesh |
| | India |
| | Kenya |
| | Turkey |
| CATEGORIES | |
| | Toys, Games & Plastic |
| | Stone & Top Fruit |
| | Berries |
| | Meat & Poultry |
| | Tea |
| | Waste Management |
| | Car Washes |
| | Fish & Seafood |
| | Textiles |
| | Logistics |

Home Workers commitment

We realise that vulnerable workers are often in more informal sections of our supply chains and may be utilised for sub-contracting within certain industries. Homeworkers for example are a community who are often under-represented in terms of visibility to their working conditions which can impact pay and the formality of their contractual arrangements with their employer. Asda is committed to understanding risks and working with suppliers and partners to best remediate and improve standards in these areas rather than mandating they are not used. Through this approach we hope to improve working conditions and opportunities for safe, rewarding and empowering employment.

Gender

Within global supply chains, women face additional barriers of accessing decent work and fair benefits. Our aim is to promote a supply chain where all workers are free from discrimination and share equal rights and opportunities.

To help obtain a detailed understanding of how gender responsive we are as a business, we worked with Women win to undertake a gender assessment. The gender assessment provided a baseline understanding of where we are as a business regarding gender-responsive due diligence and gender-responsive policies and practices. We have received feedback which we have

used to develop a road map to implement further due diligence within our supply chains. The first step in our roadmap was to create a specific Gender policy to clarify our position and communicate our expectations of suppliers on this topic. This policy has been drafted in 2023, and is under review as part of Asda's directional work on Human Rights Due Diligence. Transparency is also an important step to understanding gender related issues, we aim to work towards gathering relevant gender-disaggregated data with a strong emphasis on worker voice to support our assessments and subsequent prevention and remediation measures.

| SALIENT HUMAN RIGHTS RISK | |
|---------------------------|------------|
| | Gender |
| GEOGRAPHIES | |
| | Spain |
| | Bangladesh |
| | India |
| | Kenya |

| CATEGORIES | |
|------------|-------------------|
| | Stone & Top Fruit |
| | Berries |
| | Tea |
| | Plants & Flowers |
| | Textiles |
| | Avocado |

Working Hours

When analysing our supply chain data, we can see that excessive working hours impacts many of the workers in our supplying facilities. Working hours is a complex topic which needs to be understood end-to-end to appreciate the role all stakeholders can play to improve conditions for workers. Contributing factors can include buying practices, capacity bookings and supplier planning as well as labour shortages and increased absenteeism. Focusing on our own business practices, we have been delivering training internally to existing buyers and new starters in our George business to improve awareness of the impact of our purchasing decisions. We hope to further build this in 2024 via bespoke Human Rights training to be aimed at our Sourcing, Technical and Buying colleagues bringing the topic to life and detailing the impacts of purchasing practices throughout the supply chain.

Collaborative Action

Collective action and collaboration are vital to driving improvement into global supply chains and at Asda we work extensively with suppliers through external partnerships to bring about positive change. We regularly perform stakeholder mapping exercises to identify external partners who can collaborate with us to deliver action plans for our salient risks, including NGOs and Trade Unions.

| SALIENT HUMAN RIGHTS RISK | |
|---------------------------|-----------------------|
| | Working Hours |
| GEOGRAPHIES | |
| | China |
| | Bangladesh |
| | India |
| | Turkey |
| CATEGORIES | |
| | Toys, Games & Plastic |
| | Textiles |



Photography: Cesar David Martínez Rodríguez

Asda & Fairtrade

Sales of **Fairtrade** products at Asda generated £440,383 of Fairtrade Premium in 2023 for Fairtrade producers in our supply chain. The Fairtrade Premium is an extra sum of money producers receive and democratically decide to invest in projects of their choice.



Across Asda's supply chain:

- 37% of Fairtrade Premium was spent on Producer Group strengthening and capacity building. This includes producer organisation running costs, funding a leadership school for producers and improving producer group facilities, such as transport.
- 31% of Fairtrade Premium was spent on Producers' and their families' welfare. Used by farmers, workers and their immediate families to support social investments that contribute to the enabling environment required for a living income and improve welfare both in and outside of work, such as income top ups, school bursaries, medical insurance and emergency payments.
- 18% of Fairtrade Premium was spent on productivity, quality and climate change adaptation. This relates to initiatives that are specifically targeted at increasing farmers and workers' yields, or improving the quality of crop, with the ambition to support higher sales of crop and ultimately generate more income. Specific examples in Asda's supply chain include training on quality and a revolving farm resilience fund.
- 7% Fairtrade Premium spent on climate change mitigation to support farmers, workers and their local communities to mitigate climate change, such as through reforestation and improving irrigation infrastructure.
- 5% Fairtrade Premium spent on community welfare with initiatives that are designed to support the local community creating the enabling environment for sustainable livelihoods and to improve welfare, for example housing repairs and school supplies.

Of the £440,383 in Fairtrade Premium generated in 2023, this was split as follows:

- £170,375 Fairtrade Premium generated for banana producers
- £158,586 Fairtrade Premium generated for coffee producers
- £75,923 Fairtrade Premium generated for flower workers
- £35,154 Fairtrade Premium generated for cocoa producers
- Asda's Fairtrade sourcing supported 21 producer organisations across six countries worldwide
- Producers in the Asda supply chain invested 58% of Fairtrade Premium into projects related to SDG 2: zero hunger

Flowers

- Asda bought 10.1 million stems on Fairtrade terms in 2023.
- Asda's Fairtrade flowers supply chain includes 2,124 workers in three Hired Labour Organisations in Kenya.
- On average per producer group, 54% of the workers are female.
- 15% of Fairtrade Premium was spent on community welfare such as bursaries for school fees and 64% was spent on producers' and their families' welfare such as a disease prevention programme, transport, training and finance.

Coffee

- Asda's Fairtrade coffee supply chain includes 12,559 farmers in six Small-scale Producer organisations across four countries, with the largest volume sourced from Colombia.
- 12% of Fairtrade Premium was spent on biodiversity and reforestation projects, such as creating a revolving fund to replant healthy farms.
- 28% of Fairtrade Premium was spent on producers' and their families' welfare, such as financial support including income top-ups and setting up a contingency fund for members.

Bananas

- Asda's Fairtrade banana supply chain includes 949 farmers and workers in nine Small-scale Producer organisations and two Hired Labour Organisations within the Dominican Republic.
- 75% of Fairtrade Premium used in the Asda Hired Labour Organisation banana supply chain was in relation to the components of a living wage. This included, but not limited to:
 - Cash distributions paid directly to workers as cash or vouchers including as a temporary measure to support wages to Living Wage benchmarks where gaps exist.
 - In-kind Fairtrade Premium benefits on projects that enable a cost saving to a worker household and reduce pressure on wages, such as the provision of school equipment, housing for workers or subsidised food.
- Within Small-scale Producer organisations, 22% of the Fairtrade Premium was spent on productivity, quality and climate change adaptation which included loans for business development and training in productivity and quality improvement.

Cocoa (global supply chain)

- Asda bought 182MT of cocoa on Fairtrade terms in 2023.
- Globally, 24% of Fairtrade Premium was spent on financial support for producers and 23% Fairtrade Premium spent on improving producer group facilities and infrastructure.

TRAINING, awareness & IMPACT

IN 2023
Our modern slavery statement page on our corporate website is estimated to have attracted over 6,000* visits and page views.

Awareness of modern slavery as a topic continues to increase, and the interest in the actions we take as a responsible retailer from our customers, NGOs, investors and others emphasises the need for us to continue with our actions to mitigate our risks. We also seek to ensure that the actions we take as a business have meaningful impact, from ensuring we look to prioritise and focus on our biggest risks to the equally valuable impact we can have to support survivors.

TRAINING

INTERNAL

In 2023, 448 further Asda colleagues completed our Modern Slavery and Human Rights e-learning module. The module is interactive and introduces colleagues to Human Rights, why they matter and explains how issues of Modern Slavery are a severe breach of any individuals rights.

The module covers modern slavery from an introduction to the issues, where and how it can occur and how our colleagues can learn to recognise the signs and indicators they could encounter and understand how they are able to report any concerns to the appropriate authorities.

To check that our colleagues have understanding the training the module has a built in knowledge check assessment at the end. In 2024, Asda will look to start reporting on the effectiveness of this training.



*Based on adobe analytics data for December 2023, scaled up to reflect 2023 annualised.

EXTERNAL – SUPPLIER TRAINING AND SUPPORT

Stronger Together

We continue to value our sponsorship of **Stronger Together** and know our suppliers value the training and resources relating to modern slavery.

Stronger Together Programme

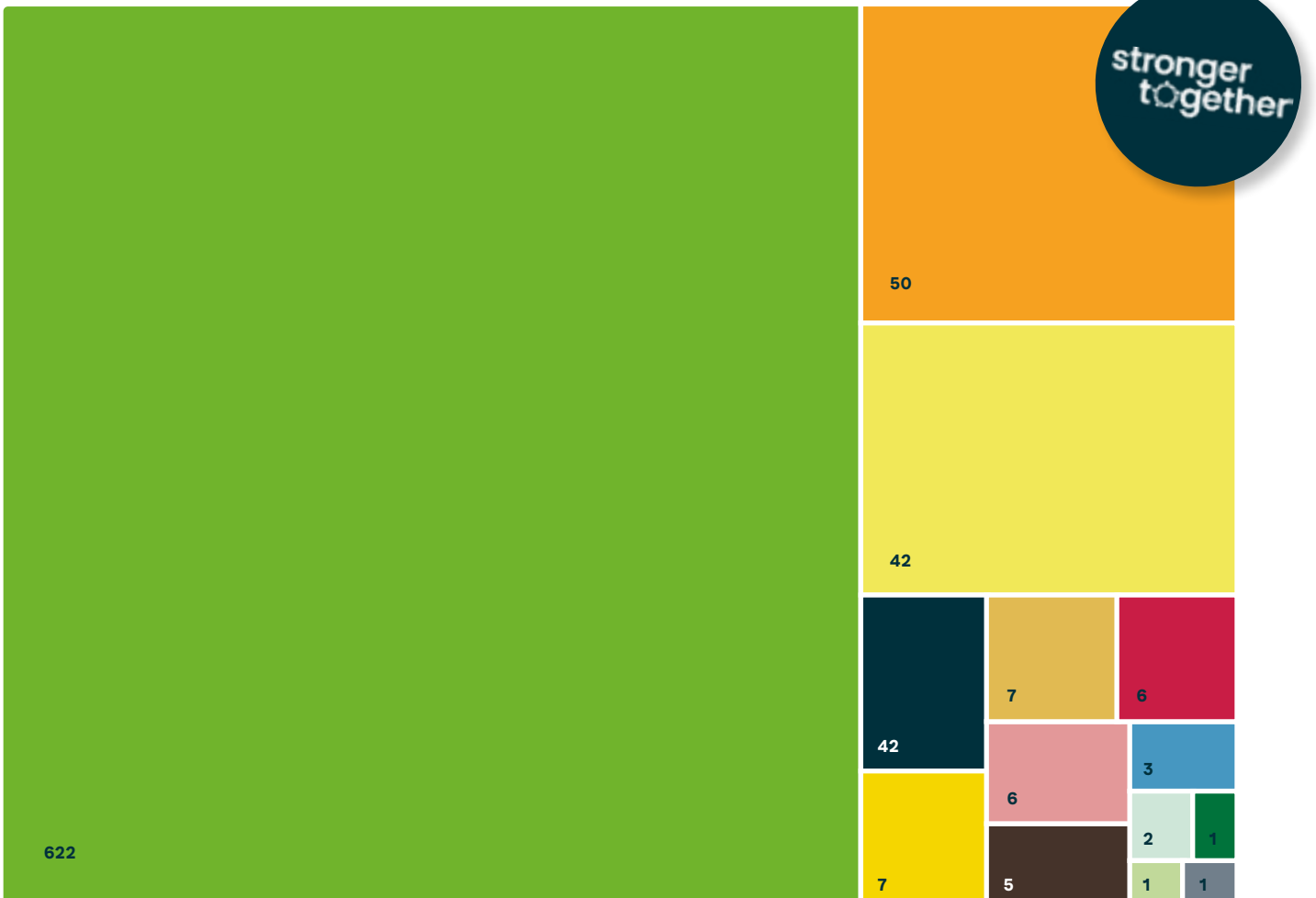
At a programmatic level Stronger Together, since the programme started has trained over 8,584 individuals, from across 3,755 sites for 2,716 businesses.

Asda has continued to promote Stronger Together training and resources to our suppliers and partners in 2023 and now has since the start of our Sponsorship:

- 33 Stronger Together business partner suppliers
- 14 Advanced Business Partner suppliers

Stronger Together training has been provided to 2,418 individuals, across 1,195 sites for 862 businesses.

Stronger Together trained Asda Suppliers by sector



Responsible Recruitment Toolkit

Asda continues to promote and sponsor the **Responsible Recruitment Toolkit** (RRT), and is pleased to support the ongoing positive impacts this has for addressing recruitment issues that can be indicators of modern slavery.

RRT Programme

RRT continues to help Asda to support our suppliers with awareness and training in relation to responsible recruitment, and provide access to a reporting tool, enabling progress reporting. Since the start of the RRT programme at the end of 2023, RRT and Asda have:



| | RRT PROGRAMME OVERALL (ALL SPONSORS) | ASDA RRT SPONSORSHIP |
|--|---|----------------------|
| Standard Business Partners | 18 | 8 |
| Advanced Business Partners | 2 | 1 |
| Average % progress score on the RRT online tool | 68% | 74% |
| No of individuals trained | | 340 |
| No of unique businesses/suppliers trained | | 216 |
| Full level RRT online tool subscribers (individuals) | | 217 |
| Full level RRT online tool subscribers (unique businesses) | | 174 |

1308
RRT Training Sessions

197
Labour Supply Chain Due Diligence & Partnerships

201
Eliminating Worker-Paid Recruitment Fees

660
Introduction to Responsible Recruitment

101
Safe Work for Agency/Contract Workers

149
Fair Equal & Dignified Opportunity & Treatment

awareness

2023 National Anti-Slavery Day

Asda turned our head office red on 18th October 2023, to mark National Anti-Slavery Day and raise awareness of modern slavery as an issue in partnership with other members of the **West Yorkshire Anti-Slavery Partnership** and supported West Yorkshire Police via a donation to their Modern Slavery **Victims Voices Exhibition**. The exhibition toured various locations across the county helping to tell the real stories of survivors, and showing the impact that modern slavery can have in our communities as well as how people can help bring it to an end. Partners from the West Yorkshire Anti-Slavery Partnership worked with charities **Palm Cove Society, Hope For Justice, Justice and Care** and **Ashiana** to create the exhibition which features stories, videos and case studies from people who have survived modern slavery in our local region.



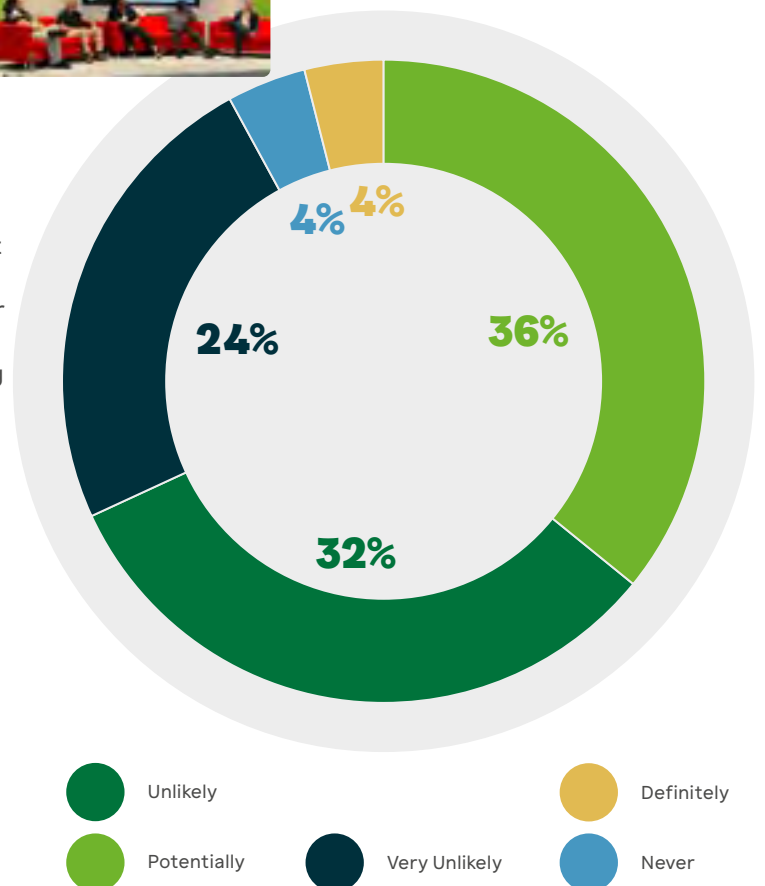
LIVED EXPERIENCE EVENT

Taste of Freedom



On National Anti-Slavery Day 18th October 2023, we also dared to try something different in our approach to training and awareness relating to Modern Slavery, moving our focus from forced labour as a form of modern slavery towards how modern slavery can impact anyone including our customers, colleagues, family and friends and helping to bring modern slavery issues closer to home as we explored other forms of modern slavery and exploitation from a different perspective including Child Criminal/Sexual and Financial exploitation. Asda delivered a hybrid in-person and online webinar 'Taste of Freedom', with a panel discussion including Lived Experience Consultants, themselves survivors of modern slavery, who shared their own very personal experiences and journeys with us.

We were able to capture pre-event, immediately after event and post-event (six weeks) feedback through interactive presentations and surveys. By analysing this data, we were able to evaluate the engagement and effectiveness of the event.



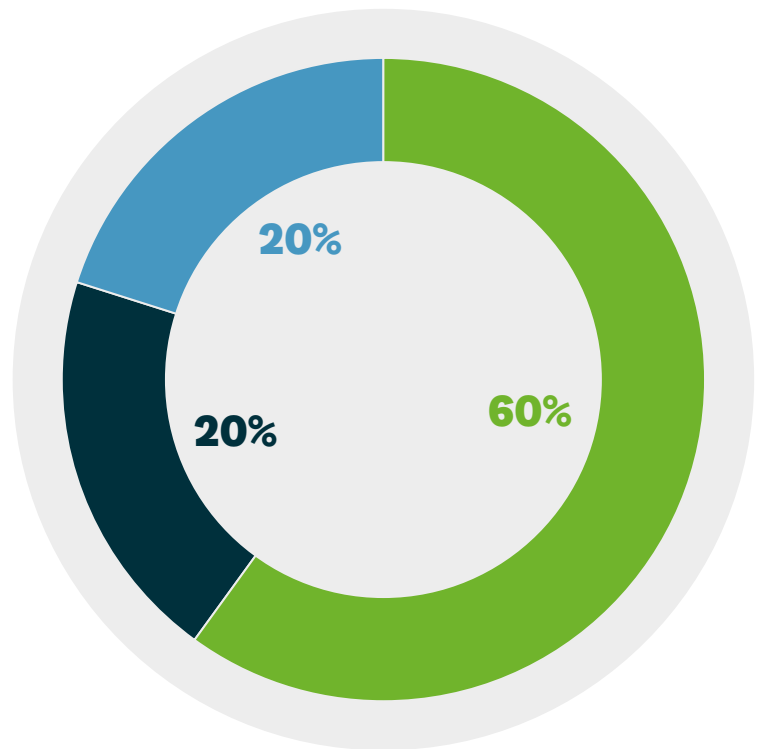
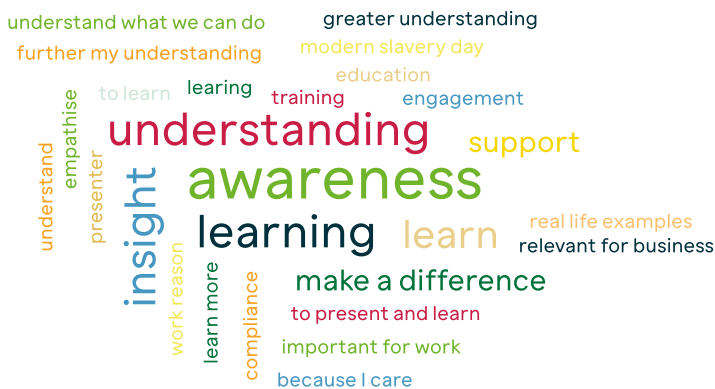
The audience was asked why they were attending the event, the image cloud shows their responses. The top three responses were **'Understanding'**, **'Awareness'** and **'Learning'**, demonstrating a desire amongst attendees to expand their knowledge in this area.

Before the event, participants were asked about the likelihood of someone they know becoming a victim of modern slavery. **56%** of people thought this unlikely or very unlikely, **36%** thought this could potentially happen, with **4%** thinking this would never happen.

Results show this point of view had changed, with **80%** of respondents thinking this could potentially or definitely happen. Demonstrating the impact of

hearing directly from those who have lived through and experienced modern slavery.

In the six week post-event survey, participants were asked if since the session they had considered who their 'one person' is, and /or who they might be that 'one person' for, that they can turn to should it be needed. **83%** of respondents answered 'Yes', indicating that the webinar had staff contemplating the issue and the part they could play in modern slavery prevention, beyond the event itself.



Taste of Freedom Participant Feedback:

| | |
|---|---|
| <p><i>“Really important to hear people’s experiences and make the information shared relatable. Such a worthwhile event.”</i></p> <p>Webinar attendee</p> | <p><i>“I learned how easily someone close to me could be targeted and exploited.”</i></p> <p>Webinar attendee</p> |
| <p><i>“This made me realise about how vulnerable people are and that I want to work on being a person that others can turn to for support.”</i></p> <p>Webinar attendee</p> | <p><i>“Saddened that it still happens almost casually in the UK. Glad that the two speakers have used their experiences to be a force of good.”</i></p> <p>Webinar attendee</p> |

Foodies Fighting Slavery



The **TRIBE Freedom Foundation** launched a project called '**Foodies Fighting Slavery**', in collaboration with the **UK Independent Anti-Slavery Commissioner, Stronger Together** and **Stop the Traffik**. The project set out to address the problem that 97% of the UK Food and Drink industry is made up of Small and Medium-sized Enterprises (SMEs), most of whom, including TRIBE, can feel powerless to understand how they can do more to fight slavery within their supply chains. The goal being to empower SMEs with practical tools and knowledge to combat the risk of modern slavery in their supply chains.

Asda supported the development of the toolkit alongside other retailers, and in May 2023, following an extensive 18-month consultation period, engaging over 2,000 consumers and 100+ SME employees participated in the launch event and panel discussion to promote the freely accessible **Foodies Fighting Slavery: SME Toolkit**. The toolkit can be accessed [here](#).

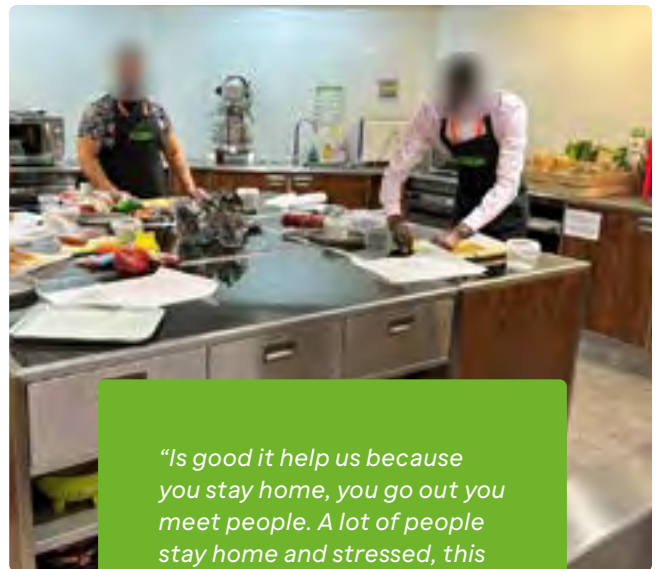
Impact

In 2023, following programme delivery by Asda and supplier, Greencore, Asda worked with Causeway to move our Ingredients for Life (I4L) programme to a sustainable model. Asda delivered a further lesson programme in May 2023 and the programme will continue to be delivered onwardly via Causeway through their Life Services, with the intention to run programmes with new partners quarterly from 2024.

In 2024, Forza and Asda supplier NESI are to run Ingredients for Life programmes to support and enable further survivors.

Asda Ingredients for Life lessons delivered in 2023, demonstrated positive impacts for the survivors attending:

- 36% increase in participants finding it easier to relax;
- 27% increase in participants saying they have a busy life;
- 19% increase in participants saying that they find it easy to talk to people.
- Smaller increases were also highlighted for participants including enjoying being around new people, having a hobby and being confident in making their own decisions.



"Is good it help us because you stay home, you go out you meet people. A lot of people stay home and stressed, this opportunity helps us and you learn something."

Ingredients for Life participant



The Snowdrop Project

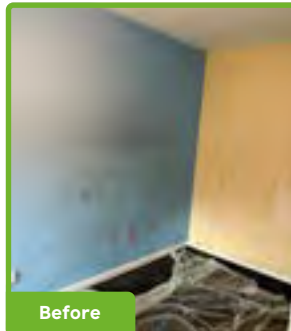
The Snowdrop Project is a South Yorkshire based charity providing long term holistic support to empower survivors of modern slavery and human trafficking in the UK to recover from their past and rebuild their future. Survivors of trafficking and modern slavery have endured unimaginable cruelty and exploitation, and without access to continued and long-term support, survivors are extremely vulnerable to a host of issues including re-exploitation, homelessness and ongoing mental-health issues.

One of the ways the charity achieves this is through their **Renovation Club** which sets out to make a house into a home for survivors to help them feel settled, safe and comfortable in their surroundings. Having a safe and comfortable home is an essential part of recovery and a survivor's well-being. Through volunteers Snowdrop help clean, paint and furnish houses. The survivor is at the heart of decisions, from choosing the paint to the colour of the bedding; sometimes, this is the first choice they've been allowed to make in life. In November 2023 a team of 11 volunteers from Asda's Legal and Compliance function volunteered to paint and decorate a survivor's new home in Sheffield. The house had been mistreated and was in a very poor state, and subjected to graffiti internally. The team spent three days decorating and the change was transformational.

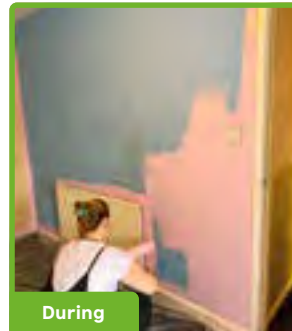


"She was very happy and her little one LOVES her pink room. Thank you so much for yours and everyone's help."

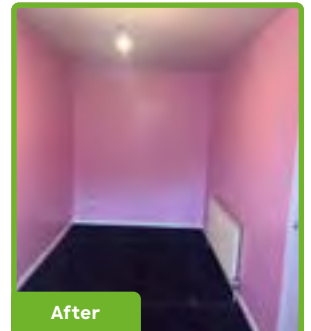
**The Snowdrop Project
client feedback**



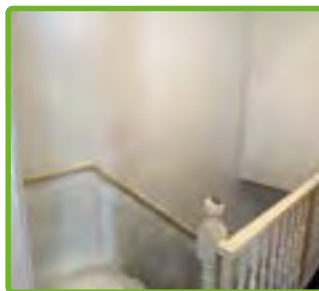
Before



During



After



"The client is so happy with the house. Also her daughter when they first viewed the house (before we went in), hated it and kept asking to leave. When they went back and she saw her bedroom she was ecstatic! Apparently she walked in and just started chanting - pink! pink! pink! pink! over and over again. Thank you so much for organising your team to come and help, it was lovely to meet you all and paint with everyone, please pass on my thanks!"

**Becky Walstow-James
The Snowdrop Project – Community Development Manager**

Causeway

Causeway is a national charity dedicated to supporting marginalised and vulnerable people in overcoming trauma, preventing further harm, fostering self-sufficiency and well-being. This includes individuals who are survivors of modern slavery and those trapped in cycles of exploitation and criminal activity. Causeway's **LifeSupply** offers essential material assistance, such as clothing, bedding, and toiletries, helping survivors to establish themselves in their new circumstances, when they arrive in Causeway's service. Survivors often arrive with nothing but the clothes that they are wearing, and LifeSupply ensures they are welcomed with items that can assist their financial and emotional well-being.

It also provides ongoing support with things like toys and clothes for survivors children, laptops and mobiles, baby items and additional clothing and toiletries as required.

Asda supported LifeSupply initiatives providing a donation of bedding sets which LifeSupply has been able to distribute to assist survivors with essential living supplies. Since the donation in January 2023, Causeway has distributed a total of 893 items (including face cloths, hand and bath towels, duvets, sheets and blankets worth over £10,000 to survivors.



Asda has facilitated connections with other local anti-trafficking organisations like The Snowdrop Project and has enabled Causeway to extend the offering of the bedding packs to their clients. The Snowdrop Project is known for their renovations of safehouses, transforming council housing into welcoming homes through painting and decorating. Causeway is proud to provide bedding packs for these renovations, ensuring that the recipients are greeted with both a beautifully decorated space and brand new bedding at no cost to them.

"When our service users arrive to the safehouses, they are often straight out of their trafficking situation and in a highly traumatised state. Having good quality bedding, blankets and towels, enables us create a more welcoming environment where they can begin their journey of recovery. We often use the bedding and in particular, the fluffy blankets, in grounding techniques for service users who struggle with dissociation and panic attacks. For example, if a service user is disassociating, we may encourage them to focus on things they can see, hear, smell or feel and having a big fluffy blanket in their room is often what we use."

Sara Stone Accommodation

"The Asda bedding has been used for setting up rooms for new service users to welcome them into our safe houses in Causeway and to make the rooms look more inviting and welcoming."

Having bedding donated means we can spend our petty cash funds on other items that can be beneficial to Service Users such as clothing."

Andrea Ward Accommodation – Causeway

"The bedding is nice, and soft and very comfortable, plus the texture is so good. I will rate it at five stars. Thank you so much."

Carmen Ramirez Molina's Service User

EFFECTIVENESS, PARTNERSHIPS & COLLABORATION, FUTURE GOALS & KPIS

At Asda, we recognise our responsibility to combat modern slavery and protect human rights. We remain committed to continuous improvement, transparency, and accountability in our fight against this heinous crime.

PARTNERSHIPS & COLLABORATION

Collaboration and partnerships continue to be key to support our modern slavery approach.

2023 NEW MEMBERSHIPS



Open Supply Hub

Open Supply Hub (OS Hub) makes supply chain data open, accessible and trusted for the public benefit. OS Hub steward data, providing a single, essential reference point that enables stakeholders to collectively address challenges and drive progress for human rights and the environment.

Asda joined OS Hub in 2023, with the aim of increasing our public disclosure of our supply chain in the interests of greater transparency and enabling conversations and where relevant actions to be taken. Asda shared supply chain data with OS Hub including all our Tier 1 Food, Non-edible grocery, Packaging, Labour providers, Produce and General Merchandise sites, along with our Tiers 1, 2 and 3 for our George Apparel business, in line with our Responsible Sourcing and Human Rights programme.

OS Hub is helping Asda to build a bigger more accurate and more complete picture of our supply chain, and we extended the data we share to include OS Hub's interactive map embedded on our [website](#).

MEMBERSHIP UPDATES

Bright Future

During 2023, Asda recognised that the **Bright Future** (BF) programme had transitioned to a sustainable model however as yet has not been a match for a viable placement to support a survivor into safe employment. As a result, Asda has reviewed other areas of the Asda business where placements may be supported including our Asda Logistics Services (ALS) function and Retail operations however other similar initiatives supporting vulnerable or marginalised groups were underway and Asda has been unable to support BF as a result in 2023.

Asda will continue to monitor the opportunity to reintroduce BF membership going forwards.

EXISTING & ONGOING MEMBERSHIPS, PARTNERSHIPS & COLLABORATIONS



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.



Causeway supports thousands of marginalised and vulnerable people in the UK on their journey from existing to living, this includes survivors of Modern Slavery.



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 (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.



The West Yorkshire Anti-Slavery Partnership (WYASP) is the strategic meeting framework for frontline organisations in West Yorkshire who may encounter incidents or matters involving modern slavery or human trafficking and exploitation. Since its creation in 2014, the WYASP has successfully brought together law enforcement, local government, public services, and NGOs for the delivery of a co-ordinated response to modern slavery, as well as the continued improvement of services for the safeguarding of victims.



The West Midlands Anti-Slavery Network (WMASN) unites and enables partner organisations to work in collaboration to end modern slavery, human trafficking and exploitation. They do this by identifying gaps, influencing change and facilitating solutions in order to protect and advocate for the vulnerable in society.



The Spanish Ethical Forum offers a space for those involved in the Spanish agri-food supply chain to share experiences and good practice on a wide range of labour matters. It also provides an opportunity for suppliers to gain expertise and allows capacity building through grower-led topical working groups, practical tools, and solutions for critical 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.



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.



Nirapon is a non-profit organisation of more than 55 members globally who share a common goal of maintaining high safety standards and management systems in Bangladesh factories. We were previously members via Walmart, and in 2022 we joined independently as Asda.



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.



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.

FUTURE GOALS

Looking forwards to 2024, we will continue on our journey to maintain and improve our approach to modern slavery. Expected 2024 deliverables will continue in line with the existing focus areas and include:

Organisational Structure:

Progress the integration of new Asda business acquisitions to incorporate where appropriate Asda's existing modern slavery approach including risk assessment, systems integration, policy implementation and controls already in place.

Policy:

Asda will continue to operate with existing policies that support our business approach to modern slavery and will review and update our policies as appropriate.

Risk Assessment:

The current approach to modern slavery risk assessment will continue incorporate any changes in this process in line with business requirements. Existing and ongoing Modern Slavery risk actions will be progressed to further reduce the risk of occurrence across our businesses and supply chains.

Due Diligence:

Asda will continue to evaluate the effectiveness of current controls and where identified close any further gaps relating to modern slavery risk and continue to review and explore new opportunities for due diligence activity.

Training, Awareness and Impact:

Asda will continue to seek opportunity to engage, train and raise awareness of modern slavery for colleagues and our suppliers through existing training, partnerships, sponsorships and memberships and will look to explore new opportunities to extend the reach of current capabilities where relevant and appropriate.

Collaboration, Effectiveness and Remedy:

We will continue to collaborate with industry peers, NGOs, and government bodies to share best practices and collectively address modern slavery.

Our experiences of modern slavery allegations and issues as a business continue to demonstrate the likelihood of further survivors presenting themselves. As such in 2024 Asda will introduce and trial modern slavery go bags at our key high-risk sites. Go Bags will contain essential items aimed to support potential survivors in the early stage of safe-guarding them once identified.

Asda will continue to support the **Ingredients for Life** programme, and look for further opportunities to support survivors. If any instances of modern slavery are identified, we take immediate corrective actions. This may include terminating relationships with non-compliant suppliers or providing support to affected individuals.

Asda's default position where allegations of modern slavery arise in our supply chains is to support remedy, there is however one form of modern slavery where remedy is sadly not possible, where State Imposed Forced Labour (SIFL) is identified. Asda has previously commenced work in identifying this abhorrent and well hidden issue, and taken action to ensure that our Tier 1 supply chain is clear from SIFL. However, as a highly complex and political issue, Asda is continuing in our journey to find improved ways to address this in the sub-tiers of our supply chain and will continue in our efforts to do so throughout 2024.

KPIS

Modern Slavery Act 2015 Supplier Compliance KPI

Asda aims to only work with suppliers and partners who themselves take the nature of the **Modern Slavery Act 2015** seriously and comply with the requirements and expectations that this important legislation provides. Asda aims to continue with our initial step into monitoring and due diligence in respect of this. We will continue in 2024 with identifying our higher risk suppliers, and assessing their compliance with MSA215, and we hope to extend this to cover inclusion of all our existing suppliers and partners in order to be able to set a measurable and meaningful baseline and KPI target for ongoing monitoring.

CONTACT

For questions relating to our Modern Slavery statement or programme and further inquiries please contact our **Modern Slavery team**.

ASDA