# MODERN-SLAVERY STATEMENT 2019/20

JOHN LEWIS & PARTNERS PARTNERSHIP

WAITROSE

# **HIGHLIGHTS**

12 in-country beyond audit supply chain programmes



Supported survivors of modern slavery on the journey to rebuild their lives in partnership with Business In The Community



covering 9,000 workers

Responsible Sourcing Code of Practice and Remediation Best Practice guide published for suppliers

Over 120 of our UK supplier sites trained in tackling modern slavery in partnership with Stronger Together



Launched second Worker Welfare Guidance document and online training to help prevent modern slavery on UK farms

3,700

3,700 employees in our urkish supply base positively impacted by worker representation training



Supported Unseen's business portal helping to fund the Modern Slavery Helpline and worked with Bright Future to provide work placements for survivors of modern slavery

28

Two year ethical hiring and worker dialogue course completed by 28 Chinese factories

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Modern slavery article published in Waitrose Weekend, reaching and raising awareness with over 400,000 customers

Over 30 UK production sites signed up to our Better Jobs Programme

Hosted the UK's first warehousing and logistics-focused event: Tackling Labour Exploitation Supply Chain Risks Together

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OVER IMAGE: Waitrose & Partners Foundation Mangoes. percentage of the sales of these mangoes is helping to improve access to ucation, healthcare and training for local communities in Ghana.

As a purpose-led business that aims to put people and the planet before profit, nothing is more important than addressing the human rights of those who help make and sell our products and services.

Before the coronavirus struck, the UK was experiencing historic shortfalls in labour availability, perfect conditions for modern slavery to thrive. The pandemic means the most vulnerable all over the world are at an even greater risk of falling victim to people traffickers and abusive employers. We have always believed in setting high standards, but now more than ever it's vital that we maintain an unwavering focus on these issues.

While we know we are far from perfect - the layers of complex global supply chains are opaque - we try to demonstrate what it takes to be an ethical and sustainable business. This report sets out our approach.

We run a robust auditing programme of our factories and pack houses, with a comprehensive approach, including training and implementation support for suppliers who don't meet our standards. However we know this can only give a snapshot, at best, of what's actually happening. That is why the key to our strategy is going beyond just auditing by developing ambitious programmes which address our salient human rights issues. This report sets out details of all these initiatives.

I am particularly proud of the work of the Waitrose & Partners Foundation, supporting communities that produce a range of our fresh produce, in countries including South Africa, Kenya, Ghana and Costa Rica, as well as our unique Better Jobs programme developed by the John Lewis sustainability team, which encourages suppliers to engage proactively with their workforce. We have now rolled the Better Jobs programme out to 30 UK suppliers and we plan to launch in China as soon as we are able.

At the same time we're conscious of our responsibility to the many agency workers we employ in the UK, either directly or indirectly, and have therefore reviewed our processes for engaging them and other third parties. The risks of labour abuses in the subcontracted workforce are ever-present, and constantly reviewing our approach is vital if we are to do all we can to protect every individual.

The immediate challenges of Covid-19 might seem overwhelming. am however determined that in this coming year the Partnership will be working harder than ever to try and protect the human rights of the people we work with. It's what our customers and Partners expect, and is central to what we stand for.

SHARON WHITE Partner & Chairman 09.04.2020



01.0 Our Business policy governance salient rights risk training effectiveness work

# **OUR BUSINESS**

The John Lewis Partnership is the UK's largest employee-owned business and parent company of two cherished retail brands: John Lewis and Waitrose. The business is owned in Trust for our 80,750 Partners (employees). We sell a wide range of products across 388 Waitrose shops, 50 John Lewis shops, Waitrose.com and Johnlewis.com. We also have three international sourcing offices, a soft furnishings factory, various distribution centres and our own farm.

# **OUR PURPOSE**

The Partnership's ultimate purpose is the happiness of all its members (Partners), through their worthwhile and satisfying employment in a successful business. We are, in essence, a social enterprise, guided by a Constitution, that requires us to make sufficient profit, to deal honestly and fairly with our customers and suppliers, and to contribute to the wellbeing of the communities we serve.

# **FUTURE PARTNERSHIP**

We are stepping into a critical new phase for the Partnership, and in March 2020 we launched a Strategic Review. We need to reverse our profit decline and return to growth so that we can invest more in our customers and in our Partners. This will require a transformation in how we operate as a Partnership and could take three to five years to show results.

John Lewis shops shops John Lewis shop-in-shops customer delivery sourcing office locations in Heritage worldwide hubs India and Hong Kong Centre Waitrose farm distribution head offices, one in London content production centres and one in Bracknell customer contact Waitrose own-brand product sourced around 50 countries and from over 64 countries territories stock Waitrose centres cookery schools products soft furnishings Partnership hotels for countries exported to by Partners' use johnlewis.com factory Resale tier one own-brand supplier factories

The Strategic Review will be led by the Executive Team, but all Partners - those who are active in our democracy and those who are not - will have the chance to contribute and shape our future. The review will focus on how we strengthen our core retail business and develop new services outside retail. As part of this, we will also look at 'right sizing' our store estate across both brands, through a combination of new formats and new locations, repurposing and space reductions of existing stores and, where necessary, closures. However the Strategic Review will mean we will continue to:

- · Be an employee-owned Partnership.
- · Retain our two brands John Lewis and Waitrose.
- Put exceptional customer service at the heart of what we dowhether in store, online or in customers' homes.
- Focus on quality and value, with Partners empowered to offer products and services that are more local.
- · Put even greater emphasis on sustainability.

# OUR PARTNERSHIP VALUES

As employee-owners we all have a share in the business and a shared commitment to go above and beyond for each other, our customers, and the communities and environments in which we operate. We have a set of five values that were created by Partners to explain what it means to be a Partner.

# Our values are:

# DO RIGHT

We act with integrity and use our judgement to do the right thing.



# ALL OR NOTHING

We put everything we have into everything we do.



# GIVE MORE THAN YOU TAKE

We put more in, so everyone gets more out.



# BE YOURSELF. ALWAYS

We're quirky, proud and at our best when we are free to be ourselves.



# WE NOT ME

When we work together, anything is possible.



You can read more about our business in our 2020 Annual Report and Accounts: johnlewispartnership.co.uk/annualreport

INTRODUCTION OUR BUSINESS POLICY GOVERNANCE SALIENT RIGHTS RISK TRAINING EFFECTIVENESS WORK

The John Lewis Partnership Responsible Sourcing Code of Practice (RSCOP) sets out our commitment to workers' rights and our expectations of our suppliers regarding issues such as pay, working hours, and child labour. It is based on the Ethical Trading Initiative (ETI) Base Code. Base code clause 1 states that employment must be freely chosen, with no forced, bonded or involuntary labour.

The RSCOP is approved and signed by the Chairman of the John Lewis Partnership. It can be found on johnlewispartnership.co.uk. It is applicable to all branded, own-brand, and goods not for resale (GNFR) suppliers of goods and services, in all sourcing countries, for both the John Lewis and Waitrose brands.

Suppliers trading with the Partnership are expected to comply with their contractual requirements and all relevant John Lewis Partnership policies, including the RSCOP. In applying the RSCOP, suppliers must also comply with all relevant national and other applicable laws. If there are areas of the RSCOP with which they are unable to comply, they should explain to the Partnership how their own policies, processes, and standards address the fundamental principles of that provision, and how their standards were developed in collaboration with workers.

The Partnership regularly consults with internal and external stakeholders in order to strengthen the RSCOP as well as our overall approach to responsible sourcing, including modern slavery. We recognise that there are limitations to audits and certification programmes, which is why we consider the RSCOP to be a minimum requirement.

The RSCOP is the first point in a continuous improvement journey within our supply chains. This report details the due diligence programmes in place to ensure all suppliers of goods and services to the Partnership understand, and comply with, the RSCOP.





Strong governance over how we are managing and mitigating the risk of modern slavery and other human rights issues in our supply chains is critical in ensuring we are meeting and exceeding our responsibilities as a retailer and the requirements of the Modern Slavery Act.

Governance of human rights in the Partnership forms part of our wider Ethics and Sustainability governance. As we reported last year, a programme to simplify governance across the Partnership has resulted in some changes to our approach. The Executive Team, led by the Chairman of the John Lewis Partnership, Sharon White, sets the strategic direction for Ethics and Sustainability, including human rights. The agreed strategy is overseen by the Partnership Board. Nina Bhatia, the Partnership's Executive Director of Strategy, has accountability for human rights and responsible sourcing performance across both our brands, John Lewis and Waitrose.

Beneath the Executive Team, the Ethics and Sustainability Committee is the most senior authority with responsibility for human rights. The Ethics and Sustainability Committee is chaired by Sharon White and is made up of senior leaders from across the business. It's purpose is to ensure ethics and sustainability is core to the Future Partnership strategy and that the Partnership continues to build inclusive, sustainable and transparent relationships between our suppliers, customers, products and services as well as responding to the increasing environmental and social challenges faced by today's society.

# HUMAN RIGHTS RISKS

# OUR SALIENT

Whilst this statement focuses on the steps we take to prevent Modern Slavery in our supply chains, the John Lewis Partnership recognises the scope of poor labour practices, exploitation, and human rights abuses within supply chains which are often referred to interchangeably with the term 'modern slavery'. These poor practices are also indicators that robust management systems are not in place which would prevent modern slavery occurring.



Our salient risks are those which are most common or have the most negative impact within our supply chains. Since 2015 we have followed the United Nations Guiding Principles on Business and Human Rights (UNGPs) guidance on how to identify them. The UN principles provide a framework for companies to prevent, address, and remedy human rights abuses committed within business operations

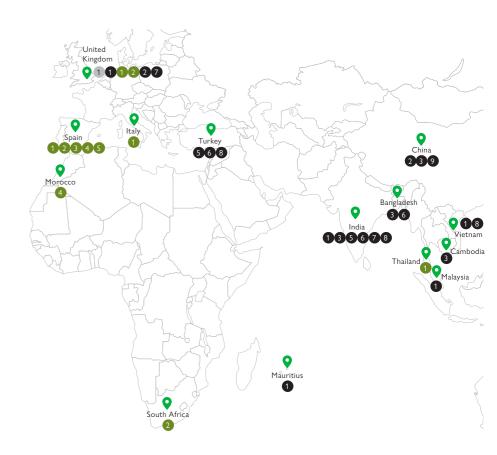
or which are worsened by a company's activities. Our understanding of those issues is constantly developing.

Salient risks are different for individual countries, industries, cultures and contexts. The John Lewis Partnership categorises these differences under General Merchandise, Food and Grocery, and Services, and the associated risks are

reviewed regularly, most recently in 2019. Multiple approaches, as outlined in Section 6 of this report, are taken to address these issues.

The risk of modern slavery in our supply chains remains one of the most severe human rights risks we have identified.





Human Rights Area	Specific Human Rights Issue
Employment is freely chosen	1: Risk of modern slavery
Freedom of Association and the right to Collectively Bargain*	2: Poor worker/manager dialogue
Wages	3: Industries where wages may not meet basic needs
Harassment and discrimination	4: Sexual harassment
	5: Discrimination
Health and safety	6: Poor working conditions
Job security	7: Employment may be precarious or unstable
Child labour	8: High risk of children being involved in work due to inherent cultural differences and/or poverty

3	f In previous reports we have referred to 'worker voice'. For clarity, we now refer to the relevant human right as referenced in the ETI base code, i.e. the right
	to freedom of association and to collectively bargain where a worker chooses to. The absence of workers 'having a voice' is often integral to other human
	rights issues and we work to ensure workers have access to channels for both raising issues and providing feedback as part of all our initiatives.

Company
John Lewis
Waitrose
Goods Not For Resale

# RISK ASSESSMENT AND DUE DILIGENCE

The Partnership sells and uses products and services which often have very different, complex supply chains and associated risks. We tailor our risk assessments to the types of supply chains we are reviewing. The types of risk assessments we use include insight from stakeholders, such as trade unions and Non-Governmental organisations (NGOs), worker interviews and feedback, third party ethical audits, and supplier self-assessments. These sources of information help us identify where workers are likely to be experiencing treatment that is not in line with the RSCOP, and can also highlight indicators of modern slavery.



# **ASSESSING RISK**

# GENERAL MERCHANDISE

Our focus is at tier one<sup>1</sup> own brand production site level. These sites are often highly labour intensive and, as our country risk assessment tool tells us, can often be based in countries considered as high risk with respect to labour practices.

All suppliers, regardless of product supplied, are required to demonstrate that they comply with our RSCOP.

At tier one production site level we have a baseline ethical audit programme in place to ensure all sites comply with our standards. These audits must be conducted by a recognised third party company. The results determine if we will approve a site for production of John Lewis Partnership own brand products, or allow production to continue. If a new factory is proposed that doesn't meet our minimum requirements, it has six months to make improvements suggested by the auditor before they can be proposed

For some of our smaller, specialist suppliers, which are often unique and artisan in nature, we recognise that a full ethical audit is not appropriate. In 2018 we piloted a bespoke self-assessment tool which gave us better insight into the way these businesses operate, and where there might be risks requiring management. In 2019, and in the future, the self-assessment questionnaire and visits to suppliers of this nature will be carried out more regularly.

We have also taken the decision to restrict sourcing from countries in which there is a high risk of poor labour practices. Where we do source from high risk countries, we require additional due diligence to ensure adequate protection of the human rights of workers in factories making our products. This includes their participation in collaborative industry initiatives such as the International Labour Organization's Better Work programme and the Bangladesh Accord.

We use data from our audit programme and bespoke risk assessments to determine the saliency of our human rights risks. This enables us to focus our beyond audit programmes where there is the greatest need, where they can truly drive improvements and have a positive impact.

# FOOD AND GROCERY

We source food and groceries from both the UK and overseas. These supply chains are often fluid and, particularly within the fresh produce sector, are characterised by high volumes of seasonal migrant workers. Human rights risks are most prevalent beyond the tier one production site level. Whilst maintaining strong ethical trade standards across all supply chains, we focus our efforts on those own-brand supply chains with the greatest risk, and in which we can influence the most change, specifically protein and produce supply

At tier one production sites, demonstration of compliance to the RSCOP is initially undertaken through completion of the SEDEX self-assessment questionnaire. This enables us to identify site-specific risks of non-compliance. We combine this with a country-level risk assessment. A third party ethical audit programme is undertaken for medium and high risk sites.

In our meat supply chains, most of which are based in the UK and Ireland, we support farmers to comply with our RSCOP. We work in partnership with our direct suppliers to monitor and improve standards through the Waitrose Farming Partnership Livestock Steering Group. We

have developed a worker welfare guidance document and supporting self-assessment questionnaire, which highlight where farmers need support in understanding and complying with UK employment legislation. An area in which improvements are needed, and we have requested an urgent resolution, is ensuring contracts of employment and payslips are issued to all workers.

In our global fresh produce and horticulture supply chains, suppliers undertake online training in order to be able to conduct 'Waitrose Farm Assessments' on their farms. These self assessments support farmers to identify gaps in compliance with our RSCOP. Through these assessments our supplier partners are able to work with their farmers to make improvements on key worker welfare indicators.

Since 2015, we have worked with the Wilberforce Institute for the Study of Slavery and Emancipation (WISE) to conduct further investigations where our risk assessments, combined with industry knowledge, mean we believe there is still a high modern slavery risk. The process began with a global deskbased assessment, at farm level, and led to in-country risk assessment in several high risk countries including the UK, Spain, Italy, Chile and Peru. The in-country visits were conducted by expert assessors from the Wilberforce Institute and included speaking to workers, management, and local trade unions, as well as NGOs. The findings highlighted indicators of modern slavery risk such as unregulated loans to workers, working hours not being recorded properly, and concerns about unregulated labour agencies. Many of the issues highlighted at individual farms are indicative of conditions in the wider industry. We shared our findings with groups such as the ETI, and supported industry-wide advocacy work (See section 6: Training and Programmes for more



# **FARMED FISH ASSESSMENTS**

Recognising there are serious human rights and modern slavery risks within fish supply chains, in 2019 we conducted assessments with the Wilberforce Institute

Stage one of these assessments involved desk based research into publicised human rights risks for both the countries from which we source farmed fish, and the species sourced. This research enabled us to identify the high risk supply

(or similar) covering modern slavery risk indicators. Eleven sites in eight countries were covered by these telephone interviews, representing over 8,000

# Key findings included:

- · Long working hours and lack of transparency on wages paid.
- · Four weeks work without a day off.
- Loans being offered in 7 out of 11 sites without strict, implemented policies on the loan amounts and repayment terms.
- In one case: Workers not being allowed to contact the 'outside' world.

In order to address all findings at an individual level we have communicated the specific results of our enquiries to each of the farmed fish supply chains that were assessed. We now have some further research to conduct before we can comprehensively report on the findings of these investigations, which we will share more widely. Our aim is to raise the profile of these issues and collaborate with others in the industry to address the most significant systemic problems and drive supply chain improvements.



Tier one is defined as those sites manufacturing a finished product, or where the majority of assembly and packaging of the product bearing the John Lewis or Waitrose label occurs

# **ASSESSING RISK** CONTINUED



## WAITROSE FARM ASSESSMENTS

Protection of workers through an agreed employment contract expected of them and from them. To support the contracts, and to demonstrate that workers are being paid in line with their agreed terms and conditions, payslips should be provided by law, such as taxes).

Through Waitrose Farm Assessments, our direct suppliers work with our global fresh produce growers to review whether basic requirements against our RSCOP are being met. This

includes ensuring that all workers have written contracts and are provided with detailed payslips. In the latest version of

- over 90% of farms provide workers with contracts, and

Where these are not being provided our suppliers are working with the farms to implement changes.

# SERVICES AND GOODS NOT FOR RESALE (GNFR)

Within our own operations we have robust processes in place which ensure we know where and how our direct employees (Partners) are recruited. However, we also require temporary workers in some areas, predominantly where there are fluctuations in labour requirements such as in our distribution centres and our farming operations at Leckford. For this purpose we often use labour agencies.

There is a higher risk of modern slavery and worker exploitation when we do not directly employ workers, such as in the procurement of people and services in operations including distribution and warehousing. This increased risk has been highlighted by reports including Good Work; The Taylor Review of Modern Working Practices and as a result of sharing information within industry groups, such as with the Indirect Procurement Human Rights Forum. We have robust due diligence procedures in place to ensure procured labour only comes via agencies that have

responsible recruitment processes, and all our contracts include our requirements for upholding labour standards.

We were the first retailer to work with Hellios - a risk management company that collects, validates, and monitors supplier information - to develop a Retailer Supplier Qualification System (RSQS) for our GNFR and services suppliers. All new suppliers of goods and services to the Partnership are now expected to register on the Hellios platform detailing information including their company contacts, financial and legal status, products and services available, information security, corporate responsibility programme, and agreement to the Partnership's RSCOP. Where necessary, more detailed information may be requested from suppliers in areas such as health and safety, physical and people security, data privacy and protection, labour standards, and human rights.

Since its launch in 2019, over 2,500 suppliers (98% of total supplier spend2) have registered on the system. Roughly two thirds of those who have registered are

service suppliers, and one third suppliers of goods. We have collated evidence about their policies, compliance, and processes across a variety of risk areas. In 2020, further systems investment by the Partnership will enhance our approach to risk assessments, leading to improved supplier relationship management and, where necessary, an audit.

Not all of our warehouses or facilities are Partner-run. Some are operated by third party contractors. These third parties are responsible for sourcing their own agency labour and, as a supplier to the Partnership, we expect the same standards (i.e. compliance to the RSCOP) to be applied throughout these supply chains. However as referenced in section 7, we have collected evidence this year that this is not happening in all cases. We are reviewing how we can better ensure compliance.

# ONGOING MONITORING

Where we use audits we are committed to ensuring they are robust and fit for purpose. Compliance and certification will not solve all of the most serious problems faced in supply chains, but they are an important starting point and allow us to have ongoing verification of where suppliers are, or aren't, meeting our expectations.

# GENERAL MERCHANDISE

Ongoing approval of tier one supplier sites to produce for the John Lewis Partnership depends on their continued compliance with our RSCOP. We run a programme which requires sites to have an independent audit every two years. If new issues are found, sites are supported to resolve them by our 'in-country teams' based in China and India, or by our nominated third party.

If a site is unwilling or unable to meet the necessary improvements within the timescales agreed, they are no longer able to supply the Partnership.

The exceptions to the above process are:

- Self-assessment questionnaires (SAO): Where the order value at an own-brand tier one production site is less than £25,000 per annum an audit is generally not required. In these instances, the factory will be required to complete a selfassessment questionnaire which will be risk assessed by our third party independent auditor. If the site is approved, the SAQ is renewed annually.
- Our Better Jobs Programme: Where appropriate, we may also ask suppliers to participate in our Better Jobs Programme. See section 6 for more details on this.

# FOOD AND GROCERY

Following initial approval, higher risk tier one production and packaging sites are audited on a two year or three year basis, depending on the severity of the previous audit findings. Where sites demonstrate that they are already in compliance with our RSCOP, through the ethical audit programme, we will lower the risk rating so the required audit frequency is reduced. If we are alerted to a specific issue at a lower risk site we may also require an audit for assurance.

Sites which have clearly demonstrated over a period of time that their internal policies and processes are robust enough to ensure worker welfare standards are maintained, and that they are addressing modern slavery risks adequately, are not required to undergo ongoing monitoring through the audit process. We currently have four suppliers and their related sites that meet these requirements and, instead of audits, we have regular meetings with them to share information and updates.

At farm level within our horticulture supply chains, the Waitrose Farm Assessment is conducted biennially to track developments. The livestock farmers self-assessment questionnaire has so far been conducted annually and we have seen improvements from the two cycles completed to date. See section 7 on effectiveness for details.

# **GNFR**

We recognise that we need to apply the same level of due diligence to our GNFR suppliers as we do to our general merchandise, food and grocery suppliers, in particular with regards to agency labour. We have made progress this year with the launch of RSQS (see section 4, Assessing Risk, GNFR) which requires suppliers on the system to renew their information every year as part of an annual review. In 2020 further systems investment by the Partnership will enhance our approach to risk assessment, leading to improved supplier relationship management and, where necessary, an audit.

Section 7 of this Statement sets out the types of issues and whistleblowing reports we have been addressing with suppliers to the Partnership this year.



Total supplier spend includes all suppliers that we spend 10k

# PARTNER TRAINING

Our procurement and buying Partners have a responsibility to behave ethically when procuring products and services for the Partnership, and to understand the risks of modern slavery associated with their sourcing practices. We currently deliver the following training in these areas:

- General merchandise Buying Partners complete mandatory responsible sourcing e-learning which includes specific training on modern slavery.
- Goods Not for Resale Procurement Partners must complete the Corporate Ethical Procurement and Supply Certification (CIPS).
- Food and grocery Buying and Technical Partners share responsibility for ensuring our suppliers are aware of our requirements and training is undertaken face to face.

We hold expert-lead sessions open to all Partners to raise awareness of modern slavery and its relevance to us all both within our work and as members of society. In February 2019 we also invited a guest speaker, Shayne Tyler, a passionate antislavery advocate, to talk to Partners. Shayne recounted real life examples of modern slavery and worker exploitation and offered practical guidance on how to identify such offences and what to do. Over 40 Partners attended this session, including buyers, marketers and local store managers.

In 2019 we partnered with the Slave-Free Alliance and started the roll out of a 'spot the signs' training programme for JLP warehouse-based Partners who have responsibilities for forecasting labour requirements and supervising agency workers on shifts. We have so far trained over 35 Partners and will continue this training in 2020. 60% of Partners surveyed after the training said that the training was very relevant or extremely relevant to their 06.0 Training and Programmes

INTRODUCTION OUR BUSINESS POLICY GOVERNANCE SALIENT RIGHTS RISK TRAINING EFFECTIVENESS WORK

# PARTNER TRAINING CONTINUED



# TRAINING FOR SUPPLIER FACING PARTNERS

Buying teams are crucial in any effort to avoid modern slavery or human rights abuses in our grocery and food supply chains. They have the closest relationships with suppliers and that's why it's essential they receive regular training on the issues.

Following structural changes to our buying teams, last year we ran a new face-to-face training session for 30 key supplier-facing Partners. It was delivered by a specialist trainer with over twenty years experience in corporate responsibility and ethical auditing experience Split into two sessions, the training offered practical advice for Partners who visit supplier factories or farm as part of their role, such as observing how workers interact with each other and how to ask suitable questions that allow site managers to demonstrate their understanding of local legislations. The training was designed to enable Partners to look around them when they are on supplier and farm visits, spot any signs, and note down anything they feel needs further investigation.

30

KEY SUPPLIER FACING PARTNERS RECEIVED FACE-TO-FACE TRAINING

"

The trainer brought a great insight into the issues we face as a retailer through his own experiences and helped me to think differently about how we can drive improvements and avoid issues in our supply chain. It was a great opportunity to pause and think about some of the challenges we face as a business, and how we can all make a difference in our roles. I feel much better informed and aware of what to look out for, and it really brought it home to me that this is an issue that is right here in the UK"

Category Technical Manager Ambient and Frozen Goods

# SUPPLIER TRAINING

We require our suppliers to demonstrate compliance with the RSCOP as this shows us that a minimum standard of working conditions is being met within our supply chains. However we recognise that suppliers need guidance and support with interpreting some areas of the RSCOP, and with applying it to their business. This year the Partnership published a best practice document which explains clearly what is expected in order to comply with our RSCOP. This guidance document was emailed to all general merchandise suppliers, and has been published on the food and grocery supplier portal.

Awareness and understanding of modern slavery risks remains low within many suppliers, even in the UK. Many of our UK farmers are based in remote locations. In order to raise awareness, in 2019 we made a film documenting the importance of worker welfare to the John Lewis Partnership, and the importance of our farmers taking appropriate steps to recognise and prevent any form of modern slavery from touching their farms. The film includes details of the Gangmasters and Labour Abuse Authority (GLAA) licensing scheme and what to do if any farmer spots signs of modern slavery in their workplace. This film now sits on our food and grocery supplier portal, with which all direct suppliers interact, and our meat supply chain mapping system, on which all livestock farms must be registered. Over 550 livestock farmers have watched the film and, of those who provided feedback, 70% said it had made them more aware of the modern slavery risks that affect their industry.

The Partnership is a founding partner of Stronger Together, a multi-stakeholder initiative to reduce modern slavery with a particular focus on forced labour and labour exploitation of workers. The programme includes free guidance documents, face-to-face training and other resources, as well as acting as a network for employers, labour providers, workers and their representatives to share information and best practices. We recognise the value that this initiative brings, in particular to food supply chains, by raising awareness, training stakeholders to spot the signs of modern slavery, and training businesses on how to put in place robust modern slavery prevention policies and procedures.

We encourage our suppliers to share information and experiences with each other in order to open up the conversation regarding modern slavery. Following Operation Fort, the UK's largest ever modern slavery prosecution, we invited our suppliers to talk about their experiences at our farming conference.

In February 2020 the Partnership hosted the UK's first Warehousing and Logisticsfocused event on Tackling Labour Exploitation Supply Chain Risks Together. This event was brought together by Food Network for Ethical Trade (FNET), Stronger Together and the Indirect Procurement Human Rights Forum. A clear action from the event was for all attendees to ensure their company has an internal due diligence system in place to check their contractual agreements with service providers can afford the costs of paying for legal and ethical recruitment such as for minimum wages, holiday pay and sick pay, and still make a profit.

"

The worker welfare film made available to all farmers within our supply chains helped to raise awareness of modern slavery, what it is, and what to look out for. It also gave assurance that full support would be given from the John Lewis Partnership, should a case of modern slavery be found in our supply chain"

HR Business Partner, Dalehead Foods



# **RECRUITMENT PRACTICES**

Irresponsible recruitment practices, such as worker-paid recruitment fees, creates one of the biggest causes for concern in relation to modern slavery within supply chains. During 2019, the John Lewis Partnership supported the roll-out of a responsible recruitment toolkit. As part of this our suppliers have access to the following free training:

- Introduction to Responsible
   Recruitment; 19 of our suppliers have attended the online training and 20 suppliers have attended in person.

   We will roll this tool kit out further in 2020
- Eliminating Worker-Paid Recruitme Fees; 11 of our suppliers have

- attended the online training and one
- Recruitment toolkit, the Partnership's suppliers' labour providers can also access the tools and guidance on the platform, and the training courses. A labour agency demonstrably practicing responsible recruitment offers a degree of assurance about the employment conditions of those working on their premises to potential clients. Seven labour providers have now attended the face to face 'Introduction to Responsible Recruitment' training, and two labour providers have attended both online courses.

**06.0** Training and Programmes INTRODUCTION OUR BUSINESS POLICY GOVERNANCE SALIENT RIGHTS RISK TRAINING EFFECTIVENESS WORK

# SUPPLY CHAIN PROGRAMMES

We base our 'beyond audit' supply chain programmes in the locations and sectors where we can have the biggest impact, as identified in Section 6: Salient Human Rights issues.

# GENERAL MERCHANDISE

# UK

Over 30 tier one production sites have signed up to the online portal and accessed our online resources and framework covering the seven themes of work: Growth, Reward, Security, Job design, Respect, Health and Wellbeing, and Voice. 23 of the sites have completed the framework, and 800 workers from these sites completed an employee satisfaction survey.

First year findings suggest that most workers in our UK factories feel they are able to voice their opinions at work, however there needs to be improvements made on how management teams support career progression and skills development for workers.

The data gathered enables us to support suppliers to identify opportunities for improvement within their business, and develop their own action plans to make sure that any changes have a positive impact on their workplaces. We will track suppliers' progress over time, capturing their improvements and ensuring other suppliers can learn from these positive developments.

During the first successful year of the programme we have demonstrated the importance of including workers' views on their workplace in making sustainable improvements to employment and working conditions. Our suppliers have been very receptive to this, and recognise it as a progressive approach that supports them in making their own beneficial changes.

The data from this programme will also support us in identifying some key industry trends in the UK manufacturing sector which will be fundamental to shaping the next year of the programme, and ensure the tool continues to add value to our suppliers. In 2020, pending Covid-19 timeline disruption we plan to roll this programme out to more sites across the UK and also trial a version of Better Jobs with 20 of our suppliers' tier one production sites in China.

## CHINA

In 2019, 28 of our own-brand factories based in China completed a two-year training programme, which included modules on ethical hiring and building effective dialogue between workers and managers. This training provided frameworks for management to establish effective hiring processes that reduce the risks of exploitation and trafficking, and child labour. Module two supports management teams to establish consistent and comprehensive worker induction and onboarding programmes at the start of their employment, as well as progressive skill development and training to ensure workers are engaged for the duration of their employment. More work will be done in 2020 to follow up with each of the participating factories to ensure that their learning is implemented in their workplaces. We have also developed a version of the Better Jobs programme (see above) suitable for China which we hope to launch in 2020.

# INDIA

Many product supply chains are complex, especially where intricate artisanal skills are required as part of the process. Our hand-woven rugs supply base in India is made up of many networks of producers

of which we previously had little visibility. In late 2018 the Partnership commissioned the Association for Stimulating Know-How India (ASK India) to carry out visits to these producers. This included detailed mapping to understand the nature of the commercial arrangements between each tier of this complex network. In 2019 we have been developing an approach to improve due diligence of the lower tiers of this supply chain to confirm that they have robust systems in place to ensure commercial agreements safeguard the safety, wellbeing and livelihoods of workers. This will be rolled out in 2020.

The John Lewis Foundation is working with the British Asian Trust as part of their on-going project in Jaipur to create the world's first child labour free certificate for handicrafts. This is an important step in stopping child trafficking in the area. As a result of this project, the British Asian Trust has secured the first two convictions for child trafficking.

# VIETNAM, CAMBODIA AND BANGLADESH

Where human rights risks are considered to be higher, we seek on-the-ground support or existing programmes that enable us to monitor both the country conditions and each factory closely. We are Buyer Partner members of the International Labor Organization (ILO) Better Work programme, which provides specialist assessment visits to factories as well as advisory support on specific workplace themes. We are also a brand signatory to the Bangladesh Accord, a legally binding agreement between brands and trade unions to enable a safe working environment in the Bangladeshi garment industry.

# FOOD AND GROCERY

# SOUTH AFRICA

We have been working closely with our growers in South Africa for many years, setting up the Waitrose & Partners Foundation programme there 15 years ago. We identified that there are issues with improving effective worker management in the country and the Foundation is designed to help our farms start to address this risk.

We are also supporting a pilot programme with the Ethical Trading Initiative to support further empowerment of workers



through promoting effective worker management dialogue. This programme has been part funded by the UK's Department of International Development (DFID) and a public toolkit will launch in spring 2020. We have also supported the establishment of Stronger Together in South Africa which is funded by the UK Home Office Modern Slavery Innovation Fund. Through this programme 232 individuals, representing 138 businesses from our supply chains, have been trained since the programme began in 2018.

# **THAILAND**

Cases of modern slavery in Thailand, particularly in the fishing sector, are well documented. In 2019 we focused attention on strengthening our relationship and engagement with the ISSARA Institute an NGO based in South East Asia which is committed to tackling issues of human trafficking and forced labour through 'worker voice'. This relationship enables us to receive feedback directly from migrant workers employed in our Thai supply chains so that their concerns can be addressed.

Issues raised and addressed this year have included concerns regarding visa processing time, passport retention, and the different treatment that local and migrant workers receive by some management. ISSARA are working on a programme of support, particularly for migrant workers from Myanmar, who are legally allowed to work in Thailand because of a Memorandum of Understanding between the two countries. ISSARA are directly supporting businesses in Thailand to help them recruit workers from Myanmar and ensure these workers are not being charged high fees by recruitment agents, thus putting them in debt. In 2019, we shared our general

merchandise sites with ISSARA in order that they too could be covered by this programme.

# SPAIN

It has been widely reported, and confirmed in our own risk assessment work through the Wilberforce Institute, that there are challenges within the Spanish fresh produce sector particularly relating to harassment, long working hours and poor worker and management dialogue. We believe that sustainable change needs to come with a willingness by those in the country to change. We therefore support the Spanish Ethical Trade Network, which are grower led forums working to collaboratively raise standards and address issues in the country, such as the harassment of women in strawberry fields. Alongside other retailers and brands, we have supported the Stronger Together team to develop a toolkit for Spanish suppliers to further support them with training and policy development for their businesses. Pending Covid-19 timeline disruption, we hope to roll this out in 2020.

# ITALY

In Italy, there is currently no registration system for labour agencies and these are often run by criminal gangs, or are part of wider organised crime. Media attention both in the UK and overseas has highlighted issues in Italian tomato fields and there have been a number of NGO reports which shine a spotlight on the use of illegal migrants to pick tomatoes.

In 2015 we conducted investigations with the Wilberforce Institute into a number of our Italian supply chains. Through conversations with local trade unions, a number of local practices were highlighted

# STRENGTHENING WORKER REPRESENTATION IN OUR TURKISH SUPPLY BASE

06.0 Training and Programmes

INTRODUCTION OUR BUSINESS POLICY GOVERNANCE SALIENT RIGHTS RISK TRAINING EFFECTIVENESS WORK

# SUPPLY CHAIN PROGRAMMES CONTINUED



# DEVELOPING WORKER VOICE MECHANISMS WITH THE WAITROSE & PARTNERS FOUNDATION

The Waitrose & Partners Foundation was established in 2005 to improve the lives of the people who grow, pick and pack our products. A percentage of the sale of Foundation products is invested back into the country of origin - co-funded with our suppliers. Over £12million has been invested back into community projects such as crèches, clinics, and training, with projects decided on by the needs of the communities. In line with the John Lewis Partnership's values, the Foundation also aims to strengthen the voice of farm workers through active worker committees. Workers decide as a

their community, giving them owners! of the programme and ensuring that their wants and needs are met rather than just those of the employer. Training and capacity building of work committees is key to this. For instance in South Africa, worker conferences have given the opportunity to share best practice and provide additional training for those involved in worker committees on farms.

£12

MILLION INVESTED IN COMMUNIT'
PROJECTS

as a concern, including migrant workers being able to purchase a contract with an employer in order to legalise their right to remain in the country. Within our own supply chains it was noted that working hours were often not recorded properly and wages did not always meet the legal minimum. Whilst these issues were addressed individually at farm level, the overarching issue in Italy is particularly complex and systemic, with organised crime playing a significant role. We are supporting the Ethical Trade Initiative to adopt a similar approach to the Spanish Ethical Forums, in which the Spanish growers' working groups are led by the growers. It is hoped that by using this model we can push for industry change within Italy and at a grower level.

## UK

Many UK companies rely on low-paid migrant workers, in particular within horticulture. Following the vote to leave the EU, and our subsequent departure under the Withdrawal Agreement, the UK has seen a tightening of labour availability in the UK. As a result, there is a heavy reliance on agency labour, increasing risks of modern slavery. Whilst these agencies are regulated, this is not infallible - as Operation Fort demonstrated during July 2019 (see section 7 for more detail).

We remain supporters of Stronger Together in the UK and in the period 2018 - 2019, representatives from over 120 of our UK supplier sites were upskilled in order to tackle modern slavery through Stronger Together's training.

We are active members of the FNET, a supplier-led UK based forum where we work together to share information and collectively develop ways to address complex issues (such as how to ensure food businesses can survive when there are severe shortages of people to pick, pack, or produce products). Our Ethical Trade Manager currently sits on the Strategic Advisory Group for FNET, and we are actively involved in working groups which we consider most relevant for our salient risks.

Inflated costs for accommodation, unsafe housing, and a requirement for workers to be housed in a certain place to retain 'control' over them is a risk associated with seasonal work in the UK food sector. The provision of large scale caravan accommodation is common. As part of a collaborative effort with other retailers, the Partnership has created an online UK caravan accommodation training course, launched in 2019. More than 100 suppliers and labour providers that house workers in caravans have used the training to help to ensure that this accommodation is legally compliant and does not pose a risk to workers' health, safety, and welfare.

# PERU

Through our assessments with the Wilberforce Institute we have identified some risks to workers in our Peruvian supply chains, particularly relating to loans which are not being properly managed, and a lack of control over working hours. We have supported further research into conditions in Peru though the ETI Working Group, which also identified areas of concern around freedom of association. We are active members of this working group looking at how we can start to address some of these issues on the ground.

# THE DOMINICAN REPUBLIC:

In 2016 'The Lab', an ILO research body, and Fairtrade undertook a study of the banana industry in the Dominican Republic. They found that one of the significant issues underpinning chronically low wages for workers was low labour efficiency when compared with other regional banana producing countries. As a result of this study, we began a programme of work with The Latin American and Caribbean Network of Fairtrade Small Producers and Workers (CLAC) to look at means of improving productivity and wages. Initial activity has included carrying out an assessment of productivity on two plantations; this resulted in a training manual being created and workshops to improve processes on farm. To date 88 people have received training. We are currently reviewing the proposal for the second phase of activity to ensure greater progress and increased worker participation.

# **GNFR**

# UK

The Partnership is one of 12 Steering Group members of the Indirect Procurement Human Rights Forum (IPHR) forum which is working collaboratively with food and non food businesses focusing on addressing issues across UK supply chains. Current focus is in three key areas of higher risk: labour providers; onsite services; and waste and recycling, with support from suppliers and experts in tackling modern slavery to identify best practice that can be applied.

# VICTIM AND SURVIVOR SUPPORT

Throughout this report we have outlined the extensive work we carry out across our supply chains to support, prevent and help our suppliers identify the signs of modern slavery. Unfortunately cases of modern slavery continue to exist. We recognise our responsibilities to provide support for victims and survivors of this exploitation, and where our business operations may impact negatively on people's human rights.

For every victim of modern slavery, or any victim whose humans rights have been breached, each journey to becoming a survivor is unique. In 2019, the Partnership published its first 'remediation' best practice document which outlines our position on support for those directly impacted by our operations, or within the communities in which we operate.

Support for a victim starts with enabling them to report an issue to the right person. In the UK we believe this is through the Modern Slavery Helpline. The Partnership now supports <u>UNSEEN</u>'s business portal which directly helps fund the Modern Slavery Helpline, offering vital first line support to whistleblowers and victims.

Last October, for Anti Slavery Day, we published an article in our weekly customer newspaper *Waitrose Weekend*. With a circulation of roughly 400,000 customers, this article helped raise awareness of the issue of modern slavery in today's society, and its impact on individuals. This article was run concurrently with fundraising for Salvation Army safehouses through our Community Matters scheme.

We support the <u>Business In The</u> <u>Community (BITC)</u> programme which focuses on making employment more accessible for some of the most vulnerable people in society, and improving modern slavery survivors' long-term economic prospects. The two year programme, funded by the <u>John Lewis Foundation</u>, brought together frontline organisations and BITC members to offer relevant skills and work experience to survivors of modern slavery. The programme has also offered important insight into the realities of life for survivors, helping to inform how we can better support people in the future

We are also proud to be members of the Bright Future employment scheme which aims to provide long-term employment opportunities for survivors of modern slavery through a four-week trial work placement, which then leads to a permanent contract if the placement is successful. During 2019 we successfully placed a candidate within our food retail operations.



Waitrose Weekend, Issue 475, 17 October 2019

**07.0** Effectiveness EFFECTIVENESS WORK EFFECTIVENESS Modern slavery is a sad reality in today's supply chains, and effective action must be measured as a combination of prevention, identification and remediation. However, modern slavery is a criminal activity and the signs can often be difficult to identify. Our due diligence processes are robust and help us to uncover areas in our supply chains where the risks of modern slavery are greatest.

07.0 Effectiveness

# **EFFECTIVENESS**

The effectiveness of our programme is often hard to determine as prevention is such an important tool, the success of which is difficult to measure. How effectively we are able to identify people within our supply chains, or operations, who are victims of modern slavery and how efficiently we then react to these cases both in terms of speed and victim support is key to our programme's success.

Success also involves learning lessons and changing processes and procedures when things haven't gone right, ensuring there is no repeat of failures. For example, we became aware of Operation Fort in July 2019 and our connection to the case through one of our suppliers. The incident occurred in 2015 and even the supplier was only aware of their inadvertent employment of modern slavery victims years after the incident.

This case highlighted the complexities and hidden nature of modern slavery and, following this, we have further strengthened our relationships with key stakeholders in the UK such as Unseen, the police, and the GLAA, all of whom can help us to identify UK-based victims quickly and start the immediate remediation process where required.

We have also reviewed our due diligence programmes in light of details that the case highlighted, and used this example of a real situation to share insights with other suppliers.



# **OPERATION FORT**

Operation Fort was the code name for the multiagency investigation into the UK's largest modern slavery and human trafficking ring. The case came to light in the public domain in July 2019 when eight members of a gang were sentenced to custodial terms.

The criminals worked by targeting vulnerable people in Poland, for example the unemployed, ex-offenders and those with drug and alcohol addictions. Promising them a better life, they trafficked them to the UK where they had implanted one of their gang into a legitimate labour agency.

As people trafficking gangs become increasingly organised and sophisticated t is difficult for even the most cautious legitimate pusinesses to protect themselves against nadvertently employing the victims of exploitation

In the case outlined above, the gang had infiltrated a respected employment agency using an individual who appeared credible and above suspicion. It was this that allowed them to damage the reputation of two trusted companies - the employment agency and the business vegetable supplier that, unknowingly, employed a vulnerable victim of modern slavery.

8
GANG MEMBERS
SENTENCED IN

We know that risk assessments and compliance programmes on their own will not prevent modern slavery occurring in our supply chains, but they do provide insight into potential indicators which we can then investigate further. The following tables show examples of the types issues we have been addressing with our suppliers this year, which have been highlighted through our compliance based programmes:

Tier One Issue	Instances highlighted through Third Party Audits			
Ineffective management processes which could indicate a lack of modern slavery prevention due diligence	4			
Lack of robust modern slavery related policies	3			
Passport retention for casual workers	1			

We are also alerted to indicators of modern slavery within our supply chains from whistleblowers - which demonstrates we have methods by which workers and other whistleblowers can communicate and feedback to us.

During the past year we have started tracking whistleblower reports more effectively and worked hard to ensure we have a fast and effective response when we receive a complaint. During 2019/20 we have received worker complaints, which indicated risks of modern slavery, through the following channels:

Contact Channel	Cases	Countries
Sedex	2	UK, India
Through the Ethical Trading Initiative	1	Kenya
Media	2 (1 was a historic case)	UK, Cambodia
ISSARA	4	Thailand
Direct letter from a whistleblower	2	UK
Direct from our tier 1 supplier	4 (1 referred to the authorities)	UK
Direct from authorities	1 (allegation about an operation on our property - see case study opposite)	UK

<sup>\*</sup>These figures include reports relating to tier 1 sites and tier 2 farms



# MODERN SLAVERY RISKS WITHIN OUR OWN OPERATIONS

alerted to a potential risk with one of our subcontracted on-site tray washes within our food business. The allegation was one of non-payment of wages for some on-site agency workers who had reported this to the authorities.

Through a thorough investigation with the GLAA, Thames Valley Police, and ar independent ethical consultant (Impactiti twas determined that, while there was no case of modern slavery onsite, there were gaps in our processes and procedures relating to the procurement of labour in this case, which we are addressing. This includes strengthening our contractual arrangements around sub-contracting and ensuring our contract managers are better equipped to recognise and question modern slavery risk areas.

This case however also gave us an ndicator of how efficient our response s, and we were given the following feedback from the police relating to thicase.

"

I would like to thank you for your prompt response to this incident which I think demonstrated a really positive attitude and understanding around modern slavery by Waitrose"

Local Police Area (LPA) DCI Thames Valley Police

We advocate for strong legislation to support the wider industry to effectively tackle this crime. In last year's public consultation we supported a 'report or explain' approach for all six suggested reporting areas in the 'Transparency in Supply Chains' (TISC) guidance document, the creation of a central repository so that compliance with the Modern Slavery Act can be monitored, and increase in scope for the TISC requirements to include the public sector.

08.0 Who We Work With INTRODUCTION OUR BUSINESS POLICY GOVERNANCE SALIENT RIGHTS RISK TRAINING EFFECTIVENESS WORK

# A selection of organisations that we work with:



# Association for Stimulating Know-How India (ASK India)

A not-for-profit organisation focused on grassroots change in marginalised communities. ASK India provided detailed assessments of our hand-woven rug supply chain in India.



# Bangladesh Accord

A legally binding agreement between brands and trade unions to enable a safe working environment in the Bangladeshi garment industry.



# Bright Future

An employability scheme through which modern slavery survivors are given opportunities for employment following a four-week trial placement.



# Business in the Community

The John Lewis Foundation supported their project designed to make employment more accessible for survivors of modern slavery. Building on this programme BITC is developing a wider programme with greater reach.



# Carnstone Partners

A leading independent management consultancy with expertise in corporate responsibility and sustainability. Carnstone advised John Lewis on the development and implementation of the Better Jobs programme.



## Farm Africa

In Kenya we are working with Farm Africa to deliver activity as part of the Waitrose & Partners Foundation. Farm Africa has been working to strengthen farm worker committees and support them to develop programmes that meet the needs of their communities.



# work and working live

CIPD

The CIPD is the professional body for HR and people development. They acted in an advisory capacity on the development of the Better Jobs programme. We drew on the CIPD's Good Work index when designing the Better Jobs employee survey.



# Food Network for Ethical Trade FNET

Established in 2016, FNET uses the 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 opportunities for collaboration.



# Ethica Limited

e.

An experienced social compliance consultancy which provided training to factories in Turkey on setting up worker representative committees and improved dialogue processes.



# International Labour Organisation Better Work Programme

A partnership between the UN, ILO, and the IFC aimed at improving labour standards and competitiveness in global supply chains. John Lewis are brand partner members.



# Ethical Trade Initiative

**Ethical** 

Trading

Initiative

An alliance of companies, trade unions and NGOs advocating respect for workers' rights around the globe. The John Lewis Partnership are corporate members.



# Impactt

A worker-focused human rights and business management consultancy with whom we partnered to conduct modern slavery risk investigations and telephone surveys for smaller



# Institute of Employment Studies

A British human resources employment research centre and consultancy which acted in an advisory capacity on the development of the Better Jobs programme.

JOSEPH ROWNTREE

An independent UK organisation focused

on social change research, policy, and

collaborations that solve poverty. JRF

have acted in an advisory capacity in

the development of our Better lobs

Joseph Rowntree Foundation



# Responsible Recruitment Toolkit (RRT)

We sponsor the RRT which allows our suppliers free access to training and an online self-assessment and learning tool to help embed responsible recruitment



# The Fairtrade Foundation

We work closely with the Fairtrade Foundation to ensure that key commodities including tea, coffee, cocoa, sugar and bananas meet their certification requirements. We collaborate to raise awareness of the difference that Fairtrade makes for farmers in our supply chain and are working with them on additional programmes to drive change.



# Sedex

We are a member of Sedex (Supplier Ethical Data Exchange) and use the Sedex platform to store supply chain assessment data, such as SAQ and audit information, for Food and Grocery sites.



A registered charity working towards a world without slavery, Useen also run the Modern Slavery.



# **NEF** Consulting

programme.

Supports organisations in the transition to a new economy. We engaged NEF to provide in-house training on measuring social impact so that we can better design programmes to meet needs as well as assessing their success.



# Slave-Free Alliance

a membership initiative launched by anti-slavery charity Hope for Justice, who partnered with us on 'spot the signs' training for Partners.



# United Purpose

In 2019 we began working with United Purpose as a delivery partner for the Waitrose Foundation in Senegal & The Gambia. United Purpose is working closely with our farms to develop plans for how Foundation funding can be best spent in local communities.



# Project Issara

Issara is an independent non-profit organisation, based in SE Asia, focussed on tackling modern slavery, human trafficking and forced labour through data collection, technology, partnership, and innovation. At present they mainly work with our food factories in Thailand, monitoring and adjusting labour conditions through partnering with businesses in empowering worker voice.



# Stronger Together

We sponsor collaborative initiative Stronger Together and roll-out their training and guidance to our supply base in the UK, South Africa and Spain on detecting, deterring and dealing with modern slavery.

真の再本ア UNIVERSITY | WILBERFORCE OF HULL | INSTITUTE

# Wilberforce Institute, University of Hull

A research hub concerned with contemporary slavery and human rights abuses. Since 2015, the Institute has conducted a number of in-depth human rights impact assessments on Partnership sites as well as in a number of key fresh supply chains.

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MODERN SLAVERY STATEMENT 2019/20 | 31

This statement has been published in accordance with the Modern Slavery Act 2015 and has been approved by the John Lewis Partnership Board at their meeting on the 9 of April 2020.

It sets out the steps taken by John Lewis plc and relevant group companies John Lewis and Waitrose during the year ending 25 January 2020 to prevent modern slavery and human trafficking in its business and supply chains.

JOHN LEWIS PARTNERSHIP PLC 171 VICTORIA STREET, LONDON SW1E 5NN

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