ASDA

MODERN SLAVERY & HUMAN RIGHTS IMPACT STATEMENT 2025



ASDA

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This Modern Slavery and Human Rights Impact Statement outlines Asda's approach to addressing Modern Slavery risks and promoting Human Rights within our operations and supply chains. It has been prepared to report on our obligations under the UN Guiding Principles on Business and Human Rights (UNGPs) and has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken in relation to Part 6, Section 54, Transparency in Supply Chains by Asda Stores Limited and, where appropriate, other relevant group companies to prevent Modern Slavery and human trafficking in our business and supply chains.

It relates to our fiscal year ended 31 December 2024 and covers the activities of Asda Group Ltd, Asda Stores Ltd, International Procurement and Logistics Ltd., Forza Foods Ltd, Kober Ltd. (References to IPL include where relevant Forza Foods Ltd. and Kober Ltd.), McLagan Investments Ltd, The Burwood House Group Laimited, Arthur Foodstores Ltd, Asda Express Ltd (both trading as Asda Express), and Leon Restaurants Ltd. It reflects our ongoing commitment to transparency, accountability, and continuous improvement and reporting the impacts experienced by rights holders from the operation of our business and supply chains globally.

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a message FROM allan



At Asda, we recognise that Human Rights and the elimination of Modern Slavery are not just legal requirements – they are fundamental values that shape how we should do business.

In 2024, we made measurable progress on transparency, ethical recruitment, and survivor support delivered through collaboration, innovation, and proactive risk management. Key achievements this year include:

- Driving supply chain transparency and improving accountability, disclosing 952 suppliers and 2,911 sites to Open Supply Hub and sharing risk, compliance, and worker data.
- Strengthening responsible recruitment practices, conducting 1,919 Modern Slavery risk assessments and ensuring 5,557 temporary workers were protected through our temporary workforce management partner.
- Supporting survivors of Modern Slavery, with donations of essential items that benefited over 400 individuals through the Causeway Life Supply Programme, and helping 23 survivors complete the Ingredients for Life programme.
- Enhancing worker voice and engagement, launching our Colleague Advisory Panel and continuing to focus on worker experience and the role of data.
- Taking action against forced labour, removing high-risk suppliers linked to State-Imposed Forced Labour (SIFL) and strengthening due diligence in high-risk locations.
- Working with suppliers to repay recruitment fees paid by vulnerable workers in agricultural supply chains.

In 2025, we remain focused on delivering real-world impact, further embedding Human Rights considerations into our business decision-making, and holding ourselves accountable to the highest ethical standards. Through our Human Rights Steering Committee, cross-industry partnerships, and policy advancements, we will continue to drive meaningful change across our operations and supply chains.

We cannot achieve this alone, and so I encourage our suppliers, colleagues, and stakeholders to work alongside us to build a fairer, more transparent, and more responsible global supply chain.

Allan

Allan Leighton
Executive Chairman
Asda
30 June 2025

OUR COMMITMENT

We are committed to respecting Human Rights and preventing Modern Slavery.

Our approach is aligned with international frameworks, including the UNGPs, and is underpinned by our core values, which are the foundation of everything we do. Integrity, respect, and collaboration guide our decisions, fostering an environment where care for people comes first.

In 2024, we advanced transformative initiatives to simplify work for our colleagues, improve customer experiences, and build a future-ready business rooted in ethics and innovation. These values inspire us to champion Human Rights and create a positive impact, as outlined within our Human Rights Policy.

KEY PERFORMANCE INDICATORS (KPIS)

At Asda, we believe that meaningful change stems from action, not just promises. Our approach prioritises measurable, tangible outcomes, ensuring that our efforts to address Modern Slavery and promote Human Rights deliver real, lasting impact. By embedding accountability into our operations, policies, processes and governance we aim to deliver for customers, colleagues, rightsholders and communities not just around the Asda business but across global supply chains.

In 2024, this commitment to action translated into measurable progress across key focus areas. From expanding supply chain monitoring to enhancing training and fostering impactful partnerships, our initiatives drove meaningful improvements in safeguarding Human Rights and combating Modern Slavery, delivering impact, and where required, remediation.

OUR IMPACT

2024 OBJECTIVES

In 2024 we set out to achieve the following objectives:

OBJECTIVE AREA	FUTURE OBJECTIVE (2024 STATEMENT)	2024 IMPACT AND EVIDENCE (FROM 2025 STATEMENT)	SOURCE (2024 STATEMENT)	STATUS GRADE
Organisation, business and supply chains	**Continue to maintain and develop existing controls and processes to improve modern slavery risk mitigation.**	100% of HIVE suppliers assessed against MSA2015 compliance. TISC Report membership to provide baseline assessment of supplier risk. Enhanced mapping of GNFR supplier base. Multiple case studies reflect enhanced systemic control.	**Future Goals & KPIs**	✔ achieved
Policies	**Update and enhance business policies relevant to modern slavery risk mitigation.**	Modern Slavery and Human Rights policies were significantly revised to better align with ethical frameworks and international standards. Combined Transparency & Supply Chain Due Diligence Policy developed. Strong internal and supplier-facing narrative alignment.	**Future Goals & KPIs**	✔ achieved
Risk Assessment	**Review and update business risk assessments related to modern slavery to support continuous improvement and meaningful KPIs.**	Demonstrated consistent application of risk-based due diligence practices, integrated across supply chains and highlighted in multiple case studies including gender, migrant worker, and SIFL-related risks. Enhanced focus on saliency risk and development of qualitative measures of impact.	**Future Goals & KPIs**	✔ achieved
Due Diligence	**Maintain and develop existing modern slavery controls and processes in place to address risk.**	Wider systems and supplier onboarding enhancements reinforced policy into practice. Cross-cutting examples like seafood and migrant labour due diligence evidence systemic control and partner alignment. Closer working relationships with agents and neutral vendors to enhance audit capability in high-risk areas.	**Future Goals & KPIs**	✔ achieved
Training and Awareness	**Continue to review and develop training related to Modern Slavery and Human Rights.**	Internal eLearning on MS for colleagues, and supplier access to training via Stronger Together and SFA programme sponsorship.	**Future Goals & KPIs**	✔ achieved

OUR IMPACT FOR 2024

1 SUPPLY CHAIN TRANSPARENCY & DUE DILIGENCE

952 suppliers + 2,911 supplier sites
Publicly disclosed through Open Supply Hub (OSH), increasing Tier 1 and Tier 2 transparency.

Source: Transparency & Supply Chain Monitoring

Sedex

Used internally for risk assessment, supplier self-assessment reviews, and audit prioritisation.

Source: Due Diligence

47 suppliers onboarded
Via HIVE with **100%** Modern Slavery Act compliance.

Source: Due Diligence

93 labour provider
Audits conducted (68 in person, 25 remote), including 41 pay audits covering 719 workers.

Source: Due Diligence – Matrix Collaboration

1,919 Risk Assessments
Risk assessments completed using Matrix worker data systems.

Source: Due Diligence – Matrix Collaboration

2 MODERN SLAVERY PREVENTION & SURVIVOR SUPPORT

400+ survivors supported
Through the Life Supply programme with essentials for recovery and stability.

Source: Remediation & Supporting Rightsholders

INGREDIENTS FOR LIFE

23 survivors
Completed the Ingredients for Life employability programme.

Source: Remediation & Supporting Rightsholders – Causeway

£14,000+
In George clothing donated to support survivors' immediate needs.

Source: Remediation & Supporting Rightsholders

Asda's grievance channel
Resulted in survivor-centred remediation and supplier reform.

Source: Remediation & Supporting Rightsholders



3 Ethical Recruitment & Worker Vice

5,557

Temporary workers monitored across **88 labour providers**, with regular risk flagging through Matrix.

Source: Due Diligence – Matrix Collaboration

52,000+

Seasonal workers indirectly supported through the Just Good Work App – up from **33,500** in 2023.

Source: Collaboration & Partnerships – Seasonal Worker Scheme Taskforce

Ask the workers platform

piloted in three sourcing markets to capture real-time worker insights.

Source: Risk Assessment & Saliency Issues – Decent Work

Internal Colleague Advisory

Panel launched to bring frontline perspectives into decision-making.

Source: Collaboration & Partnerships

4 Industry Collaboration & Strategic Partnerships

700+ UK growers

Trained via six regional ethical recruitment roadshows.

Source: Collaboration & Partnerships – Seasonal Worker Scheme Taskforce

120+

Organisations engaged through the Seasonal Worker Scheme Taskforce.

Source: Collaboration & Partnerships

Continued partnerships

with **15+** global organisations including SEDEX, ETI, RRT, Slave-Free Alliance, CRIB and Stronger Together.

Source: Collaboration & Partnerships

5 Training & Capacity Building

2,143

Colleagues completed Modern Slavery training, achieving a **93.89% completion rate**.

Source: Training & Awareness

RRT RESPONSIBLE RECRUITMENT TOOLKIT.ORG

955 supplier

Representatives trained using the Responsible Recruitment Toolkit.

Source: Collaboration & Partnerships

9,137 individuals

Trained through Stronger Together, with **419** completing the advanced module.

Source: Collaboration & Partnerships



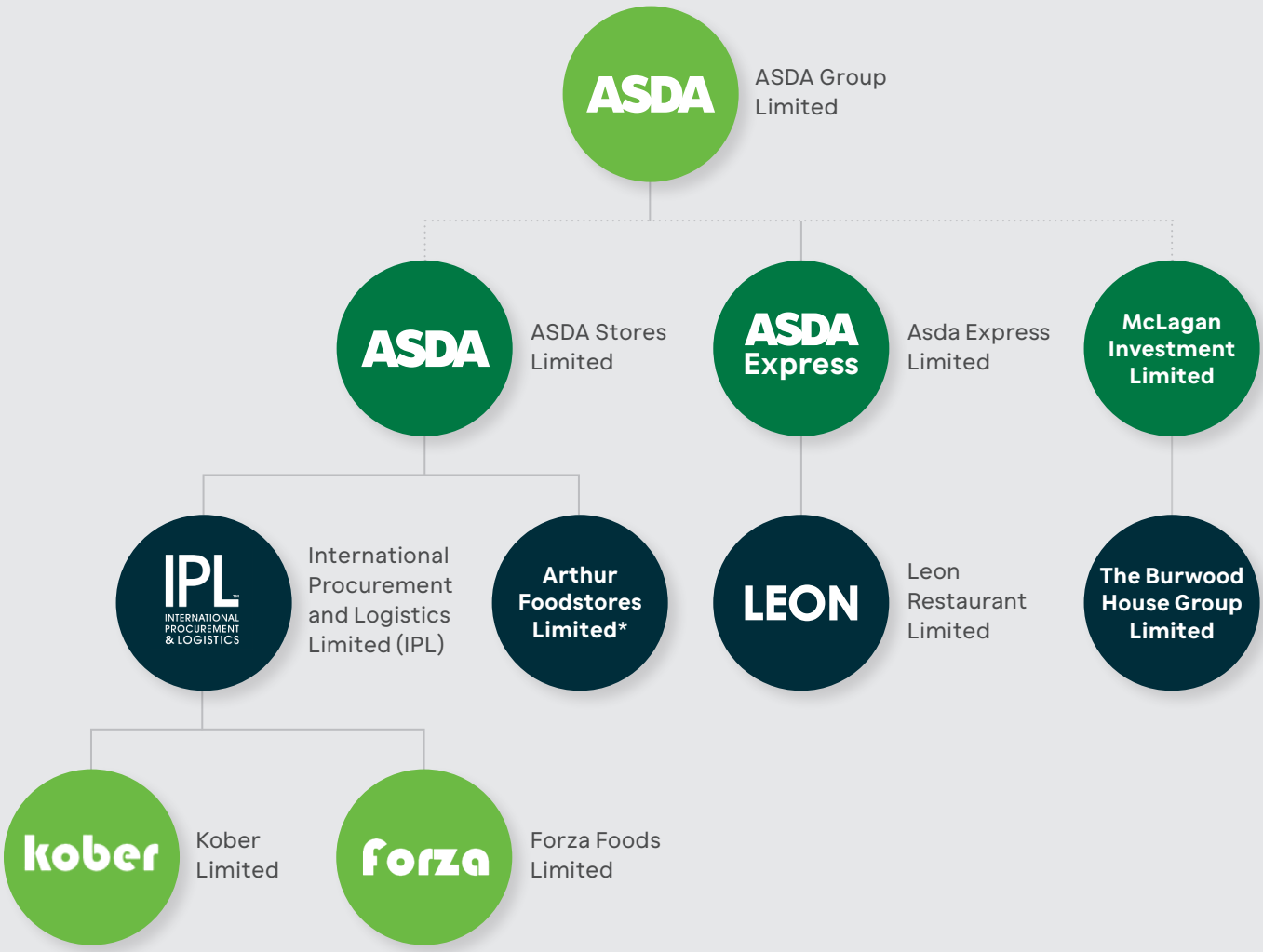


OUR BUSINESS

Asda operates a dynamic, complex and fast paced business and an extended, multi-tier supply chain, sourcing a wide range of products globally.

Our primary operations include grocery, apparel (George), and general merchandise, from raw material sourcing to final product delivery, supported by key subsidiaries such as International Procurement Logistics Ltd., Forza Foods Ltd., and Kober Ltd. 2024 also saw the redefining and setting of scope for enhanced focus on our GNFR suppliers (which includes suppliers in construction, operation consumables, facilities management, marketing, corporate services, information technology and logistics.

Asda Stores Ltd employs 132,149 permanent colleagues, and our 800+ agency colleagues across Logistics, Retail and Home Offices, as well as our colleagues in our three IPL, Forza and Kober Head Offices, nine manufacturing operational sites and three overseas locations.



SUPPLY CHAINS

Asda's has a dedicated Modern Slavery, Responsible Sourcing and Human Rights team managing our programmes and risks across these areas.

Our approach to Modern Slavery and Human Rights in our global supply chains is led by this team, structurally within our Legal and Compliance business function. Our Responsible Sourcing programme seeks to address labour standards risks and compliance within Asda's own brand supply chain. Based primarily on risk and the introduction of the Modern Slavery Act 2015, we have brought new suppliers, sites and categories into the scope of this programme to provide increased due diligence in higher risks areas of our supply chain associated with increased Modern Slavery risk, such as elements of our Goods Not For Resale function. In 2024, we have now also incorporated all Asda and IPL labour providers into the programme, where we have continued to evolve and address our approach to risk and where labour provision is known to be higher risk for Modern Slavery issues.

There are over 3,000 supplier sites and facilities in scope for Asda's responsible sourcing programme, representing 952 unique suppliers across all business areas and functions. Over time Asda will look to identify and assess Modern Slavery risk and responsible sourcing compliance for Asda Express and Leon suppliers and their sites, providing greater transparency as appropriate, and will also seek to extend our visibility into the lower tiers of supply chains associated with saliency risk.

Our supply chains are vast and complex; we buy an extensive range of products and services from all over the globe which we either sell (Good for Resale (GFR)) or use within our own business operations GNFR.

Key Policies

We recognise that clear and robust policies are essential in setting expectations and driving meaningful change across our operations and supply chains.

Our Modern Slavery Policy sits within a broader Human Rights framework, designed to protect workers' rights, promote responsible recruitment, and prevent exploitation. Across our business, we have specific policies that either directly address modern slavery risks or incorporate human rights protections as part of our wider ethical commitments:

- Agency Worker Policy
- Domestic Abuse Policy
- Grievance Policy
- Recruitment Policy
- Right to Work Policy
- Modern Slavery Policy
- Forced Labour Policy

- Safeguarding Policy
- Whistleblowing Policy
- Statement of Ethics
- Human Rights Policy
- Standards for Suppliers
- Transparency Policy
- Cotton Policy

We recognise that policy alone is not enough, change happens through awareness. To ensure policies drive cultural change, we are embedding ongoing training and communication initiatives to support their implementation.

For example, our sexual harassment e-learning programme has been developed to support relevant policies and create a workplace culture where respect and safety are prioritised. Similarly, our Modern Slavery training provides practical guidance for colleagues, ensuring policies are understood, applied, and enforced across all areas of our business.

By linking policy, training, and action, we aim to create a culture where ethical business practices are embedded at every level, ensuring that workers' rights are protected, risks are mitigated, and our supply chains operate with integrity.

Governance

Asda continues to have strong governance structures and processes in place to steer and support our overall approach to Modern Slavery and Human Rights.

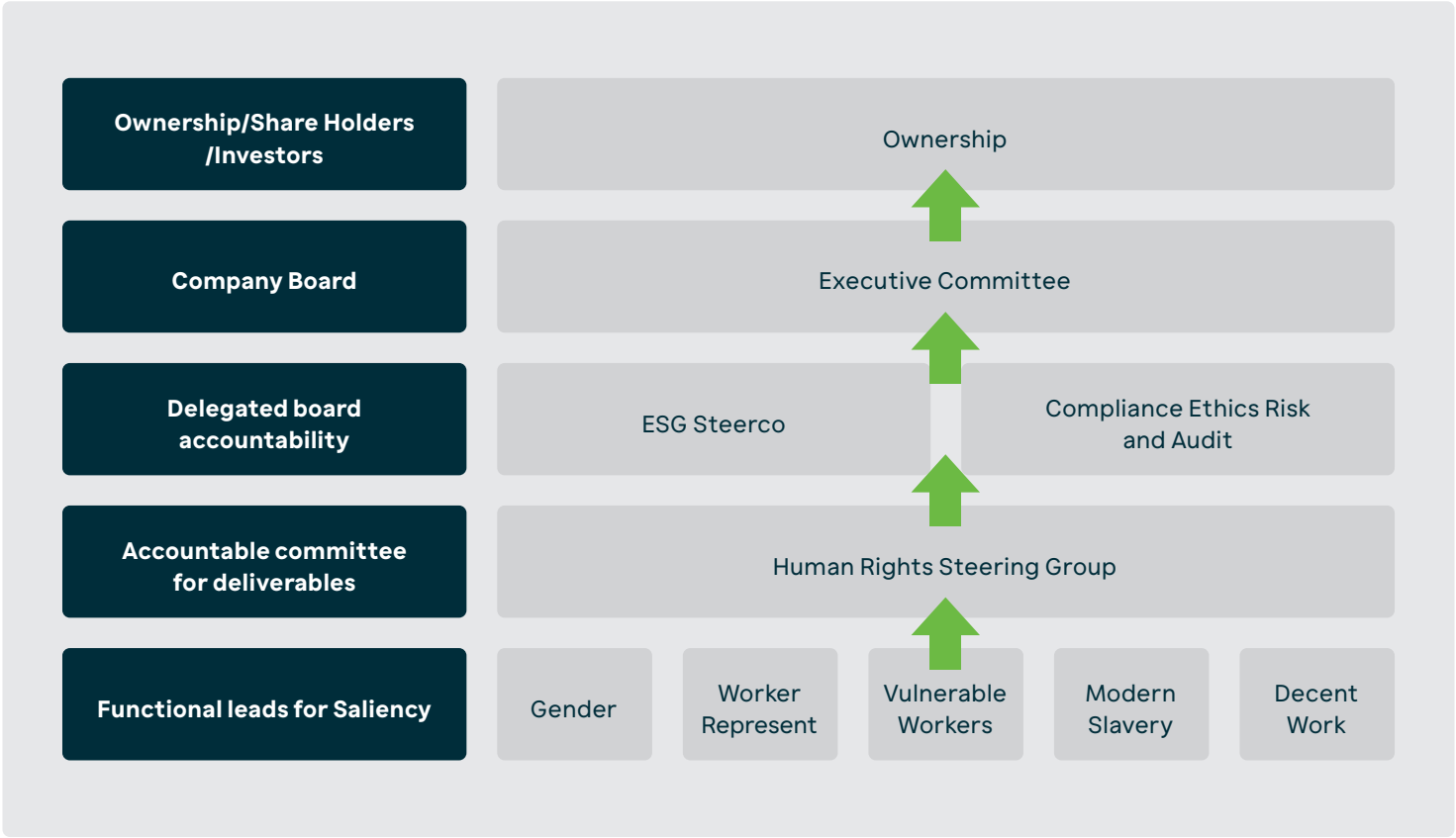
Key governance groups are detailed below:



We are committed to ensuring that our policies and governance structures are aligned with internationally recognised frameworks and best practices, such as the UNGPs and Organisation for Economic Co-operation and Development (OECD) Guidelines for Responsible Business Conduct.

We recognise the state's duty to protect Human Rights and comply with national laws applicable to our business. Through our policies and due diligence processes, we strive to respect the Human Rights of all rightsholders connected to our operations and supply chains, including the communities around them and are committed to emphasising sustainable development and risk-based due diligence, as well as providing access to effective remedy of Human Rights violations as required.

In 2024, Asda approved a revised governance structure to enhance oversight and accountability in addressing Human Rights risks across our operations and supply chains. As part of this initiative, the Human Rights Steering Committee will play a central role in driving strategic alignment, breaking down business silos and ensuring measurable progress is reported on and achieved for Asda's Human Rights objectives as outlined under Environmental Social and Governance (ESG) reporting.



Our Objective for 2025 is to embed the newly created Human Rights Steering Committee as a key governance body responsible for providing strategic oversight, business alignment and accountability to our Human Rights work across Asda, as well as assessing impact and driving remedial action.

By formalising the role of the Human Rights Steering Committee within the revised governance structure, Asda aims to embed Human Rights considerations at the heart of decision-making and ensure continuous improvement in ethical practices across all areas of our business.



Transparency and supply chain monitoring

Transparency is at the core of our efforts to combat modern slavery and uphold human rights across our supply chains.

By ensuring open, accessible, and verifiable supply chain information (see section below on Open Supply Hub), we promote accountability and continuous improvement throughout our operations and partnerships.

Understanding and managing risks across our supply chain is complex, but transparency is essential. In 2024, our commitment to improving traceability intensified with the redefined scope of our responsible sourcing programme, based upon saliency and proximity to risk, enabling us to identify and mitigate risks further down the supply chain. We believe that transparency and accountability are intrinsically linked. By disclosing our in-scope sites and key supply chain data, we drive improvements for rightsholders and reinforce supplier responsibility.

Our commitment to the Asda Standards for Suppliers and endorsement of the UNGPs on Business and Human Rights through our Human Rights Policy reflects our dedication to ensuring supplier compliance and upholding ethical standards.

While supply chain oversight is not always linear, these foundational principles allow us to generate insights, better understand risks, and work closely with partners and suppliers. Through monitoring, engagement, and remediation where necessary, we continue to strengthen our saliency work and improve protections for vulnerable workers.

Our ambitions in traceability and accountability continue in 2025 as we see value in sharing more data about where we operate and the components of the products we sell, as already demonstrated by the George business, beyond our direct supply base and into tiers 2 and 3 of our supply chain.

CASE STUDY

Enhancing Supply Chain Transparency in collaboration with New England Seafood International (NESI)

Incident
Asda identified gaps in visibility across its seafood supply chains, posing risks to ethical sourcing and worker welfare. Limited engagement with secondary suppliers hindered Asda's ability to monitor conditions effectively.

Response
Asda's Responsible Sourcing and Human Rights team collaborated with NESI to improve supply chain transparency. In April 2024, NESI facilitated introductions to five secondary suppliers at the Global Seafood Expo in Barcelona, allowing Asda to engage directly with lower-tier suppliers.

Impact/Future Improvements
The improved supplier engagement enhanced Asda's ability to monitor seafood supply chains effectively, ensuring ethical standards were upheld. Looking ahead, Asda plans to expand its direct supplier engagement model in other high-risk sectors to enhance visibility and accountability across.

OPEN SUPPLY HUB & TRANSPARENCY IN SUPPLY CHAINS

In 2024, Asda increased transparency of our supply chain by publishing supplier site information across Grocery, General Merchandise, George (clothing and home), categories via Open Supply Hub.

Future Objective

In 2025, in line with our enhanced Transparency and Supply Chain Monitoring Policy, we are asking all suppliers to access Open Supply Hub and claim their sites, ensuring data accuracy and ownership. This step is critical for building a more transparent, collaborative, and responsible supply chain.

Transparency in Supply Chains (TISC)

In 2024, Asda became a Transparency Pioneer by signing up to the TISC Report, a leading open-data platform for monitoring and sharing Modern Slavery statements. Pledging to champion transparency and uniting with the corporate transparency movement to strengthen trust and collective action for our planet and its people. This commitment allows us to publicly share our annual statement, ensuring greater visibility of our actions and progress. By joining TISC, we also contribute to sector-wide collaboration in tackling Modern Slavery.

Future Objective

Looking ahead to 2025, our focus is on evolving beyond disclosure to driving meaningful change. We aim to use TISC not just as a reporting tool, but as a mechanism to strengthen supplier accountability, enhance risk identification, and foster deeper industry collaboration. By integrating data-driven insights and engagement, we will work towards tangible improvements in ethical sourcing, ensuring transparency leads to real-world impact.

A global, public platform that enhances visibility, accountability, and ethical sourcing.

TISC 2025 TRANSPARENCY PIONEER GB-01396513

OPEN SUPPLY HUB

TISC REPORT

Due Diligence

Asda employs robust due diligence measures to identify and address Modern Slavery and Human Rights risks across our operations and supply chains.

Colleague Modern Slavery Checks

Quarterly monitoring by the Labour and Employment Compliance team flags duplicate or multiple records (e.g., bank accounts, phone numbers) for investigation.
(See section on Matrix)

Internal Audits

Regular audits include assessments of compliance with Modern Slavery policies. Any issues are reported internally and action plans implemented.

Annual Reporting

Asda publishes a Modern Slavery & Human Rights Impact Statement annually, detailing progress and challenges. This is available on our website and the UK Government's Modern Slavery Registry.

Incident Management

Access to grievance mechanisms, including our confidential Ethics Hotline enables colleagues and suppliers to report Modern Slavery concerns anonymously. In 2024, the hotline received 2,133 reports of which 377 involved allegations of unfair labour practices and 28 to reported human rights violations.

These processes demonstrate our commitment to identifying risks, promoting transparency, and taking decisive action to uphold Human Rights.

Our due diligence framework includes supplier audits, worker interviews, and collaboration with third-party organisations to assess and mitigate Human Rights risks across our supply chains.

Supplier Self-Assessments
All in-scope suppliers are required to complete detailed questionnaires via SEDEX, covering key areas such as recruitment practices, working conditions, and Human Rights risks.

Audits and Inspections
High-risk suppliers undergo regular third-party audits and on-site inspections to verify compliance with our policies.

Worker Interviews
Where appropriate, we conduct anonymous worker interviews to gain firsthand insights into working conditions and identify potential risks of exploitation or coercion.



Supplier MSA Compliance

In 2024 we onboarded 47 own label and non-edible grocery suppliers. These are checked for MSA 2015 compliance and 100% compliance across this supplier base was achieved, for in-scope businesses. What's more encouraging is that a number of suppliers have published voluntary Modern Slavery statements – despite not currently being legally obligated to do so.

Collaboration with Strategic Partners

Matrix – At Asda, collaboration with strategic partners is integral to addressing risks within our supply chains, particularly in the high-risk areas of GNFR. One such valued partner is Matrix, a neutral vendor that manages our engagement with labour providers and ensures consistent application of robust recruitment and employment standards across our operations. Their work in 2024 reflects our shared commitment to promoting transparency, ethical practices, and safeguarding worker rights. Matrix provided significant support in managing and monitoring the recruitment and employment processes of temporary workers, including:

- **Temporary Workforce Oversight:**
  - Number of Temporary Workers Supplied: 5,557
  - Labour Providers Engaged: 88
- **Audits and Compliance Checks:**
  - Full Audits Completed: 93 (68 in-person, 25 remote), with 76 clear passes, 8 remedial passes, and 9 fails.
  - Separate Pay Audits Conducted: 41
  - Workers Audited: 719
- **Pre-Employment Checks:**
  - Matrix completed 6,588 pre-employment checks in 2024, ensuring rigorous verification before workers were onboarded
- **Modern Slavery Checks:**
  - Matrix administered 1,919 responses to timesheet questionnaires and 196 responses to email questionnaires, investigating potential risks of Modern Slavery.

Matrix

From October 2024, Matrix began conducting detailed investigations into matching data (e.g., email addresses, phone numbers, and home addresses) to flag risks of exploitation. While no concerns of Modern Slavery were identified, this enhanced monitoring mechanism provides a robust framework for addressing potential issues in the future.

By leveraging Matrix's expertise and data-driven approach, we ensure that our labour providers uphold the highest ethical standards and are actively contributing to safeguarding worker rights. This collaboration exemplifies how a collective approach to risk management can drive meaningful improvements across supply chains. Moving forward, we aim to strengthen this partnership further to support continuous improvements in transparency, compliance, and ethical recruitment practices.

> Our partnership with Asda has been instrumental in both setting and monitoring the highest compliance, ethical and legal standards for our labour suppliers, particularly in the areas of eligibility to work, modern slavery prevention and fair recruitment practices.
>
> Matrix has been dedicated to developing comprehensive compliance frameworks that are tailored to Asda's specific needs. We continuously monitor and audit these processes to ensure they remain effective and in line with current regulations. Our proactive approach has enabled us to identify potential risks swiftly and implement corrective measures, thereby safeguarding both Asda and its supply chain.
>
> We are privileged to support Asda in their mission to combat modern slavery and promote fair labour standards. Our collaboration stands as a testament to what can be achieved when organisations work together towards a common goal of integrity and social responsibility.
>
> **Melissa Trehy, Matrix's Compliance Manager**

Responsible Recruitment Toolkit

As part of our commitment to responsible recruitment practices, Asda has continued to strengthen its approach by utilising the Responsible Recruitment Toolkit (RRT) to assess and improve our own recruitment processes. In our latest review, we have assessed ourselves against all 142 applicable steps of the RRT framework, achieving 97% completion, with:

- **134 steps completed**
- **7 steps in progress**
- **1 step yet to be started**

These steps ensure that we have effective management systems and due diligence embedded, including those to assure: No forced labour, no child labour, no recruitment fees are paid by workers, job information is accurate and transparent and employment status is appropriate, all workers are properly recruited and onboarded and legal eligibility to work is established, wages and benefits are paid fairly and properly, regular work is offered and working time is not excessive, work conditions are safe and hygienic, freedom of association is respected, opportunity and treatment are fair, equal and dignified. Termination rights are provided, access to remedy is ensured and a worker-centred culture is promoted and that business conduct is ethical and professional.

RRT RESPONSIBLE RECRUITMENT TOOLKIT.ORG

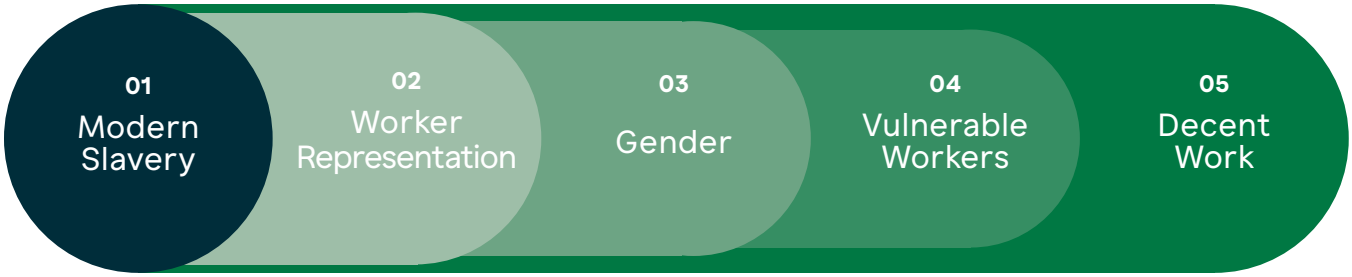
RISK ASSESSMENT AND SALIENCY

We conduct regular risk assessments (using a combination of country-specific risk information from publicly available sources, self-declared supplier information, social audit trends and incidents that have occurred) to identify areas where Human Rights are most at risk. Our assessments prioritise high-risk regions and industries, ensuring a targeted approach to risk mitigation.

We have prioritised our focus based on commodity, geography, impact, and complexity, and are committed to understanding these areas better, to address the risks for the benefit of the rightsholders and communities who make the products we sell.

We are committed to continuously improving our understanding of each of these saliency risk areas. To do so we require the support of our suppliers, industry partnerships, NGOs, and Trade Unions to establish transparency of our extensive global supply chains, breakdown barriers and identify solutions to address risk. This is why supplier and stakeholder engagement will always remain a significant element of our Human Rights strategy.

Our five saliency risk themes:



MODERN SLAVERY

CASE STUDY

State Imposed Forced Labour (SIFL) in Seaford supply chains

Incident
An investigate report flagged concerns for North Korean workers at several seafood processing facilities located across the border within China. Allegations include being subjected to SIFL, beatings and sexual abuse.

Response
Owing to Asda's proactive ongoing transparency requirements, we swiftly investigated our in-scope supply chain and found one site listed within our secondary supplier site list.

Impact/Outcome
Given the high risk and lack of viable remediation pathways, Asda instructed any linked suppliers to discontinue sourcing from the site, and resourced alternative locations of manufacture. This action, while challenging, aligns with Asda's zero-tolerance approach to forced labour.

Modern Slavery

CASE STUDY

Due diligence in tomato supply chains

Incident

In 2021 Asda communicated to all suppliers that it is their responsibility to take steps to ensure the products they supply to us are not produced in factories that are complicit in human rights infractions. In 2024, we received information from a media outlet alleging links to the sourcing of tomato-based ingredients from Xinjiang, a region associated with SIFL risks. While our direct supplier confirmed they do not buy or sell any products containing raw materials from Xinjiang and these ingredients were not used in Asda products, they acknowledged that their due diligence processes had not identified the risk of Xinjiang sourced materials being present in supply chains used by their manufacturers for sale to other markets.

Response

Asda took proactive measures and collaborated closely with our supplier to understand their approach to identifying human rights risks, specifically SIFL within their supply chains. In line with our Standards for Suppliers, we promoted supplier accountability by capacity building and supporting them in identifying key risk themes and focus areas associated with their operations.

Impact/Future Improvements

To support broader compliance, we intend to write to all suppliers that utilise tomato-based ingredients in 2025 to outline additional due diligence considerations and ongoing risks associated with this commodity and geography. We aim to reinforce compliance, outline transparency expectations and provide guidance to mitigate supply chain risks. This includes mapping supply chains, implementing systems to monitor adherence to our standards and laws against forced labour, conducting due diligence on products, suppliers and facilities to ensure compliance with our Forced Labour Policy, focusing on the Xinjiang region and ensure these are expectations are communicated throughout their extended supply chain.

Worker Representation

CASE STUDY

Addressing alleged union busting in Sri Lanka

Incident

In early 2024, Asda was informed by an NGO about alleged union busting within a George clothing supply chain factory in Sri Lanka. Reports indicated that union members faced intimidation, and that workers struggled to exercise their right to freedom of association.

Response

Asda worked with all stakeholders, including the NGO, the Union, the supplier, and factory management. Despite ongoing tensions, Asda worked collaboratively with suppliers in constructive dialogue, including the decision to move 15% of orders to alternative sites to responsibly increase supplier engagement.

Impact/Outcome

Following intensive mediation efforts, a resolution was reached on almost all concerns. We continue to engage with the supplier to ensure improved worker representation and long-term compliance with Asda's expectations.

GENDER

CASE STUDY

Addressing Gender-Based Violence in agricultural supply chains

Incident
Asda's risk assessment framework has identified Kenya as a high-risk sourcing region, particularly for Gender-Based Violence and Harassment (GBVH) within the tea, coffee, and flower industries.

Response
To mitigate these risks, Asda partnered with Civil Society Organisations, Multi-Stakeholder Initiatives, and Trade Unions to promote awareness, provide worker training, and implement robust grievance mechanisms. Asda also supported the Ethical Trading Initiative's GBVH workstream, reinforcing ethical practices across suppliers in the region.

Impact/Future Improvements
The initiative has strengthened worker protection policies and improved access to grievance mechanisms for agricultural workers. Asda is committed to expanding this engagement in other regions and will continue supporting initiatives that empower women in supply chains.

DECENT WORK

CASE STUDY

Using technology to understand worker experience

Asda ran a pilot of an application to enhance data-driven decision-making in supply chain management. The app allows workers to answer anonymous surveys about working conditions, provide real-time feedback on employment and recruitment practices and Raise grievances safely and collectively.

In 2024 it was operational in three key sourcing markets, this initiative is helping Asda validate social compliance findings, improve worker engagement, and strengthen grievance mechanisms.

DECENT WORK

CASE STUDY

Addressing extreme heat risks in agricultural supply chains

Extreme heat and drought pose increasing risks to farm workers in Asda's fresh produce supply chains. Recognising the importance of building resilience in global supply chains to sustainably feed a growing population with healthy and affordable products, Asda has committed to:

- Developing climate resilience strategies with key suppliers.
- Improving worker access to cooling and hydration measures.
- Incorporating heat stress mitigation into our Just Transitions approach.

By proactively addressing these risks, Asda aims to ensure long-term sustainability and worker well-being.

VULNERABLE WORKERS

CASE STUDY

Remediating migrant worker recruitment fees – agricultural food supplier

Incident
During a routine ethical audit, a sample of migrant workers from Thailand disclosed that they had incurred significant recruitment fees before employment.

Response
A full investigation revealed that a large percentage of Thai and Vietnamese workers had paid excessive recruitment fees, covering flights, visas, permits, and training costs. Asda worked with the supplier to implement immediate remediation, and contributed towards the reimbursement of affected workers for fees, strengthening due diligence on recruitment agencies, introducing additional oversight on ethical recruitment practices.

Impact/Outcome
Building on our remediation efforts, Asda's 2025 objective is to transition from reactive remediation to proactive prevention in migrant worker recruitment. We are committed to working with suppliers to ensure they uphold ethical recruitment standards. By embedding these principles into our due diligence processes, we aim to create a supply chain where migrant workers are protected from exploitation and recruitment fees are eradicated at the source.

VULNERABLE WORKERS

CASE STUDY

Strengthening protections for Myanmar migrant workers

Incident
Due to escalating socio-political risk and documented threats of forced labour, the presence of Myanmar migrant workers in global supply chains raised significant human rights concerns in 2024.

Response
Asda required all suppliers employing Myanmar migrant workers to submit updated risk assessments, enhance grievance mechanisms, and confirm compliance with ethical recruitment standard.

Impact/Outcome
Formal supplier communications were issued in August 2024, ensuring all suppliers took immediate steps to protect migrant workers and prevent recruitment-related exploitation. This reflected Asda's broader shift toward risk-based, migrant-sensitive due diligence.

VULNERABLE WORKERS

CASE STUDY

Feasibility of the employer pays principle (Tuna processing and UK agriculture)

Incident

Asda co-funded two studies into the implementation of responsible recruitment practices and the Employer Pays Principle within the tuna processing and UK agriculture sectors. The studies worked across retailers, suppliers, producers, civil society, industrial bodies and governments to understand the challenges faced across the industry when trying to work towards the 'true' cost of recruitment. The reports make recommendations for buyers, suppliers and industry bodies.

Response

Whilst Asda sponsored this work, for it to be impactful we need to work collectively as an industry. As such in 2025 we are working to communicate the study, it's findings and associated action plan to the industry in order to increase awareness of these issues and increase our ability to drive impact in improving recruitment practices. As part of ongoing efforts to promote ethical recruitment, Asda also supported a feasibility study commissioned by DEFRA and the Seasonal Worker Scheme Taskforce, exploring the implementation of the Employer Pays Principle (EPP) in the UK horticulture sector.

Impact/Outcome

Assessing the potential economic and welfare impacts of employers covering recruitment costs instead of workers and sharing the pass-through of labour costs across the supply chain in order to help shape future policy and ensure worker welfare remains a priority.



TRAINING

Awareness of Human Rights and Modern Slavery in particular, continues to increase, and the interest in the actions we take as a responsible retailer from our customers, NGOs, investors and others emphasises the need for us to continue with our actions to mitigate our risks.

We also seek to ensure that the actions we take as a business have meaningful impact, from ensuring we look to prioritise and focus on our biggest risks to the equally valuable impact we can have to support survivors, rightsholders and the communities around our business and supply chains.

TRAINING COMPLETION OVERVIEW*



2,143
TOTAL COLLEAGUES
ASSIGNED TO TRAINING

94% **COMPLETION RATE**
Of all colleagues

This training was delivered across multiple key areas of the business, ensuring comprehensive coverage and engagement. Training completion was distributed as follows:

738
Colleagues completed the training
ALS (Asda Logistics Services)

643
Colleagues completed the
Home Office training

631
Colleagues completed their
Retail training

AT THE TIME OF WRITING



4%
COLLEAGUES
Were actively completing their training

2%
Colleagues were identified as yet to start their training



*These training figures represent total training figures from 1 January 2024 to 31 December 2024.

This high completion rate and broad engagement highlights our commitment to embedding awareness of Modern Slavery risks throughout all areas of our operations, from logistics and retail to corporate functions and fostering a well-informed workforce dedicated to mitigating risks of Modern Slavery. Asda will continue to expand and tailor training initiatives to meet the needs of each business area and ensure every colleague is equipped to uphold our ethical standards and aim to achieve full participation and will continue to provide resources to ensure all colleagues are equipped to contribute to this critical effort.

HUMAN RIGHTS TRAINING

Asda is committed to enhancing knowledge and capability across our operations and supply chains to align with our Human Rights strategy. Our aim is to implement targeted training initiatives that address key risks and empower colleagues, suppliers, and workers with the tools to drive meaningful change.

Human Rights Training for Commercial, Sourcing, and Technical Teams

We aim to empower buyers, sourcing teams, and technical colleagues to engage suppliers confidently on human rights issues, to strengthen understanding of risks, including forced labour, discrimination, and unsafe working conditions and to provide practical tools and guidance on responsible purchasing and risk mitigation.



EMPOWERING SUPPLIERS THROUGH STRATEGIC PARTNERSHIPS

At Asda, we believe that collaboration is key to building a future where every worker is treated with dignity, fairness, and respect. We are proud to sponsor and actively support two of the most impactful initiatives in the fight against modern slavery and labour exploitation – Stronger Together and the Responsible Recruitment Toolkit.

Our sponsorship reflects a deep and sustained commitment to creating safer, more transparent supply chains and empowering our suppliers with the tools, training, and guidance they need to embed ethical practices at every stage of the recruitment journey.

These programmes are more than partnerships – they represent a shared mission to eliminate forced labour, promote responsible recruitment, and foster cultures of continuous improvement across global supply chains. By championing these efforts, we help to equip businesses with the skills to identify risks, respond effectively, and engage with workers in a way that is inclusive, responsible, and just.

Stronger Together provides business-led, impact-driven solutions that help organisations prevent modern slavery through practical training and collaborative resources. The Responsible Recruitment Toolkit supports businesses in embedding ethical recruitment practices through structured assessments, guidance, and capacity-building.

Through these collaborations, we are investing in long-term, systemic change – because real impact happens when businesses come together, not just to comply with ethical standards, but to lead with integrity.

We are proud to stand alongside other committed organisations in advancing a global vision: a world where all work is fair, and no worker is exploited.

awareness

At Asda we share an important role in continuing to raise awareness of human rights impacts. In 2024, Asda deepened its commitment to tackling exploitation in high-risk labour sectors, including construction, warehousing, logistics, and GNFR.

We appreciate that the complexity and diversity of GNFR supply chains, makes them difficult to approach, but that awareness is the first step in affecting real and lasting transformational changes to perceptions and approaches in these sectors. We worked in partnership with SafeContractor and Matrix to enhance supply chain due diligence in two areas of saliency risk within our GNFR supply chains.

Both initiatives focused on identifying recruitment risks, improving supplier accountability, and ensuring ethical labour practices across subcontracted and temporary workforce operations.

SafeContractor: Addressing Exploitation in the Construction Sector

In September 2024, Asda participated in the SafeContractor Modern Slavery Risk Awareness Event, reinforcing its commitment to tackling forced labour risks in construction – a sector vulnerable to complex subcontracting chains and temporary labour exploitation. Proactive Risk Awareness – Encouraging businesses to identify and mitigate forced labour risks before they escalate. Transparency and Reporting – Advocating for stronger supplier disclosure requirements and due diligence measures and remediation and Support – Strengthening industry partnerships to ensure exploited workers receive access to justice and recovery support. By engaging with policymakers, suppliers, and corporate peers, Asda is committed to raising ethical standards in the construction supply chain, aiming to ensure that due diligence extends beyond direct suppliers to subcontracted workers and labour providers.

Matrix Labour Provider Event: Ensuring Ethical Recruitment in Temporary labour

In October 2024, Asda joined the Matrix Labour Provider Event, which focused on improving recruitment due diligence across temporary and high-risk labour supply chains. 5,557 temporary workers monitored for compliance with ethical recruitment standards, 1,919 Modern Slavery risk assessments conducted through Matrix's worker data verification system and 93 audits completed, ensuring that all labour providers met Asda's ethical sourcing requirements. Matrix's data-driven approach to risk assessment helped Asda flag potential exploitation risks early, ensuring proactive intervention and supplier accountability. Asda is enhancing its oversight of high-risk labour supply chains, reinforcing supplier accountability, and ensuring that workers across temporary and subcontracted sectors are protected from exploitation and will continue to define scope within a number of high-risk sectors and industries.

GNFR

2024 OBJECTIVE

To clearly define and consult on the scope of GNFR within Asda's human rights and modern slavery programme, with a focus on identifying high-risk categories, engaging internal and external stakeholders, and establishing a prioritised roadmap for enhanced due diligence, supplier accountability, and worker protection across all relevant GNFR sectors.

Decent Work

CASE STUDY

Anti-Slavery Week Event – Strengthening Business-Led Survivor Support

In October 2024, Asda hosted an Anti-Slavery Week event, in collaboration with Stronger Together, bringing together businesses, law enforcement, and survivor-focused organisations to explore effective remediation strategies for survivors of Modern Slavery. The event, raised awareness of Modern Slavery risks and how businesses can proactively support survivors, shared best practices on trauma-informed responses in corporate settings and engaged businesses in discussions on their responsibility for survivor remediation. Attendees benefited from insights into regional Modern Slavery trends from West Yorkshire Police and shared learnings from the Trauma-Informed Code of Conduct (TICC) where Modern Slavery Core Outcome Set (MSCOS) shared learnings from the Trauma-Informed Code of Conduct (TICC).



COLLABORATION AND PARTNERSHIPS

At Asda, we recognise that combating Modern Slavery and promoting Human Rights cannot be achieved in isolation. Effective partnerships and collaborative initiatives are critical to driving systemic change, sharing best practices, and amplifying our impact across supply chains. In 2024, we actively engaged with industry partners, NGOs, and government bodies to strengthen our efforts in safeguarding workers' rights.

COLLABORATING THROUGH THE SEASONAL WORKER SCHEME TASKFORCE

As a founding sponsor of the Seasonal Worker Scheme (SWS) Taskforce, Asda is committed to safeguarding the rights of seasonal workers and fostering responsible recruitment practices within the UK horticulture sector. In 2024, the Taskforce made significant progress, thanks to the collaboration of 120 participants from 65 organisations, including retailers, growers, and Scheme Operators.

Key Achievements in 2024

- Delivered six regional grower roadshows and train-the-trainer sessions, reaching over 700 delegates and improving awareness of worker entitlements and risk mitigation strategies.
- Expanded the Just Good Work app, empowering over 52,000 jobseekers and seasonal workers with critical information about their rights and access to support.
- Initiated the Independent Seasonal Worker Survey, providing ongoing insights into workers' challenges to inform actionable improvements.
- Advanced the Responsible Recruitment Progress Assessments (RRPAs) to help Scheme Operators identify gaps and drive improvements in recruitment practices.
- Collaborated with government bodies, submitting key policy recommendations to promote systemic change in the Seasonal Worker Scheme.
- EPP feasibility study?

CASE STUDY

Colleague Advisory Panel – Strengthening Worker Voice

In August 2024, Asda launched its Colleague Advisory Panel to enhance employee representation and ensure colleagues have a structured platform to voice concerns and provide feedback. The panel brings together representatives from Trade Unions, Colleague Voice groups, and Inclusion Networks, creating a direct channel to Asda's Executive Team. Meeting three times a year, the panel serves as a formal mechanism for engagement, enabling colleagues to contribute to decision-making and shaping workplace policies that reflect their experiences and needs.

LOOKING AHEAD

By actively supporting the SWS Taskforce, Asda demonstrates its dedication to collaboration and continuous improvement, driving meaningful change to protect vulnerable workers.

These efforts will be underpinned by enhanced engagement with government bodies to ensure every seasonal worker's rights are safeguarded.

The Taskforce will continue its mission by expanding its worker surveys, delivering new cultural awareness and inclusion training, and rolling out findings from the Employer Pays Principle Feasibility Study.

2025



Just Good Work APP

We supported the further development and outreach of the Just Good Work App, a digital tool providing workers with information about their rights, entitlements, and support services throughout their recruitment and employment journey. By the end of 2024, over 52,000 jobseekers had accessed the app, an increase of 18,500 users compared to the previous year.

COLLABORATION WITH THE CENTRE FOR CHILD RIGHTS AND BUSINESS (CRIB)

In 2024, Asda commenced a new partnership with The Centre for Child Rights and Business (CRIB), reinforcing our commitment to advancing child rights and improving worker well-being across global supply chains.

Child labour remains a key focus of Asda's human rights work. In 2025, we will continue leveraging CRIB's expertise alongside tools and specialist support to strengthen child labour prevention, risk identification, and remediation efforts across our supply chains.

THE CENTRE
FOR CHILD RIGHTS AND BUSINESS

CASE STUDY

Child Labour allegations in Madhya Predesh, India

Incident

We were contacted by an investigative organisation called Transparentem regarding allegations within cotton farms in the Madhya Pradesh region of India. Allegations focused on the sourcing operations of a spinning mill within Asda's supply chain and included allegations of child labour, debt bondage, wage violations and abusive practices. Subsequently Transparentem have released their findings: From Field to Fabric: Enhancing Due Diligence in Cotton.

Response

Although the cotton provided to the George clothing business was not sourced from the farms within the study, we have continued to engage in this initiative to understand more on this important topic, how it ties into our Saliency work and on-going market strategy. Central to this is our support of The Fair Labour Association and the India: Harvesting the Future – Cotton India Initiative, which aims to deliver three main goals: Strengthening Human Rights Due Diligence, improve living and working conditions and continued and enhanced stakeholder engagement. India is a strategic market for George and is key to our business and understanding of risk.

Impact/Future Commitment

We will also integrate insights from Transparentem investigations and case studies to refine our approach, ensuring that remediation is effective, sustainable, and child-centred. By embedding these initiatives into our business processes, we reaffirm our commitment to transparent, responsible supply chain management that prioritises the rights and well-being of children and vulnerable workers.



In addition to our direct partnerships, Asda engaged in several charity, industry and multi-stakeholder initiatives, including:

Fairtrade has a vision of a world in which all producers enjoy secure and sustainable livelihoods, fulfil their potential, and decide on their future.

Slave Free Alliance support organisations in working towards slave-free operations and supply chains. Part of Hope for Justice's portfolio of preventing exploitation, rescuing victims, restoring lives, and reforming society across five continents.

Stronger Together is an impact driven, not for profit organisation providing businesses with practical training, resources, business services and collaborative programmes to create a world where workers are recruited responsibly and have fair work free from exploitation.

RRT is a not-for-profit, global programme whose mission is to drive ethical and professional recruitment and labour supply that's good for workers, recruiters and clients.

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGO's that promotes respect for workers' rights around the globe and enables the members to collectively tackle issues that cannot be addressed by individual companies working alone.

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

IDH convenes, co-creates, and co-finances inclusive and sustainable solutions that enable people in business, investment, and government to create value for people and the planet.

Food Network for Ethical (FNET) is a collaborative initiative aiming to use collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage, and horticulture supply chains by providing guidance, resources, training, and collaboration.

The British Retail Consortium (BRC) are in place to make a positive difference to the retail industry and the customers it serves.

By working together with our partners, Asda aims to drive meaningful change and create safer, fairer working environments for all.

Foros Comercio Ético
Ethical Trade Forums

The Spanish Ethical Forum provides a platform for agri-food supply chain members in Spain to exchange experiences and best practices on labour issues. It also supports supplier learning and capacity building through grower-led working groups, practical tools, and tailored solutions to key labour challenges.

Sedex

Sedex is a data platform used to provide data-driven insight, tools, and services to help companies continuously improve environmental, social and governance (ESG) outcomes.

SEAFOOD ETHICS ACTION ALLIANCE

The Seafood Ethics Action Alliance (SEAA) is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights.

NIRAPON

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

fast forward
Building sustainable supply chains

Fast Forward is a not-for-profit, next generation labour standards improvement programme operated by the not-for-profit Stronger Together. Fast Forward uniquely combines a proven forensic auditing methodology with a collaborative beyond audit programme to support suppliers and brands to continuously improve.

BetterWork

Better Work is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect of labour rights for workers and boost the competitiveness of apparel business.

WEST YORKSHIRE
ANTI-SLAVERY
PARTNERSHIP

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

ALLIANCE
FOR BANGLADESH WORKER SAFETY

The Alliance works to enhance safety in garment factories by addressing fire, building, and electrical hazards, and empowering workers.

Remediation and supporting rightsholders and communities

At Asda, we recognise that effective remediation is essential to restoring dignity and upholding the rights of individuals impacted by Modern Slavery and Human Rights violations. Our approach is not just about addressing immediate harm but about empowering individuals to rebuild their lives with agency and autonomy.

Central to our strategy is meaningful dialogue with affected individuals and key partners to ensure that remediation efforts are informed, sustainable, and tailored to the needs of survivors. By collaborating with expert organisations and implementing worker-centred solutions, we prioritise access to remedy, long-term support, and pathways to sustainable futures. Through partnerships, innovative programmes, and ongoing engagement, we remain committed to ensuring that survivors' voices are heard, their choices respected, and their futures safeguarded.

Whistleblowing Mechanism

94%
of cases have been closed

Our Ethics team maintain a confidential whistleblowing channel for colleagues, suppliers, and other stakeholders to report concerns related to any issue they may wish to report. It is a requirement of doing business with Asda, that this information is present within our supply chain locations, and all Asda offices, operational sites and stores.

94% of cases have been closed, reflecting Asda's drive to suitably resolve reported issues. A small number remain under investigation or review (14 cases combined). Every report received through our Ethics Line is handled with the utmost respect and confidentiality. Our approach focuses on timely resolution, fair remediation, accessibility and support and continuous learning with the individual reporting the issue at its core.

Although most issues are categorised as Low Severity (665 cases), with only a few marked as Critical (1 case) or High Severity (25 cases). Instances of Human Rights impacts and Modern Slavery indicators are received via this channel and are supported by our Responsible Sourcing and Human Rights teams. Outcomes can vary, depending on the required approach, but there always focused on protecting rightsholders, assessing root causes, bringing about improvements to process, policy and procedures and, as required, remediation.

CASE STUDY

Concession partner – Modern Slavery incident

Incident
In 2024, Asda's grievance mechanism played a vital role in uncovering and addressing an exploitation case that impacted one of our colleagues and their spouse. This case exemplifies the power of robust and trusted grievance mechanisms to drive meaningful change and underscores our commitment to supporting individuals in need.

An Asda colleague came forward to report that their spouse, employed and sponsored by a franchisee manager at one of our food concessions, had been subjected to exploitation. They claimed to have paid over tens of thousands of pounds in recruitment fees and debts to enable them to take up the employment opportunity. The situation caused significant emotional, financial, and physical harm to the family.

Response
Asda acted swiftly to support the family and address the issue:

- Immediate Support: Collaborated with the Salvation Army and Justice and Care to facilitate the family's relocation and rehabilitation, ensuring they had access to critical resources and ongoing guidance.
- Collaboration with Authorities: Worked with Police, charities, and other stakeholders to support investigations into the franchisee's practices, ensuring accountability.
- Remedy: Facilitated dialogue between the family and the franchise operator, to ensure remediation was central to expectations and discussions.
- Empowerment and Independence: Supported with relocation and ongoing employment for the Asda colleague and worked to ensure that both individuals have were positioned to secure stable employment.

Outcome/Future Improvement
Driving Systemic Change – In addition to providing immediate support, Asda engaged with the concession owners to review recruitment practices and ensure they aligned with our Standards for Suppliers and the United Nations Guiding Principles on Business and Human Rights.

This included:

- Enhanced oversight of franchisee recruitment processes.
- Ongoing monitoring and support to drive continuous improvement.

Asda also focused discussions on remediation and restorative dialogue with the impacted parties at its core and in partnership with Slave-Free Alliance, Asda will focus on capacity building for concession partners, franchisees, and key stakeholders. We aim to develop targeted training to improve awareness of recruitment risks and ethical hiring practices, enhance due diligence mechanisms to detect and mitigate forced labour risks, and strengthen supplier engagement, ensuring franchisees and concession operators uphold ethical recruitment and worker protection standards.

By integrating preventative measures, ongoing support, and strong remediation frameworks, Asda remains committed to eradicating exploitation from our supply chains and protecting vulnerable workers.

Our Commitment to Remediation
This case highlights the importance of grievance mechanisms in empowering individuals to seek justice. At Asda, we remain committed to ensuring every person within our business and supply chains is treated with dignity and respect. By listening to and acting on grievances, we aim to provide lasting solutions that restore hope and create opportunities for rightsholders.

CASE STUDY

Community impacts

In 2024, a historic petrol station leak near our Bramley store created significant environmental and community challenges. Asda worked closely with Environmental Agencies, utility providers, and local stakeholders to understand the impact, causality, and necessary remediation steps.

Through collaboration with the Environment Agency and Environmental Protection Society, we implemented targeted measures to address contamination and mitigate risks:

- Groundwater and Vapour Treatment – Advanced pumping and filtration systems were deployed to remove fuel from the water table and safely treat petrol vapours, achieving positive early results.
- Utility Infrastructure Remediation – Partnering with Thames Water and Openreach, we conducted thorough clean-ups in utility trenches, ensuring contamination was addressed at its source.

These efforts have been recognised for their effectiveness and commitment to environmental restoration.

Community and Business Support – Understanding the disruptive impact on local residents and businesses, we prioritised engagement and support:

- Over £500,000 invested in community projects to rebuild trust and resilience.
- Financial assistance for affected businesses through the Bramley Business Support Scheme.
- Direct support for 621 households impacted by interruptions to drinking water, including compensation and essential provisions.

Transparency and Ongoing Engagement – Recognising the importance of open dialogue, Asda maintained regular communication with the community through newsletters, public meetings, and direct engagement. This included an in-person meeting with Asda's then-Chairman, to hear community concerns first-hand.

This incident reaffirmed our commitment to responsible business practices, transparency, and community collaboration. By focusing on remediation, supporting those impacted, and working closely with stakeholders, we continue to align with our obligations under the UN Guiding Principles on Business and Human Rights, ensuring we act responsibly and proactively when challenges arise.

Causeway – Ingredients for Life

Since 2019, Asda's partnership with Causeway on the Ingredients for Life (IFL) programme has provided survivors of Modern Slavery with essential cooking and life-skills training, helping to build confidence, resilience, and community connections. With Asda's seed funding and ongoing support, IFL has delivered multiple courses across supplier sites, including Greencore, Forza, and Compleat Food Group.

This initiative is not just about equipping survivors with practical skills – it plays a crucial role in helping Asda and its suppliers better understand the challenges survivors face and how businesses can support their long-term recovery and independence. By engaging directly with survivors, we foster a more informed and empathetic approach to ethical sourcing and responsible business practices.

Programme Impact
In 2024 a total of 23 survivors participated in a series of six courses, with measurable improvements in confidence, social interaction, and employability. Some participants have even gone on to secure roles in hospitality, including one who became a sous chef.

Participant feedback highlighted:

- Confidence & Social Skills: 30-50% improvement in self-confidence, social interaction, and comfort in group settings.
- Cooking & Well-being: 30-60% increase in cooking confidence and skills, with some participants doubling their use of cooking as a way to relax.
- Overall Satisfaction: High ratings (4-5 out of 5) for course structure and delivery.

One participant shared:

> Thanks to all who supported me in this and gave me the opportunity to do this course, it gave me a great chance of meeting others, learning in a group and learning how to socialise.

Participants valued the social connections and hands-on learning the programme provided, with many expressing interest in more sessions and advanced cooking lessons. Asda remains committed to supporting survivors but also to build awareness and understanding within our business and supply chains about how we can create safer, more inclusive opportunities for those rebuilding their lives.

Causeway's Life Supply Programme
Provides essential support to survivors of modern slavery, helping them rebuild their lives through access to basic necessities, financial aid, and long-term rehabilitation resources. The programme focuses on empowering survivors with stability, dignity, and opportunities for independence, ensuring they have the tools to transition into safe and sustainable futures.

We are incredibly grateful to the Asda team for their generous contribution to our LifeSupply department. Over the course of 40 hours, their staff volunteered their time and expertise to help us in numerous ways, including photographing items for our new platform, packing orders for our service users, and organising our storage unit. Their dedication, kindness, and positive attitude made a significant impact on our ability to deliver vital support to survivors of Modern Slavery and trafficking.

Thanks to Asda's hands-on assistance, LifeSupply is on track to meet its goal of supporting at least 400 survivors this year.

In addition to their volunteer efforts, Asda also donated over 1,500 items of brand new George clothing, including coats, shoes, and children's and adult clothing, worth more than £14,000. This generous donation will make a lasting difference to the lives of many of our service users.

The commitment shown by the Asda team to support survivors of Modern Slavery, both within their professional capacity and in their volunteer work, is truly commendable, and we are fortunate to have such a dedicated partner in our mission to support vulnerable people.

Thank you, Asda, for your unwavering support in helping us make a real difference.









APPENDICES

APPENDIX 1.
ABOUT OUR BUSINESS

With roots dating back to a Yorkshire family business in the 1920's, the first Asda officially opened on 3 May 1965. Today, Asda today employs more than 132,149 permanent colleagues across its stores, depots, home offices in Leeds and Lutterworth and wholly owned subsidiaries including IPL, Forza, Kober and LEON.

Asda's primary operations include the sale of groceries, general merchandise, fuel, as well as clothing and homeware through George at Asda. It also offers a host of other services including Asda Mobile, Asda Money, pharmacy, and optical services.

As well as 610 superstores, supermarkets and Asda Living Stores across England, Scotland, Wales and Northern Ireland, Asda has a significant footprint in the fast-growing convenience and food service markets with 478 Express stores and 384 food service restaurants, including 53 LEON sites. The supermarket's online service also delivers to 99.5% of the UK population.

Asda
is a diversified retail group serving circa 16m customers each week from over 1,200 UK locations and online.

APPENDICES

APPENDIX 2. 2025 OBJECTIVES

OBJECTIVE AREA	2025 OBJECTIVE	SALIENCY RISK THEME	SUGGESTED PRIORITY LEVEL
Ethical Recruitment & Migrant Workers	We are reviewing the implementation of the principles that support the responsible recruitment of migrant workers.	Vulnerable Workers	HIGH
Supply Chain Transparency	Expand the integration of supply chain data – TISC use to strengthen supplier accountability and risk identification.	Modern Slavery	MEDIUM
Supply Chain Transparency	Share the findings of our Landscape Assessment in to meat and poultry supply chains whilst expanding the disclosure of this supply chain beyond Tier 1 to Tier 2 and Tier 3.	Vulnerable Workers	MEDIUM
Training & Capability	Assess the training needs of Commercial, Sourcing and Technical Teams around the topic of Human Rights.	ALL	HIGH
Training & Capability	Implement harassment training to address gender-specific risks in supply chains.	Gender	MEDIUM
Due Diligence	Expand mandatory pre-onboarding risk assessments for GNFR suppliers and define and consult on the scope of GNFR suppliers.	Modern Slavery	HIGH
Remediation & Support	Develop capacity-building training with Slave-Free Alliance for franchisees and concession partners.	Vulnerable Workers	MEDIUM
Child Labour Prevention	Strengthen child labour prevention via partnerships and collaboration on Saliency themes.	Modern Slavery	HIGH
Recruitment Practices	Communicate the outcomes of the Employer Pays Principle findings in tuna processing sector recruitment and Seasonal Workers Taskforce – Employer Pays Principle Feasibility Study, including any associated action plan.	Vulnerable Workers	MEDIUM
Supply Chain Transparency	Instruct all suppliers to disclose in-scope sites to Open Supply Hub and claim their sites, ensuring data accuracy and ownership.	Modern Slavery	HIGH
Due Diligence	Strengthen supplier due diligence for high-risk commodities (such as tomatoes or paprika) by Geography – issuing targeted guidance to all suppliers of such components.	Modern Slavery	HIGH

ASDA

For inquiries about our Modern Slavery statement or programme, please contact our Modern Slavery team.

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