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Dame Sara Thornton CBE QPM Independent Anti-Slavery Commissioner 5th Floor, Globe House 89 Eccleston Square London, SW1V 1PN

3rd December 2020

Dear Dame Sara

Thank you for your letter of 24th November in which you shared your findings and recent activities following Operation Fort, along with the new maturity framework your office has developed.

Both I and other key colleagues in the business have read the Operation Fort Review which you published in June. Our General Counsel and Company Secretary and our Head of Sustainability joined your launch webinar on the 16th June. One of our colleagues also attended the Slave Free Alliance seminar, at which you presented last November, to hear your insights. We found the Review to be comprehensive and insightful and take our own role in tackling slavery very seriously.

As you are aware, since the news of the West Midlands gang and their victims broke in July 2019 we have been strengthening controls both within our own business and our supply chain, particularly in relation to temporary workers. For temporary workers in our Distribution Centres we now require a sign-off sheet for each worker from the agency, including their name and photograph, which we check against the workers' ID at our sites on their first day of work. The sign-off sheet and photograph enable us to verify that the person who turns up to work is the person we are expecting and that they have access to their own ID documents (these are often confiscated by gang members). We shared the red flags of modern slavery with all employees this year in our revised and updated Code of Conduct and have developed an improved training module for key colleagues including operations, HR, commercial and freighting, which is in the process of being rolled out. Within our supply chain we launched a new Online Risk Assessment and new Site Audits which have improved temporary worker checks. Modern Slavery is led from the top of our business with a clear Group policy and a new minimum standard, sponsored by our Group Leadership Team.

We welcome the new maturity framework that you have shared. We assess our current performance as within the "Evolving Good Practice" bracket, and will use the framework to inform our development plans going forward. Your agenda for action, with four clear challenges, is something that we will also incorporate into our planning.

The next steps we plan to take include

- continued roll-out of our new in-depth modern slavery training for key colleagues
- new bite-sized refresher training for all colleagues to keep up awareness
- making our whistleblowing line available to our suppliers, not only our own business
- introducing unannounced audits for selected sites (note that we have recently moved to semi-announced site audits)
- enhanced supplier engagement through supplier forums on ESG, including anti-slavery
- review of your published framework and four challenges to incorporate into our planning

Thank you again for your engagement with us on this agenda. We are committed to tackling slavery wherever it could occur within our business and our supply chain and will continue to strengthen controls and work collaboratively across our supply chain to achieve this objective.

Yours sincerely

Nick Roberts Chief Executive

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