

Human Rights Policy

At Asda, we believe that respecting and protecting the human rights of those who contribute to our business is not only our responsibility, but our duty to help safeguard the dignity of those who work with, and for our company.

In line with the <u>UN Guiding Principles on Business and Human Rights</u>, our human rights policy is guided by the following: The International Bill of Human Rights

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

This policy draws upon the core principles embedded within our existing policies and emphasises our aspirations to address human rights breaches within, or impacted by, our business operations and initiatives. It has been developed with the support of our internal and external stakeholders including suppliers, NGOs, commercial, legal, finance and worker representatives.

Our Focus

Our focus remains on the salient human rights risks associated with our business operations, as we believe this is where we can achieve the greatest impact, these include rights relating to health and safety, protection from discrimination, preventing forced and child labour, freedom of association, wages and working hours.

We acknowledge the relationship between human rights and the environment, linked to climate change, deforestation, pollution, and land use. To support our ongoing responsibilities, we have a clear set of sustainability commitments and policies in place. Our sustainability commitments also help to ensure environmental practices do not negatively impact the human rights of communities.

We recognise that vulnerable groups and individuals are at a greater risk of human rights abuses, based on characteristics such as gender, age (child labour), and being members of marginalised groups or migrant workers. We place greater emphasis to identify, manage and mitigate these risks through our policies and our Responsible Sourcing Programme.

Commitments and Expectations

We uphold the UN Guiding Principles on Business and Human Rights and use the framework to help prevent, address, and remediate associated risks. Our commitment extends to all individuals impacted by Asda and our subsidiaries' business activities and relationships, including colleagues, suppliers, workers within our supply chain, communities in which we operate and our customers. It is our minimum expectation that our colleagues, business partners, suppliers, and stakeholders work to these principles.

Our commitment to our Colleagues:

It is our duty to make Asda a place where our colleagues feel safe, nurtured, and empowered to be the best they can be. To support this, we do not tolerate any form of discrimination, harassment, victimisation or bullying and have a range of people policies in place to protect the human rights of our colleagues, including but not limited to, Diversity and Inclusion, Health, Safety and Fire, Modern Slavery, Working Time Directive, Recruitment, Right to Work, Safeguarding, Grievance and Whistleblowing policies.

Our commitment to workers within our Supply Chains:

We have identified our global supply chain as a key area of focus to drive change, promote decent work and enhance workers' rights. Through our Responsible Sourcing Programme, which is led by our legal function, reporting to our General Counsel and Company Secretary and fully supported by the Senior Directors across Sourcing and Technical, we promote strong labour standards via our <u>Standards for Suppliers</u> which are applicable to all suppliers and cover the extended supply chain.

We recognise that transparency is a key element of human rights due diligence. Through our Responsible Sourcing Programme and Transparency Policy we require in-scope suppliers to join Supplier Ethical Data Exchange (Sedex) and share facility level information. This provides access to risk information to help us identify and mitigate human rights infringements globally. Working in collaboration with our suppliers, we commit to improve standards for workers and where required drive remediation. In some instances, we recognise that it may be necessary to go beyond our Responsible Sourcing Programme, to achieve a collective improvement in global standards for the benefit of the people who make the products we sell. As a founding member of the Ethical Trading Initiative (ETI), our Responsible Sourcing Programme is aligned to the ETI base code.

Our commitment to our Customers:

We serve millions of customers weekly through various platforms and it is key that we provide customers with confidence in what they purchase from our stores. We aim to meet the diverse needs of our customers ensuring they feel valued and respected. We do not tolerate any form of discrimination, harassment, victimisation, or bullying.

Modern Slavery:

Modern slavery is an umbrella term that encompasses crimes of human trafficking, forced labour, debt bondage, forced child labour, forced marriage, and commercial sexual exploitation. It has been identified as one of the highest areas of risk in relation to human rights violations. We are committed to ensuring we take steps to mitigate the risk of Modern Slavery within our business and supply chains. For further information, please see our <u>Modern Slavery Statement</u>.

Environmental, Social, and Governance (ESG):

Asda is committed to building a better world and a more sustainable future through all that it does. Asda's ESG programme, Creating Change for Better, covers our activity to protect and conserve the world around us and work towards a Better Planet; to remove the barriers to opportunity, health and happiness and help colleagues, customers and communities to enjoy Better Lives, and to operate responsibly and transparently in order to build a better business. We monitor our progress through a number of key performance indicators, and report these annually in our ESG report. For further information, please see the <u>Creating Change for Better website</u>.

We are committed to complying with the UK Modern Slavery Act 2015 and our ongoing ESG commitments to investors, stakeholders and customers which are communicated through our annual reporting.

Raising a concern

We have multiple channels for colleagues, suppliers, and customers to raise grievances or concerns if they believe the Human Rights Policy is being violated.

We have a confidential hotline accessible for both internal and external issues to be raised

- Asda Ethics
- Tel: 0800 318 405

In addition to the above, colleagues can also follow the Whistleblowing Policy and Colleague Grievance Policy.

Governance

To ensure we fulfil our policy commitments, we report performance internally to the Compliance, Ethics, Risk and Audit committee.

We will update and outline progress through our ESG report and Modern Slavery Statements which are published annually to ensure that our human rights commitments are given the focus and prioritisation they require. Through these we will introduce metrics and report against these as we continue to develop our human rights approach.

This policy was formally adopted by the Compliance, Ethics, Risk and Audit committee on 26/08/2022