

Supplier Modern Slavery Policy

What's it about?

This policy makes sure all Asda suppliers are aware of our requirements in relation to the issue of Modern Slavery.

Foremost, our requirements are in place to ensure that as a responsible business we are directly addressing the risk of the occurrence of Modern Slavery in our business and supply chains. In addition, this ensures Asda's compliance with the

Modern Slavery Act 2015, and supports both our annual reporting requirements under Section 54, Transparency in Supply Chains, and our purpose, to bring brighter living within everyone's reach.

This policy applies to all suppliers of the Asda business and their extended supply chains across Goods for Resale (GFR) and Goods Not for Resale (GNFR).

Introduction

Modern slavery refers to situations of exploitation in which a person cannot refuse or leave because of threats, violence, deception, debt bondage or abuse of power. It is an umbrella term and includes human trafficking, forced labour, child labour and forced marriage. It is a global issue, figures estimate around 49.6 million people were living in modern slavery in 2021, of which 27.6 million were in forced labour¹

Modern Slavery - If you believe there is an immediate risk to life/safety call 999 reporting to the Police. To report other concerns/suspicious activity relating Modern Slavery you can report via the **UK Modern Slavery Helpline** by calling **08000 121 700** or reporting online [here](#).

Asda's business and our global supply chains are diverse and complex, and ensuring we are doing everything we can to mitigate risks of modern slavery and human trafficking is essential to the dignity of workers in our supply chain.

With ever increasing pressures on global supply chains and labour shortages, we have seen increased risk of incidents of modern slavery. To address these risks, we have taken a number of steps to understand the root cause and mitigate the risk, including the establishment of specific policies and procedures relating to modern slavery, more information on these can be found in our [Modern Slavery Statement](#).

At Asda, the forms of Modern Slavery that may be most likely to be found within our business and supply chains are forced and child labour. Modern Slavery can impact any area and any level of the supply chain. Within our supply chains, forced labour risks have been identified across different areas of our business from carrying out our Salient Risk data review exercise (list is not exhaustive):

- Garment manufacturing (UK)
- Meat and poultry processing
- Seafood processing
- Citrus fruits (Europe, Africa & South America)
- Car washes (UK)
- Temporary labour
- Waste processing

¹ [International Labour Organisation \(https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm\)](https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm)

All Suppliers will:

- Comply with the UK [Modern Slavery Act 2015](#)
- ^{If²} required by the Modern Slavery Act 2015, an organisation must ensure compliance with [Section 54 'Transparency in Supply Chains'](#) public reporting requirements.³
- not knowingly enter into business with any organisation who is supporting, or is found to be involved in any form of Modern Slavery, including: slavery, servitude, involuntary prison labour and forced, compulsory labour or child labour.
- Identify and address Modern Slavery issues, implement best practice on Modern Slavery and Human Rights within their business and supply chains.
- be transparent and report about issues (where permitted by authorities) relating to Modern Slavery that occur in relation to the products and services provided to Asda.
- be aware of the [indicators of Modern Slavery](#), taking proactive measures to reduce the risk of incidents occurring, making your workforce aware of them and manage incidents appropriately when they occur.
- have a robust incident management process in place to ensure incidents are managed effectively and consistently, ensuring that any victims and those affected by Modern Slavery issues are appropriately safeguarded.
- enable confidential reporting of Modern Slavery issues by having a suitable grievance mechanism in place.
- have stringent policies in place which set out their expectations of their own operations and supply chain, in the prevention and/or mitigation of Modern Slavery issues.
- have a mechanism in place to allow remedy to be implemented when remediation is required.
- Recruit Responsibly: Abiding by the [Employer Pays Principle](#) which sets out that no worker (including migrant workers) should pay for work (based on the [ILO definition of recruitment fees](#)). The cost of recruitment should be borne by the employer, we expect:
 - the employer to cover any costs and/or fees associated with recruitment, travel and processing of migrant workers from their home country to their place of work (including through to return when the relocation is not permanent);
 - Migrant workers to be provided with a contract which is understandable and accurate, prior to travel from their country of origin;
 - labour providers to be held to the same standards and allow workers freedom of movement without restrictions, support workers in the recruitment process and comply with all applicable laws, regulations and industry requirements;
 - suppliers to have an explicit and transparent recruitment policy that commits to no charges of recruitment fees and related costs to workers, irrespective of where or how they are recruited, and a clear understanding of the processes and costs associated with recruitment, and where possible, understand where workers have outstanding debts as a result of recruitment prior to their employment with you;
 - suppliers to have understood and identified where recruitment fees and related costs may be occurring and have developed an action plan to address these, including historic fees;

Sanctions

Asda does not tolerate any form of Modern Slavery and any breaches of this policy will be investigated thoroughly. Asda will work with suppliers to find ways to remediate Modern Slavery issues where possible and provide support to enable this. Should there be circumstances where suppliers are resistant to mitigation and or improvement Asda may take actions from the delisting of products to in the very worst case, terminating business with a supplier.

²Turnover exceeds £36m. ³Statements must be: published within six months of the previous financial year close; on a business corporate homepage in a prominent position; signed by a Director or Board as appropriate and cover the previous financial year.

Frequently Asked Questions

Q: Our turnover does not exceed the turnover threshold required by legislation to publish our own Modern Slavery Statement, does Asda still require this?

A: We strongly encourage suppliers that are not in excess of the turnover² threshold that requires reporting, to consider doing so anyway, as the process of reporting will help you look at where there may be risk within your own business and supply chains. In addition, demonstrating that your business has taken steps to understand and address its own risks in relation to Modern Slavery would be viewed positively by existing and prospective clients and investors. A published Modern Slavery Statement is designed to improve transparency and vigilance within businesses and their supply chains. Modern Slavery Statement Modern Slavery risks are much closer to home than you may realise. Benefits to businesses of tackling modern slavery include:

- Improved brand recognition
- Positive business reputation
- Increased sales and customer loyalty (increasingly consumers seek businesses with higher ethical standards)
- Greater ability to attract talent and retention
- Organisational growth
- Improved investor confidence
- More responsive and stable supply chains

Q: We are a Small Medium Enterprise and haven't considered our risks relating to Modern Slavery, and we don't know where to start, can you help?

A: Yes, Asda has supported the development and launch, through our membership of Stronger Together, a specific and free to access [toolkit](#) aimed at SMEs to help provide the tools and resources to help support you.

Useful Resources

All Suppliers:

[Ingredients for Life](#) – is our programme developed in collaboration with the charity [Causeway](#), to aid the recovery and boost the confidence of survivors of modern slavery. For more information, please email ifl@wearecauseway.org.uk.

[Slave Free Alliance](#) - is a critical friend to organisations, supporting them to protect their operations, supply chains and people from modern slavery and labour exploitation. If suppliers experience issues relating to Modern Slavery, Slave Free Alliance can be contacted for limited free advice and guidance, without being a member.

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

Asda is a Sponsor of Stronger Together and through our membership suppliers can access:

- **Free** and discounted training places on Stronger Together workshops.
- **Free** access to the Progress Reporting Tool (PRT), a pioneering online self-assessment tool that supports companies globally to measure progress made in addressing modern slavery risks and to highlight improvement opportunities for their businesses and supply chains
- Regular communications including the Stronger Together UK and Training newsletters, complimentary webinars, and live demonstrations of available tools and resources.

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[Responsible Recruitment Toolkit](#) (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. Asda is a Sponsor of RRT, and through our sponsorship suppliers can access free benefits including:

- 'Full' level subscription on the RRT online tool; and
- unlimited places on RRT online training courses.

Apparel Suppliers:

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

Other Resources:

[Modern Slavery Act 2015](#)

[Asda Supplier Website](#)

[George Supplier Website](#)

For further information

For questions relating to this policy or **Modern Slavery** specifically contact ModernSlavery@asda.co.uk or Asda's Modern Slavery Subject Matter Expert – [Anna Smith](#), Senior Manager, Modern Slavery SME, Responsible Sourcing and Human Rights.

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