

---

## JOHN LEWIS PARTNERSHIP ETHICAL COMPLIANCE POLICY SUMMARY

### Introduction

The John Lewis Partnership ('the Partnership'), owners of the two successful brands John Lewis and Waitrose, is the UK's largest co-owned business and the welfare and satisfaction of our Partners (employees) is at the core of our employment practices. Our Partnership is an ongoing experiment to find happier, more trusted ways of doing business, for the benefit of us all. We work together to create a successful business and a fairer, more sustainable future for Partners, customers, suppliers and communities. We seek to build lasting relationships with our suppliers and are committed to upholding human rights throughout our product and services supply chains.

The Partnership requires all suppliers to demonstrate compliance to the Responsible Sourcing Code of Practice (RSCOP), or explain why they cannot do so. Where non-compliances are found, we seek to work collaboratively with suppliers to drive improvements. The Partnership recognises that there are limitations to audits and certification programmes as a method in which to demonstrate ethical compliance, therefore we consider this policy to be minimum requirements and it is one component of the Partnership's human rights due diligence approach. We use this compliance data to drive continuous improvements, as well as to support papers for the Ethics & Sustainability Committee and inform our JLP Human Rights Strategy.

### Sites In Scope

- Sites supplying final Waitrose branded food, drink, and grocery non-food products, or are critical links in the supply chain.
- Tier 2 fresh produce sites supplying Waitrose
- Sites supplying final John Lewis branded general merchandise products in Tier 1 or where core processes are being subcontracted.
- Suppliers of JLP branded Goods Not For Resale (GNFR) products
- Branded Exclusives that are labelled with Waitrose or John Lewis in any context (brand co-owner, importer etc).

### Policy Requirements

- Suppliers must comply with John Lewis Partnership Responsible Sourcing Code of Practice (RSCoP) and the ETI Base Code according to the provisions in this policy.
- Suppliers and sites must be approved by either the JLP Ethics & Sustainability Team or a Factory Compliance Manager prior to orders being placed.
- Suppliers are required to have visibility of, and when requested be willing to share details of, the lower tiers of the supply chain to ensure compliance with this policy.
- Failure to comply with this policy will result in management through the JLP Underperforming Suppliers programme and may lead to products being delisted.

- John Lewis Partnership reserves the right to request, or undertake ourselves or via nominated third-parties, audits of any site as part of the Sample Audit programme.
- Waitrose Suppliers with UK-based sites must have one delegate attend Stronger Together's core training courses every 3 years

### Site Risk Assessments

Low	Medium	High
Sites deemed as Low risk through their risk assessment questionnaire. May be selected for Sample Audit Programme or required to audit less frequently.	Sites deemed as Medium risk through their risk assessment questionnaire. Required to submit audits on a 2 or 3 year basis.	Sites deemed as High risk through their risk assessment questionnaire. Required to submit audits on a 1 or 2 year basis.

### Audit Grading of Non-Conformances

Green	Amber	Red	Black
Audit with no or little non-conformances and approved for orders.	Audit with some minor or major non-conformances. Approved for orders but must close non-conformances.	Audit with multiple minor and major non-conformances, or one critical. Must close non-conformances for orders to continue.	Audit with multiple critical non-conformances, or one business critical. Must be remediated as soon as possible for orders to be placed.