

Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner
5th Floor, Globe House
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Dear Dame Sara,

Thank you for your letter detailing the actions your office has taken following the Operation Fort review.

We were disturbed to see the scale and impact of the modern slavery gangs uncovered during the Operation Fort investigation. The review published by your office earlier this year has helped us appraise and update our own processes for identifying and remediating indicators of modern slavery in our operations and supply chains. The IASC Maturity Framework is another welcome tool in our mission to rid our business and supply chains of forced labour. Whilst we have an ambition to lead on human rights, we recognise that there is still much to learn in this field so would place ourselves as 'Evolving Good Practice', with some activity under 'Leading on Human Rights Innovation'. I have outlined below where we believe we are leading in tackling modern slavery and where we have further work to do.

Our vision is to be the most trusted retailer where people love to work and shop. This includes treating people fairly wherever they are in the business and supply chains.

As such our priorities over the last few months have been keeping our customers and colleagues safe, helping to feed the nation and supporting our communities and the most vulnerable in society. That includes the communities we both serve and source from. We are proud to continue our commitment, and duty, to respect and protect human rights and we will not tolerate any form of slavery or servitude in our own operations or supply chains. Our risk-based approach enables us to proactively tackle serious exploitation of workers and provide resources where they are most needed to protect workers.

We have established a Modern Slavery Risk Assessment Tool that gives us unique insights into slavery risks across our complex global supply chain, not only at product and service level but also for individual ingredients and components. This tool provides a level of detail that is unprecedented in our industry, combining our own data with economic models of sectors such as agriculture and manufacturing. This enables us to identify risks in multiple tiers of our supply chain, so we can take action. Importantly, this includes upstream tiers, where the risks are greatest but also more difficult to identify. Across the business, we use findings from our tool to inform our supplier conversations, as we identify areas of risk in our supply chain.

As part of our own accountability processes, we have initiated an internal audit of our Modern Slavery governance and procedures to help us identify areas for improvement. Our internal audit team will report by the end of 2020 and the findings will help us strengthen our plans for 2021 and beyond. As part of those future plans we are pleased to be part of the newly formed Modern Slavery Intelligence Network working with suppliers and competitors to find ways to combat and eliminate modern slavery in our supply chains.

I personally take a lead on these issues as Retailer College Co-Sponsor for The Consumer Goods Forum's (CGF) Sustainable Supply Chain Initiative (SSCI), covering issues including human rights. We are active members on the Steering Committees for the Forum's Sustainable Supply Chain Initiative (SSCI) to ensure that major social compliance schemes meet minimum customer requirements on issues such as forced labour and recruitment fees. We also support The CGF's Forced Labour Priority Industry Principles through their Human Rights Coalition of Action – Working to End Forced Labour, tackling three of the most problematic employment practices that can lead to forced labour

- every worker should have freedom of movement
- no worker should pay for a job
- no worker should be indebted or coerced to work.

To reinforce our position, we have incorporated these principles into our recent updates to our sustainable sourcing policies for goods not for resale and goods for resale. Through the CGF, we are working to ensure that these principles continue to be embedded in international sustainability certifications.

We have identified that the presence of labour providers correlates with the highest risk of forced labour and continue to gather information on recruitment flows in our supply chains to identify these. We also support industry initiatives to map recruitment flows and trends globally

As such this year we continued our position as founding sponsors of the Responsible Recruitment Toolkit, supporting our suppliers in recruiting responsibly and helping them progress towards Clearview certification. (We require all agency labour providers to our depots to have Clearview certification already and are encouraging our suppliers to follow suit). Led by allianceHR and the Association of Labour Providers, the toolkit sets out 24 responsible recruitment labour standards, covering all stages and elements of labour sourcing and supply. Our role as founding sponsors means our suppliers can benefit from free places on responsible recruitment workshops, online guidance, resources, self-assessment and reporting tools and additional in-depth training. We contacted our suppliers to encourage them and the labour providers they use to take full advantage of the support and guidance available. We will be tracking uptake and progress made by suppliers on this.

We complement the training available through Responsible Recruitment Toolkit with our own in-house training on Ethical Sourcing and on Modern Slavery that we provide for colleagues and suppliers. Following the publication of your review of Operation Fort, and findings from Operation Melrose, we are in process of updating this training with the help of your office and Essex Police. It is important that we take note of developments in this field, learn from external sources, and keep our colleagues and suppliers up to date so that we can remain vigilant for the signs of forced labour.

Our priorities for the coming year are to finalise our beyond-2020 strategy for human rights including modern slavery, and we will be setting targets and KPIs to track performance and publish our progress annually. Angie Risley, Director of Group Human Resources, and member of our Operating Board is responsible for our human rights policy and strategy in our operations and supply chain. Our human rights strategy, which includes mitigating labour exploitation risks, is embedded in our human resource teams, sourcing with integrity and communities' teams; supported by our human rights and sustainable sourcing policies. Our sustainability strategy is overseen by Jo Harlow who is one of our Non-Executive Directors and Chair of our CR&S Committee ensuring we have the highest-level commitment to these issues.

We will continue to publish our Modern Slavery Statement each year, in line with Section 54 of the UK Modern Slavery Act 2015, to report on progress and our priorities for the coming year. Our latest Modern Slavery statement can be found here: (https://www.about.sainsburys.co.uk/~media/Files/S/Sainsburys/documents/reports-and-presentations/2020/CR/Sainsburys_Modern_Slavery_Statement_FY1920.pdf).

We will use the IASC Maturity Framework as another metric to help drive our work in this area forward and look forward to working with your office on this.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Simon Roberts', with a long horizontal flourish underneath.

Simon Roberts
Chief Executive Officer
Sainsbury's