

Modern Slavery Statement

July 2021 - June 2022

CEO Statement



Everything we do supports our purpose of helping families get more out of life, from our customer and colleagues, to workers in our supply chain. To deliver on this purpose we know our customer needs to trust us and we need to be proud of what we do, that is why I am pleased to share our annual modern slavery statement for the period July 1st 2021 – June 30th 2022.

Globally this has been another challenging year, whilst the world is returning to some degree of normality following the Covid-19 pandemic, the impact has continued to be felt in our global supply chain. Further, world events such as the war in Ukraine has seen a significant displacement of persons fleeing their homes as well as crises in Sri Lanka and Pakistan generating risk and vulnerability to citizens.

In response to such challenges, and in accordance to our commitment to identify and combat modern slavery in our business, we undertook some key activities this period including:

- Ongoing due diligence to identify exploitation and slavery, particularly in the context of Covid-19 and world crises
- Development and launch of the 'Just Good Work' app for Ukrainian's seeking employment in Poland and Romania
- Opened a Migrant Resource Centre for Indian migrant's seeking employment in South India

Looking to the year ahead, we pledge to staying vigilant and ensure our processes and projects to tackle modern slavery remain relevant and effective. Our commitment to tackling modern slavery and protecting human rights will continue to underpin how we do business.

Lionel Desclee
Group CEO

Introduction

The Very Group's purpose is to help families get more out of life. Whether a customer, supplier, colleague or a community we influence, we are committed to operating in a way which has positive impact.

In this Modern Slavery Statement we have outlined the progress we have made in the period July 2021 – June 2022 on our journey to respecting and protecting the human rights of all who come into contact with us.

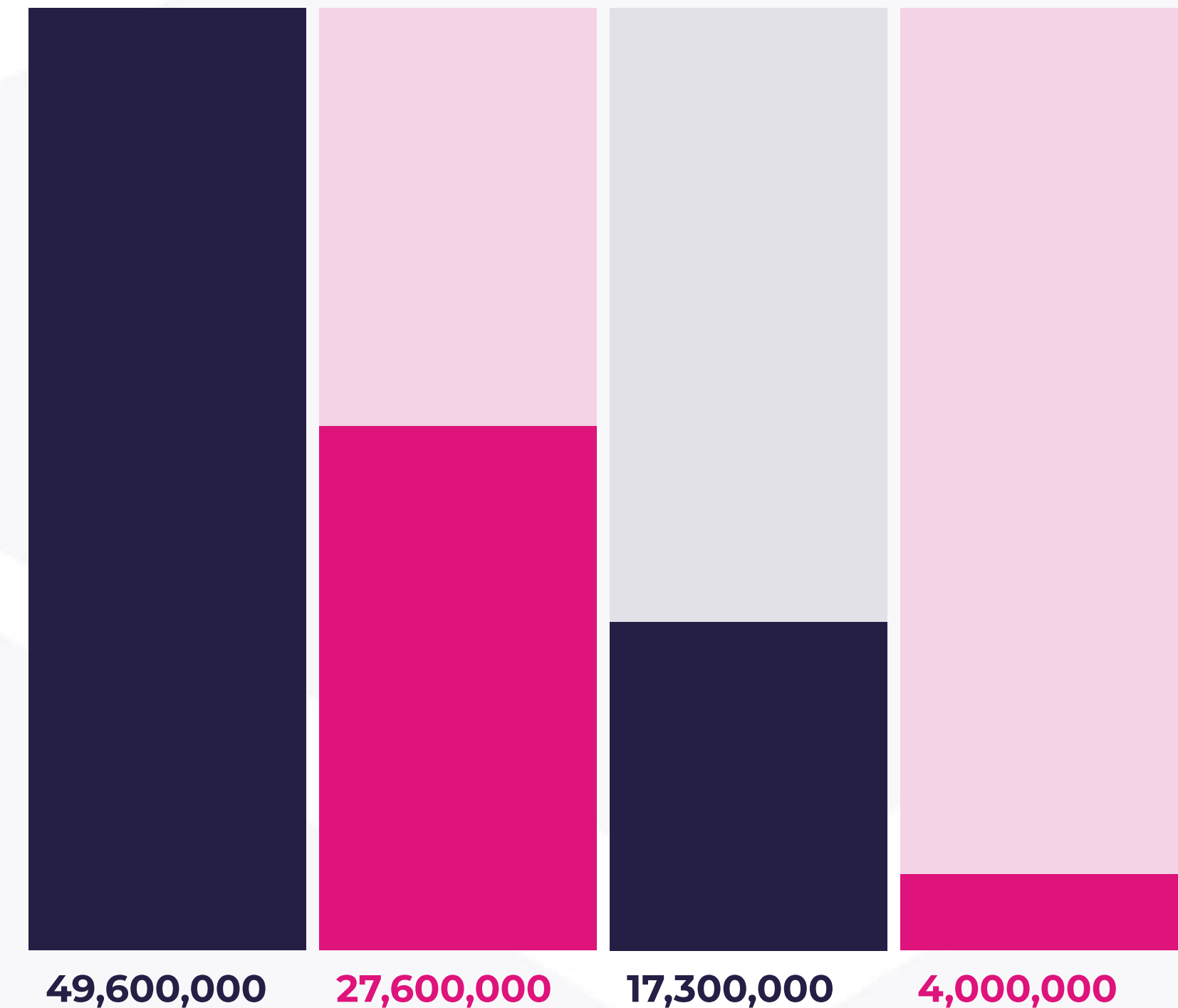
This statement applies to all entities within The Very Group, including Very, Very Ireland and Littlewoods.

What is Modern Slavery?

Modern Slavery is 'when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom' (Anti Slavery International). Modern Slavery presents itself in four forms:

- 1. Forced Labour:** Any work or service that people are forced to carry out against their will or under threat
- 2. Human Trafficking:** The act of placing someone into a situation of exploitation
- 3. Bonded Labour:** Forced to work to pay off a debt, working for little or no pay, without control over their debt
- 4. Child Labour:** Any work that is dangerous or harmful to children or interferes with their education

According to the latest global estimates, approximately 49.6 million people live in modern slavery, with roughly a quarter of these victims being children.



27.6 million people are estimated to be trapped in forced labour along, with **17.3 million** of those in forced labour exploitation in the private economy. **4 million** are in forced labour imposed by state authorities.

Our Organisation at a glance

Our Business

The Very Group is the UK's largest integrated pureplay digital retailer and flexible payments provider.

Through Very and Littlewoods.com, we combine over 2,000 famous brands across electrical, home, fashion and more with a simple online experience and flexible ways to pay provided via our Very Pay platform.

Very makes up 83% of group revenue, our biggest and fastest growing brand selling everything from tech to tableware. Famous for a combination of big-name brands and on-trend fashion.

Littlewoods.com was established in 1923, a family-focused digital multi-category store that has a loyal customer base.

Headquartered in Liverpool, we also have offices in London and Dublin and fulfilment facilities in the East Midlands and Wrexham. We also have sourcing operations in Turkey, India, Bangladesh, China and Malaysia.

Third Party Brands

The Very Group retail over 2,000 brands across our sites. As part of our commitment to respecting people and planet we are actively ensuring new brands we onboard complete 'The Very Basics', which is a self-assessment questionnaire covering transparency, modern slavery, human rights, more sustainable materials and animal welfare. Responses to the questionnaire are reviewed with any responses of interest being investigated with the brand.

Goods Not for Resale (GNFR)

GNFR refers to goods and services not directly sold to our customer or services and goods we buy to run our business. We have over 1000 GNFR suppliers and plan to undertake a business wide modern slavery risk assessment in FY2022/23 to understand our controls and opportunities to mitigate the risk of modern slavery in our GNFR supply chains.

Our Organisation at a glance

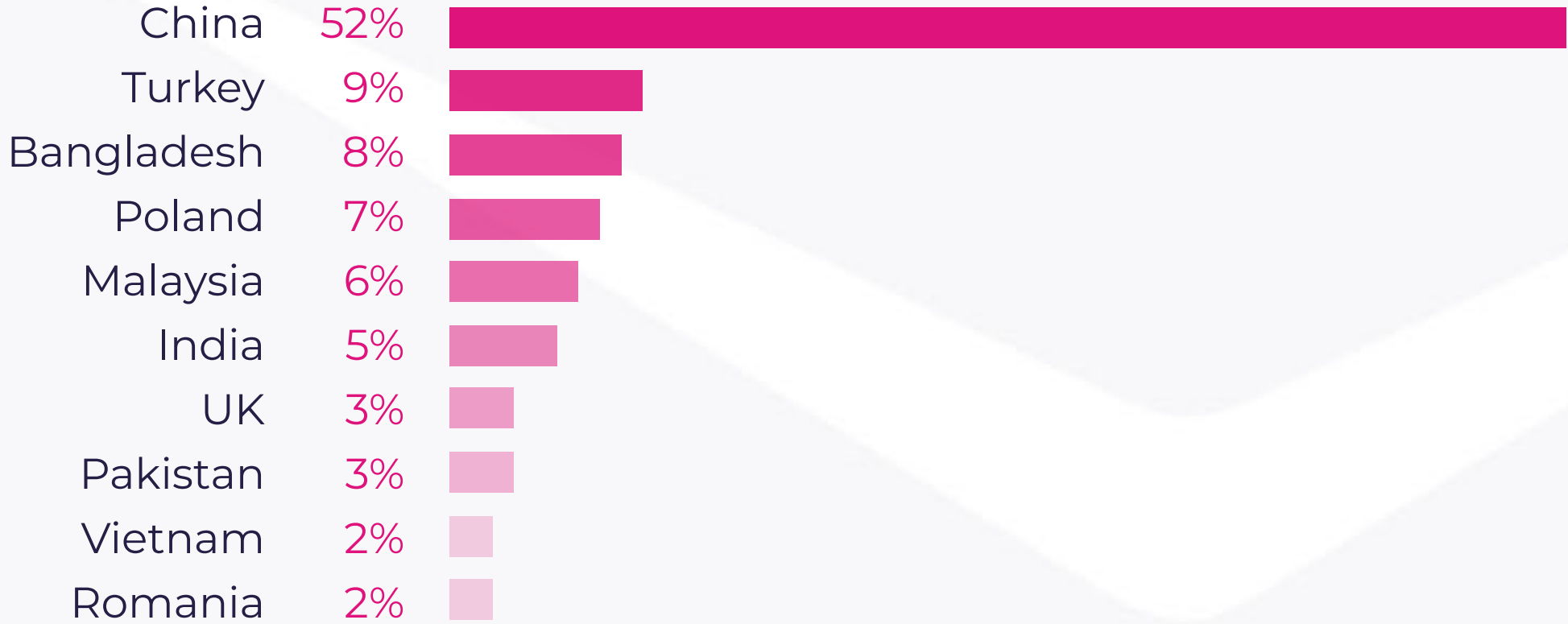
Our Supply Chain

Our primary focus is on our own operations and our own-label business, this is where we have the greatest impact and greatest opportunity to influence and drive change.

The Very Group manufactures own label products through 344 tier 1 factories across 15 countries. We have also mapped a further 457 Tier 2 factories across 10 countries. We have mapped 227,374 workers, 102,273 (45%) female and 125,101 male (55%). Our top ten sourcing regions representing 97% of our own brand product purchasing can be seen opposite.

Tier 0	▶ Own Operations (Offices, Distribution Centres)
Tier 1	▶ Finished Product Manufacturers
Tier 2	▶ Outsourced process and enhancement to product
Tier 3	▶ Material Production
Tier 4	▶ Raw Material Processing
Tier 5	▶ Raw Material Extraction

Ensuring transparency of our own brand supply chain is fundamental to our human rights programme. Full detail of all mapped units within our supply chain can be found in the Open Supply Hub. This includes both fashion and home suppliers and is updated biannually.



Governance

“Good governance is critical and the only way to run a sustainable business. Being sustainably successful means doing not only the right thing for your customers but doing it in the right way.”

Dirk Van Der Berghe

Our governance processes, and focus on our purpose, have both been crucial to managing the business through the global pandemic, supporting us in making what were sometimes difficult decisions during the past two years. They help us act with integrity and treat our employees, customers, suppliers, communities, and environment appropriately and with respect, while we work to provide a good return for our shareholders.

In 2021 we instated The Very Group ESG Committee, this forum is responsible for overseeing the delivery of our human rights programme and ensuring we have clarity of vision as the business grows and looks to embed ESG into its core business activities.

The ESG Committee met 3 times during the period July 2021 – June 2022 and has committed to meet on a quarterly basis for FY22/23.

Commitments made by the committee for FY22/23 include:

- Form a Social Sustainability Working Group dedicated to the development and monitoring of The Very Groups human rights programme with a dedicated focus on modern slavery
- Conduct an organisation wide modern slavery risk assessment
- Continue to review and assess ESG risks and ensure these are build into the broader business risk appetite and risk management processes
- Ensuring ESG risk is presented periodically at key forums including Executive Committee, Board Performance, Governance Committee and Audit and Risk Committee

Governance

Policies

There are a number of policies in place to support our commitment to protecting and respecting human rights, many of which are relevant to modern slavery. These policies are aligned to internationally recognised standards and based on the principles of the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work as well as the Ethical Trading Initiative (ETI) Base Code.

Third Party Code of Conduct: based on the International Labour Organisation's core standards as well as the Ethical Trading Initiative Base Code, the document reflects best practice industry standards being applied globally by responsible retailers. All merchandise suppliers must sign this document prior to doing business with us.

The Very Group Anti-Bribery, Corruption and Conflicts of Interest Policy: establishes The Very Group's position on preventing and prohibiting bribery, in accordance with the Bribery Act. The policy applies to all individuals working for The Very Group, including senior managers, directors, employees' consultants, contractors, or any other person associated with the business.

Young Worker, Child Labour and Prevention of Children Entering Production Sites Policy: sets out the steps suppliers need to take to protect young workers and to make sure no children are involved in the manufacture of any of our products. If we discover child labour in our supply chain, the policy sets out our remediation process.

Migrant Labour Policy: sets out the steps suppliers and factories need to take to responsibly recruit migrant labour and ensure they receive the same rights and benefits as local workers. This policy also underlines the importance of the employer pays principle.

Risk Assessment & Due Diligence

In order to fulfil our commitment to the protection of human rights, we work to identify and mitigate modern slavery in both our business and supply chain. In order to do this, we analyse insight sought from detailed mapping of our business and supply chain, intelligence from expert stakeholders, desk-based research, audit data and contribution from colleagues and suppliers. Controls and processes include:

Identifying high risk areas

Global Slavery Index

We refer to Walk Free Foundations Global Slavery Index to understand the prevalence of modern slavery in our sourcing regions and use this to further understand risk in our supply chain. The below table shows the prevalence of modern slavery across our sourcing regions, alongside the percent of our tier 1 sourcing mix in that region:

Sourcing Country	Estimated prevalence of Modern Slavery (no. of people per 1000)	% Sourcing Mix
China	2.8	52.2%
Turkey	6.5	9.2%
Bangladesh	3.7	7.5%
Poland	3.4	7.0%
Malaysia	6.9	6.2%
India	6.1	4.5%
UK	2.1	3.3%
Pakistan	16.8	3.2%
Vietnam	4.5	2.3%
Romania	4.3	2.2%

(This table illustrates our top ten regions by purchased volumes for FY21/22 by prevalence of modern slavery according to the Global Slavery Index Map 2018)

<https://www.walkfree.org/projects/the-global-slavery-index/>

Monitoring and responding to world events

In the past year the continued impact of Covid-19, armed conflict and climate change have widely been noted to be driving disruption in employment and education. Consequently a heightened risk of modern slavery has been observed as a result of these events. The Very Group recognise the following categories of people to be most vulnerable to modern slavery and have taken steps to understand the impact of world events on these demographics:

- Migrant workers
- Minority Groups
- Homeworkers
- Contract, agency and temporary workers
- Young Workers
- Women workers

Risk Assessment & Due Diligence

In FY21/22 through our approach to risk assessment we recognised the following issues as being of highest risk of modern slavery in our business and supply chain:

- The use of labour agencies both within our own operations & supply chain
- Lower tiers of our supply chain where we have reduced visibility
- Goods not for resale and service providers
- Sri Lankan Political Unrest
- The movement of refugees following the crisis in Ukraine

Having identified these risks, mitigating actions commenced with the aim of identifying the presence of exploitation and preventing this from occurring where we had the opportunity to do so.

Following the commencement of the war in Ukraine, we took a proactive approach to preventing the risk of refugee exploitation as people left the country and entered key sourcing regions for The Very Group. Through our partnership with Just Good Work, we developed and funded free labour rights and human rights guidance via the Just Good Work app for use by Ukrainians fleeing to nearby Poland and Romania for refuge. We actively promoted this app amongst Ethical Trading Initiative members as well as engaged in conversations with the IOM, La Strada in Poland and other industry networks. Usage data for the Just Good Work app as of November 2022 can be seen opposite:

We will continue to monitor the situation in Poland and Romania with our suppliers and offer guidance and support as they seek to offer employment to Ukrainians.

There have been 1,600 users of the app in total with 69% of them Ukrainian. 33% of users are Polish. 54% of users have been male, with many accessing the app from Ukraine. Users between the ages of 25-44 make up the biggest proportion of people using the app (65%).

Average engagement time in the app is just over 7 minutes, with people spending the most time in the following sections:

Employment contracts

Managing your money

Warnings

Getting Help

Healthcare

Risk Assessment & Due Diligence

In Sri Lanka the economic crisis caused concern for the welfare of workers in our supply chain. Following a meeting between the The National Chamber of Exporters (NCE) and the Prime Minister of Sri Lanka in June 2022 a suite of support solutions to allow suppliers to continue operating without interruption and with minimal impact to workers. Despite this, factories faced order cancellations due to uncertainty, having learnt of the impact of this during Covid, The Very Group ensured business with its suppliers in Sri Lanka continued as usual. Furthermore we ensured ongoing dialogue with the ETI, brands and factories to ensure workers were paid in full and on time ensuring not just their salaries but also annual bonus and other benefits.

Social Audits...

Our audit programme consists of a combination of assessments conducted by nominated third party audit companies and our in house team. Audits use local law, our code of conduct and the ETI base code to identify risks and areas for us to work with factories on improvement actions.

Our in-house team carry out regular visits to our factories to offer advice and support on improving issues and implementing best practice. Despite the ongoing impact of Covid across our supply chain we were able to ensure 65% of our tier 1 factories undertook ethical audits with the remaining units being engaged with through desktop communication.

Where we recognise salient human rights risks or identify problems relating to specific issues within our supply chain, we work with partners to develop and deliver training to both factories and workers to mitigate and remediate. Elements of our training programmes and project work are explored later in the statement.

We recognise the limitation of ethical audits to identify modern slavery issues and continuously to introduce additional methods of due diligence.



Risk Assessment & Due Diligence

Social Audit Statistics

- **239 third party audits conducted across our tier 1 supply chain** (over 65% of total tier 1 factories).
- **102 audits conducted across our tier 2 supply chain.** These were a mixture of third-party audit and audits conducted by The Very Group ESG team.
- **Out of the tier 1 audits conducted, 86% were semi-announced and 14% were announced.**
- **Out of the tier 2 audits, 70% were announced and 30% were semi announced.**
- Modern slavery indicators were noted in 20 tier 1 factories across China, India, Bangladesh, Malaysia, Vietnam, Turkey and the UK. The main indicators included inadequate systems to manage hours and wages, inadequate contracts and working hours and overtime exceeding local requirements. In these instances, we worked with suppliers to remediate the issues found through capability building and education to ensure sustained improvement. The ESG team work with suppliers to remediate issues on an ongoing basis.

Everyones Business

Though the roll out of Everyones Business app has been hampered by Covid-19, we have now trained our global hub teams to use the app during routine visits to our tier 1 factories. Findings from the app are analysed by the ESG Team and any flags of modern slavery are escalated for investigation.

During the reporting period a total of 70 visits were logged in the Everyones Business app

Transparency

Our full supplier list can be found on the Open Supply Hub. By contributing to this platform we aim to enable accountability, collaboration and remediation for any human rights abuses which could be present in our supply chain.

Risk Assessment & Due Diligence

Worker voice

The Very Group believe that workers should be empowered to use their voices and have mechanisms to share their views both within their working environment as well as to credible third parties who can offer support.

In our supply chain, we have provided training to over 20,000 workers on the topics of worker voice and social dialogue. We also have worker grievance mechanism TIMBY available in India and support the promotion of Amader Kotha in our factory base in Bangladesh. In the UK we are founders of Fab-L, a community engagement programme for Leicester garment workers as well as members of Unseen. Through these mechanisms we seek to permit workers an opportunity to find advice or support if they feel their rights are being impeded.

FAB-L Case Study

Fashion Workers Advice Bureau Leicester (FAB-L) has been integral in empowering garment workers in Leicester. The Very Group are a proud supporter of FAB-L, which is a community run initiative funded in partnership with trade unions and other brands sourcing in the region. Through the dedicated work of two Community Outreach and Engagement workers (one full time and one part-time), FAB-L has supported over 90 garment workers in a variety of issues from inadequate housing to workplace rights. The project is going from strength to strength, with plans to introduce IT and language classes in the second year. FAB-L has been a huge success and has given garment workers the opportunity to raise their queries externally through a trusted route. We will continue to support FAB-L and are excited to see how the second year unfolds.

Training

Tackling Modern Slavery is the responsibility of all The Very Group colleagues as well as that of our suppliers. We provide modern slavery training for all colleagues annually with more focused approaches for colleagues in front line positions to ensure we are empowered and able to spot the signs and take mitigating action.

In August 2021, we partnered with Bronco Technology, a sustainable development organisation based in China, to deliver modern slavery training for our colleagues based in our offices in Shenzhen, Hong Kong and Malaysia. The training was designed to further increase awareness of the risks of modern slavery, particularly during sourcing.

We also provided modern slavery training to our two labour agencies used at our distribution centre in the East Midlands. The aim of this training was to increase awareness of the risks of modern slavery, provide guidance in improvement or modern slavery due diligence and communicate the expected standards to be upheld through their recruitment practices.

In our supply chain we are committed to providing training to workers across a number of topics including social dialogue, labour rights, health and safety and gender equality. Despite Covid disruption we were able to continue to support workers through training in some regions.

Other Actions taken

Alongside committed activity, a number of unplanned interventions were taken by The Very Group to ensure we are operating as a responsible business and in an effort to protect the rights of workers in our business and supply chain.

In October 2021 we joined a number of business, investors and associations operating in the UK encouraging the Government to play a positive role in building a more resilient and sustainable post pandemic economy. To realise this ambition we called on the government to introduce Mandatory Human Rights and Environmental Due Diligence (MHREDD) for companies and investors. Our belief is that such a requirement to prevent the abuse of human rights and environmental harm in global operations and value chains would deliver on the government's commitments to the levelling up agenda and to the transition to a net zero economy, as well as establishing Global Britain as a leader in setting standards for renewed and sustainable prosperity worldwide.

In the UK, we are now members of the steering committee for the Fashion Workers Advice Bureau – Leicester (FAB-L). FAB-L is a community led outreach programme which began in October 2022 and formally launched in May 2022, and is designed to support garment workers in Leicester. Through the outreach of the FAB-L case workers, garment workers are offered advice, support and opportunity to raise grievance. Through partnership with the FAB-L team, trade unions and retailers resolution is sought for workers and strategies developed in order to improvement and protect the future of Leicester garment manufacturing. The FAB-L team have been provided access to 100% of our suppliers in Leicester and workers have been introduced to the project with contact details being provided.

In response to the 40% minimum wage increase for unskilled workers in Pakistan's Sindh province, we worked with our suppliers in the region to ensure that impacted workers were back paid from 1st June at the elevated wage rate. A virtual conference with all our suppliers sourcing from Pakistan was held to communicate our expectation with regards to labour rights and compliance to the minimum wage increase.

Other Actions taken

The Very Group commissioned Align Ltd to undertake a modern slavery site assessment at Skygate, our fulfilment centre in the East Midlands.

The project looked at how modern slavery is currently managed on site, and the way in which third party suppliers on site manage this risk. The long-term goal was to ensure colleagues and partners are able identify modern slavery, and that robust prevention mechanisms exist with all areas of the operation.

A modern slavery capability assessment was conducted in both labour supply agencies at Skygate, and with the onsite security company. The project looked at the current policies and procedures in place, as well as undertaking a number of employee focus groups, workshops, interviews and surveys to obtain a complete baseline review.

The review found a desire at all levels of the business to engage with this process, and to contribute not only information but ideas. There was also positive culture that employees can speak to colleagues and to managers about this topic.

Some key recommendations from the review have now been adopted to build on the positive culture and desire to engage in reducing the risk of modern slavery at Skygate.

To ensure consistent approaches to modern slavery across all partners and employees, The Very Group has led with a comprehensive and standardised approach to have in place clear policies and procedures which provide transparency and high-quality due diligence.

In addition, it was recognised that a key area to spotting the signs of modern slavery was the power of community connection and clear communication. To build upon the current good practices improved awareness, education and improved training has been implemented on modern slavery.

Committed activity - Migrant Workers

Action Committed FY21/22	Issue Defined	Steps Taken FY21/22	Our Commitment
<p>In India we committed to opening a migrant resource centre in Tirupur to assist migrants in fair recruitment, equal rights and pre-departure knowledge</p> <p>In Turkey, we will work with our partners United Work and Mudem to protect Syrian workers found in our supply chain.</p> <p>In Malaysia we continue to work with 50eight, The Ethical Trading Initiative and Our Journey on the development of the Just Good Work app.</p>	<p>Migrant workers face a higher risk of falling into modern slavery than non-migrant workers. The prevalence of forced labour is three times higher amongst the migrant labour population. Migrant workers are more vulnerable where there are poor recruitment practices, where migration is irregular or poorly governed, where they are not protected by law or able to express freedoms.</p>	<p>In India, the migrant resource centre opened as planned in Tirupur. So far, 410 migrants registered at the centre with 154 being trained on their employment rights to minimize the risk of exploitation. 110 have been trained on legal rights to avoid harassment and abuse and 59 were provided with basic health awareness to minimise risk of illness and consequent vulnerability. The remaining 87 were supported in understanding the Tamil Nadu Migrant portal. All registered migrants are also provided with an induction to the TIMBY worker voice app so they can raise grievances if help is required.</p> <p>In India, the migrant resource centre opened as planned in Tirupur. So far, 410 migrants registered at the centre with 154 being trained on their employment rights to minimize the risk of exploitation. 110 have been trained on legal rights to avoid harassment and abuse and 59 were provided with basic health awareness to minimise risk of illness and consequent vulnerability. The remaining 87 were supported in understanding the Tamil Nadu Migrant portal. All registered migrants are also provided with an induction to the TIMBY worker voice app so they can raise grievances if help is required.</p> <p>In FY21/22 we had 15 registered Syrian workers, working across 8 factories in our supply chain. We worked closely with MUDEM to ensure that their contact information alongside details of the Worker Support Centre programme are available at all times. No contact has been made by Syrian workers to Mudem to date.</p> <p>In Malaysia, the borders continue to be closed to migrants. We have worked with one of our suppliers on the ongoing development of Just Good Work in anticipation of migrant arrival into Malaysia. So far we have registered 686 users on the app.</p>	<p>We will continue to support migrant workers through our resource centre in India, sharing findings with local stakeholders and continue to tackle the systemic exploitation of migrants.</p> <p>In Malaysia, we will continue to work with suppliers to scale the use of Just Good Work amongst our suppliers and their migrant workers, enabling access to Our Journey and information on worker rights.</p> <p>In Turkey we will continue to partner with Mudem and United Work to protect Syrian workers found in our supply chain.</p> <p>We will continue to promote and collaborate on the promotion of Just Good Work in Poland and Romania, reaching as many Ukrainians as we can.</p>

Committed activity - Worker Voice

Action Committed FY21/22	Issue Defined	Steps Taken FY21/22	Our Commitment
<p>In India and Sri Lanka, we will be expanding our existing worker voice solution TIMBY across all tier 1's</p> <p>In Bangladesh we will deliver social dialogue training across our tier 1 supply chain.</p> <p>In Turkey and Bangladesh, we will deliver social dialogue training to support workers in communicating effectively with factory management and raising concerns or grievance</p>	<p>Empowering workers to use their voice is pivotal to tackling modern slavery. Through worker voice, incidents of abuses, concerns and other difficulties can be identified and remediated.</p> <p>To ensure effective remediation, channeling voice into a robust grievance mechanism is fundamental to tackling modern slavery.</p>	<p>Due to the economic crisis in Sri Lanka our plans to launch TIMBY could not be delivered as we sought to ensure consistent orders and support suppliers.</p> <p>In India our supply base has consolidated with the majority of tier 1 units in South India where TIMBY is already well known. We will continue to raise awareness amongst our tier 1 suppliers and conduct analysis into any grievances raised.</p> <p>In China we partnered with INNO to deliver worker empowerment training in 3 factories capturing a total of approx. 1000 workers. Within this training is a comprehensive communications module used to educate both workers and management, aiming to enable effective communication skills.</p> <p>In Bangladesh due to Covid delays, training launch was delayed until September 2022. The plan is to deliver training which enable workers to use social dialogue techniques to mitigate issues in the workplace, community and at home. Workers will be able to communicate effectively and raise concerns and grievances, which we believe will support our ambition to ensure no workers in our supply chain find themselves in modern slavery. The training will also train in financial literacy and aims to support workers through financial empowerment too.</p> <p>In Turkey, we have launched a pilot social dialogue programme in 3 factories in partnership with four other retailers (Primark, Marks & Spencer, Tesco and Verner). The programme aims to strengthen communication between workers and management and employs a train the trainer approach so it can be scaled at the end of the pilot.</p>	<p>In Turkey we will continue to develop our social dialogue programme as well as a pilot of TIMBY with key suppliers in the region.</p> <p>In Bangladesh we will continue the roll out of our worker voice training across our tier 1 supply base.</p> <p>In China, we will continue to deliver INNO training aiming to train 1000 workers by June 2023</p> <p>In the UK we will continue to support the FAB-L community outreach project in Leicester. Through this project we will encourage workers to raise grievance regarding their workplace rights via FAB-L and seek advice if in doubt.</p>

Committed activity - Recruitment Agencies

Action Committed FY21/22	Issue Defined	Steps Taken FY21/22	Our Commitment
In China we will conduct focussed due diligence across our tier 1 sites to identify any unscrupulous recruitment processes. We will also work with suppliers to ensure their understanding and practices regarding ethical recruitment.	The use of recruitment agencies reduces visibility of employment conditions of workers by employers. Recruitment agencies also offer a heightened opportunity of unlawful practice due to operating in an environment of impunity, this could include the use of coercion and deception resulting in workers being trapped in forms of modern slavery.	Despite the ongoing Covid restrictions in China our team visited 53 factories in FY21/22 to conduct enhanced due diligence on recruitment processes, one instance of payment issues was identified in relation to recruitment agents and is under ongoing remediation.	In China, our team intend to continue their focused due diligence with regards to recruitment processes. They will also host an online training for suppliers in the region regarding responsible recruitment. We recognise the challenges with recruitment agencies are universal and will explore the development of clear tools and guidance for suppliers to ensure best practice is understood.

Committed activity - Due Diligence

Incorporate tier 2 into our annual audit programme and improving our approach to supply chain mapping Respond to modern slavery risk identified through colleague use of Everyone's Business in Poland, Turkey, Bangladesh, India, China, and Malaysia. Continue to respond to modern slavery risk indicators raised through our own- and third-party audit programme ensuring all indicators are investigated and remedied	Ongoing monitoring of the risk of modern slavery in across our business and supply chain is an essential practice to ensure we are identifying and mitigating existing and emerging risks/cases of modern slavery.	We have now mapped 457 Tier 2 sites and despite covid restrictions have audits for 102 of them. In FY 22/23 we will continue to expand our audit programme a Tier 2 and incorporate these sites into our beyond audit initiatives. Everyones Business continued to be embedded into business as usual for our colleagues across our sourcing hubs. Modern Slavery Indicators are identified from our audit programme and investigated accordingly.	To calibrate our efforts in tackling modern slavery and to expand into areas we can do more in, we will undertake a business wide modern slavery risk assessment in collaboration with key stakeholders across the business and externally.
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Next Steps

As our business faces into a challenging operating landscape we remain committed to the protection of both people and planet and working to ensure we have a positive impact to all our stakeholders.

In FY22/23 we have committed to setting Science Based Targets and commencing our decarbonisation journey with an ambition to being a Net Zero retailer by 2040. As we begin to define what this means for our business we are committed in being mindful of a just transition and ensuring human rights are respected to all of our climate change mitigating activities.

We are also committed to understanding our goods not for resale and service provider supply chains in more detail and intend to expanding our modern slavery due diligence approach deeper into these areas of our business.

Identifying, mitigating and remediating any presence of modern slavery in our operation remains a fundamental practice to our business ambitions and we will continue to focus on this and act responsibly and swiftly where we have concerns.

Our Partners

We recognise that some of the issues we face are incredibly complex and that in order to make the most meaningful impact, we need to partner with external organisations to share best practices and gain access to expertise to resolve any potential issues throughout our operations.

We ensure that we are active participants in any initiative that we commit to and also only partner with organisations with whom we know we can add value throughout our supply chain and in the communities, we operate in.

Partnerships for us are key to ensuring effective protection of workers and so we play an active role with each of our partners to respond to the risk and needs of our supply chain. We continue to build and maintain strong relationships with varied stakeholders including NGOs, trade unions and government departments to ensure integrity in our work and provide the best solutions to complex issues and deliver positive outcomes for workers.

