

M&S

EST. 1884

# MODERN SLAVERY STATEMENT

*2022/23*

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# INTRODUCTION FROM OUR CEO

This is M&S's eighth Modern Slavery Statement issued in accordance with the Modern Slavery Act 2015. It sets out the steps we have taken (and continue to take) as a business during year ending 1 April 2023 to prevent slavery and human trafficking in our own operations and supply chain.

At Marks and Spencer, doing the right thing is a core behaviour in our business. This means treating everyone fairly and with respect, taking a zero tolerance approach to discrimination and unacceptable behaviour and treating supplier partners fairly and as partners in our success. We understand the responsibility to prevent, mitigate and remediate, as understood and carried out in accordance with the responsibility to respect human rights under the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We recognise that modern slavery is a growing issue, and that global crises increase the risks of human trafficking and forced, bonded and child labour. Modern slavery can be more prevalent in situations where migrant workers are employed. People leaving their home countries for work can often find themselves lacking social support networks and knowledge of their rights

in the host country. The seasonal nature of agriculture work increases the risk of modern slavery as there is often a need for temporary labour during peak harvest periods. Workers may be subjected to excessive working hours, substandard living conditions and withheld wages perpetrating their vulnerability to exploitation.

Regions experiencing cross-border economic migration face unique challenges as when large numbers of people migrate for work it can put a strain on resources and support infrastructures, creating an environment where vulnerable workers can be exploited.

As we review risks across the Group, we are particularly alert to, and focused on, initiatives to identify and prevent modern slavery in seasonal workers and regions with cross-border migration.



As I complete my first year as CEO, I am committed to leaning into these challenges and working collectively with the industry to tackle the issue of modern slavery. We are actively working with the agricultural sector to convene the government and wider supply base, as well as our peers, to act together to manage the risks arising from labour shortages in the UK. For example, we have been instrumental in the development of the Seasonal Workers module of the "Just Good Work" app which gives workers their rights in their own language once arriving in country and has been downloaded 19,000 times already.

This year we have also made progress in strengthening our own approach, including:

- completing a review of our salient human rights issues at a country and sector level, with input from internal and external stakeholders;

- carrying our targeted due diligence into our UK and ROI Own Operations covering; Cleaning and Waste Management, Facilities Management, Security Guarding, Construction, Warehousing and Operations and Logistics.
- the continued roll out of worker voice technology across our Clothing & Home and Food supply chains; and
- further strengthening our governance with the introduction of the ESG Business Forum.

As was the case last year, we have scored ourselves against the IASC maturity framework, with its four clearly defined stages. We believe we remain in the "Evolving Good Practice" category, with some activity in "Leading on Human Rights Innovation".

Our commitment to our customers and stakeholders is very clear; we will always treat people in our business and supply chain fairly. Doing the right thing by the people who work with and for M&S is part of our DNA, and at the core of the trusted value our customers expect from us – now more than ever.

*Stuart Machin*

**Chief Executive Officer  
Marks and Spencer Group plc**

23rd May 2023

This Statement has been approved by the Board of Directors



# OUR BUSINESS

M&S operates as a family of businesses across Food, Clothing & Home and International, each led by its own integrated management team, with functional accountability for their divisions, including marketing, supply chain and finance.

We do this through a network of 1,064 stores, and over 100 websites globally. Across our stores, support centres, warehouses and supply chain, our 64,000 colleagues serve over 30 million customers each year.

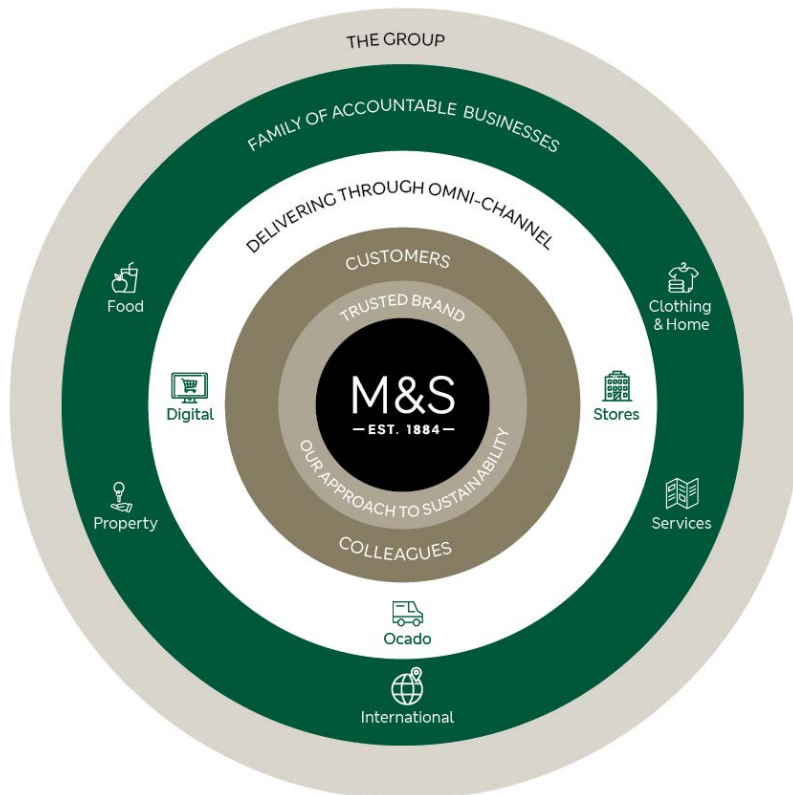
**Ocado** - M&S holds a 50% investment in Ocado Retail, a joint venture relationship between M&S and Ocado Group. Ocado Retail publishes a separate [Modern Slavery Statement](#).

**International** - We work with trusted partners to extend the M&S brand to markets around the world. This statement covers activity within our owned and JV International operations (Greece, Czech Republic - owned, and India - JV).

**Services** - M&S Bank is operated by HSBC. Due to the nature of their business, they report separately through HSBC.

**Brands** - In March 2021, we formally launched "Brands at M&S". To date, we have launched over 60 brands under owned, wholesale, consignment or collaboration models.

**Gist** - M&S acquired Gist, our principal Food logistics provider in July 2022. Gist will continue to report through their own [Modern Slavery Statement](#).



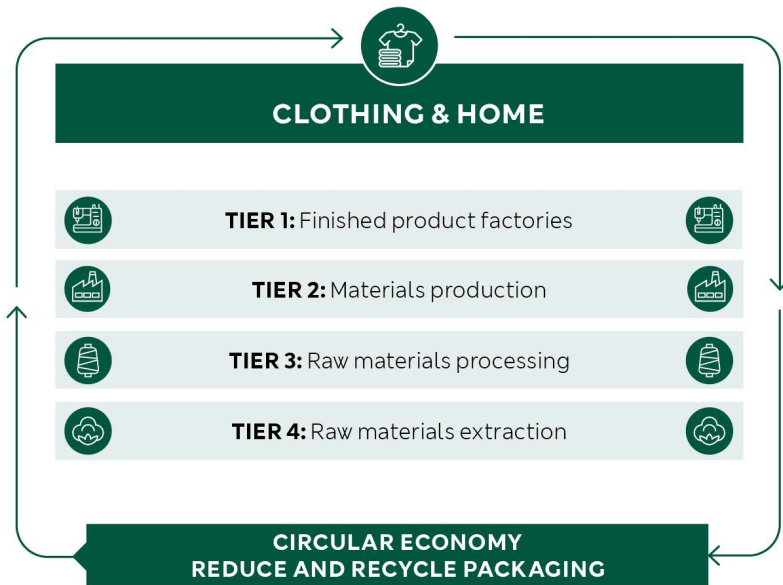


# OUR OWN LABEL SUPPLY CHAIN

We predominantly sell own-brand products, manufactured and marketed exclusively under the M&S brand. Our relationships with our supplier partners are built on trust with shared aims. We have three primary groups of suppliers: Food, Clothing & Home and Goods not for Resale (GNFR):

Reporting transparently on our own-label supply chain practices and operations is core to our approach to sourcing. We publish data within the [M&S Interactive Supply Chain Map](#), disclosing our Tier 1 supply chain across Food and Clothing & Home. This scope also includes some raw materials, including wool, man-made cellulosic fibres, beef, fish and seafood, dairy, tea and coffee, and is updated twice each year.

GNFR includes products and services we buy to run our business and covers Logistics, Operations, Marketing Technology, HR, Property, Facilities Management and Packaging. We have nearly 1800 GNFR suppliers, 80% of the money we spend is with the top 250 suppliers.





# POLICIES AND GOVERNANCE

We have several Group-wide policies in place that are relevant to modern slavery, all of which are signed off at director level. We continually review and develop our policies with input from in-house experts, suppliers and external stakeholders.

<u>Global Sourcing Principles</u>	First introduced in 1998, and extended to all suppliers and partners as of May 2016, these principles set out our minimum requirements and expectations of how we and our supplier partners conduct business to uphold human rights, labour environmental, ethical and legal requirements in their own operations and their supply chains. The Principles were updated in April 2022.
<u>Human Rights Policy</u>	States our commitment to respecting internationally recognised human rights in line with the principles and guidance contained in the United Nations Guiding Principles (UNGPs) on Business and Human Rights.
<u>Code of Conduct</u>	Sets a floor of minimum commitments for our business conduct. The commitments are focused on key policy areas affecting M&S, to ensure we act in line with relevant laws and regulations, industry standards and stakeholder expectations. The code applies to everyone at M&S, including our Board, our management team and all our colleagues, as well as those working in any joint ventures that we control and overseas sourcing offices.
Confidential Reporting Procedures	Aimed principally at our colleagues, but also available to others working in our supply chain, confidential reporting channels are managed by Safecall and concerns can be raised by phone or online in multiple languages. We are also strengthening our approach with digital solutions including worker voice feedback mechanisms.
<u>Grievance Procedure for Clothing, Home and Food Supply Chains</u>	Grievance mechanism to remedy adverse human rights impacts within the Food and Clothing & Home supply chains. The policy sets out how to raise a grievance and our recommended process for investigating and understanding concerns.

Our grievance policy was last updated in July 2022 and it is regularly reviewed to ensure it remains compliant with the [ACAS](#) Grievance Procedure and best practice. Whilst the review did not identify any immediate opportunities to improve the process, it did identify potential opportunities to use the data we gather in a more effective way to help guide decision making across the business.

## GOVERNANCE

Overall accountability for the Modern Slavery Statement and risk assessment process is held by the Executive Committee “ExCo”, chaired by the CEO, Stuart Machin. The report is also reviewed by the ESG Committee for content, the Audit Committee for internal controls, and ultimately approved by the Board.

To further enhance our alignment across our family of accountable businesses, our modern slavery working group includes representatives from each of the accountable businesses and support functions. The working group reports quarterly on progress to ensure business-wide alignment, monitor progress against our modern slavery commitments and identify any emerging risks.

You can read more about our governance structures in our [Sustainability Report](#).

# IDENTIFYING RISK AND PRIORITISING ACTION

Our annual modern slavery risk assessment is aligned with the M&S Group risk assessment process that considers external, internal and emerging risks and how these are mitigated.

It covers the business functions of Food, Clothing & Home, Retail & Property, International, and the support functions: Finance and Procurement, Digital and Technology, and HR. The Director of each business area and support function is accountable for their risk assessment and due diligence approach.

The manifestations of modern slavery are complex and hidden, so our risk assessment includes the following to enable us to prioritise activity:

- detailed mapping of supply chains and operations;
- desk-based research;
- data from our audit programmes;
- supplier surveys;
- supply chain due diligence;
- supplier engagement;
- discussions with expert stakeholders through multi-stakeholder initiatives.

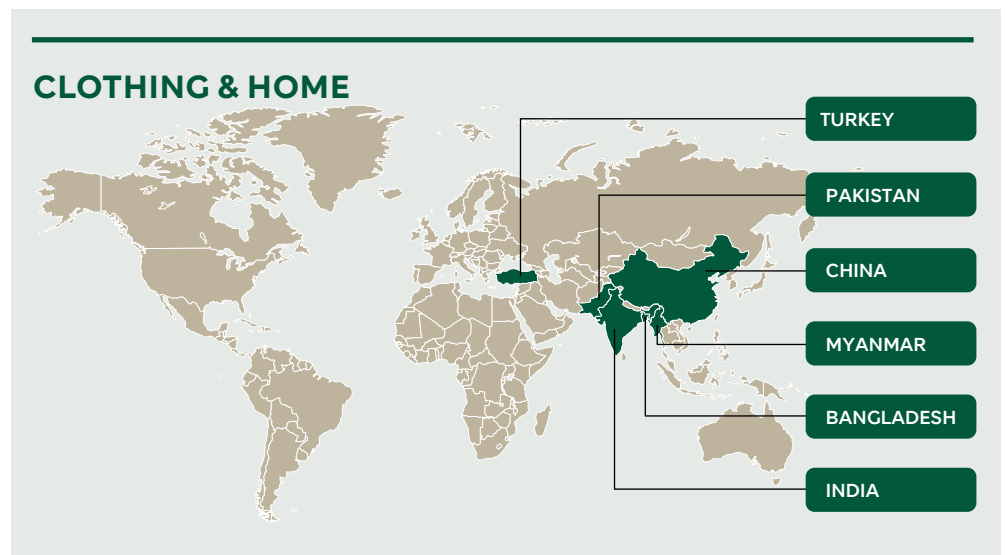
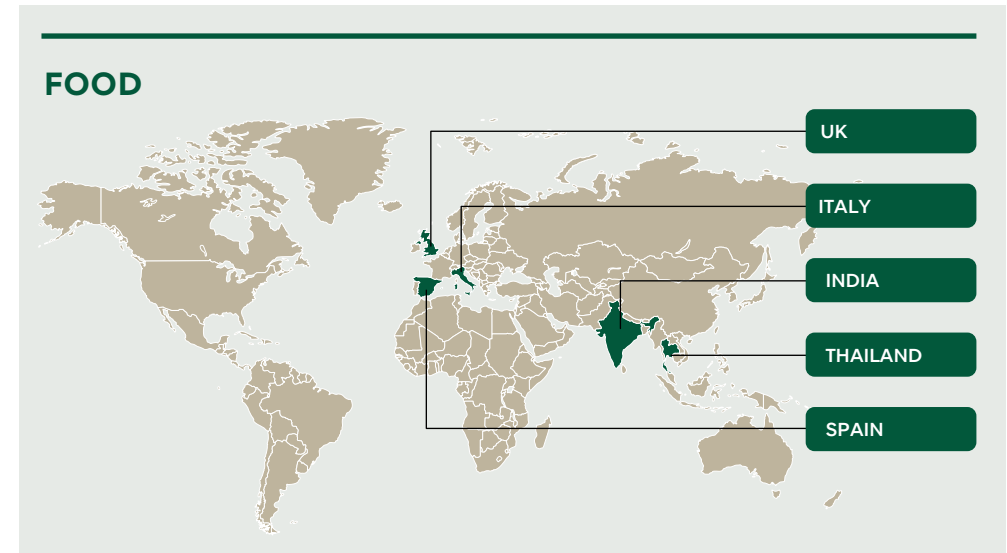
As a majority own-label business, our primary focus is on our Food and Clothing & Home supply chains, where, working closely with our trusted supplier partners, we are able to make the greatest impact. As part of our risk assessment process for these supply chains, we map our exposure

to high-risk areas with systemic risks in the areas of governance, security, human rights or environmental challenges. To identify the countries with the highest risk, we have used the following:

- the SEDEX Radar portal to understand country-level risks of forced labour;
- information and intelligence from our projects on the ground, and local knowledge from our Clothing & Home sourcing teams in our 10 sourcing offices;
- the Food Network for Ethical Trade (FNET) product-specific risk assessment to drill down to the specific ingredients and raw materials per country to identify if material to M&S;
- the information contained in a report titled “M&S Ethical Trade Risk Index 2023” based on country-level risk indicators and product-specific risk assessment, commissioned with an expert ethical consultancy; and
- information received through our memberships including Ethical Trading Initiative (ETI) and FNET.

This year we also carried out a review of our salient human rights issues, including detail at a country and sector level, with input from internal and external stakeholders. We completed the assessment in April 2023, and we have updated our group salient rights issues, you can read more in our [Sustainability Report](#).

In 2022/23 the following countries were identified as highest risk:





## IDENTIFYING RISK AND PRIORITISING ACTION CONTINUED

Our programmes are built on a robust foundation of compliance which allows us to monitor and track our supplier partner performance against our minimum requirements. You can read more about our approach on our [corporate website](#).

While we are confident that there continues to be a role for compliance and social audit programmes, we recognise their limitations in identifying instances of modern slavery. We will continue to explore modern slavery due diligence methodologies that complement our strong compliance foundation. Where possible, we are using technologies, such as worker voice apps, to allow us to reach further into our supply chains and hear directly from the workers impacted. You can read more about these programmes in our [Sustainability Report](#).

### FOOD AUDIT PROGRAMME

During 2022/23, we had 38 issues raised in relation to 'employment is freely chosen' (compared with 84 in 2021/22) 13 of these are closed and verified, with the remaining 15 related to contract wording related to voluntary overtime and deductions. Audits identified two potential instances of recruitment fees this year, one in the UK and one Thailand. We are working closely with our supplier in the UK on the investigation and with our supplier in Thailand on a detailed action plan.

### CLOTHING & HOME AUDIT PROGRAMME

During 2022/23, five non-compliances (compared with five in 2021/22), under "employment is freely chosen" were identified in SMETA audits. The findings related to forced labour indicators, for example compulsory overtime. For all audit non-compliances, we continue to work with the factory, and other brands where shared sites, with a plan to resolve the issue.





## IDENTIFYING RISK AND PRIORITISING ACTION CONTINUED

### REPORTING THROUGH OTHER CHANNELS

Any notifications of potential modern slavery issues and risks that are reported to us through other channels, grievance mechanisms, whistle-blowers or any other parties are thoroughly investigated and remediated where required.

In Foods, we have seen a growth in allegations, particularly with a focus on the seasonal workers scheme (see page 9). In 2022/23 we received 20 pieces of intelligence related to potential modern

slavery with 18 in the UK, 1 in Italy and 1 in Thailand. We have taken action on each case in conjunction with our suppliers and as a result 15 cases are now closed, with 5 pending further investigations and/or actions with the supplier. We also have seen increased awareness of the indicators of modern slavery amongst our suppliers, many of whom have referenced completing Stronger Together training. We continued to sponsor this training as this is key in spotting the signs and taking the appropriate steps to support potential victims.

RISK	INDUSTRY OR FACTORY LEVEL	SOURCE	MIGRATION / REMEDIATION ACTION
UK – Seasonal workers scheme	Industry	Collaboration and External stakeholders	Collaborative action with SWS Taskforce
UK – agency worker with indicators of modern slavery	Factory	Direct supplier contact	Support supplier to engage with GLAA and law enforcement
UK – potential community exploitation	Factory	Modern Slavery Helpline	Site visit to identify issue and worked with site to resolve
Thailand – recruitment	Factory	Issara, direct supplier contact	Working closely with supplier
Italy – migrant worker exploitation	Grower	Direct supplier contact	Working closely with supplier



This year, in Clothing & Home, due to the majority of our supply chain workers being permanent and not seasonal, whilst we received some notifications regarding conditions in our partner factories, those related to modern slavery risk were predominantly industry-based as detailed below. The information was received from multiple channels, including:

- internal mechanisms: our on-boarding due diligence and worker voice programme.
- collaboration: our participation in partnerships and shared projects.

- external stakeholders: notification from other external parties.

We investigate all allegations and put risk mitigation or remediation measures in place. These measures can either be at a factory level for local issues, or at a country or industry level for wider issues, acting in collaboration with other stakeholders where appropriate.

Examples of risks identified and mitigation actions this year (Clothing & Home) include:

RISK	INDUSTRY OR FACTORY LEVEL	SOURCE	MIGRATION / REMEDIATION ACTION
Myanmar – forced labour risk	Industry	Collaboration and External stakeholders	Responsible exit from Myanmar
India – labour rights risk	Industry	External stakeholders and internal mechanisms	Worker voice and grievance programme initiated
Dubai – forced labour issues	Factory	Internal mechanisms	Factory not approved





## IDENTIFYING RISK AND PRIORITISING ACTION CONTINUED

### FOOD SUPPLY CHAIN

#### UK AGRICULTURAL SEASONAL WORKERS

In Summer 2022, we supported the creation of the Seasonal Workers Scheme (SWS) Taskforce, a collaboration of trade bodies, retailers, growers, recruiters, and non-profit organisations. The group was formed in response to the well-documented human rights issues associated with the SWS and aims to work with the UK government to improve practices and safeguard workers. The output of this group has been an action plan agreed in February 2023, focussed on five priority issues:

- Prevention through education and information for job seekers through the creation of the “Just Good Work” app, which gives workers their rights in their own language once arriving in country. It has already been downloaded by 19,000 workers.
- Collaborating to take a risk-based approach to source countries.
- Minimising scheme costs to recruiters.
- Independently assessing scheme operations.
- Working with the government on quick wins and longer-term policy changes to improve the system.

A core pillar of our [Food Human Rights Standard](#), is the requirement for our supplier partners to embed a pro-active Human Rights Due Diligence (HRDD) approach in their own operations and supply chain. This year we reviewed 45 supplier partners’ approaches to HRDD

and their KPIs, including 19 of our key produce and horticulture suppliers, you can read more in our [Sustainability Report](#).

As of April 2023, while risks still remain, we believe the actions taken by industry in response to the Taskforce will support in preventing challenges of the scheme, we remain actively engaged with government on shaping the future of the scheme beyond 2023.

#### SOUTHERN EUROPE

In Southern Europe, much of our fresh produce supply base is reliant on migrant workers, particularly over seasonal periods. In 2022, we continued our longstanding engagement in the Ethical Trade Initiative (ETI) Working Group on Italian Produce, which aimed to use its collective leverage to improve the human rights impact specifically in the processed tomato sector. The group worked to support local growers to adopt more robust labour practices and engage local suppliers to strengthen due diligence. During 2022/23, 38 supplier partners received due diligence training and two additional webinars on responsible recruitment were hosted in February 2023. The progress and learning from this working group will now feed into the new ETI “Grievance Mechanisms in Agriculture” programme, which M&S will be supporting. In addition to the ETI Working Group, we also carried out our own due diligence visit during harvest season 2022, to understand the leading work our key supplier partner has been undertaking in collaboration with an NGO and to build capacity to engage with migrant workers in the fields.

As part of our Human Rights Strategy, we have committed to undertake human rights impact assessments (HRIA), which provide an in-depth analysis of the salient risks to people in our supply chains. They include desk-based research and, most importantly, field research including interviews with stakeholders, rightsholders (workers and smallholders), and our own business. This year we worked on a salient risk assessment of human rights issues associated with Spanish produce and will be publishing an action plan in due course.

We are also active partners in the Spanish Ethical Forums, a collaborative initiative delivering dialogue and engagement between the fresh food industry supply chain and its stakeholders, while obtaining relevant impacts, raising awareness, developing solutions and improving workers’ lives.

#### THAILAND

In Thailand, we have been strategic partners with The Issara Institute since 2014, a non profit organisation tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation. In 2022 Issara handled 105,365 calls and messages from workers and job seekers across the industry, providing critical information and leading to the successful remediation of 34,608 worker-reported labour issues. This year, we have continued to make use of the updated Issara Partner Supplier Dashboard, which allows us visibility of information on recruitment and working conditions reported on an ongoing basis directly by workers in our supply

chain, through Issara’s independent worker voice channels. It also provides us with information on the responses of recruiters and suppliers; these are verified by Issara and offer assessments of the quality and timeliness of responses to worker grievances.

#### MODERN SLAVERY INTELLIGENCE NETWORK (MSIN)

M&S is a founding member of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK’s largest ever modern slavery investigation. Members are coming together to pool intelligence from within our supply chains and to achieve effective ways of working across the food industry with the aim of ensuring, as far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation. In June 2022, the MSIN held a conference with over 100 attendees engage wider stakeholders on issues of labour exploitation in the food and agriculture sector. In 2023, MSIN was created as a registered business; M&S is represented on the Board.

## IDENTIFYING RISK AND PRIORITISING ACTION CONTINUED

### CLOTHING & HOME SUPPLY CHAIN

#### MYANMAR RESPONSIBLE EXIT

Following the coup in Myanmar we worked closely with our stakeholder groups such as the Ethical Trade Initiative, the British Retail Consortium and the Government Department for International Trade, as well as our on-the-ground audit process to monitor the situation in Myanmar. There is always a balance between trying to be a force for good by offering jobs in a safe, respectful environment, and reflecting changing situations, hence we kept the situation under review for many months.

Myanmar was a very small sourcing market for us and in 2022 we refrained from making any additional investments in Myanmar while continuing to meaningfully engage with unions locally and internationally as well as other international NGO's on the ground, such as the International Labour Organisation, to ensure the welfare of the workers in the small number of factories we work with. As the situation developed, we commissioned and co-funded a research assessment "Myanmar Enhanced Due Diligence Sectoral Assessment" into the situation in Myanmar, investigating the human rights risks, the economic links to the military and the socio-economic impact on workers of a withdrawal of sourcing. The assessment concluded that forced labour indicators were present, including excessive overtime and restriction of movement. The full report can be found here: [Myanmar Enhanced Due Diligence Sectoral Assessment](#).

In October 2022, based on the findings from the Myanmar Enhanced Due Diligence Sectoral Assessment, we concluded that it was not possible for our Global Sourcing Principles to be upheld, and as we do not tolerate any human rights abuses within any part of our supply chain, we began working towards a responsible exit from Myanmar. You can read our [public statement](#) here. We worked closely with relevant stakeholders including the Ethical Trading Initiative throughout the consultation process, to ensure that our suppliers adhered to national laws and human rights were upheld and to ensure the effects of the withdrawal decision on the individual workers in Myanmar was considered.

This process of withdrawal has taken several months to ensure minimal impact on workers and a continuation of their employment after our exit and we also honoured our commitment to suppliers, to pay for products that were in production. We have no further production nor trading relationship with Myanmar.

#### DUBAI FORCED LABOUR CASE

In January 2023, our regional compliance team carried out an M&S social compliance assessment of a potential new factory in Dubai. During the visit, evidence was found that migrant workers had paid recruitment fees in their home countries, there was restricted freedom of movement in worker accommodation and compulsory overtime.

Due to the findings of our site visit, and in particular the forced labour issues, M&S did not approve the factory for

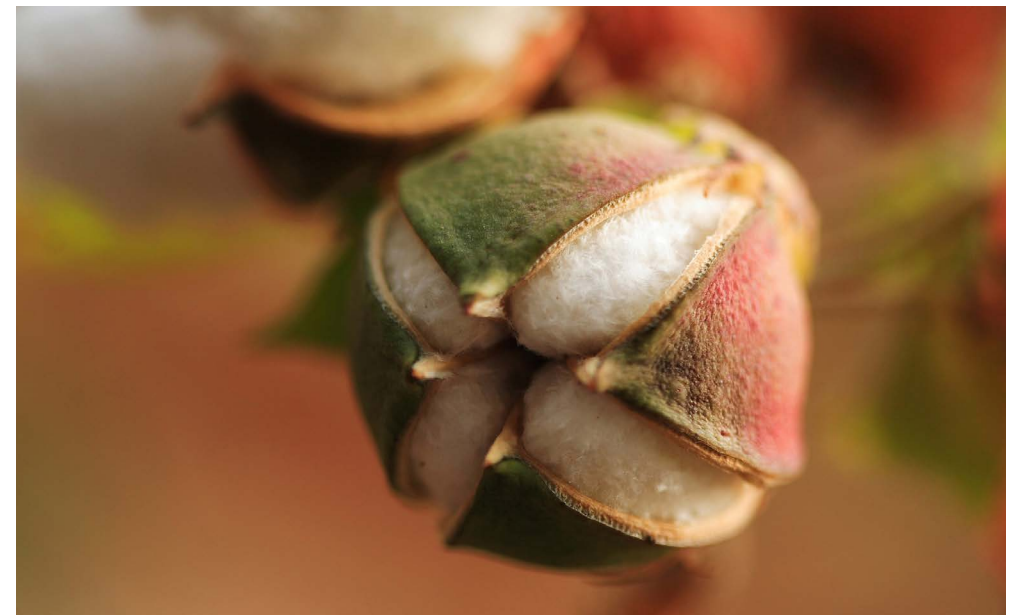
production and excluded Dubai from becoming an approved sourcing country for Clothing & Home. Even without becoming part of our supply chain, we advised the factory on remediation of the issues that they agreed to address. We continue to review our sourcing approach in response to risks identified in our due diligence and from information from external partnerships and stakeholders.

#### COTTON TRANSPARENCY

Our [Responsible Cotton Sourcing Policy](#) requires that no cotton should be sourced from Turkmenistan, Uzbekistan, and the Xinjiang region of China. All supplier partners must declare the cotton country of origin and we regularly share updates

to remind existing or new suppliers of this ban.

Since September 2022, we have been testing samples of cotton on a monthly basis through the Oritain™ lab. Oritain™ apply forensic and data science to detect naturally occurring elements in a product or raw material. Soil composition, climate, altitude, precipitation, and other environmental factors all reveal details of the products origin – allowing us to confirm the claim origin of the cotton and verifying any consistency with the banned source of origins. Launching the testing programme has given us the opportunity to reinforce the dialogue with our supplier partners on cotton sources and gives us added assurance our policy is being followed.

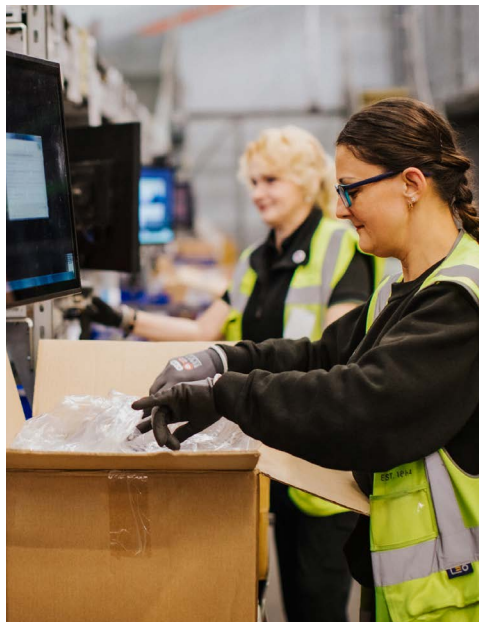




## IDENTIFYING RISK AND PRIORITISING ACTION CONTINUED

### GNFR AND SERVICES

To ensure compliance with our minimum standards in our GNFR supply base, all our supplier partners are invited to carry out a questionnaire and document-based management system assessment through the EcoVadis platform. This assessment covers the policies and processes supplier partners have in place, covering topics including employee health and safety, working conditions, social dialogue, diversity, child labour and human rights. Once a scorecard has been generated for a supplier, any improvements required are highlighted and issued to suppliers in the form of a corrective action plan, which is then actively monitored on the EcoVadis system.



### UK OWN OPERATIONS

Labour shortages across the UK and Europe are increasing the reliance on temporary and contracted labour for supplier partners providing services to our own operations. In recognition of this heightened risk, this year we completed targeted modern slavery due diligence with suppliers in the UK and ROI covering: Cleaning and Waste Management, Facilities Management, Security Guarding, Construction, Warehousing and Operations and Logistics. As an initial step we have engaged all supplier partners operating in these areas to understand more about their processes including their policies, due diligence, training, and whistleblowing channels. We approached the due diligence with a particular focus on how our partners manage relationships with agents and sub-contractors. We will use the findings of this work to shape conversations with our supplier partners over the next 12 months, sharing any learnings and best practice where appropriate.

### FOOD LOGISTICS

M&S acquired Gist, our principal Food logistics provider, which operates via a network of 16 redistribution centres across the UK and ROI. The acquisition provides a platform to accelerate our plans to modernise our supply chain and support growth and allows us to take closer control of key decisions. Modern slavery and human rights formed part of the due diligence during the acquisition, and we met with Gist to understand more about their approach during the year. Gist will continue to report through their own [Modern Slavery Statement](#).

### CLOTHING & HOME LOGISTICS

With the exception of China, this year we have been able to recommence our regular physical audit programme in all offshore Container Freight Station locations (CFS). Audits are completed by our International Sourcing Offices and UK Logistics Team and they include questions on health and safety, wages, agency work and management systems. As China has now lifted restrictions our audits have recommenced. Maintaining an open dialogue on modern slavery is a priority and this year we engaged with our logistics partner in Bangladesh in conversations on the use of agency workers. As a significant sourcing region our priority will be to ensure the standards and conditions for all workers across sites are equivalent to the highest in the network.

### INTERNATIONAL OPERATIONS

With the growth in sales in European markets, this year we have invested in a new logistics hub in Croatia enabling the direct import of stock destined for EU markets. The facility is managed by a third party and modern slavery controls were incorporated into contracts. Over 80% of the workers at the facility are on permanent contracts with the remaining agency workers from two pre-agreed partners. Our priority in the coming year will be extending our own operations due diligence to supplier partners in Europe.

### THIRD PARTY BRANDS

The Brands at M&S programme launched in 2021, and in recognition of the growing importance to our business of the programme, this year we recruited a Brands ESC Manager to work in partnership with our own label Ethical Trade and Sustainability teams. The initial focus has been to embed our compliance programme and carry out due diligence to understand more about how our brand partners source through a combination of desk-based research and interviews. Our minimum requirements prohibit our partners from sourcing cotton from Xinjiang, Turkmenistan and Uzbekistan, and Myanmar was added to our high-risk country list in September 2022. However, we know our biggest risk is transparency as we have limited visibility into our brand partner's supply chains. The priority for the year ahead will be to continue building relationships with our partners through regular interviews and engagement through webinars on key topics centred around M&S policies.

# TRAINING AND AWARENESS RAISING

Our colleagues and supplier partners play a major role in helping us to identify and prevent modern slavery in our supply chain.

## COLLEAGUE TRAINING

In January 2022, we launched an e-learning module for our support centre colleagues that shines a light on the "People Behind the Product". The module helps our colleagues to consider who the people behind our products are and to understand how the choices they make on a daily basis can impact the people who work in our supply chains. It includes fictional case studies from global supply chains. The module was completed by 94.8% of colleagues across our Food, C&H, International, Bank and support centre functions, including Corporate Governance, Procurement, Digital and Data, HR and Property. The module is mandatory for new colleagues when they join M&S, and will be completed by all colleagues on a bi-annual basis. All colleagues will be completing the training module in 2023/24.

## FOOD SUPPLIER PARTNER TRAINING

This year we delivered three Supplier Exchanges with the objective of bringing our supplier partners together to engage on key topics, collaborate, and share best practice. This year sessions covered modern slavery and embedding human rights due diligence into their businesses.

We recognise the role that excessive recruitment fees can play in leaving workers in situations of debt bondage, a form of forced labour. M&S is a sponsor of the Responsible Recruitment Toolkit (RRT), which enables our suppliers to access a variety of tools and resources to manage responsible recruitment. This year 146 of our supplier partners have accessed the programme and 124 individuals have completed an RRT training course.

We continue to work with Stronger Together, a multi-stakeholder business-led initiative aiming to reduce modern slavery by providing guidance, training and resources in the UK. Since the beginning of our sponsorship we have reached 1,932 individuals with 570 suppliers across the UK; 18 sites continued to be Stronger Together Business Partners and 9 became Advanced Business Partners.

## CLOTHING & HOME SUPPLIER PARTNER TRAINING

This year we co-funded a UK supplier training event with Slave-Free Alliance and UK Furniture Brands: *Addressing Modern Slavery and Labour Exploitation, Together*. This was a training event for all UK furniture suppliers and was a collaboration between Slave-Free Alliance (SFA) and seven UK furniture brands. The training aimed to provide a deeper understanding of the risks and indicators of modern slavery and labour exploitation and deliver practical advice and tools to address these. It included best practice sharing on responsible recruitment, effective due diligence, grievance mechanisms, and proportionate remediation.





# PARTNERSHIPS AND WIDER INDUSTRY ENGAGEMENT

Partnerships are crucial in tackling modern slavery, particularly when confronting some of the global challenges we face within the industry. Collaborations between retailers, manufacturers, NGOs and government bodies is a crucial way to share information, develop guidance and shape our approach moving forward.

ORGANISATION	HOW IT SUPPORTS OUR WORK CONFRONTING THE CHALLENGE OF MODERN SLAVERY
International Accord	M&S were a signatory of the original Accord on Fire and Building Safety in Bangladesh (2013), and have since also signed the subsequent Transition Accord (2018), the Interim Agreement (2021), and the International Accord for Health and Safety in the Textile and Garment Industry (2021). In January 2023, M&S signed the Pakistan Accord on Health & Safety in the Textile & Garment Industry, as part of our ongoing commitment to working conditions in our supply base.
Clear Voice	Interpreting service specialising in telephone, face-to-face and video interpreting. The social enterprise run by Migrant Help allows us to speak to workers through translation during interview.
The Coalition to End Forced Labour in the Uyghur Region	A coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China, known to local people as East Turkistan. M&S was one of the first companies to formally sign the Call to Action on human rights abuses to exit the Uyghur Region.
ETI	Our membership enables us to work collaboratively with companies, trade unions and civil society on difficult human rights issues, including modern slavery, that cannot be solved by individual companies working alone.
Food Network for Ethical Trade (FNET)	FNET is a key vehicle to drive ethical trading down the supply chain and work with industry partners and suppliers on challenging ethical issues. It played a pivotal role over the last year during Covid-19 – M&S was a founding member.
ILO Better Work Programme	M&S is a partner of Better Work, which is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect of labour rights for workers.
Reimagining Industry to Support Equality (RISE)	Formerly known as Empower@Work, RISE brings together the women's empowerment programs from CARE, Better Work, BSR's HERproject, and GAP Inc. P.A.C.E to deliver a unified approach to women's empowerment and gender equality in global supply chains. M&S has been a member since January 2023.
Institute for Human Rights and Business "Leadership Group for Responsible Recruitment", focussing on the Employer Pays Principle	Launched in May 2016, the Leadership Group for Responsible Recruitment is a collaboration between leading companies and expert organisations to drive positive change in the way that migrant workers are recruited. As part of this group we are committed to the "Employer Pays Principle".
Issara Institute	M&S is a strategic partner in the Issara Institute in Thailand, which promotes a different model of issue detection based on an "empowered worker voice".
Modern Slavery Intelligence Network (MSIN)	M&S is a founding member of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.
Responsible Recruitment Toolkit	The Responsible Recruitment Toolkit (RRT) is an unparalleled online capacity building tool to help business understand, achieve and demonstrate responsible recruitment. RRT is an initiative of not-for profit Stronger Together.
Seafood Ethics Action (SEA) Alliance	The Seafood Ethics Action (SEA) Alliance 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. Members include many of the UK's major retailers and seafood businesses, alongside retail and industry trade bodies.
SEDEX	Sharing data significantly increases efficiencies for M&S. The platform creates consistency across supply chains, making it much easier for suppliers to take action.
Spanish Ethical Trade Forums	Collaborative initiative delivering dialogue & engagement between the fresh food industry supply chain and its stakeholders, while obtaining relevant impacts, raising awareness, developing solutions and improving workers' lives.
Stronger Together	Multi-stakeholder business-led initiative aiming to reduce modern slavery by providing guidance, training and resources in the UK, Spain and South Africa.
Unseen Modern Slavery and Exploitation Helpline and Business Portal	Sponsorship of the Modern Slavery and Exploitation helpline and intelligence from the portal helps us to investigate live issues within our supply chains.



# OUR PRIORITIES FOR THE YEAR AHEAD

## ONGOING COMMITMENT

Train our colleagues to raise awareness of our corporate responsibility and train suppliers and assess their ability to detect and mitigate modern slavery risks.

Strengthen our network of supply chain intelligence to build supplier partner capacity, and work with leading forced labour experts on bespoke due diligence audits.

Identify risks regarding recruitment practices of third-party labour providers in M&S operations and supply chains.

Identify and use opportunities for collaboration to verify and help resolve risk issues.

## ACTIVITY PLANNED FOR 2023/2024

Complete the bi-annual refresher training the People Behind the Products module for all colleagues and new joiners to the business.

Continue to sponsor the Responsible Recruitment Toolkit and Stronger Together programme with supplier partners.

Continue to develop and scale worker voice programmes across Food and Clothing & Home supply chains.

Roll out the Everyone's Business App in Clothing & Home, a human rights toolkit to allow M&S colleagues to raise any issues of concern internally when visiting our supply chain.

Continue to engage with high-risk suppliers on their approach to HRDD as a commitment within the Food Human Rights Standard.

Extend our GNFR modern slavery due diligence to supplier partners in our European operations.

Continue to collaborate and work with the partnerships listed on page 13 with a particular focus on:

- Engaging with the UK government on delivering the objectives of the seasonal workers taskforce and shaping the future of the scheme beyond 2023.
- Supporting the delivery of the ETI "Grievance Mechanisms in Agriculture" programme