

Asda Modern Slavery Statement 2021

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken in relation to part 6, section 54, by Asda Stores Limited and where appropriate, other relevant group companies to prevent modern slavery and human trafficking in our business processes and supply chains.

It relates to our financial year ended 31st December 2020. It covers the activities of Asda Stores Ltd, Asda Group Ltd, McLagan Investment Limited, The Burwood House Group Limited, Power4All Limited, International Procurement and Logistics Limited (IPL), Forza Foods Limited and Kober Limited.

(Collectively referred to as "Asda", except where the report specifically refers to an individual entity or where explicitly stated otherwise). References to IPL include, where relevant, Forza Foods Limited and Kober Limited.

Content

Foreword

2020 Objectives Progress Summary

Structure, Business and Supply Chains

Policies

Due Diligence

Risks

Effectiveness

Training

2021 Future Focus

Foreword

“I am pleased to share Asda’s fifth modern slavery statement, detailing the progress we have made to the way we assess, engage and prioritise our work to combat modern slavery. Despite the challenges 2020 has brought, we have continued to work closely with our suppliers and service providers and collaborate with industry partners in addressing these issues.

2020 was a year like no other, and everyone globally has felt the impact of the COVID pandemic and will for some time to come. I am proud of how quickly Asda adapted to the changes that the pandemic presented to our ways of working, whether in our stores, depots or home offices, particularly in relation to recruiting responsibly.

Through the year, we have seen high profile examples of the increased risk of modern slavery, trafficking and exploitation, both here in the UK, most notably in Leicester, and globally, such as in Xinjiang province in China. We have not lost sight of the many other countries, industries and commodities plagued by these risks.

As we responded to COVID-19, we have worked to support our wider community of suppliers through the impacts on their businesses, whether through paying our small suppliers immediately or supporting British farmers and growers on managing changes in demand brought about by the closure of hospitality. This has enabled our supply chain to remain vigilant to the risks of modern slavery, preventing issues including delayed or non-payment of wages, where there is potential for smaller challenges to evolve into larger and more complex slavery or forced labour problems.

In our George clothing business, despite a huge downturn in demand, we maintained our commitment to taking over 94% of orders as planned. We have longstanding valued relationships with our suppliers and in places like Bangladesh we worked collaboratively to look at what products we could sell at the time, store for later in the year or rework fabrics into new designs. For the small number of products we were unable to take from suppliers, we agreed to pay a percentage of the order value within seven days, offering payment much quicker than standard industry terms and ensuring that suppliers had access to much needed cashflow allowing them to support workers during the pandemic.

**“I AM PROUD OF
HOW QUICKLY ASDA
ADAPTED TO THE
CHANGES THAT
THE PANDEMIC
PRESENTED...”**



Closer to home, the UK's exit from the European Union may in the longer term have significant repercussions for labour markets and the availability of workers for our own business and supply chains. We know the impact that a shortage of labour availability can have on increasing the risks of trafficking, modern slavery or forced labour and exploitation, so this is an area we continue to monitor.

“WE ARE REASSURED BY THE ONGOING GOVERNMENT COMMITMENT TO THE MODERN SLAVERY ACT 2015”

Asda's supply chain is, like all others, not immune to occurrences of modern slavery, and we have unfortunately encountered further instances this year. We have, however, again taken the opportunity to learn more and remediate any process gaps these cases have identified and have included further case studies in our 2021 statement. Given the hidden nature of these abhorrent crimes, we are pleased to see the effect of our efforts in preventing or managing these occurrences and note the correlation between our training and awareness activities and increasing incident reporting.

We are reassured by the ongoing Government commitment to the Modern Slavery Act 2015 and welcome the new measures that are to be implemented to bolster the legislation further, including mandating the areas statements must cover, publishing new guidance and requiring statement publication on a Government-run reporting service.

Looking ahead to our next report, we will cover a period in which Asda has changed ownership for the first time in 20 years, with the acquisition from Walmart by the Issa Brothers and TDR Capital. While we will continue to enjoy many aspects of our previous relationship with Walmart, we also now have a unique opportunity to chart our own course. In terms of our supply chain and our approach to modern slavery, this enables movement from a Walmart global approach to an Asda-specific Responsible Sourcing programme, honing in and focusing our efforts to mitigate the risks of trafficking and modern slavery within our own supply chain.”

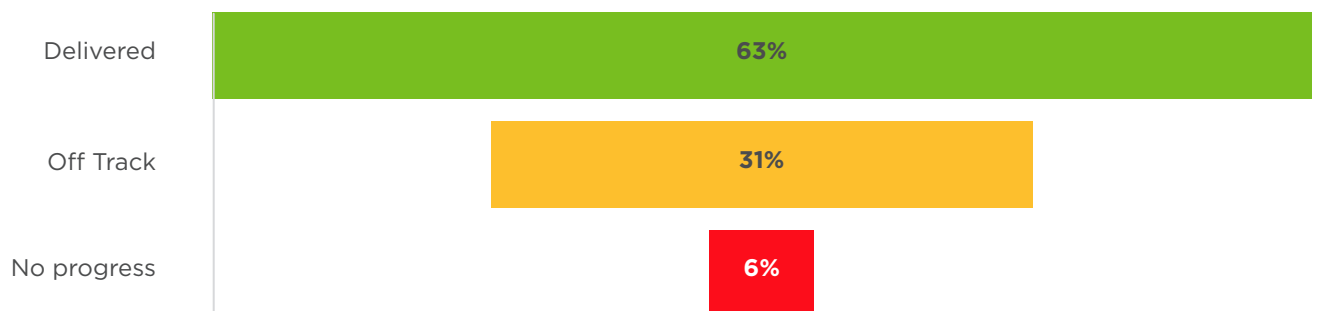


Roger Burnley
President and CEO

Signed on behalf of the Asda Board
Roger Burnley
27.05.2021

2020 Objectives Progress Summary

Modern Slavery Objectives 2020 Summary



Below is top line summary of our progress made in 2020 across our key objective areas and the associated deliverables, with more detailed commentary below. Please refer to section 8 for our future focus areas to continue to enhance, refine and improve further throughout 2021.

The table below provides a snapshot of our progress on the 2020 deliverables and provides links to further detail on each within our Statement.

Objective Area and Deliverable	Commentary
<p>Enhance our Risk Assessment</p> <p>Continue work on our previously identified focus areas within our George and IPL businesses.</p>	<p>George Working Hours Activity Management (WHAM) project: Despite the project being stalled by the pandemic we managed to make progress by socialising, within our wider General Merchandise business and with other retailers, our work on monitoring working hours within our supply chain to focus on Purchase Order (PO) management and prioritisation.</p> <p>IPL's identified key risk area in relation to banana sourcing progressed, with all our programmed suppliers sourcing via either Rainforest Alliance or Fairtrade.</p> <p>Beyond the above, wider business and supply chain incidents highlighted further risk in relation to Labour Providers across the businesses and we have taken a number of key steps to further mitigate our risk.</p> <p>Please see section 5 Risks for further information and details.</p>

Increased Training and Awareness

Enhance company-wide awareness of indicators of modern slavery with an all colleague training platform to support and develop further understanding of potential concerns.

Our mandatory Modern Slavery Computer Based Learning (CBL) module was delivered to an extended colleague audience covering further roles identified as having closer proximity to potential modern slavery risks, and the module has been made available for all colleagues through self-assignment via our Learning Management System (LMS) catalogue.

Asda supported the multi-agency Project Aidant operation via the GLAA's modern slavery poster campaign. Posters were shared across our store and depots network in prominent colleague and customer locations with reach to over 35 million customer visits during the campaign.

Further awareness raising activities took place during the week of National Anti-Slavery Day (18th October 2020) and, following this period, an assessment of colleague impact undertaken which showed an encouraging level of awareness to Modern Slavery risk across our colleagues.

Simplified messaging and ways to raise awareness across our colleague base have also been trialled, with key teams utilising Modern Slavery messaging in email signatures, and these have been found to be successful in raising colleague awareness and effecting positive actions.

Training and Awareness for our suppliers has continued with an increase annually over 12% and Asda also joined as a Sponsor of the Responsible Recruitment Toolkit (RRT) in February 2020 unlocking further training, tools and resources for our suppliers to access.

We are also clear on the growing interest in what we do as a responsible business to mitigate the risks of trafficking and modern slavery and 2020 has seen an exponential increase, 340% YOY, in viewings of our Modern Slavery statement on our corporate website with 5,112 viewers during the year.

Please see section 7 Training for further information, details and case study.

Review and evolve our training tools for Buyers, Merchants and Technical Managers maintaining up-to-date content and relevant case studies delivering relatable and real-life scenarios.

A bespoke in-house training course was delivered to relevant Goods Not For Resale (GNFR) buying colleagues and the Asda packaging teams, this included a forced labour exercise in addition to an overview of the Responsible Sourcing programme.

A specific supply chain incident encountered during 2020 provided the opportunity to create a new process to mitigate business Modern Slavery risks in relation to exclusive suppliers or facilities and evolve the associated training for our buying teams.

Please see section 7 Training for further information, details and case study.

Enhance integration within the overall Asda and IPL businesses providing end to end coverage across systems, processes and policies.

Further integration across the Asda and IPL businesses has taken place, with key elements being the introduction of a combined Modern Slavery end to end reporting and incident management process, bringing together and aligning the processes established in previous years. This has been implemented and communicated, along with associated updates to the relevant colleague Modern Slavery Policies.

Reciprocation of representation for the Asda and IPL businesses is now in place, with Asda representation on the IPL Modern Slavery Steering Group in addition to IPL representation at the Asda Modern Slavery Working Group to better enable best practice sharing and offer support and guidance in relation to Modern Slavery.

Our approach to tackling Modern Slavery and Human Trafficking forms part of our Creating Change for Better initiative under the Better Business pillar and is included in the first ASDA ESG Report due to be published imminently.

Please see section 3 Policies for further information and details.

Steps to strengthen policy

Review policies for effectiveness and evolve as required in line with strengthening legislation and consultations.

Recognising the presence of Modern Slavery risk in relation to our suppliers or supplying facilities which are exclusive to Asda, and therefore potentially not subject to our Responsible Sourcing programme, or wider industry scrutiny, Asda introduced an Exclusives policy and process to mitigate this risk and bring these suppliers into the scope of our programme coverage.

The Asda colleague Modern Slavery Policy has been updated to include full business end to end incident reporting and management.

Modern Slavery quarterly checks have seen further enhancements across both the Asda and IPL businesses in 2020:

- **Asda has collaborated with the GLAA integrating a step in our process to support our business checks where potential duplicative cases cannot be validated without the risk of alerting potential exploiters.**
- **IPL has extended quarterly checks to include Next of Kin duplicates.**

Modern Slavery requirements and supplier onboarding due diligence checks have been refreshed for GNFR.

Please see section 3 Policies for further information and details.

Progress implementation of the [Responsible Recruitment Toolkit](#) (RRT) throughout the business and supply chains.

RRT was rolled out through a soft launch to all suppliers with follow up communications throughout the year. This has seen 80 participants utilising the benefits of Asda sponsorship across 57 of our suppliers and labour providers, with 50 completing an RRT training session and 59 subscribing to the RRT online tool at the 'plus' level, enabling our suppliers to access a wide range of guidance, resources and self-assessment functionality to demonstrate their own commitments to embedding good practices in Responsible Recruitment.

Please see section 3 Policies for further information and details.

Increased focus on partnerships

Collaborate with appropriate third parties to improve the alignment of our policies, strategies and statement – Suppliers, NGO's and Not for Profit organisations.

As mentioned above, ASDA joined the [Responsible Recruitment Toolkit](#) (RRT) and we further maintained our existing partnerships along with engaging in a number of forums, including the West Yorkshire Anti-Slavery Partnership to improve the alignment of our policies and strategies. Asda has also reviewed suitable partner organisations to better enable our business modern slavery survivor support proposition, and through 2021 will progress onboarding.

Incidents that have arisen in 2020 have also led to the establishment of closer working relationships with several Police forces across the UK.



Gangmasters & Labour Abuse Authority

Asda has collaborated with the [Gangmasters and Labour Abuse Authority](#) (GLAA) on our Modern Slavery Quarterly Checks process. As a result of progressing enhancements, this helps us to ensure that our approach as a business in the identification of potential Modern Slavery risks does not place potential survivors at risk through investigation. In addition, Asda supported the multi-agency Project Aidant operation and supported the GLAA's campaign in running a nationwide awareness poster campaign throughout our stores and operations.

Please see section 6 Effectiveness for further information and details.

Continue to actively engage with collective partnerships and member organisations to support and share learning and best practice.

We have continued to actively engage through our partners and memberships.

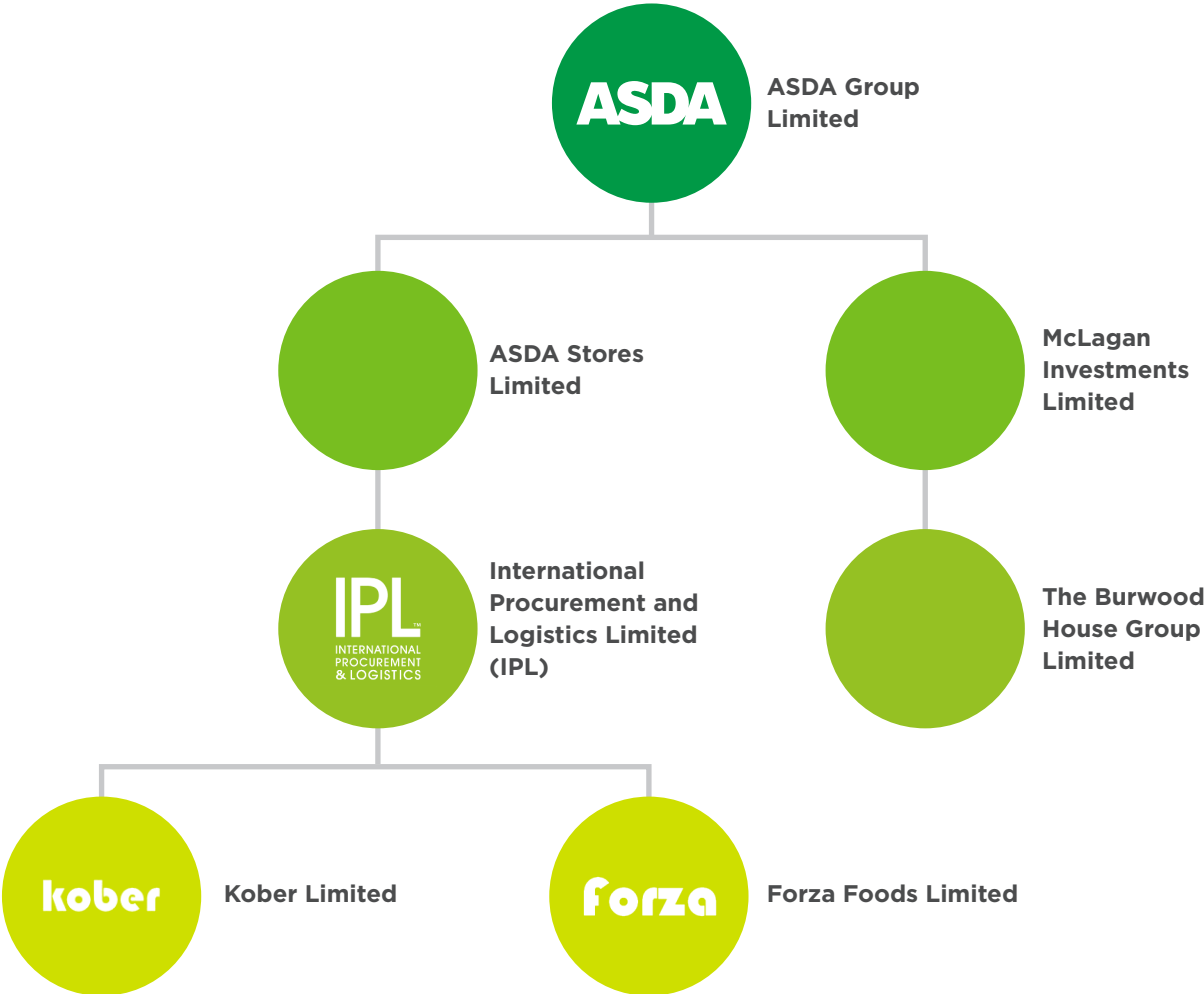
Please see section 6 Effectiveness for further information and details.

<p>Sharing best practice from our programme further to drive innovation and collaboration at industry and partnership meetings and with our supply base.</p>	<p>Through our FNET membership, Asda shared best practice guidance in relation to COVID with other members and suppliers, and our Director of Responsible Sourcing has continued to Chair the British Retail Consortium's Ethical Labour Working Group (BRC ELWG) during 2020.</p> <p>Our Asda Logistics Services team shared details of our What Have You Seen programme at Stronger Together's webinar " Everyone can play a role: effectively raising awareness of modern slavery across your business ".</p> <p>Please see section 7 Training for further information.</p>
<p>Develop and establish the global Forced Labour Centre of Excellence with Walmart to share best practice and learning across our global businesses.</p>	<p>Asda supported the establishment of Walmart's Centre of Excellence in relation to Forced Labour, sharing best practice enabling Walmart to complete an assessment of its global Fresh Food Manufacturing facilities with a particular focus on indirect (agency) labour and enabling the creation of a Global Forced Labour Policy to be introduced in 2021.</p> <p>Please see section 3 Policies for further information and details.</p>
<p>Enhance our Risk Assessment</p> <p>Evaluate and enhance our risk management tools to drive insight and impact supporting improvements in future risk focus areas.</p>	<p>A data refresh of our Forced Labour Dashboard has not been possible in 2020, with issues in the availability of the external report data informing our updates. This is expected to be rectified in 2021, and supported further by the business ownership transition, which is expected to enable an Asda focussed Responsible Sourcing programme specific to the risks of only the Asda supply chain. Overall business risk assessment has been repeated during 2020 with an enhanced focus on GNFR.</p> <p>Please see section 5 Risks for further information and details.</p>
<p>Develop Modern Slavery KPI metrics which will enable us to assess, monitor and track our efforts and support resource allocation in priority areas.</p>	<p>During 2020 our resources needed to be reprioritised to focus on increased incidents and allegations driven by increasing awareness internally and externally of Modern Slavery issues, and as such implemented an incident monitoring dashboard to enable future KPI reporting on allegations and incidents of Modern Slavery with a view to this forming a KPI measure in the future. This deliverable is planned for refocus in 2021.</p> <p>Please see section 6 Effectiveness for further information and details.</p>

<p>Increased Training and Awareness</p> <p>Roll out our “what have you seen?” training within our European haulage operations to cover all drivers within the business.</p>	<p>COVID impacts hampered the ability to complete our HGV Driver Modern Slavery Training, however progress was made with our total training now at 66% complete with over 1,700 drivers trained to date. This will roll into 2021 to finalise.</p> <p>Please see section 7 Training for further information.</p>
<p>Provide reference tools and guides to colleagues visiting suppliers to increase awareness.</p>	<p>A pocket guide for colleagues could not be released as planned due to the risk of cross contamination and was replaced by a poster campaign, this deliverable will roll forwards into 2021.</p> <p>Please see section 7 Training for further information.</p>
<p>Increased focus on scalable initiatives</p> <p>Host a Bright Future placement within IPL business and review opportunities within our wider business to support survivors and enabling them to develop new skills and experience.</p>	<p>A Bright Future placement has not yet become available, however the business has remained open to receipt of a potential candidate.</p> <p>Please see section 6 Effectiveness for further information and details.</p>
<p>Increased focus on scalable initiatives</p> <p>Deliver Ingredients for Life pilot alongside a supply chain partner and partner charities to assess feasibility and impact of scaling enabling survivor support on a wider scale outside of our own business.</p>	<p>Our plans to deliver our Ingredients for Life initiative further via a supplier partner, which involves practical classroom cookery sessions, have not been possible, again due to the COVID pandemic, and as such will roll forward into our plans for 2021.</p> <p>Please see section 6 Effectiveness for further information and details.</p>

Structure, Business and Supply Chains

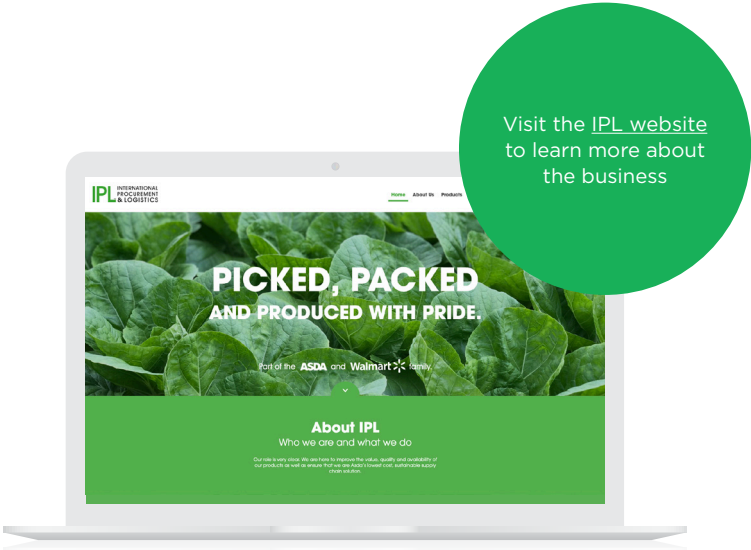
Structure



Our Business and Supply Chains

ASDA

Founded in the 1960s in Yorkshire, Asda is one of Britain’s leading retailers. Dedicated colleagues serve customers from our network of stores and online services, including supercentres, superstores, supermarkets, Living stores, petrol filling stations and depots across the UK. For more details of our business and corporate history please see our [Asda](#) and [IPL](#) websites.



150,101
Colleagues^{*1}



12,177
Agency colleagues^{*2}



79
Labour providers^{*3}



632
Stores



26
Distribution centres



4
Home shopping centres



15m
Customers/week



67
Car washes



24.8m
Annual online orders



9
IPL UK manufacturing sites



4625
Suppliers^{*4}



5781
Supplying sites^{*5}

*1 Asda Stores Ltd., International Procurement and Logistics Ltd. Forza Foods Ltd.and Kober Ltd. at 31/12/2020.

*2 Asda Stores Ltd., International Procurement and Logistics Ltd. Forza Foods Ltd.and Kober Ltd.

*3 Asda Stores Ltd., International Procurement and Logistics Ltd. Forza Foods Ltd.and Kober Ltd.

*4 Asda Stores Limited Goods for Resale and Goods Not for Resale Suppliers

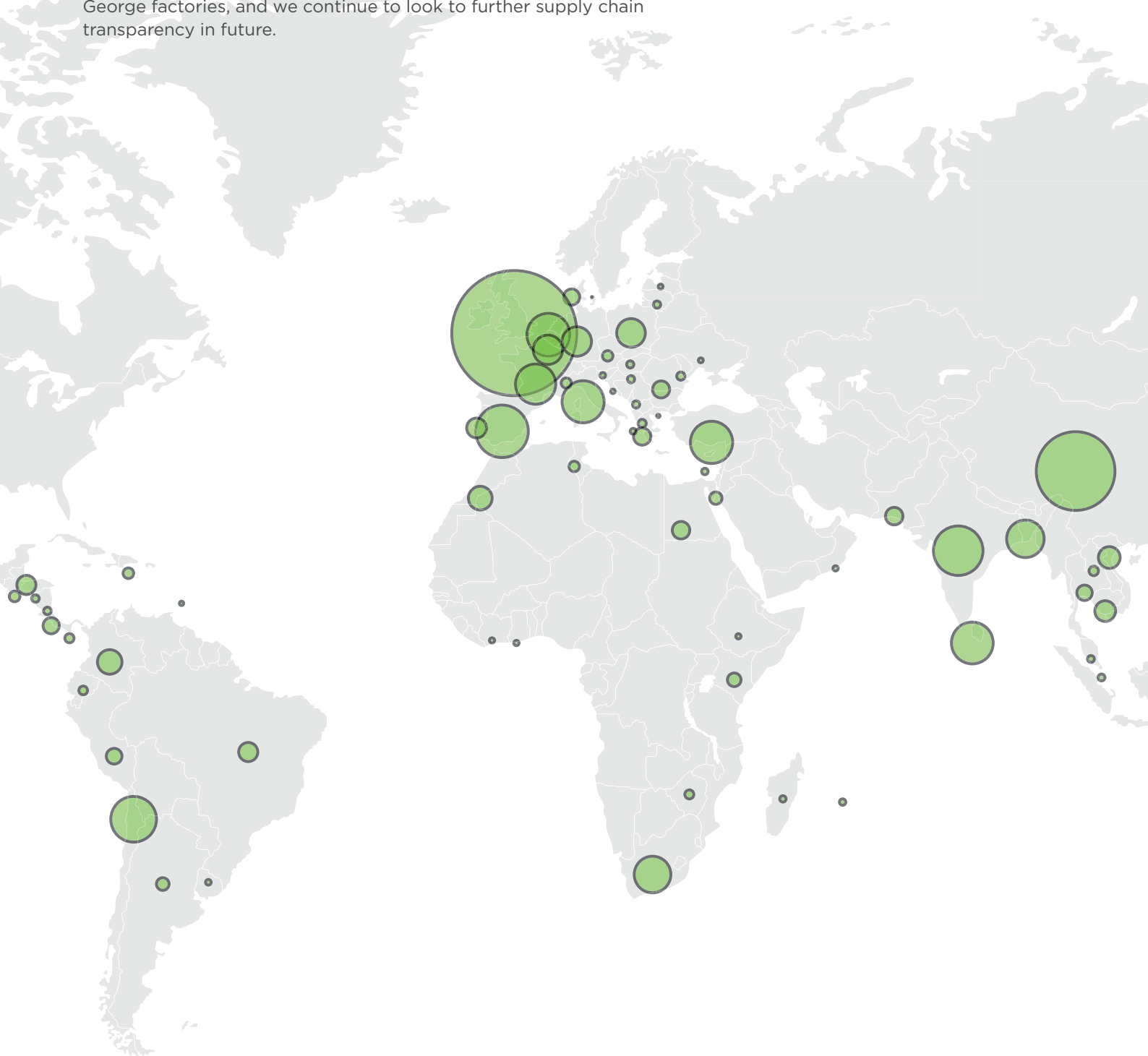
*5 Supplying sites based on the scope of our Responsible Sourcing Compliance Audit programme

Our Supply Chains

Global

Our global supply chains are complex and managing Modern Slavery and Human Trafficking risks throughout is a key focus for our business. The global map is illustrative of where our products are sourced.

In some higher risk areas of our supply chain, including Apparel we look deeper into our sourcing, and have mapped our [Tier 1](#) (Suppliers who provide their products and services directly to Asda) and [Tier 2](#) (Suppliers who provide products and services to Asda via Tier 1 suppliers) George factories, and we continue to look to further supply chain transparency in future.



Our top sourcing countries* across our key business areas are detailed in the table below.

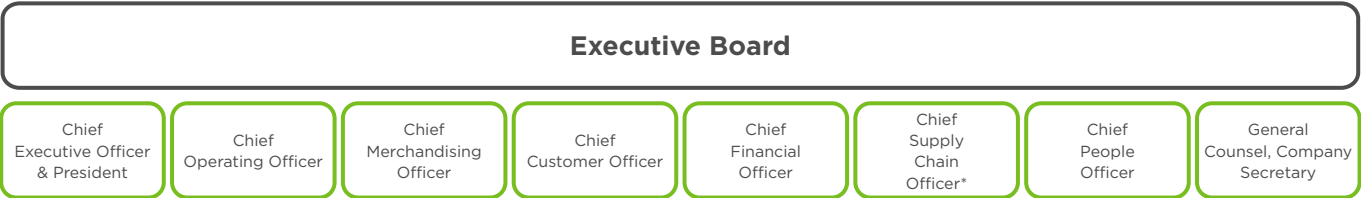
	Food & Produce	Apparel	General Merchandise	Non-Edible Grocery	GNFR
1	 United Kingdom 35%	 China 32%	 China 77%	 China 38%	 United Kingdom 45%
2	 South Africa 12%	 Bangladesh 15%	 Vietnam 4%	 United Kingdom 26%	 China 16%
3	 Spain 6%	 Turkey 14%	 United Kingdom 4%	 Germany 5%	 India 8%
4	 Netherlands 6%	 India 12%	 India 3%	 Poland 4%	 Bangladesh 8%
5	 Chile 4%	 Sri Lanka 10%	 Bangladesh 2%	 France 3%	 Ireland 3%
6	 France 4%	 Vietnam 4%	 Cambodia 2%	 Netherlands 2%	 Turkey 3%
7	 Italy 4%	 Pakistan 3%	 Pakistan 2%	 Belgium 2%	 Sri Lanka 3%
8	 United States 3%	 Cambodia 3%	 Taiwan 1%	 United States 2%	 Vietnam 3%
9	 Belgium 2%	 United Kingdom 2%	 Poland 1%	 Spain 2%	 Spain 3%
10	 Costa Rica 2%	 Indonesia 1%	 Egypt 1%	 Ireland 2%	 Thailand 2%

*Top Sourcing countries based on the no. of supplying sites in scope of the Responsible Sourcing Compliance audit programme

Our Committees & Governance

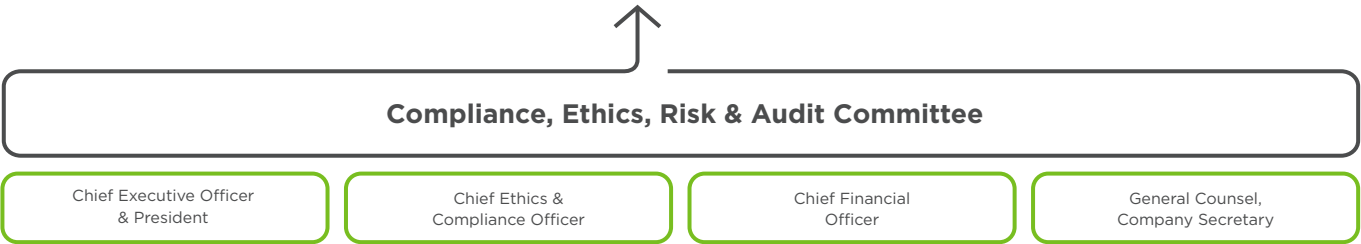
In order to properly assess risk and drive change in the business, we have a strong governance structure of committees, working groups and [executive board](#) interaction to oversee the execution of the modern slavery strategy and provide guidance and approval.

■ Committee ■ Attendees



* As of January 2020

Our most senior authorising level comprising of Asda Board members who will ultimately sign off our modern slavery statement.



Enables Asda to continue to operate in accordance with applicable laws and regulations. In this instance, any authorisations or recommendations regarding modern slavery that require approval come to this forum.



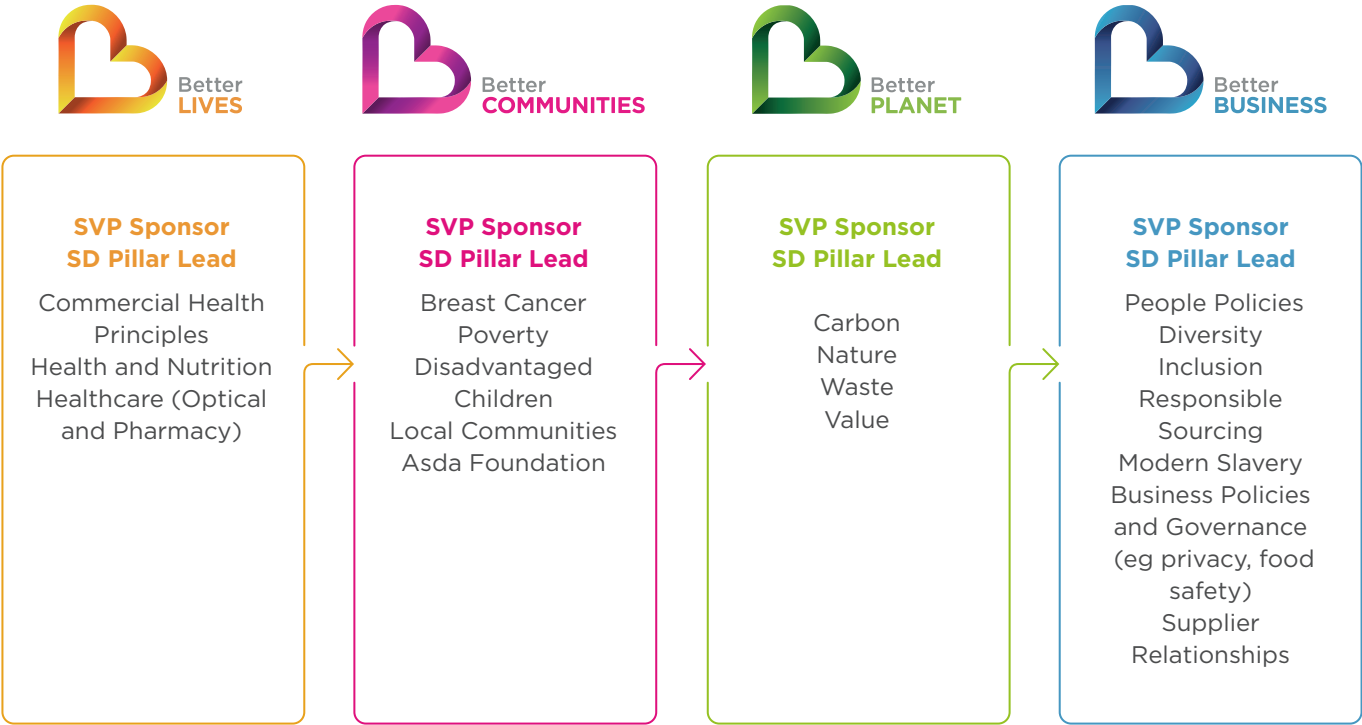
Made up of senior leaders from across Asda this group provides strategic direction to how we combat modern slavery. It is the corner stone to our work and is essential for bringing the topic into the spotlight at the most senior levels. It is chaired by our Senior Vice President for commercial.



Formed to enable and drive decision making to further the modern slavery agenda for IPL and Asda supply chains the group is made up of senior leaders from the IPL business.

In 2020, Asda has continued to engage the most relevant areas of our business as we remain vigilant about risk.

In 2020, whilst challenged by the COVID pandemic, we have continued our work to embed the modern slavery agenda across our business and supply chains, and commenced the journey with our overall business [Environmental, Social and Corporate Governance](#) (ESG) commitments, of which Modern Slavery forms a key element under our Creating Change for Better programme, through our Better Business Pillar.



SVP - Senior Vice President **SD** - Senior Director

IPL Modern Slavery Steering Group

In order to properly assess risk and drive change in the business, IPL have an independent Modern Slavery Steering group. This cross-functional group provides a strong governance structure, overseeing the execution of IPL's modern slavery agenda, providing guidance and approval.

Our Ethics and Compliance Programme

A number of Asda Ethics and Compliance Subject Matter Area (SMA) teams are engaged in supporting the delivery of our Modern Slavery objectives, including Subject Matter Experts (SMEs) across Labour and Employment, Ethics, Trade (Supply Chain Security) and with the delivery of our supply chain approach via the Responsible Sourcing SMA.



Responsible Sourcing

Responsible Sourcing is a key subject matter area of our Ethics and Compliance programme, where resources, structure and guidance are provided to our extended supply chains. With oversight of around 5,800 facilities worldwide within the scope of the Responsible Sourcing programme, we are committed to promoting worker dignity, including addressing issues such as modern slavery. Our Standards for Suppliers are the foundation of the Responsible Sourcing programme and reflect the deeply rooted values of service to the customer,

respect for the individual, striving for excellence and acting with integrity. The Standards provide clear fundamental expectations for suppliers and their supply chains. At Asda, our relationship is with the suppliers, and in turn suppliers have the relationship with the facilities that produce the products we sell. As such we expect our suppliers to cascade our values throughout their supply chains. Failure to adhere to the Standards for Suppliers may result in consequences, up to and including, termination of business.

Policies

To effectively communicate our expectations on modern slavery, we have implemented policies and procedures that are designed to support our high standards in ethical and responsible business and supply chain practices.

They cover how we source our products, employ people appropriately, and how we operate and interact with modern slavery legislation in our business and with suppliers.

All Asda colleagues, contractors and third-party workers are expected to adhere to our Modern Slavery Policy. It sets out the responsibilities of each colleague, including the requirement to immediately report any concerns or suspicions of modern slavery. In 2020, our colleague Modern Slavery policy has been updated to include cross business reporting and incident management throughout Asda and IPL to support timely reporting and enable suitable support to be provided at the earliest opportunity.

The policy also includes details of what the business is doing to combat modern slavery at a corporate level, such as creating and sharing supporting policies and procedures that apply to many parts of the business. We are committed to raising awareness of modern slavery through colleague training and communication campaigns, enabling our colleagues to have the most up-to-date information to remain engaged with this complex issue.

All IPL colleagues, contractors and third-party workers are expected to adhere to either the colleague modern slavery policy or the [supplier modern slavery policy](#). The policies set out the responsibilities of each person, including the requirement to immediately report any concerns or suspicions of modern slavery.

The policies also include details of what IPL is doing to combat modern slavery at a corporate level, such as creating and sharing supporting policies and procedures that touch many parts of the business.

Colleague responsibilities



- Follow Asda's Recruitment Policy at all times, ensuring modern slavery risks are mitigated.
- Managers to issue all new colleagues with a contract of employment stating rights and entitlements and follow all appropriate checks – evidence that bank accounts belong to the colleagues, right to work checks e.g. obtain proof of ID.
- Use Asda's approved employment agency partner only – they are verified and are regularly audited.
- Ethical recruitment practices - under no circumstances must bribes be accepted to recruit or favour workers.
- Hourly paid colleagues must always clock in and out.
- If you have concerns, **report** them

Asda Stores Ltd works with [Geometric Results International](#) (GRI) who run our labour provider framework. GRI worked with a panel of 66 agencies in 2020 to provide our labour. They have clear policies and procedures and make available resources such as toolkits to their providers. This approach means that they are able to source best practice and share learning across multiple agencies on behalf of Asda and help them implement strategies to combat modern slavery. For example, GRI access the skills of organisations such as Slave Free Alliance with whom they partner to investigate allegations and incidents or advise on policy and strategy development. In 2020, through our sponsorship of RRT, Asda facilitated GRI commencing their own journey to join the [Responsible Recruitment Toolkit](#) to further support ongoing improvements in Responsible Recruitment.

The toolkit previously developed and implemented by GRI in collaboration with Asda intended to support GRI's panel of agencies to implement a strategy for their business to tackle modern slavery, as well as make clear GRI's and Asda's expectations, has been updated in 2020 to improve incident reporting and include details for Asda Labour Providers to access RRT through Asda sponsorship. In addition, a new due diligence process has been established to help Asda ensure that any Labour Providers on the Panel are, where required, compliant with the Modern Slavery Act 2015.

To complement the Asda process, IPL work with a core group of labour agencies that support operational sites. Developed with guidance from [Stronger Together](#) in 2020, IPL have improved onboarding requirements to ensure that labour providers have stringent policies and procedures in place. This helps to ensure that all agency worker regulations and modern slavery prevention initiatives are adhered to, to protect the agency worker and the business.

All suppliers of Goods for Resale (GFR) and Goods Not For Resale (GNFR) are required to comply with [Walmart's Standards for Suppliers](#) and the [Responsible](#)

[Sourcing Disclosure Policy](#). This means supplier facilities must be disclosed and made available for audit, in accordance with [Walmart's Risk-Based Approach](#).

Since 2018 we have in place specific requirements for suppliers of Goods and Services Not for Resale (GNFR) in order for suppliers to be fully aware of our expectations of their conduct. The policy is available to all suppliers via our externally facing [supplier website](#). We carried out a GNFR specific risk assessment in 2020 which identified further suppliers as higher risk, which were subsequently brought into the scope of the Responsible Sourcing audit programme. This included suppliers who provide equipment, specifically trolleys and baskets and nominated packaging suppliers globally. We are also continuing discussions with our waste business partners and suppliers to bring mills into scope.

We work closely with our suppliers to remind them of their obligations under the legislation and are partnering with them to move the industry forward. In addition to the above, our IPL business reviewed the steps needed to implement wording into their GNFR requirements to match that of their GFR requirements, and in 2020 issued all GFR and GNFR suppliers with an updated MS policy. This policy is also located on the supplier section of IPLs website.

RRT RESPONSIBLE
RECRUITMENT
TOOLKIT.ORG

2020 Sponsorship:

Over **50** completed training sessions

57 Supplier Partners signed up

80 users utilising RRT Sponsorship benefits



Employers pays principle

Workers should not pay for a job and that the costs of recruitment should be borne not by the worker but by the employer.

Our [Responsible Recruitment Statement of Principles](#) includes a public commitment in support of the Employer Pays Principle. Asda joined the Responsible Recruitment Toolkit RRT in February 2020 to support the implementation of these principles, and during 2020 Asda's sponsorship has seen 80 individuals utilise RRT benefits across 57 supplier partners who have taken up a 'plus' level RRT subscription, and over 50 of these have already completed training sessions.

A full list of our Policies with relevance to Modern Slavery are listed below:

	Policy Title and Purpose
Policies specific to Asda	<p>Colleague Modern Slavery Policy. The purpose of this policy is to set out our responsibilities in relation to modern slavery, including the requirement to immediately report any concerns / suspicions of modern slavery.</p>
	<p>Supplier Modern Slavery Policy. This policy sets out what we do to make sure that Asda, our colleagues and our suppliers and service providers can work safely and within the law. We expect all of our suppliers of goods and services, to comply with this policy and the Modern Slavery Act 2015.</p>
	<p>Domestic Abuse Policy. This policy gives information for Line Managers or colleagues if they need to support their colleagues experiencing domestic abuse.</p>
	<p>Agency Workers Policy. The Agency Workers Regulations (AWR) gives all agency workers the right to receive equal treatment to comparable colleagues in certain circumstances.</p>
	<p>Grievance Policy. This policy helps colleagues and Managers resolve problems or concerns, including bullying and harassment, fairly, consistently and timely. To handle a Grievance in the right way, colleagues must follow this process.</p>
	<p>Recruitment Policy. This policy is all about the end-to-end recruitment process for both internal and external recruitment here at Asda. It also talks about all the help that's available on the Recruitment site and 'Manager Self Service' (MSS) section of WalmartOne.</p>
	<p>Right to Work Policy. The 'Right to Work' is the legal right to work in this country. We have a duty to prevent illegal working by making basic document checks on every potential new colleague we intend to employ before they start work. We must also complete repeat checks to satisfy ourselves that colleagues who have a temporary right to work continue to be eligible to work. This policy sets out what our colleagues need to know about conducting right to work checks, where repeat checks are required and how frequently we should perform these checks.</p>
	<p>Safeguarding Policy. The purpose of this policy is to outline what Safeguarding means, why we require colleagues in certain roles to have a Safeguarding check, and the process of applying for a check. We take our responsibility to protect children, vulnerable adults and all our customers very seriously. By carrying out Safeguarding checks on colleagues in certain roles, this allows us as a business to do the right thing by our customers, communities, and our colleagues.</p>
	<p>Temporary Contracts Policy. This policy gives guidance on recruiting and managing colleagues on temporary contracts.</p>

	Policy Title and Purpose
Policies specific to IPL	<p>Colleague Modern Slavery Policy. The purpose of this policy is to set out our responsibilities in relation to modern slavery, including the requirement to immediately report any concerns / suspicions of modern slavery.</p>
	<p>Supplier Modern Slavery Policy. This policy sets out what we do to make sure that IPL, our colleagues and our suppliers and service providers can work safely and within the law. We expect all of our suppliers of goods and services, to comply with this policy and the Modern Slavery Act 2015.</p>
Overarching Walmart global policies by which Asda and IPL operate	<p>Statement of Ethics. This sets out Asda’s expectations for all colleagues to act in accordance with the law, our principles and our values each and every day.</p> <p>Whistleblowing Policy. This policy outlines the process for raising and escalating a concern relating to a matter of public interest. Asda expects colleagues to always do the right thing and report suspected wrongdoing as soon as possible and without fear of negative consequences.</p>
	<p>Global Discrimination and Harassment Prevention Policy. We are committed to a workplace that is free of discrimination or harassment. Walmart will not tolerate discrimination or harassment based on an individual’s race, colour, ancestry, ethnicity, religion, sex, pregnancy, national origin, age, disability, marital status, veteran status, military status or obligation to perform military service, sexual orientation, gender identity or expression, genetic information, or other legal protections as defined by the laws of the locations in which we operate.</p>
	<p>Global Forced Labour Prevention Policy. Walmart respects the basic rights of workers and complies with all applicable laws and regulations in the locations where we operate. The use of any form of forced or trafficked labour anywhere in our own operations and supply chain is prohibited. Walmart will not intentionally use forced labour, including underage labour or involuntary prison labour, and we will take actions to exclude forced labour from our own operations and supply chain.</p>
	<p>Global Labour and Employment Policy. Walmart is committed to complying with all Labour and Employment (L&E) laws and regulations in the locations where we operate. Compliance with the laws and regulations promotes a great workplace and facilitates the fair and consistent treatment of our associates.</p>
	<p>Global Responsible Sourcing Compliance Policy. Walmart is committed to buying and sourcing products that are produced in a responsible way and complying with all governing laws related to responsible sourcing.</p>
	<p>Walmart Standards for Suppliers. All suppliers and their facilities – including subcontracting and packaging facilities – are expected to uphold Walmart’s Standards for Suppliers.</p>

	Policy Title and Purpose
<p>Overarching Walmart global policies by which Asda and IPL operate</p>	<p>Disclosure Policy. Supplier transparency about the facilities used to manufacture products for Walmart Inc. (“Walmart”) is a foundational aspect of Walmart’s Global Ethics & Compliance program.</p>
	<p>Audit and Assessment Policy. Any facility producing product for sale or use by Walmart may be audited at any time. Nevertheless, we use a risk-based approach to auditing that focuses on disclosed facilities and allocates audit resources to those facilities that may pose a higher risk of noncompliance with Walmart’s Standards for Suppliers or where noncompliance poses a higher risk to the company.</p>
	<p>Conflict Minerals Policy. Walmart understands that awareness and cooperation among its supply chain participants is essential to any responsible sourcing initiative. By holding product suppliers accountable for the principles in this policy, Walmart believes its conflict minerals program will help drive necessary transparency in the supply chain and further the ultimate goal of ending armed conflict in the Democratic Republic of Congo.</p>
	<p>Human Rights Statement. This statement describes Walmart’s approach to human rights in all aspects of policies our operations globally, including all associates at all levels of the organisation.</p>
	<p>Walmart Code of Conduct. Global Ethics is responsible for promoting Walmart’s culture of integrity. This includes developing and upholding our policies for ethical behaviour for all of our stakeholders everywhere we operate. Most importantly, it includes raising awareness of ethics policies and providing channels for stakeholders to bring ethics concerns to our attention.</p>

Due Diligence

Our Approach to Addressing Modern Slavery

The umbrella term ‘Modern Slavery’ refers to situations of exploitation that a person is not able to refuse or leave because of threats, violence, deception and/or abuse of power.

In 2020 we continued with our holistic engagement strategy to combat modern slavery within business processes and supply chains. Core to this work remains the role of the Modern Slavery Working Group (MSWG), which meets to review progress, set objectives and drive this work forward within our business. The group has three core themes highlighted by the infographic below, used to drive our engagement with the risk of modern slavery across our business processes and supply chains.

Asda has collaborated with internal and external stakeholders to embed our work on Modern Slavery within the business and with greater accountability for working group members. This group further provides insight and activity to other forums across our business including our Environmental, Social and Corporate Governance (ESG) programme ‘Creating Change for Better’.



Building our strategy

Our collective approach to modern slavery.

Engaging through initiatives & partnerships

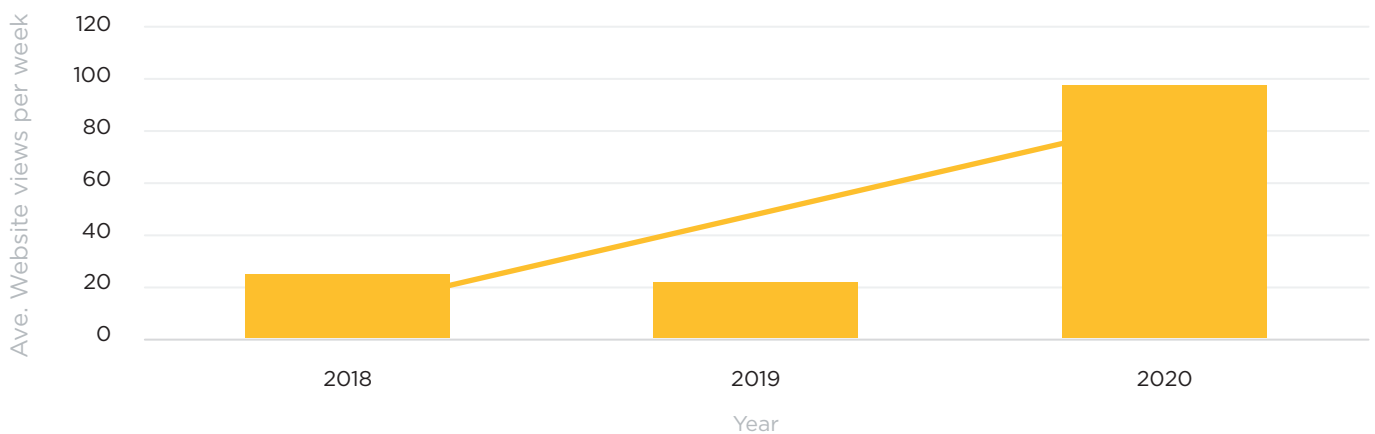
How we collaborate to address issues and build capacity alongside partners and other retailers for the benefit of all.

Assessing the risk

A data led assessment of modern slavery across our business processes and supply chains.

Through increasing media coverage the Covid-19 pandemic has brought the hidden issues of Modern Slavery nearer to the surface and focussed greater attention across industries, sectors, authorities and the general public. We have continued to see the rate of engagement in the topic of Modern Slavery grow throughout 2020, both within our business and externally, recording a significant increase year on year, in traffic to our Modern Slavery statement on our corporate website with 5,112 unique views during the year, a four-fold increase in weekly viewings of our 2020 statement at on average 98 per week.

Modern Slavery Engagement



Business Process

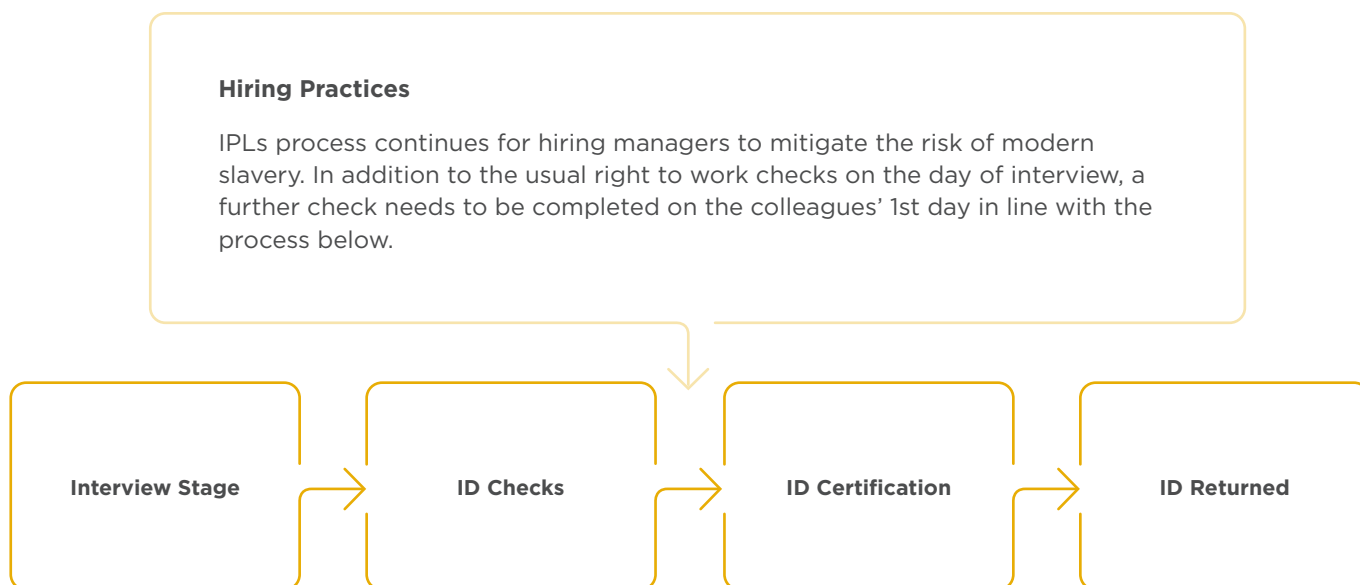
ASDA Labour Provider Due Diligence: In 2020, a new due diligence process was established and implemented via collaboration with GRI, supporting assurance that all Asda Labour Providers, where required under the Modern Slavery Act 2015, are compliant with the section 54 Transparency in Supply Chains Clause, having produced and published their own Modern Slavery Statement. This process established that one Panel Labour Provider appeared non-compliant, and the Provider was given the opportunity to address to become compliant. The Labour Provider however was unresponsive, and additionally failed a GRI audit, with action then taken quickly to remove the Labour Provider from the Asda Panel.

The labour model within our Asda Group businesses varies depending on the nature of the activity. To assess these risks and work to understand them better we have implemented information background checks on certain direct and third-party employees using a risk-based approach.

Asda completes a first day check on right to work documents and bank account details. Right to work documents are checked to confirm that the person who has attended to commence work is the holder of the documents and the person who attended for interview and received an offer of employment, in order to prevent impostors infiltrating the business. Bank account details are also checked to ensure that the colleague is being paid into a bank account in their name, and if not, to confirm that they will have access to the wages paid into the account.

Asda also runs quarterly duplicative bank account checks to highlight if wages are being paid into shared bank accounts, emergency contact, address and telephone numbers checks on all direct employees to highlight and investigate any potential survivors of modern slavery based on these known risk indicators. Asda Stores Limited's labour provider, GRI, also checks agency labour providers on an annual audit basis. Their audits include duplicative bank account, address and next of kin information checks.

IPL Limited undertakes duplicative bank account and address checks on the first day of employment and then quarterly after that, with their core group of labour agencies undertaking the same checks on a number of cadences. IPL’s subsidiary companies Forza Foods Limited and Kober limited complete checks on a quarterly basis. Should a concern be identified then the incident management process would be followed and the concerns raised with both internal and external stakeholders including Asda Ethics, senior leadership, the steering group and where appropriate relevant authorities, for example the GLAA or the Police.



1	Copies of Right To Work / ID Documentation certified by hiring manager.
2	Prior day to commencing employment, ID copies provided to the line manager and local HR.
3	ID provided checked and confirmed to match the colleague commencing work.
4	Certified ID scanned and returned for record keeping.

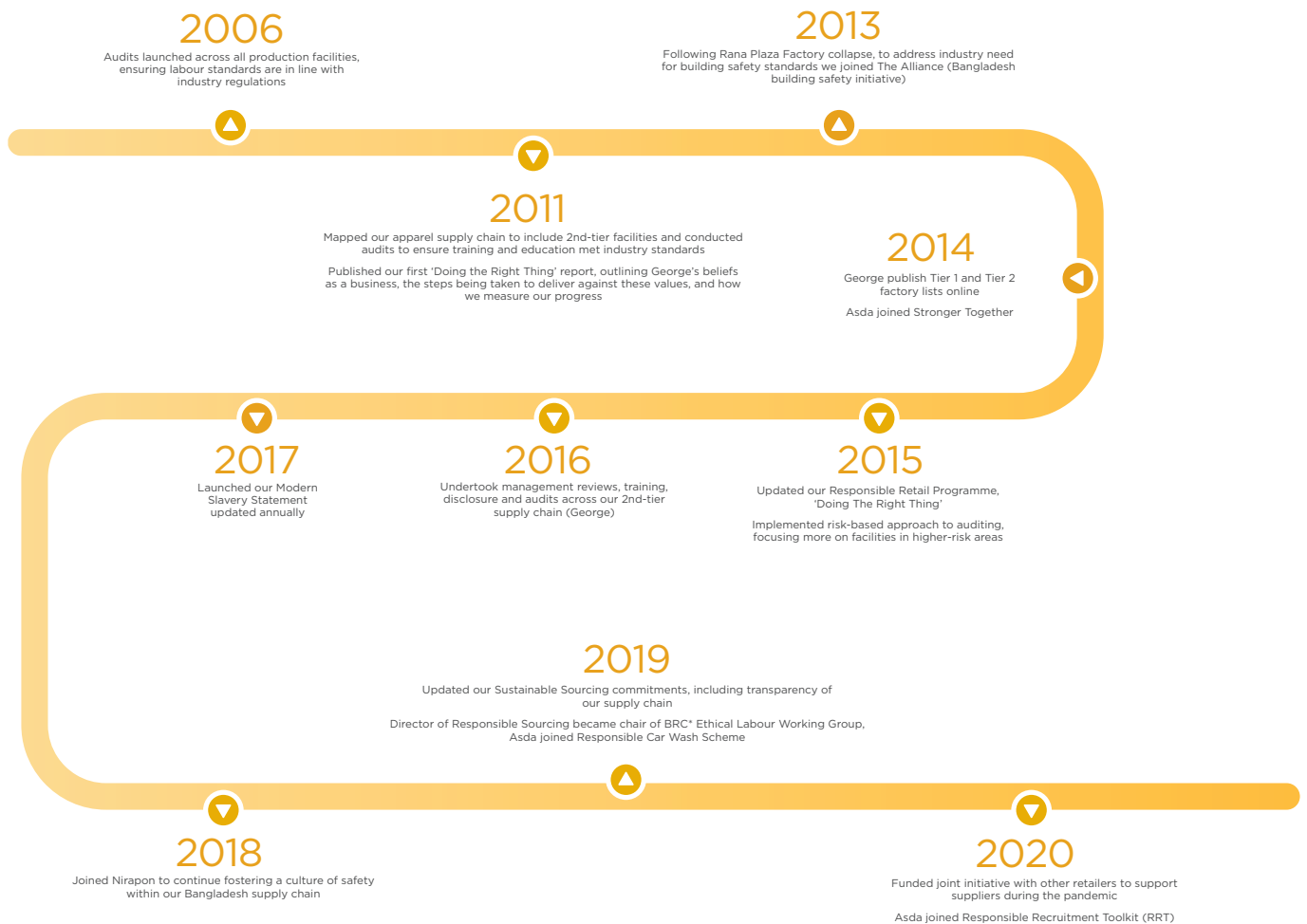
To assess the operation and compliance of Asda’s tenants with modern slavery legislation the Responsible Sourcing team have partnered with our colleagues in Property to identify key tenants, for example car wash operators. In addition, as we increase the number of partnerships we offer to customers within our stores and online operations, we have been working closely with Commercial teams to provide wording, insight and best practice to accurately represent the expectations we as Asda have of our business partners during small scale pilots and major roll outs. Any future contracts and agreements with Asda feature a standard Modern Slavery clause requiring partners to be compliant with the Modern Slavery Act.

In addition to the above, Asda Stores Ltd have also amended further our business process management system, in place for on boarding GNFR suppliers, by simplifying checks in relation to compliance with the Modern Slavery Act. Where suppliers may not be compliant or only partially compliant with the Act, this control measure enables conversations and decision making with the supplier and/or business representative as appropriate.

Our commitment to mitigating the risks of Modern Slavery and Human Trafficking has been in place longer than the Modern Slavery Act 2015 legislation, and the timeline below shows how we have adapted and evolved our approach over the last 15 years. From 2006, with the introduction of Ethical audits for our supply chain via the Walmart Ethical Sourcing programme, through to the introduction of a risk-based approach in 2015, to 2020 where we have continued to commit to tackling these issues and joined the [Responsible Recruitment Toolkit](#) to further support our own business and supply chains.

Human Rights: Our Journey of Improvement since 2006

Our efforts over the years aim to promote human rights within our supply chain for food, apparel and the other products we provide. We work closely with our suppliers and partners in increasingly innovative ways as shown below.



Case study

Modern Slavery Incident

An IPL labour agency alerted an IPL colleague that an agency worker had divulged to their onsite supervisor that they were experiencing a situation that could be regarded as modern slavery. They indicated that they were being threatened and asked for money to remain in the UK by a further two workers at the IPL site. The worker also explained that they had their identification card withheld.

THE AGENCY WORKER WAS ADVISED TO CALL THE POLICE BY THE AGENCY ONSITE RECRUITMENT CONSULTANT. THE POLICE ATTENDED SITE, SPOKE WITH THE COLLEAGUE AND DECIDED TO TAKE THEM TO A SAFE LOCATION.

The IPL colleague receiving the report and following the incident management procedure, reported the matter to the IPL Modern Slavery lead. Using the details that had been provided by the agency colleague and the labour provider, IPL checked internal systems to verify the facts. IPL determined there was sufficient information to confirm this was a likely case of modern slavery, convened the Modern Slavery Investigation Group and reported the incident to Asda.

IPL identified that the two colleague names provided by the labour provider, and accused by the agency colleague as being perpetrators, were recent IPL employees (the two colleagues had recently transferred from temporary labour to permanent IPL colleagues). IPL contacted the police with this further information and acted upon the advice and guidance provided.

IPL continued to communicate with the police throughout their investigations and understands that the colleague raising the concerns, has at their request, returned to their home country. The suspected perpetrators were suspended from IPL pending investigation and subsequently dismissed. IPL and Asda continue to work with the police and are regularly updated on the ongoing investigation.



CHANGES AND IMPROVEMENTS MADE AS A RESULT OF THIS CASE, TO STRENGTHEN DUE DILIGENCE, HAVE INCLUDED WORKING WITH STRONGER TOGETHER TO ENHANCE ON-BOARDING AND AUDIT CONTROLS WITH THIRD PARTY LABOUR PROVIDERS AND PROVIDING ADDITIONAL TRAINING AND AWARENESS FOR COLLEAGUES.

Our incident management process

Asda's Compliance team work closely with teams from across our business to look into allegations, intelligence and trends to understand more about where we might need to work with suppliers to raise concerns, close out issues and investigate exploitative practices.

Reports and allegations are received into our business in a number of ways:

- Directly from colleagues, individuals, workers, suppliers, audit firms or other 3rd parties (generally this is via our global Ethics reporting helpline).
- Indirectly via intelligence from media, external partners or enforcement agencies.

All incidents are assessed and where appropriate investigated in partnership with our Global Responsible Sourcing Investigations Team, with a suitable response provided to business partners and directly to suppliers. We actively partner with suppliers, host remediation conversations and support them in their compliance with our Standards for Suppliers. A number of these incidents were investigated and successfully remediated in 2020.



2020 Modern Slavery Incidents and Allegations 19



2020 Modern Slavery Incidents Substantiated 2



ASDA APPLIES A RISK-BASED APPROACH TO ESTABLISH SCOPE OF AUDITS GLOBALLY, WORKING CLOSELY WITH APPROVED THIRD PARTY AUDIT PROVIDERS SUCH AS THE BUSINESS SOCIAL COMPLIANCE INITIATIVE, RESPONSIBLE BUSINESS ALLIANCE AND SEDEX MEMBERS ETHICAL TRADE AUDIT TO PROMOTE CONTINUOUS IMPROVEMENT.

Efforts are focused on all aspects of our Responsible Sourcing programme, with particular attention paid to issues related to forced labour and trafficking, both issues within modern slavery. For example, our approved audit programmes are encouraged to continually enhance the methodologies used to identify and report forced labour indicators and to find ways to effectively evaluate compliance with the Employer Pays Principle. Through our enhanced and refined escalation process we have seen increased escalations of possible incidents of forced labour, which we believe to be the result of additional training and awareness raising.

While our programme relies upon third party audits, we assess each audit independently and review it for certain higher-risk findings, including indicators of forced and underage labour, and unsafe working conditions. If these indicators are present, the audit is escalated within the business for additional review and potential investigation. All audits undertaken on behalf of Asda must be undertaken by auditors registered with the [Association of Professional Social Compliance Auditors](#) (APSCA). We do this to deliver a consistent standard in the audits we review and the experience of those facilities under audit.

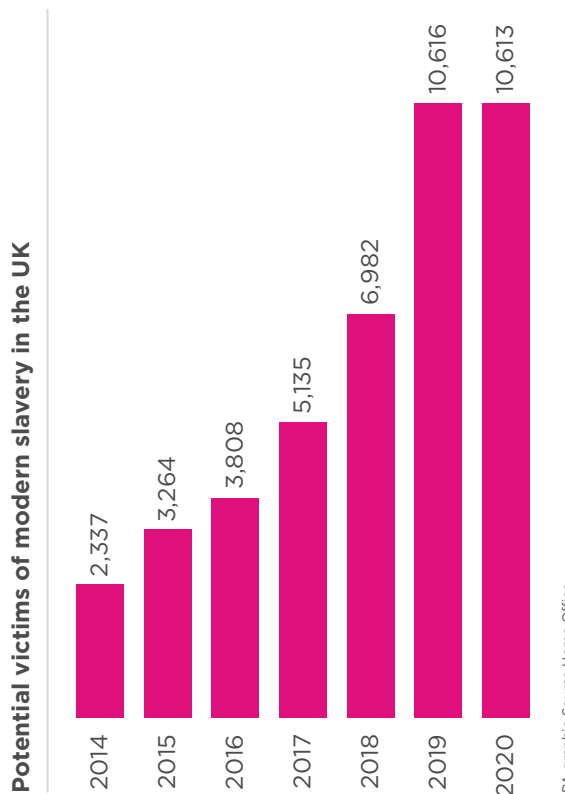
Risks

The risk and scale of modern slavery is becoming increasingly well-known with recent data highlighting a stagnation in the volume of potential survivors just in the UK alone.

In previous statements we have highlighted the methodology we developed to assess the risk of modern slavery to our business and how this translates into relevant activity. Whilst a data refresh has not been achieved in 2020, we have continued to work on our progress in relation to areas previously identified as higher risk, along with emerging risk areas identified through partnerships and external collaboration.

In order to continuously improve our approach and focus on areas where we can have the maximum impact we feed information back to the Risk Register and update our Forced Labour Dashboard. This methodology is used to focus our approach and drive insight into areas which impact the Asda business. In 2019 we highlighted three focus areas: our George (China) business, UK vegetables (IPL) and Bananas from Colombia and Costa Rica (also IPL), and these continue to be where our resources are focussed.

Asda data is combined with insight from Sedex risk scoring. Previously, improvements in our dashboard highlighted our General Merchandise and Non-edible grocery areas for more in depth review, however, due to the re-prioritisation of resources to adapt to the COVID pandemic, as yet this has not taken place and rolls forward for consideration under an Asda focussed programme in 2021.



George

Assessing risk within our apparel business

Launched in 1989, George at Asda is now sold in over 450 stores and through George.com, one of the fastest growing online fashion businesses serving over 1.3m customers a week. Sourcing from 260 suppliers and 872 factories in 25 countries, George prides itself on quality, affordability, and style across all product areas from clothing and footwear, to jewellery and accessories.

Due to the Covid pandemic we had to postpone our work highlighted in our previous statements on monitoring working hours within our supply chain to focus on Purchase Order (PO) management and other areas for prioritisation. This project was based on one key question:

“HOW DO WE ENGAGE END-TO-END TO BETTER UNDERSTAND HOW WORKING HOURS IMPACT FACILITIES IN THE SUPPLY CHAIN, WITH A PILOT FOCUSING ON PRODUCTION WITHIN CHINA?”

Towards the end of 2020 we were able to resume our plans to socialise this with other retailers, and also within the wider General Merchandise business. In 2021, we will continue our focus on China and the associated commercial practices and suppliers' operations relating to working hours.

Alongside this work, we have mapped our [second tier supply chain](#) and we provide transparency via our George Cares website to customers on where their products are manufactured.

Asda GNFR and Labour Provider Risk

Beyond the above, wider business and supply chain incidents highlighted further risk in relation to Labour Providers across the businesses. Via partnering with Geometric Results International (GRI), our strategic Labour Provider supplier, Asda have taken a number of key steps to further mitigate risk and facilitate the journey with GRI to join us in supporting engagement with our sponsor initiative partner Responsible Recruitment Toolkit (RRT) to achieve and demonstrate responsible recruitment practices. In addition, we have made progress in extending the scope of our programmatic approach covering Goods Not For Resale (GNFR) suppliers, with further suppliers identified as higher risk brought into the scope of the Responsible Sourcing programme. These include packaging suppliers beyond the UK and our trollies and baskets suppliers, and we have commenced working with our waste services suppliers to bring them within scope.

Positive, Strong and Transparent Supplier Relationships

One of the best ways for us to address our supply chain risks is to ensure that our relationships with suppliers are positive, strong and most importantly transparent.

Our teams invest significant time and resource in supporting our suppliers, sharing best practice and the tools and training that our Sponsorships and Memberships enable. Our strategic supplier for our corporate uniforms Dimensions, in the case study here explains their own approach in Tackling Modern Slavery, and we recognise that we can also learn from the work and initiatives our suppliers undertake to collaborate and further improve our relationships.

Case study

GNFR Supplier Case Study

A contribution from Dimensions, one of the leading suppliers in bespoke corporate clothing and proud to have been supporting Asda for over 15 years with their uniform provision.

Dimensions takes Corporate Social Responsibility (CSR) very seriously and as members of the Ethical Trading Initiative for 15 years, we ensure that 'doing the right thing' is at the heart of the way we do business.

AT DIMENSIONS, WE RECOGNISE THE SERIOUSNESS OF THE THREAT THAT MODERN SLAVERY POSES ON OUR SOCIETY AND WE ACKNOWLEDGE THAT THERE IS RISK BOTH DOMESTICALLY AND OVERSEAS IN OUR SUPPLY CHAIN. AS CUSTODIANS OF HIGH PROFILE BRANDS, SUCH AS ASDA, WE UNDERSTAND THE IMPORTANCE OF MINIMISING RISK WHEREVER POSSIBLE AND AIM TO ENSURE THE WELLBEING OF OUR STAKEHOLDERS BOTH IN THE UK AND IN OUR SOURCING COUNTRIES.

To tackle Modern Slavery, we firstly mapped out our supply chain in order that it could be effectively monitored and created a 3 tier structure for our suppliers. In 2018/2019 we set a target in our Modern Slavery Statement to move to a 5 tier structure for increased transparency. The increase in tiers has allowed us to consider more than the garment manufacturers in our top tiers and begin to look further down the supply chain.

In January 2020, we became members of the Slave Free Alliance so that we could get expert support and advice specifically in the area of Modern Slavery as we recognise that we need to be at the forefront of a global movement, to demonstrate our ethical commitment to our workforce. In October 2020, the Slave Free Alliance joined us for a day as a 'critical friend' and conducted a gap analysis on our business. We found the experience enlightening and very helpful in supporting our business to be the strongest we can be in protecting ourselves against this ever present threat. We have also asked our suppliers to join us on our journey in becoming more resilient in tackling Modern Slavery.

We have also partnered with Intertek on their Inlight programme which aims to deliver supply chain risk transparency and visibility. As such, we are currently asking our suppliers to complete the Self-Assessment Questionnaire (SAQ) on Modern Slavery as part of a deeper dive in this area. This SAQ will give us the opportunity to benchmark our suppliers and support them in affecting change within their own businesses.

Internally, we operate a Preferred Supplier List of recruiters and audit them on a regular basis. There is a Modern Slavery e-Learning course that is available to our staff on the intranet and, more recently, we have also released a podcast to raise awareness on the subject and discuss our actions in relation to it.

In summation, Dimensions knows that to truly have an impact in the fight against Modern Slavery, we must turn and face what is before us, rather than try to look for it with our eyes closed.

Effectiveness

IASC Maturity Framework

“ASDA HAS INTRODUCED A FORCED LABOUR DASHBOARD, BASED ON SUPPLIER AUDITS AND SELF-ASSESSMENT QUESTIONNAIRES, WHICH IT USES TO IDENTIFY STRATEGIC RISKS AND “TRANSLATE THEM INTO ACTIONABLE QUANTIFIABLE OBJECTIVES.”

In 2020, the Independent Anti-Slavery Commissioner found organisations in different stages of maturity in preventing, identifying and tackling the risk of modern slavery occurrences with some proactively investigating risk and taking measures to safeguard, and others heavily relying on policy setting as the solution. As a result, following the Commissioners review of Operation Fort, a maturity framework has been established by which organisations can measure their progress. Essentially, the framework comprises 4 categorisations for maturity: Barely Achieving Compliance, Meeting Basic Expectations, Evolving Good Practice and Leading on Human Rights Innovation.



“WALMART ARE SIGNATORIES TO THE LEADERSHIP GROUP FOR RESPONSIBLE RECRUITMENT WHICH IS PROMOTING THE EMPLOYER PAYS PRINCIPLE – THAT NO WORKER SHOULD PAY FOR A JOB. THE GROUP IS AIMING TO ERADICATE RECRUITMENT FEES BY 2026.

Dame Sara Thornton
CBE QPM, Independent Anti-Slavery Commissioner

Evaluating Asda Maturity

In 2020, we reviewed our maturity against the criteria set out in the framework and consider our progress to date to position us within the Evolving Good Practice category, meeting all criteria under the barely achieving and basic expectations categories. Asda also meets several criteria within the Leading on Human Rights Innovation category for example: using data analytics to identify risk through our Forced Labour Dashboard and supporting suppliers to develop ethical competencies. The maturity framework is aiding our focus on what we can continue to improve upon and learn from the best practice of others, and informing our future focus areas.

“SOME BUSINESSES ARE SUPPORTING LIFE SKILLS COURSES FOR MODERN SLAVERY SURVIVORS. FOR EXAMPLE, ASDA IS LAUNCHING A COOKING SKILLS COURSE WITH CITY HEARTS”

Leading on human rights innovation

- ✓ Board leading on human rights strategy
- ✓ Using data analytics to identify risk
- ✓ Local, national, international intelligence gathering
- ✓ Supporting suppliers to develop ethical competencies
- ✗ Pioneering new ways of worker engagement, using technology
- ✗ Factoring in the true cost of labour

Evolving good practice




- ✓ External challenge or working groups informing strategy
- ✗ Going beyond auditing - deep dives and unannounced visits
- ✓ Cascading ethical standards throughout supply chains
- ✓ In-depth training for staff in key roles, such as procurement
- ✗ Commitment to worker engagement
- ✓ Implementing the Employer Pays principle

Meeting basic expectations




- ✓ Evidence of activity or improvement in modern slavery statement
- ✓ Identifying areas of high-risk in the business and supply chains
- ✓ Educating suppliers on policy and setting expectations
- ✓ Regular staff training and awareness-raising exercises
- ✓ Basic protocols for dealing with labour exploitation cases
- ✓ Installing whistleblowing hotlines

Barely achieving compliance




- ✓ Superficial modern slavery statement - policy but no action
- ✓ Little or no mapping of supply chains
- ✓ Minimal awareness of modern slavery amongst staff
- ✓ Sole reliance of audits
- ✓ No protocol for dealing with labour abuse






Initiative / Group	Our Role and Partnership Information
<p>Collective Partnerships: Large strategic industry groups collaborating to find solutions to complex global issues within modern slavery.</p>	
<p>Ethical Labour Working Group</p> 	<p>Chair. This forum brings together retailers, public officials and charities to respond to issues and advocate for solutions impacting modern slavery from remedy to legislation changes. Asda actively lead on the agenda convening members on private/public collaboration. For example, members of the group were aligned to support an appeal to the government to fund the Modern Slavery Helpline where a decision remains pending.</p> <p>The British Retail Consortium's Ethical Labour Working Group is chaired by our Director of Responsible Sourcing Compliance and is a key industry forum for understanding the direction of legislation and providing feedback.</p> <p>A key focus for the group in 2020 has been following reports from the Xinjiang province of China stating that the Uyghur Muslim population suffers from gross human rights violations including forced labour. In response, Asda commenced a review of products sourced from the region and contributed to ongoing forums discussing the issue, primarily via the British Retail Consortium. We were pleased that our global programme already required a prequalification process to be adhered to prior to sourcing from this region and this has been a requirement since 2019 when the issues started to become highlighted. In 2021, we will work with our suppliers and supply chain to continue to address the issues highlighted.</p>
	<p>Participant. 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 survivors. All five West Yorkshire districts are represented; Leeds, Bradford, Wakefield, Kirklees and Calderdale, all of which also have their own district-level forums.</p> <p>The partnership is delivered by the Office of the Police and Crime Commissioner for West Yorkshire and through our participation Asda has been able to learn more about the wider challenge of Modern Slavery for frontline organisations, and benefits from an increased understanding and appreciation of the intelligence gathering and sharing across the frontline networks and helps these frontline organisations to understand the business perspective on Modern Slavery issues.</p>
	<p>Participant. The West Midlands Anti-Slavery Network connects various agencies involved in tackling modern day slavery in the West Midlands and beyond. Via the Network's newsletter Asda ensures it stays informed of current issues, strategies and initiatives and in 2020, noted the creation of a new Language and Media workstream. This workstream has been created to address the sensitivities around Modern Slavery language and media, including the use of imagery, and as a result Asda is seeking to make sure our Modern Slavery communications are sensitive to the potential impact that specific language and image use may have on the survivors of Modern Slavery, the professionals who working with survivors and the general public.</p>

Charity Partnerships

	<p>Partner. Asda Fight Hunger Create Change is a transformational partnership with FareShare and the Trussell Trust that aims to create long-term, positive change to poverty in the UK. FareShare are experts in food distribution and they run regional centres, who support a wide range of charities across the UK. Some of these charities support survivors of Modern Slavery through helplines, provide counselling, financial support, advice and guidance and healthcare.</p>
	<p>Partner. The Trussell Trust is currently working with City Hearts to provide a training module for food banks to help them identify issues of Modern Slavery. They are also working to put a plan in place to ensure the food bank has a route to an organisation who can provide support and assistance. Once this is in place they will look to provide internal Trussell Trust staff training which will help them to understand and identify potential signs of Modern Slavery.</p>
	<p>Partner. Our Ingredients for Life programme developed in partnership with charity City Hearts successfully piloted in 2019 and is designed to teach cookery skills to survivors of modern slavery. We offered lessons utilising a syllabus developed by our Head Innovation Chef to teach many of the building blocks required for cooking and boosting health and wellbeing. Our plans to extend the programme further via our supply chain partners roll forwards into 2021.</p>

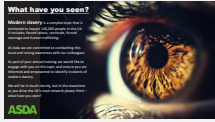
Memberships and Sponsorships

	<p>Member. We have been working with the Ethical Trade Initiative (ETI) to inform their strategic direction, via consultation with our Responsible Sourcing Compliance team and establishing our engagement plan for future interactions based on shared priorities and areas of impact such as Modern Slavery.</p> <p>Specifically, the output of our involvement in the ETI's Modern Slavery sub-group has seen collaborative consultation on strengthening modern slavery legislation.</p>
	<p>Member. Our membership has enabled us to be part of various conversations to address emerging risk in different sectors including warehousing and logistics. The regular Covid-19 calls proved invaluable as suppliers were able to share their experiences of the pandemic and highlight any issues they may be facing, such as migrant labour unable to return to their native country due to Covid-19 travel restrictions.</p>
	<p>Member. Spain is an important sourcing region for IPL and one that continues to attract negative media attention relating to worker exploitation and specifically to sexual harassment and poor living conditions.</p> <p>IPL and Asda continued to support their Spanish supply base by continuing their membership of the Spanish Ethical Trade Forum, a forum which enables suppliers to meet and share learnings and ultimately take ownership of the issues. 67% of IPLs Spanish suppliers have attended the forums and training with very positive feedback seeing the forum as a platform where they can share experiences and learn from the experiences of others, with several suppliers participating changing their own policies and procedures to include coverage for Modern Slavery issues.</p>

	<p>Member. Nirapon facilitates workplace safety for its members' factories in Bangladesh. We do this by providing guidance on the implementation of fire, building and electrical safety management systems, and through our worker trainings and a worker helpline. Nirapon is built upon the principles of commitment, collaboration, transparency and accountability. It recognizes the importance of promoting a self-sustaining culture of safety within the Bangladesh Ready-Made Garment (RMG) industry, in large part by guiding and developing factory capacity to manage safety effectively using best practice methodologies.</p> <p>Nirapon facilitates workplace safety for its members' factories in Bangladesh. They do this by providing guidance on the implementation of fire, building and electrical safety management systems, and through our worker trainings and a worker helpline. Through Walmart all Asda's Bangladesh facilities have participated in this programme, and this will continue under a new Asda membership.</p>
	<p>Member. Sedex provides an online platform for companies to manage and improve working conditions in their global supply chains. Sedex provides practical tools, services and a community network to help Asda and our suppliers improve their responsible and sustainable business practices, and source responsibly.</p>
	<p>Sponsor. A founding member of Stronger Together, Asda continues to utilise the tools and resources available through the membership to support suppliers on training and awareness and strategic direction. IPL are sponsors/members of the Stronger Together Spain programme. Through IPL's sponsorship the tools and resources available help support our Spanish suppliers on training and awareness and strategic direction.</p>
	<p>Sponsor. Asda joined RRT in 2020 as a Sponsor to drive the responsible recruitment of workers in global supply chains. Through our sponsorship our suppliers are encouraged to access support and guidance to work towards a future of high standards in responsible recruitment, helping us to further tackle modern slavery and eliminate illegal and unfair recruitment fees.</p> <p>To promote greater awareness to the industry and wider public, we regularly speak at conferences and forums to move forward global efforts to combat modern slavery. Our Director of Responsible Sourcing Compliance has previously joined panels participated in discussions examining the barriers to Responsible Recruitment in supply chains and what can be done to overcome them.</p>
	<p>Member. We continue to support a programme called Bright Future that's all about helping survivors of modern slavery towards employment. Bright Future was launched in 2017 by charity City Hearts alongside the Co-Op. Since then it has expanded to involve 28 charities and 21 businesses, including Asda.</p> <p>Our IPL business have been working with City Hearts since 2019 to understand how they might best be able to support survivors of modern slavery via the Bright Future programme, becoming a member accessible on the National Matching System, set-up to match potential survivors with available job opportunities. Unfortunately, through 2020, IPL have not yet been matched for a suitable placement, we however remain open to welcoming a survivor in 2021. We will also look to progress evaluation of the opportunity of the programme's model to Asda's logistics business to understand where we might be able to offer work placements to candidates.</p>

Asda Specific Initiatives: our own internal initiatives to combat modern slavery and support survivors.

'What have you seen?'



Asda's internal campaign to raise awareness amongst our colleagues with particular focus on Heavy Goods Vehicle (HGV) drivers about the indicators of modern slavery and what to do if they have concerns for someone's safety.

We recognise that through their day-to-day activities our drivers may see potential indicators of modern slavery and the aim of this training is to upskill them in spotting signs and knowing how they should report any concerns. During 2020, progress on our driver training has been made with 66% of Asda drivers receiving training, and this objective deliverable rolls forwards into 2021 for completion.

Targeted initiatives: Issue specific initiatives



Hand car washes are well-documented as a high-risk industry. In 2018, we joined the Responsible Car Wash Scheme, established by the Downstream Fuel Association, GLAA, HSE and a number of national retailers including Asda, to make sure affiliated operators act ethically and improve the industry as a whole, and to mitigate a prominent business process risk. The aim of the organisation is to target unethical labour practices and ensure compliance with regulations via ethical audits and certification, allowing customers to select an ethical car wash and allow enforcement agencies to focus on unscrupulous operators. Asda has been involved in the establishment of this programme and is working as part of the pilot stage within the Midlands. We believe involvement in initiatives such as this will drive improvements within the industry, ensuring legal trading, adherence to environmental regulations and the appropriate protection of workers.

Asda has continued to support the delivery of the Responsible Car Wash Scheme during 2020 and co-signed a letter to the Home Secretary seeking endorsement for a pilot of a blueprint for the mandatory licensing of car washes, and in 2021 is contributing funding to support the next phase.

Political engagement and Advocacy:

Responding to consultation requests and contributing to best practice.



Home Office

Contributor. We continued to support the Home Office by feeding into discussions relating to the development and introduction of a single state-owned Modern Slavery Registry. This followed a call by the Independent Anti-slavery Commissioner in 2018 to improve business compliance with the legislation requirements following the introduction of the Act in 2015. The registry will aim to reduce business confusion about where to file modern slavery statements, provide businesses with a single repository in which to file statements and enable other stakeholders – such as investors, consumers, non-governmental organisations, trade unions and contracting companies or local authorities – to quickly and easily identify whether a particular company has complied with the Act.



Gangmasters &
Labour Abuse Authority

Contributor. In December, Asda responded to the GLAA's Public consultation to change its current approach to inspections and compliance activity within the sectors the GLAA regulates through its licensing scheme. Our response on the consultation was consistent with other industry retailers, who are all aligned on the importance of the GLAA licensing scheme and offered views on how current GLAA compliance due diligence activity relating to licences and inspections could be enhanced by taking a risk-based approach to future inspections.

Training - Business

Modern Slavery E-learning

We continue to equip Asda colleagues with the skills they need to engage with the complexities of modern slavery, whether that's part of their role at Asda or as they go about their daily lives. An educated and informed colleague is vigilant to these issues and can respond accordingly.

All Asda Home Office line managers with supplier facing or sourcing roles and selected retail colleagues receive modern slavery training via an e-learning module. The module defines modern slavery and indicators to look out for, and provides information on UK legislation, case studies, best practice and what to do if a colleague has concerns for someone's safety. Following the training of nearly 2,700 colleagues in previous years via our Tackling Forced Labour in global supply chains training developed in collaboration with Stronger Together, mandatory training via our bespoke Asda Modern Slavery eLearning module was provided to a further 192 Asda colleagues and 516 IPL colleagues. The module has also been made available for all colleagues through self-assignment via our Learning Management System (LMS) catalogue.



Modern Slavery - UK
(CBL_CMP_LE_MdmSlavery-FY19_EN_UK)
★★★★★ (15)

Module Name	Syllabus information
Modern slavery eLearning module	Provides an insight into the issue of modern slavery and how you can help prevent it and deal with it if you suspect it. Includes case studies and best practice for hiring managers.
Tackling forced labour in global supply chains - UK	A customised course that works with selected industries covering specific roles and how issues may manifest themselves in the trainees industry.

IN ADDITION, IPL DELIVERED BESPOKE TRAINING DIRECTLY TO 161 IPL OPERATIONAL LEADERS AND SITE HR IN ALL UK SITES ON SPOTTING THE SIGNS OF MODERN SLAVERY AND REPORTING/RESPONDING TO INCIDENTS.

HGV Driver Training

Our ‘What have you seen?’ campaign:

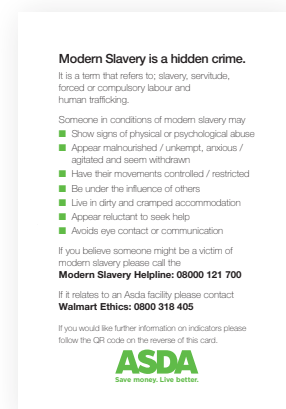
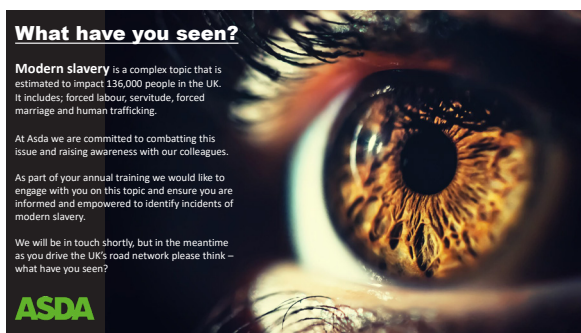
In our previous statements, we set an objective to increase awareness of the indicators of modern slavery for colleagues who may have closer proximity to those in conditions of modern slavery. We have progressed this by focusing on our Heavy Goods Vehicle drivers within our Asda Logistics Services Division as they travel the UK’s road networks, visit industrial areas, the communities we serve and rest areas nationwide. It is our goal to provide them with the skills required to understand and act should they have reason to do so.

We chose to engage our driver colleagues in a reflective and thought-provoking programme as an addition to their Driver Certification Professional Competence sessions. An initial notification to their handheld devices set the scene and rationale for

training, giving the drivers time to reflect on the topic, its impact and what they may have seen prior. Additionally, drivers were provided with a pocket-sized reference tool following their training with a QR Code which directs them to the [Modern Slavery Helpline](#), should they need to report concerns.

Driver feedback to this training has been positive and well received, with drivers saying “that they will be more aware when parked up and collecting backhauls” and “[it] opens awareness of what to look out for”.

Whilst the impacts of COVID hampered our ability to complete our HGV Driver Modern Slavery Training, significant progress was still made with our total training now at 66% complete with our Asda Logistics Services (ALS) Regional Training Team delivering the module to over 1,700 drivers to date and this will roll forwards into 2021 to finalise.



Goods Not For Resale (GNFR) Training

As an emerging risk area highlighted previously, in 2020 a bespoke training course was also delivered to the relevant GNFR buying colleagues and Asda packaging team. The course included a forced labour exercise in addition to an overview of the Responsible Sourcing programme. The trainer gathered feedback and each of the colleagues trained confirmed that they understood the content and that it will help them to source responsibly.

WE HAVE ALSO INCREASED OUR EFFORTS TO UNDERSTAND OUR SUPPLIERS APPROACH AND PARTNER WITH KEY STRATEGIC SUPPLIERS TO ACHIEVE MORE IN ADDRESSING MODERN SLAVERY RISKS. AS AN EXAMPLE OUR LONG-TERM SUPPLIER OF COLLEAGUE UNIFORMS, DIMENSIONS HAS SHARED HOW THEY HELP TO SUPPORT ASDA MODERN SLAVERY PRIORITIES WITHIN THEIR OWN BUSINESS AND SUPPLY CHAINS (SEE CASE STUDY).

Responsible Buying Training

This course covers all aspects of the Responsible Sourcing programme and gives commercial teams the tools they need to understand the potential impact they could have on issues such as overtime. In 2020, 11 new colleagues were trained across further 2 sessions and the training will continue for all new colleagues in the future.

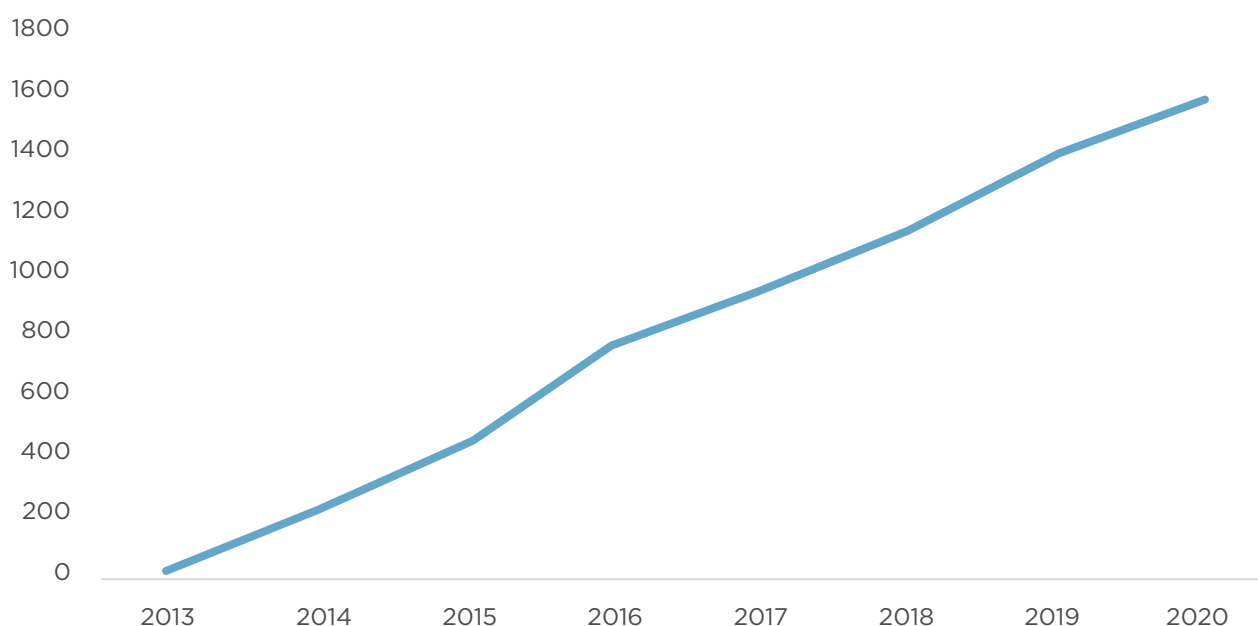
Supply chains

Training and Awareness for our suppliers has continued via Stronger Together with almost 1,600 delegates from across 692 of Asda suppliers now having completed Stronger Together Modern Slavery training. This is a year on year increase of over 12%. Additionally, since commencing our Sponsorship of the Responsible Recruitment Toolkit (RRT) in February 2020, Asda has 80 individuals utilising RRT benefits across 57 supplier partners who have taken up a 'plus' level RRT subscription, and over 50 of these have already completed training sessions.

Stronger Together Training:

Through our membership of [Stronger Together](#) we have facilitated the modern slavery training of 1,599 supplier delegates. Stronger Together workshops are interactive and focus on practical skills to equip businesses to tackle modern day slavery and specifically forced labour, labour trafficking and other hidden third party exploitation of workers. The workshops are delivered by industry specialists and provide a safe space for attendees to share challenges and exchange ideas and best practice. Attendees leave informed, motivated, and prepared with key resources to implement what they have learnt.

Stronger together supplier delegates trained



“ASDA WAS A FOUNDING ORGANISATION OF THE STRONGER TOGETHER CONSUMER GOODS STEERING GROUP IN 2013, AND HELPS EMPLOYEES WITHIN THEIR BUSINESS, THROUGHOUT THEIR UK SUPPLY CHAIN AND THE WIDER SECTOR TO SPOT THE SIGNS OF FORCED LABOUR AND TAKE ACTION AGAINST IT.”

Jantine Werdmüller von Elgg - Managing Director Stronger Together

Responsible Recruitment Toolkit (RRT):

Responsible recruitment is about ensuring that labour employment procedures across supply chains have been carried out in an ethical manner. It is about protecting the basic human rights of all people, safeguarding the livelihoods of workers across all sectors, in all countries. Asda recognises this and since joining RRT in 2020 has facilitated training in responsible recruitment for over 50 delegates from across our suppliers.

Further training modules, as shown in the tables below, also continue to be made available to Asda colleagues and suppliers via our Responsible Sourcing Training Academy. This provides access to foundational training for all suppliers and their supply chains worldwide. Participants learn and understand how to identify signs and mitigate the effects of modern slavery.

Many of our suppliers are enrolled into our Global Responsible Sourcing Academy. Enrolled suppliers have access to a number of modules to aid their efforts to combat modern slavery and forced labour.

Module Name	Summary
Responsible recruitment of facility workers	Describes effective recruitment practices that can help build a skilled and productive workforce and aid compliance with labour laws.
Responsible sourcing for suppliers	Describes how a responsible sourcing management system is an important component to a well-functioning business. When suppliers and/or facilities purchase and source products, raw materials, and components, responsible sourcing helps to reduce risk to their business.
Communication and feedback process	Describes the communication and feedback process, provides key elements and examples for consideration in an effective worker communication strategy, and suggests guidelines for creating a communication and feedback process policy.
Wages and hours	Describes the benefits of having a wages and hours management system to help facilities remain compliant on a number of topics; wages (compensation), hours, benefits, breaks, rest days, holidays and leave. It aims to prevent illegal or excessive wage deductions or withholdings, delayed wage payments and irregular payments.

Training - Awareness

In 2020, we have continued to engage the business through training and awareness and we see the ongoing value and benefit from this with a workforce that is aware and ready to respond. Further incidents of suspected modern slavery have been reported, and this has enabled us to take action and inform the relevant authorities to investigate further.

When incidents do occur, we are focused on investigating thoroughly, supporting any involved colleagues, testing our reporting process and taking action to support remediation where possible.

Supplier Awareness:

In 2020, Asda collaborated with other retailers in the UK via FNET to run a series of free webinars providing guidance and information to support suppliers enabling them to protect and support their workforces. Topics included managing labour responsibly and managing recruitment and labour exploitation risks in light of COVID19, along with other topics such as worker safety and welfare and worker management communication. The supplier webinar series reached 3,993 participants across 56 countries and 99% of participants who took part in the polls at the end of each webinar stated that they had been useful. Feedback from the webinars reinforced the intended unique selling point of the webinars which was the provision of practical case studies and the sharing of best practice between food suppliers, growers and farmers.

Facility Posters

Are you working against your will?

Signs of forced labor and trafficking include

- Valuable possessions, including passports and work permits, are withheld
- Threats or abuse keep you from leaving, or you didn't get the job promised
- You paid to get the job, or work is coerced through debts or pay deductions
- Workers are below the legal age

If so, speak up.

Report if you experience or observe any of these situations

- 1 Talk to a co-worker, supervisor, or authorized worker representative
- 2 Contact Walmart anytime, anywhere—
Email: ethics@wal-mart.com
Visit: walmartethics.com
Call: 0800 318 405
- 3 Contact appropriate governmental authorities

As part of our Responsible Sourcing Programme, we continue to require our suppliers to distribute our Posters throughout their supply chain to help make workers aware of our expectations and the availability of reporting channels. Our posters feature country-specific information in a variety of languages.

Customer and Colleague Awareness



AS PART OF THE MULTI-AGENCY PROJECT AIDANT IN 2020, ASDA SUPPORTED THE GLAA WITH A POSTER CAMPAIGN TO RAISE AWARENESS OF MODERN SLAVERY. OUR POSTER CAMPAIGN RAN BOTH THROUGHOUT OUR HOME OFFICES, STORES AND DEPOTS, REACHING ALL COLLEAGUES. WITH PROMINENT POSITIONING IN OUR STORES IT HAD A POTENTIAL REACH OF OVER 35 MILLION CUSTOMERS.

Email Signatures

A number of colleagues within Asda Compliance have opted to utilise a specific Modern Slavery email signature which comprises simple messaging along with routes to report any Modern Slavery concerns accompanied by links to our Policies and Modern Slavery Statement. This simple initiative produced a direct result within a matter of just a few months, where a colleague from an Asda depot taking on a new in role in our Home Offices engaged with Asda's Labour and Employment Subject Matter Expert (SME) to organise a meeting. Via email conversation, the colleague noted the Modern Slavery footnote in the email signature. Our colleague explains more in this case study.

Regards
 First, Last Name
 Senior Manager
 Compliance
 Asda House Great Wilson Street Leeds LS11 5AD
 T/ 0800 318 405
 M/ 0800 318 405
 Email/ first.lastname@asda.co.uk



My line manager is Lisa Domoney, Director Responsible Sourcing and can be contacted on 0113 826 4300

Modern Slavery - If you believe there is an immediate risk to life/safety call 999 reporting to the Police, or for any other Modern Slavery concerns report [here](#)
Modern Slavery Indicators may include people appearing to have restricted freedom (show signs their movement is being controlled), display unusual behaviour (act as if instructed by someone else), have no access to their earnings, be unable to choose when or where they work, bear unexplainable physical injuries or not know where they live
[Asda Modern Slavery Statement](#) [Colleague Modern Slavery Policy](#) [Supplier Modern Slavery Policy](#)

SIMPLE MESSAGING MAKING A POSITIVE DIFFERENCE:

Case Study

Email signature

"In my new role I was talking to a colleague to organise a Zoom get together, at the bottom of the colleagues email I read the Modern Slavery and Indicators footnote...this made me think of a colleague that I had taken on in my last role.

THE COLLEAGUE HELPED US MASSIVELY THROUGH THE PRESSURES OF THE PANDEMIC WITH A FANTASTIC ATTITUDE, WORK ETHIC, EFFERVESCENT PERSONALITY AND A GENUINE PERMA-SMILE!

I called and spoke with another manager, asked them to read the statement – we agreed that the colleague was now quite withdrawn, making less effort with themselves, had sporadic time off, had lost weight, would sit on their own eating only very small meals from the canteen, their partner called for them on our work phone recently, they would drop the colleague off and pick them up like clockwork at the very entrance and now had gone off sick where every time the depot spoke with the colleague, they couldn't actually say what was wrong with them.

The Manager spoke with other colleagues and uncovered other apparent issues, the statement gave us the confidence to flag it up. Through a Regional Compliance Manager and Senior Ethics Investigator, Asda engaged with the depot team and organised a site welfare visit for the colleague. We collaborated with Kent Police who sent 2 specialist plain clothes officers to meet with the colleague at the depot. The colleague opened up to them about the controlling and abusive relationship they were in. They have helped the colleague get out of the situation they had been in, is now back to work, thanks us, thanks Asda and is now working their way back to top form again."

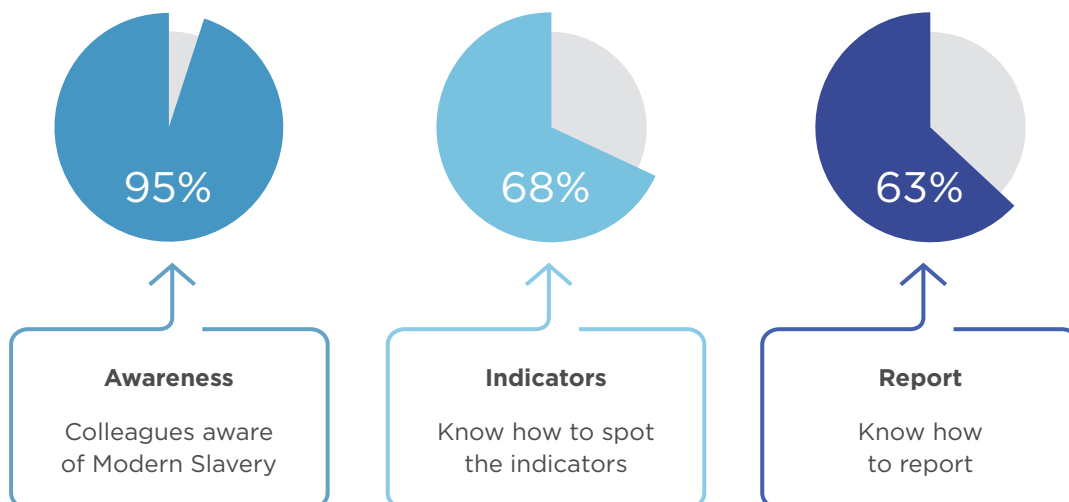
National Anti-Slavery Day 2020

National Anti-Slavery Day (NASD) is an opportunity for us as a business to raise awareness of human trafficking and Modern Slavery with our colleagues, suppliers and business partners. During the Covid-19 pandemic, the Responsible Sourcing team used a variety of communications channels to target Modern Slavery awareness raising activity, adapting to ensure that the campaign this year was cognisant to the volume of colleagues working from home due to the pandemic, whilst maintaining the need to provide overall awareness to our frontline key workers in stores and depots.

Messaging on colleague laptop screensavers which covered Asda, George and IPL colleagues was live in the week leading up to NASD, as well as messaging included on our Hive system (Asda's brand management and compliance portal), supplier websites and our Retail Link system (reporting software giving suppliers access to point of sale data, documentation, reports, store information, communications, and special applications that suppliers use to manage their business).

The poster from the GLAA's Project Aidant modern slavery awareness campaign was also re-posted on our Colleague Noticeboards during October.

The reach of our Modern Slavery awareness activity was extended in 2020 where we partnered with local businesses within the Lutterworth area, where our George office is located, to share guidance on how to spot potential survivors of modern slavery and key reporting mechanism available. This newsletter is issued to 82 businesses within Magna Park and cascaded to approximately 6,500 colleagues.



This year we took steps to assess the impact of our awareness campaign and undertook an assessment of the colleague impact. Results demonstrated that 95% of Asda colleagues were already aware of the existence of Modern Slavery in the UK, with 68% colleagues reporting that they feel they have enough information to spot the indicators and signs of Modern Slavery and 63% colleagues stating they know how to report if they see any of the signs.

In addition, Asda's Responsible Sourcing team took part in the 'Go the distance' challenge set up by Hope for Justice. This was a virtual fundraiser involving running, walking or cycling 250 kilometres as a team between 12th - 18th October. Funds raised went to Hope for Justice, whose purpose is to bring an end to modern slavery by preventing exploitation, rescuing survivors, restoring lives, and reforming society.

IPL similarly undertook four awareness campaigns during 2020, including a poster locker drop at all sites and supporting Project Aidant via posting the GLAAs translated posters across all sites. A Leadership snap-shot aligned with National Anti-slavery Day was delivered, along with usage of media screens and laptop screen savers across the business.

2021 Future Focus

Commitments and Deliverables

We aim to build on our improvements to date and make further progress against our revised and updated objectives as detailed below.

<p>1</p> <p>Risk Assessment and Intelligence Gathering</p>	<p>Continue to evolve our risk management tools driving insight and impact through an Asda focussed lens, extend work on previous focus areas and provide greater coverage for GNFR.</p> <p>Explore the opportunity for improved due diligence for high-risk product sourcing to establish and validate traceability and provenance via scientific forensic testing.</p>
<p>2</p> <p>Training and awareness</p>	<p>Roll out Modern Slavery training to relevant colleagues and suppliers specific to the financial sector where highlighted as a risk area by the Independent Anti-Slavery Commissioner through the Agenda for Action across the Financial Services Sector report.</p> <p>Continue to extend colleague and supplier training and awareness of the indicators of modern slavery, creating communication mechanisms aligned with a new Asda specific programme, signposting colleagues and suppliers to the training tools and resources most relevant to them. Developing further reference tools and guides to colleagues visiting suppliers to increase awareness as appropriate.</p> <p>Finalise completion to 100% for our “what have you seen?” training for HGV drivers.</p>
<p>3</p> <p>Policy and Governance</p>	<p>Continue integration within the overall Asda and IPL businesses providing end to end coverage across systems, processes and policies.</p> <p>Continue to modify and evolve policies in line with strengthening legislation and consultations by exploring the development of an Asda Human Rights Policy, and evaluate an approach to establish a business Human Rights Impact Assessment.</p> <p>Ensure Asda Modern Slavery reporting in 2021 meets the revised UK Government format, including coverage for mandated sections, single reporting deadline and utilises the Modern Slavery Registry (once implemented).</p> <p>Continue to progress with the implementation of the Responsible Recruitment Toolkit throughout the business and supply chains, completing and publishing Asda progress in the 2022 Modern Slavery Statement.</p>

<p>4</p> <p>Collaboration and Impact</p>	<p>Develop Modern Slavery Key Performance Indicator (KPI) metrics enabling us to assess, monitor and track our efforts and support resource allocation in priority areas.</p> <p>Continue to collaborate with appropriate third parties to improve the alignment of our policies, strategies and statement – Suppliers, NGOs and Not for Profit organisations, including onboarding a suitable partner organisation enabling enhanced survivor support proposition across the businesses.</p> <p>Continue to actively engage with collective partnerships and member organisations to support and share learning and best practice.</p>
<p>5</p> <p>Survivor Support</p>	<p>Identify and onboard an external partner with a survivor centric approach to safeguarding potential survivors.</p> <p>Deliver Ingredients for Life pilot alongside a supply chain partner and partner charities to assess feasibility and impact of scaling enabling survivor support on a wider scale outside of our own business.</p> <p>Host a Bright Future placement within IPL business and review opportunities within our wider business to support survivors and enabling them to develop new skills and experience.</p>