

Human Rights Report & Modern Slavery Statement 2023/24



WORKING IN PARTNERSHIP FOR A HAPPIER WORLD

JOHN LEWIS

WAITROSE

Our business

Reflections from our Chairman and our CEO

There have been distressing events in the world that have affected many of us this past year. As the Partnership continues to operate globally, we remain acutely aware of our impact on the people and communities we work with and serve, and of the rising risks owing to climate change and geopolitical tensions.

More than ever, customers expect companies to operate in an ethical way. Customers of Waitrose and John Lewis have very high expectations of the Partnership, the largest employee-owned business in the UK and one that - unusually - operates on democratic principles.

Our supply chains - encompassing over a million different product lines and involving more than 4,500 suppliers - are complex and in no way immune to the risks to human rights. For the Partnership, combating modern slavery within our supply chains goes far beyond a legal obligation, it is intrinsically linked with our values and our purpose; Working in Partnership for a happier world. That's why we put such focus on ensuring that minimum standards are not only met but maintained throughout, and have been reporting on our actions in this way since 2016.

Transparency remains key, and this year's report sets out areas of both progress and opportunity. We're not perfect, but are working tirelessly - with our Partners, customers, NGOs and suppliers around the world - continually to address the challenges. My enormous thanks to all involved.

Sharon White

Chairman

We've made great strides with our human rights programme this past year, and it's crucial that we keep building on this foundation. A key focus has been on ensuring that minimum standards are met according to our Responsible Sourcing Code of Practice, which clearly sets out the Partnership's expectations of suppliers on issues such as pay, working hours, child labour, worker rights and representation. I'm particularly proud of the hard work our teams in the UK and local sourcing offices have put in.

As we move into the next phase of our Partnership Plan and continue to take the necessary steps to transform the business, we're unwavering in our commitment to uphold human rights standards within our supply chains. However, our responsibility extends beyond the factories. For example, this year, we've partnered with external experts to better understand our impact on the Egyptian cotton supply chains and have continued to address human rights issues within our tea supply chains in Kenya.

We've continued our work to reduce the risk of labour exploitation, by improving policies and procedures within our operations where we rely on agency teams. Progress has been made across all assessed sites, including improved processes for worker-onboarding alongside the implementation of awareness-raising programmes for managers and Partners, helping them to recognise any indicators of modern slavery.

The last few years have also highlighted the challenges faced by crew in logistics supply chains, which is why we've actively collaborated with the International Transport Workers' Federation to ensure our sea-freight forwarders align with our values.

There's so much more detail and many great examples in this report. I'd like to thank all of our Partners, customers, NGOs, businesses, and workers around the world for their ongoing support. Our work continues - there's still much to do - but it's thanks to all of you that we can achieve so much.

Nish Kankiwala

Chief Executive Officer



The Partnership

The John Lewis Partnership is the UK's largest employee-owned business and parent company of our two retail brands, John Lewis and Waitrose, which are owned in trust by our 70,000 employees (who are Partners in our business). You can find out more about our business in our 2023/24 Annual Report and Accounts.



Our Purpose

Working in Partnership for a happier world

As co-owners we all have a share in the business and a shared commitment to go above and beyond for each other and our customers.

We have a unifying Purpose created by Partners, for Partners. Our Purpose makes it clear why we exist, our ultimate aim as a business and gives us an exciting opportunity to do things differently.

Happier people

Our happier business starts with happier Partners, enjoying worthwhile and satisfying work in a supportive environment we all help to create.

We treat people with fairness, courtesy and respect, and we work with others who do the same. We create an inclusive environment and celebrate diversity with our Partners, customers and the communities we serve. We're at our best when we all feel welcomed and free to be ourselves. We take pride in making our customers happy. We put everything we have into everything we do, earning the loyalty and trust that we need to be successful.

Happier business

We build happier businesses that are honest, fair and free to think and act for the long term. We aim to make sufficient profit to retain our financial independence, invest in our Partners and pursue our Purpose.

Our Partnership is built on democratic principles. We share the responsibilities and rewards of ownership: knowledge, power and profit.

Partner opinion is crucial in driving the actions of our governing authorities: the Partnership Council, the Partnership Board and the Chairman.

Happier world

We champion the role our Partnership can play in advancing the happiness of the communities we work with and the wellbeing of society.

We build trusted business relationships, acting with integrity and doing what's right. We take responsibility for our impact on the planet and work tirelessly to protect and restore nature, creating a more sustainable future for generations to come.

Governance

To ensure that we are meeting our responsibilities as a business, as well as requirements of the Modern Slavery Act 2015 we have in place a framework to help us to manage and mitigate the risk of human rights abuses in supply chains providing goods and services to the Partnership.

Governance of human rights in the Partnership is part of our wider ethics and sustainability governance and is overseen by a Board-level Ethics & Sustainability Committee (ESC). The Committee comprises the Chairman, the Deputy Chairman (who is the Chair of the Committee and a Non-Executive Director), one Elected Director, two External Independent Members and one Executive Director; the Executive Director, Finance. The Executive Directors who are responsible for John Lewis, Waitrose and New Businesses (or their delegate), and the Director of Ethics and Sustainability, also attend meetings. The two External Independent Members assist the Committee to ensure that an external perspective is maintained, and that the Partnership's approach remains relevant and stretching. In the area of human rights in particular, John Morrison - Chief Executive at the Institute for Human Rights and Business - brings a wealth of experience to the Partnership.

The terms of reference for the Committee state that its purpose is to "assist the Board in fulfilling its responsibilities for setting the Ethics & Sustainability (E&S) strategy in accordance with our Partnership's Purpose and Values and ensuring that this strategy is embedded into [our] operations."

Nina Bhatia, Executive Director of New Businesses, has accountability for human rights and responsible sourcing across our Partnership. An ethical compliance update is provided to the ESC each quarter, with the Committee holding to account those responsible for delivery in operational teams. Ethical sourcing performance is also monitored via our risk management framework, for further information on this framework, please refer to our Annual Report and Accounts 2023/24.

Reflections from our Director of Ethics & Sustainability

During the last year situations across the world where human rights are under threat have continued to make headlines globally, shining a light on how far we still have to go as a society to achieve the standards set out in the Universal Declaration of Human Rights back in 1948. As a Partnership we have continued to drive improvements in our supply chains, and demonstrate that we are a business that is really striving to fulfil its Purpose. I am hugely proud of the work that we do and this report shows how we continue to support those within our supply chains, and the communities around them, to realise their human rights. There is still work to be done, but we continue to improve and develop our programmes and to address human rights and modern slavery risks as we identify them. We couldn't do this without the help and support of our many expert partners who are listed on page 23. Thank you for all that you do.

From a governance perspective, this year we benefited from the expertise of John Morrison (CEO of the Institute for Human Rights and Business) on our Ethics & Sustainability Board Committee, and his input and guidance has been instrumental in allowing us to have more challenging and constructive conversations about human rights within our supply chains.

We have refreshed our human rights programme to better reflect our ambition to support both those working directly within our supply chains and those living in the communities around them. This is an important step for us to move further along in our journey from focusing on our Responsible Sourcing Code Of Practice (RSCOP) towards wider human rights due diligence.

After a few years of limited travel due to covid and rising costs, in the past year Partners have been able to increase the number of supplier visits and in-person engagement. In the Asia region our local sourcing office started a programme to verify that our general merchandise products are being made in the factories that have been declared to us, which supports our ongoing ethical compliance programme. They have made great progress already, giving us much better visibility of what is happening on the ground and allowing us to have a greater understanding of where there might be human rights risks.

Regarding Waitrose Foundation, some of our Partners visited South Africa, Kenya and Ghana spending time at our projects, meeting beneficiaries to better understand the Foundation's impact and how it



might evolve further. We have also made great progress towards achieving our £1 million investment commitment into climate resilience programmes. New programmes have been agreed in South Africa, Kenya, Senegal and The Gambia (see page 17) and we have continued our partnership with the Foreign, Commonwealth & Development Office (FCDO)'s Work and Opportunities for Women (WOW) programme.

Globally we have seen increasing focus on the introduction and expansion of human rights-related due diligence legislation, such as the EU CSDDD. The Partnership welcomes such legislation being debated and enacted in the UK in order to help to level the playing field and to drive increased transparency, best practices and positive impacts within supply chains.

As we continue into another year I know that protecting the rights of people within our supply chains will involve new challenges and new risks, but I have confidence that we will continue to do all in our power to understand and address them.

Marija Rompani
Director of Ethics & Sustainability

The ambition of our Human Rights Programme is to enable everyone in our supply chain to realise their fundamental human rights. We are committed to respecting the rights of those who pack, make, pick, grow and transport our goods, or provide services into the Partnership. This commitment also extends to the communities in which we operate, in line with John Spedan Lewis's founding vision.

As part of our ongoing governance process, our policies are reviewed on a regular basis and updated where needed. If there have been no interim updates, we have a formal review at least every two years.

Human Rights Policy

Our Human Rights Policy recognises the responsibility we hold as the John Lewis Partnership in respecting human rights across our operations, supply chains, or within organisations we work with more widely. Through our Human Rights Policy we make clear our commitment to maintaining safe working conditions, inclusive grievance procedures and treating workers equitably. Our Policy prohibits worker-paid recruitment fees within our supply chains and references our commitment to ensuring workers and those in the communities around where we do business have access to clean water and sanitation. It also confirms our commitment to maintaining a healthy environment and upholding land rights for indigenous communities. We aim to collaborate with suppliers to avoid harm and address systemic issues that exist beyond their own production sites and farms, in line with our Human Rights Policy. Our work is both proactive, in addressing possible risk areas, and reactive, responding to challenges as they emerge. Examples of our efforts are detailed on page 9.

Policy framework

<p>Human Rights Policy</p>	<p>Purpose To set out our commitment to respecting all human rights.</p> <p>Scope Our own operations, all supply chains, surrounding communities and charity partners from or to whom the Partnership procures services or donates.</p>
<p>Responsible Sourcing Code of Practice</p>	<p>Purpose To ensure decent working conditions in line with basic human rights.</p> <p>Scope All supply chains into the Partnership</p>
<p>Ethical Compliance Policy</p>	<p>Purpose To ensure decent working conditions in line with basic human rights.</p> <p>Scope Tier 1 factories supplying John Lewis and Waitrose own brand products. Tier 2 sites supplying Waitrose with fresh produce.</p>

Responsible Sourcing Code of Practice

The John Lewis Partnership's Responsible Sourcing Code of Practice (RSCOP) sets out our commitment to workers' rights and our expectations of our suppliers regarding issues such as pay, working hours and child labour. It is based on the Ethical Trading Initiative (ETI) Base Code and relevant Conventions of the International Labour Organization (ILO).

Ethical Compliance Policy

All goods for resale suppliers in our own-brand supply chains must demonstrate they meet our RSCOP. Our Ethical Compliance Policy sets out how we monitor compliance to our RSCOP for Tier 1 factories supplying John Lewis and Waitrose own brand products, and for Tier 2 sites providing fresh produce to Waitrose. These sites demonstrate compliance by completing self-assessment questionnaires and, where applicable, undergoing subsequent inspections. The due diligence process surrounding the policy enables us to identify gaps in understanding or application of our RSCOP, and to determine where suppliers will benefit from our support in upskilling and capability building.

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Our Human Rights Programme sits within the 'People in Supply Chains' area of our Ethics & Sustainability strategy. It takes a three stage approach. Our due diligence work ensures that suppliers adhere to our RSCOP at an absolute minimum. We support this work through our capacity building programmes which aim to improve understanding and application of our policies. In the third stage, our programmatic activity supports workers and smallholders to improve their livelihoods through sustainable change.

We have recently refreshed our human rights plans to underline our ambitions to go beyond compliance and towards improving the livelihoods of those within and around our supply chains. We recognise our suppliers are at different stages in terms of their understanding and action on human rights. In key supply chains our focus may be on building supplier capacity and driving improvements in standards. In others, we may work alongside our suppliers on industry initiatives and collaborations that go beyond the basic requirements of audit programmes.

Our ambition is to enable everyone in our supply chain to realise their fundamental human rights. We believe that championing worker voice and building more resilient and responsible supply chains creates lasting value for the John Lewis Partnership and those we work with.



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Identifying risk and monitoring conditions

Our human rights work is built upon our fundamental monitoring and risk assessment processes. As a minimum, we require that working conditions for those working within supply chains which supply our Partnership comply with our RSCOP. We prioritise our risk assessments based on the level of associated supply chain risk – including country of origin, industry and product type – and the level of influence and impact we are able to have on a particular supply chain.

As outlined in last year’s report, in 2022 we aligned our monitoring processes across the Partnership, with both John Lewis and Waitrose now making use of the Sedex platform. A requirement of this is that all sites have completed a Self Assessment Questionnaire (Sedex SAQ). This helps us to determine the required frequency of subsequent SMETA audits. To ensure this is done we have implemented a risk rating penalty for sites that do not keep their Sedex SAQ complete and up to date.

In October 2023, Sedex released an update to their SAQ. The update was designed to provide better visibility around the recruitment and housing of migrant workers, giving users better understanding of any risks in this area. We have been working collaboratively with our supply chain to ensure completion of the updated SAQ.

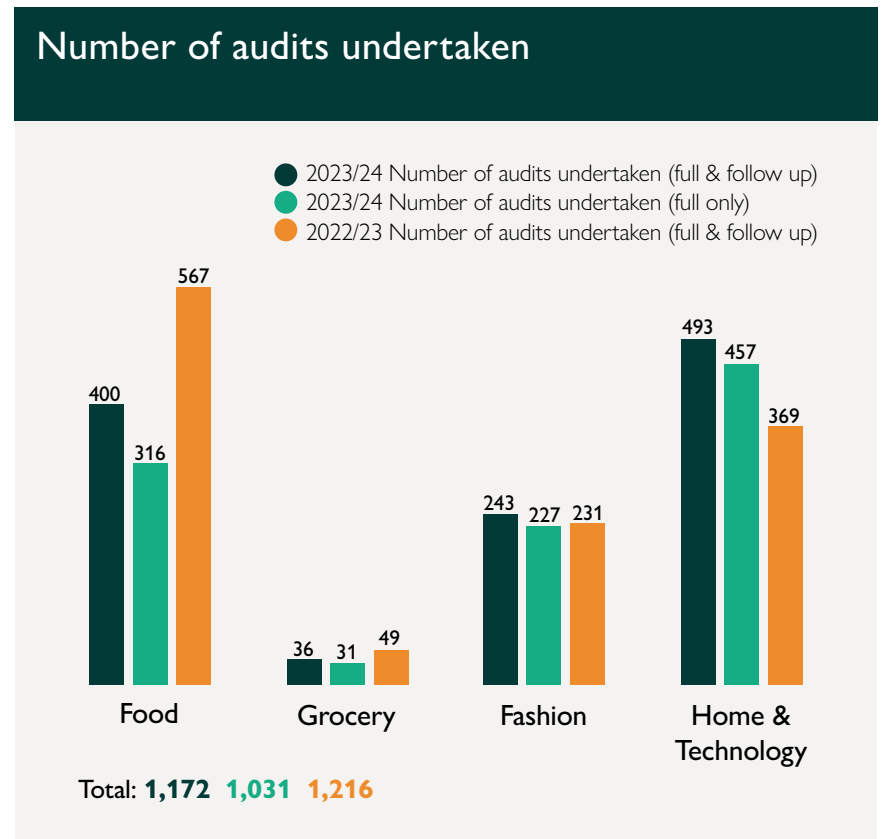
We think that it is important to increase transparency around our supply chains. We have moved to uploading our tier 1 site lists to Open Supply Hub every quarter, ensuring that we are sharing up to date information.

Audits

Our Ethical Compliance Policy requires sites to carry out audits at a frequency determined by our risk rating. Full details of our approach can be seen on the [People in Supply Chains](#) section of our website. These may be unannounced or semi-announced (within a three week window), unless otherwise agreed in writing. We have implemented an audit cycle ‘penalty’ for sites that arrange an announced audit without prior approval from the Partnership’s Human Rights and Quality & Technical teams. These audits are only valid for a period of one year which for most sites means this is an increase in audit frequency. As part of our August 2023 Ethical Compliance Policy refresh we have clarified reporting of ‘business critical’ non-conformances on SMETA audits, so they are now more clearly graded within our internal systems and can be acted upon immediately.

This year we have seen fewer audits than in 2022/23. In total we carried out 1172 audits against 1216 in the previous year. Of these 1031 were full audits. Full audits require auditors to look at all elements of our RSCOP to verify their compliance rather than follow-up audits which focus solely on pre-identified areas for non-conformance closure. The reduction in the number of audits in 2023/24 was due to the changes made to align our compliance requirements for Waitrose and John Lewis in 2022. This was done by moving the John Lewis programme to the Sedex platform and making use of the Sedex risk assessment tool. As a result many sites had their audit cycles reset in 2022/23, and were placed into a one, two or three year audit cycle depending on their risk rating. Subsequently not all sites were required to repeat the audit in 2023/24.

More information on the effectiveness of our programme is shared on pages 20-21.



Spot checks

We commissioned a total of 15 spot checks in eight countries during 2023/24 to look at the effectiveness of our compliance programme. These checks were carried out to SMETA standards and sites were chosen either through a random selection process to verify the effectiveness of our risk assessment process or to follow up on specific concerns. Checks were carried out across John Lewis and Waitrose supply chains.

Spot checks		
Waitrose	Waitrose Foundation	John Lewis
3 in France	1 in Kenya	3 in China
3 in the UK	1 in South Africa	1 in the UK
1 in Belgium		
1 in Spain		
1 in Denmark		

Visibility checks

Since autumn 2022 we have been increasing on-the-ground ‘visibility’ checks at tier 1 factories supplying us, starting with factories based in China. This allows us to confirm that production is continuing at authorised sites but also provides opportunities for us to support factories in improving their overall ethical performance. By the end of 2025 we aim to visit all general merchandise sites in the Asia region.

Since this programme began we have conducted 178 checks, 115 of which took place over 2023. 25 of the sites looked at in 2023 raised some basic concerns around transparency, for example our team were sometimes restricted access to site, or were refused access to key documentation, or subcontracting without permission was found. All of these issues were resolved by our sourcing offices in collaboration with our supply chains. This work continues in 2024.

Key raw materials

Cotton

The Partnership has committed to sourcing 100% of the cotton used in own-brand products from more sustainable or recycled sources by 2025. To do this, we continue to be an active member of Better Cotton. Our Senior Manager, Human Rights Programmes, was part of the Standards Committee, the governance group responsible for providing oversight for the 2nd revision of the Principles and Standards Criteria. This new version (Principles and Criteria (P&C) v.3.0) has bolstered its criteria around decent work and particularly recognises the role of women in achieving impact in sustainable cotton production. It adds gender equality as a cross cutting priority across the standard as well as addressing the importance of climate change mitigation and adaptation. The latest version received formal approval from the Better Cotton Council on 7 February 2023 and became effective for licensing starting in the 2024/25 season.

For more details on our work in cotton supply chains see page 9.

Cocoa

Building upon our previous commitment to source 100% Fairtrade cocoa for all Waitrose own label confectionery products, in 2023 we increased the scope of this commitment to cover all own brand products containing cocoa by 1 January 2025, and extended it to include either Fairtrade or Rainforest Alliance certified cocoa.

During 2023/24 we worked with Tony’s Chocolonely to develop nine own label chocolate bars for launch in April 2024, containing cocoa sourced via Tony’s Chocolonely’s sourcing model ‘Tony’s Open Chain’. This industry leading initiative is founded on five sourcing principles that aim to create a more sustainable and transparent cocoa supply chain by addressing some of the most salient issues in the sector: child labour, farmer poverty, and deforestation. The Fairtrade cocoa in the products is segregated and fully traceable, enabling the farmers who produced it to receive additional Fairtrade Premiums that can help them to achieve a living income. We will be reporting further on the impact of these changes in next year’s report.

Wild caught fish

The Responsible Fishing Vessel Standard (RFVS) is a voluntary programme certifying high standards of vessel management and safety systems. The Standard includes expectations around crew safety, rights and wellbeing. Our aim for all British fishing vessels supplying fish and shellfish to Waitrose to be RFVS certified has to date been a challenge to achieve. There has been a limited uptake amongst vessel owners, whose focus has generally been towards sustainability through certifications like MSC. We are now supporting vessels and skippers to increase focus on worker welfare by sponsoring a number of vessels to participate in the RFVS programme. We hope vessel owners will be able to share their experiences of the scheme with others to encourage an increased uptake in the future.

Enhanced due diligence and Human Rights Impact Assessments

Cotton: Egypt & India

In 2022 we commissioned Partner Africa to conduct a supply chain assessment of our Egyptian cotton supply chains. Cotton is one of our most commonly used own-brand raw materials, featuring in bedding, furnishings and fashion. For this assessment we focused particularly on cotton used within our own label John Lewis bedding ranges. The assessment covered supply chain impacts throughout the production process from farming and ginning in Egypt to spinning, weaving, production and manufacture in India. Fieldwork in Egypt was delayed due to a challenging harvest season and government restrictions limited researchers' ability to access smallholder farmers directly. However, the research has given us a good understanding of some of the challenges facing the sector and ways in which the Partnership can work collaboratively with supply chain actors to bring about improvements. We plan to develop and share an action plan, with progression of this a key priority for 2024.

Shrimp: Ecuador

In 2022 we began work with Ergon Associates to complete an Impact Assessment into workers' rights within our prawn supply chains from Ecuador. Increasing political instability in the country meant we were unable to send researchers to complete the fieldwork element of this project. As a result we instead completed a comprehensive desk-based study of potential risks. Potential risks included low wages, poor health and safety practices and a lack of freedom of association. The report noted that remote location of hatcheries and farms could also mean a higher likelihood of issues such as forced labour and long working hours. We will continue to monitor the situation in Ecuador to ensure ongoing safety of those in our supply chain and to identify appropriate next steps for our assessment.

Tuna: South Korea

Having been unable to complete our planned work in Ecuador we re-visited our risk mapping and began to scope work with Ergon Associates and our fresh tuna supplier to understand the impact of the South Korean government's 'Implementation Plan for Migrant Fishers on Distant Water Fishing Vessels' (known as 'the Plan') for fishers on tuna longline vessels. This work is complex given the nature of the supply chain, where it is common for vessels to be at sea for six months at a time and has therefore taken time to agree on a terms of reference. Working collaboratively with the supply chain and vessel owners we now hope to have completed the fieldwork element of the project by the end of 2024 and will go on to develop an action plan.

Update on previous Human Rights Impact Assessments

We have made progress with actions following a joint review (with M&S) into the tea sector in Kenya in 2021/2. To better understand issues around living incomes and living wages in the sector we have conducted a Service Delivery Model Analysis with the Sustainable Trade Initiative (IDH). This reviewed supply chain and business structures to identify opportunities to add more value to farmers and workers through improving the performance and profitability at the factory level, as well as identifying diversification opportunities for smallholders. Together, these activities have the potential to reduce the living income gap for tea farmers. We have also begun to pilot a livelihood improvement programme surrounding two tea factories in East and West Rift in Kenya. This will include a focus on supporting householders to improve financial literacy, increase climate resilience at a smallholder level and establish additional income generating activities. We are continuing to deliver against our joint Action Plan which can be seen [here](#).

In our pork and lamb supply chains we continue to make progress through our action plan following the joint impact assessment completed in 2022 with Pilgrims and the Co-Op. To date we have worked collaboratively with our supplier, Pilgrims, to ensure the continued adoption of a cost of production model, which ensures farmers are receiving a fair price for their product. We have also developed a guidance document for farms on our Responsible Sourcing Code of Practice and its application. Pilgrims have additionally worked with their supply chain to roll out mental health first aiders across their sites and farms. We were pleased that this work was subsequently shortlisted for the Food Manufacture Excellence Awards in February 2024.

Goods Not for Resale (GNFR)

Goods

In April 2023 we transitioned to a new risk assessment system (from Helios to Coupa Risk Assess) which has resulted in a simplified risk assessment process for onboarding new suppliers. The assignment of risk level has also been brought in-house. The risk assessment process requires all suppliers to confirm that they are compliant with our RSCOP and the Modern Slavery Act 2015. This is refreshed on an annual cycle so suppliers will be reassessed each year.

As part of this move to Coupa we have added in a requirement for goods suppliers to confirm where they manufacture goods for the Partnership. Data collection remains ongoing as suppliers move over to the Coupa system.

Services

We worked in partnership with Slave-Free Alliance (SFA) in 2022/23 to refresh the risk assessment carried out in 2020. This work provided us with both site-specific action plans and wider internal recommendations to improve policies and procedures to reduce risk of labour exploitation. Findings were shared with our Ethics and Sustainability Committee in 2023 and subsequently a working group was formed with representatives from Supply Chain, People (human resources), Legal and Procurement to carry out actions identified. In the run up to peak trading at the end of 2023 we carried out repeat spot checks at three of the sites previously visited by SFA. Improvements had been made across all sites, including improved processes for worker onboarding and implementation of awareness-raising programmes across management and workers of the possible indicators of modern slavery.

Transport and logistics

As a business with a global supply chain, we rely on the shipping industry to support us in getting products to our shelves. However, severe human rights abuses are reported in the industry. At the end of 2021 we began work with the International Transport Federation (ITF) to understand the standards they recommended for ocean carriers, so that, through changes to our tending requirements, we could play a role in protecting the rights of seafarers. Due diligence carried out by ITF into our supply chain at the end of 2023 has shown that 95% of vessels are now covered by an ITF approved Collective Bargaining Agreement (CBA). These CBAs have enabled seafarers to access protections and grievance procedures. On Partnership chartered vessels examples of this support have included ensuring workers are receiving the correct pay, are able to access medical treatment and are provided with adequate, clean drinking water.

Salient human rights risks

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We source a wide product portfolio from across a diverse range of geographies, so to prioritise our focus areas we take a rights-centred risk-based approach to identify our salient human rights issues, as considered best practice within the UN Guiding Principles on Business and Human Rights (UNGPs). The Partnership's Human Rights Team uses a range of approaches to help identify current and potential human rights issues. This includes reviewing supplier data, desk based research, human rights impact assessments and enhanced due diligence, participation in industry forums, insights gained through our membership of organisations such as the Ethical Trading Initiative (ETI) and Food Network for Ethical Trade (FNET), and engagement with key stakeholders like NGOs, trade unions, other brands and Government bodies. All these channels help us determine the scale, scope and remediability of human rights risks in our supply chain.

The following table shows our salient human rights by issue type and where they exist across the Partnership's supply chains:

It should be noted that this list is not exhaustive and these focus areas do not take away from our ambition to protect and respect human rights for all those affected by our operations outside of these supply chains. We also recognise that human rights issues can develop quickly and emerging issues may be added to this list over the course of the year.

Salient human rights risks			
Human rights risk	Supply chain	Country focus	Mitigation / Remediation Action
1. Employment is freely chosen	Fresh produce Fish and aquaculture General merchandise	UK and Europe Global China	Seasonal Workers Scheme Taskforce (pg 11) Work in UK Fishing / Tuna Impact Assessment (pg 11 & 9) Resilience programme work China (pg 16)
2. Freedom of Association	Fashion and home GNFR	India and Bangladesh Global	Programme work with The Centre for Child Rights and Business (pg 12 & 13) Logistics work (pg 9)
3. Health & safety	Tier 1 factories	Global	iHASCO training (pg 12)
4. Child labour	Flowers Cotton Fashion and home	Turkey Egypt Asia	Mapping and programme work with The Centre for Child Rights and Business (pg 12 & 22)
5. Wages	Bananas Tea Fashion and home Cotton	Dominican Republic Kenya, India India, Bangladesh Egypt	Living wage commitment (pg 13) HRIA action plan and Fairtrade Assam Code (pg 9 & 13) Monitoring implementation of wage increases with suppliers Cotton action plan (pg 9)
6. Gender and discrimination	Home Fresh produce	India Europe	Programme work with Society for Labour and Development, India (pg. 16) Grievance Mechanisms in Agriculture project in Italy, Spain (pg 15)

Programmes Addressing Salient Human Rights Risks

Employment is freely chosen

Seasonal workers in UK fresh produce

In 2023 45,000 visas were made available for workers to come to the UK via approved licensed labour operators and work within the fresh produce sector as part of the Seasonal Workers Scheme (SWS). Since the scheme's launch in 2019 there continue to be numerous media reports of human rights abuses, mainly relating to debt bondage and fees paid by migrant workers.

In March 2023 the Seasonal Workers Scheme Taskforce was formed to try to address some of these challenges. This multi-stakeholder initiative, comprising retailers, growers, suppliers, scheme operators and industry associations, aims to develop practical actions to ensure access to workers' rights in the SWS. This takes a two tiered approach. The first tier is focused on actions that can be implemented within the current scheme to improve recruitment and employment of seasonal workers. The second involves engaging with relevant government departments to address structural issues within the Seasonal Worker visa scheme that may increase risk of worker exploitation. Waitrose is a retail representative on the Taskforce, also participating in a number of the sub working groups.

Over 2023 the Taskforce has made updates to the [Just Good Work](#) worker information app, developed and delivered seven regional grower roadshows to support responsible recruitment, developed a project proposal for a study on the Employer Pays Principle in UK horticulture and refined policy asks to relevant government departments. The Taskforce is coordinated by Stronger Together, with further details on activity to date and plans for 2024 available [here](#).

Fishing

Over the last couple of years there has been increased attention upon the fishing industry from NGOs and media highlighting the challenging conditions faced by workers in the sector. This has included a focus on the use of forced labour in the fish processing sector, debt bondage and poor treatment of migrant fishers in the UK. Fish is an important category to Waitrose and we have continued to focus our attention on driving improvements in this sector. Our work has predominantly looked at how to support migrant workers to access their rights. At an advocacy level, during early 2023 we continued to support calls for an end to the transit visa system. This exploitative system had meant that crew with these visas on fishing vessels off the coast of the UK were not legally allowed to work and reside on UK soil. We welcomed the changes passed into the Nationalities and Borders Act in April 2023 which closed the loophole of fishing boat owners using the transit visa scheme to crew boats when working 'wholly or mostly' in UK territorial waters.

CASE STUDY

Work in UK fishing pre-departure films, UK

In our 2021/22 Human Rights Report we shared findings from our research into working conditions experienced by migrant fishers in the UK. As part of the action plan following this work, we developed a series of four worker education films in partnership with The Seafarers' Charity and Stella Maris and with consultation from a wide range of stakeholders including the ITF, vessel owners and NGOs. These films aimed to educate workers on what they could expect at all stages of their journey, from pre-departure, to conditions on vessel and who to contact for support when in-country. These films have now been translated into nine languages and are freely available on YouTube. They were shared at the ITF Seafarer's expo in Manila, attended by an estimated 5000 fishers and are now included in induction materials for Fisherman's Mission, Stella Maris and Scottish White Fish Producers Association. To date, they have been viewed over 2000 times across social channels. We plan to further share these over 2024 and are working with partners to look at how best to develop our work in this area to ensure fishers coming into the UK are able to access their rights.



Freedom of association

Our work with the ITF, particularly in relation to transport and logistics has enabled workers to collectively bargain for improved conditions (see page 9). In Sri Lanka we have engaged with a local union to understand how workers have been impacted by a supplying site running into financial difficulties. Sadly an acceptable resolution for workers has still not been reached despite the Partnership following the requests from the union. We remain in conversation with the union to see how we can further support.

Grievance processes

In our 2021/22 report we shared details of our work with Oxfam Business Advisory Service (OBAS) to develop a pilot to address the lack of effective grievance mechanisms for supply chain workers in the Italian tomato industry. We have continued to embed the changes devised in phase one. The site we have worked with on this programme has implemented a communications committee, and elected two spokespeople responsible for sharing worker feedback, one with a particular focus on ensuring migrant workers' views are considered. OBAS have supported the site to create posters and flyers to raise awareness of grievance raising procedures and have helped the site to put a tracking system in place so they are monitoring grievances received and remediation taken. Many grievances highlighted issues with staff relations, emphasising the importance of investing in team-building activities to improve workplace dynamics. The newly established Communication Committee is currently also looking at how the hours of office staff can be amended after issues were raised that the lack of defined working hours were making it difficult to access transport. We are building on the lessons learnt from this work by engaging in 2024 in a joint Grievance Mechanisms in Agriculture programme led by the ETI (see page 15).

Health and safety

The highest percentage of non-conformances (NCs) against our RSCOP (see page 20) continue to be health and safety related. In last year's report, we shared details of our partnership with iHASCO, an online learning provider, to provide sites with 30 online training courses, ranging between 15 to 45 minutes each to complete. The aim of the training was to improve knowledge at site level for future audits and close out any current NCs. Our ambition was to register 400 sites with iHASCO and whilst 356 sites signed up to the platform, only 37% (133) of these

went on to complete courses. These 133 sites, collectively employing 32,821 workers, completed 2382 courses by the time our contract with iHASCO ended in October 2023. The nature of our supply chains mean that in some cases we work via agents and in other cases we work directly with sites. We found it more challenging to engage with sites where we don't have a direct relationship. Health and safety training is also often delivered in person so it was harder to encourage this to be done online. However, feedback from those who took part in the courses was positive.

Feedback was given on a scale of 1-10 with 10 being highest.

- Usefulness of these training for furthering understanding? 8.3
- Likelihood of implementing changes based on learnings from these trainings? 8.4
- Relevance of these trainings for the factory? 7.8
- Likelihood of recommending these trainings to a colleague? 8

Child labour

Child labour is forbidden by law in most countries, however risk still remains across many supply chains where social or economic factors may drive children into work. Where issues are identified we aim to work collaboratively with our supply chain partners to address this following our **Child Labour Remediation Best Practice** guidance. In 2023 we became members of **The Centre for Child Rights and Business (The Centre)** to support our work in this area. Their 2023 feedback report commended us for proactively assessing child labour risks in the supply chain, and awarded us a score of 39 out of 50 on our child labour remediation activity. They noted key strengths in prevention and remediation policies and practices, a proactive approach to assessing child labour risks and commitment to supporting remediation. Areas to improve on including enhancing monitoring and case detection across source countries and integrating these efforts with fair buying practices.

Over the last year we have been involved in remediation for two suspected cases of child labour. One in Turkey and one in China (see case study pg 13). In Turkey, a supplier raised concerns around the safety of children present on three farms that supply flowers to the European market. Working together under the guidance of the ETI, retailers and suppliers have sponsored a review of the conditions on the farm and are now putting in place a plan to ensure that these farms are family friendly and safe for children. This work is being undertaken by The Centre and Ethica, a Turkish based expert on supply chain standards.



CASE STUDY

Rugs, India

In 2022 we worked with ASK Training and Learning India to conduct 17 site visits at a range of our hand-made rugs factories and their sub-contracting units. The major findings from these site visits related to Health and Safety, worker representation and grievance redressal mechanisms. We have worked collaboratively with ASK India and suppliers to look at ways to address some of the challenges found. In September 2023 we conducted two training days for nine participating suppliers in Panipat and Bhadohi, to help them to understand where there were gaps in terms of Health and Safety practices and worker representation mechanisms and how they might work to address them. ASK India has begun to support sites with activities such as worker training on committee representation and developing and effectively managing grievance procedures. The focus is specifically on building the capacity of factory management and the committee members and system improvements. This work will continue through 2024.

Wages

Reducing poverty in banana supply chains

Bananas remain a bestselling item in customer baskets but are a high risk product from an ethical and environmental perspective. Wages in the banana sector are low and farmers and workers are increasingly seeing the impact of changing climate and weather patterns, making production unsustainable. To try and address some of these challenges, in 2010, Waitrose committed to sourcing only 100% Fairtrade bananas, helping to guarantee a Fairtrade Minimum Price and a Fairtrade Premium to farmers in our supply chain. In March 2023 supported by the IDH, we joined with eight other UK retailers and collectively committed to closing the living wage gap in our banana supply chains by 2027. As part of the commitment our growers have begun to use the IDH Salary Matrix to calculate the living wage gap on their plantations. Data from 2022 surveys, covering approximately 97% of our volume, suggests that 28% of workers had a living wage gap, with the average living wage gap being 20%. Over the next year we will be working collaboratively with the sector and key partners like Fairtrade to understand how to address this gap in a sustainable way.

Tea sourcing in Assam

As outlined in our previous Human Rights reports, Fairtrade tea sourcing in the Assam region is challenging, due to poor working conditions, low wages and increasing costs of production which has resulted in a limit to the number of producer organisations certified as Fairtrade. Over the past year we have made considerable progress with Fairtrade and other industry partners to develop a new model for sourcing Assamese tea, which will provide a greater impact to workers whilst retaining the Fairtrade principles. Whilst the new model is in development, we continue our independent due diligence with our expert partner Impactt. Each year we ensure that the equivalent Fairtrade Minimum Price and Premium are being paid and the producer groups are assessed against Fairtrade and international labour standards. We have extended this work by delivering additional training to build organisational capacity. This year training was focused on awareness around the root causes of absenteeism and management training.

CASE STUDY

Christmas crackers, China

During a routine visit to a supplier of crackers in China it was noted that there was a young boy on the factory floor with his mother whilst she was working. It was believed that the boy was folding paper for the crackers. The Partnership worked through the ETI to establish which other clients were working with the factory so that a coordinated approach could be taken to support the remediation process. We collectively engaged The Centre for Child Rights and Business (The Centre), who carried out an onsite investigation. This did not find evidence of child labour at the factory but did determine that there were some safeguarding issues with regards to children living in the factory accommodation during the school holidays. There were not the appropriate controls to prevent children walking onto the factory floor. It was identified that the family concerned had been experiencing some financial pressure and the young boy did not have anyone to look after him whilst his mother worked and he was not at school.

As a result, alongside other retailers and brands we supported him with tuition fees for a summer school and a living stipend. The boy completed his summer education and went back to his usual school in September. The factory management have been given training on child labour prevention and remediation, as well as how to make improvements to the HR management system in the factory. Through The Centre we continue to support the factory to set up their own child friendly space with activities such as identifying the right location for the space, undertaking a needs assessment to identify operational requirements and training staff to be able to run the space with minimal external support.

Gender and discrimination

Gender equality

In our 2022/23 report we shared details of the work that we are doing through our Waitrose Foundation Global Strategic Fund to support climate resilience amongst farmers and workers in East Africa (see page 17). Recognising that women are disproportionately affected by climate change, our partnership with the UK's Foreign, Commonwealth & Development Office Work and Opportunities for Women (WOW) programme ensures this work takes a gender lens. The partnership with WOW provided additional training and resources to 2169 women

within the Waitrose Foundation farms and the surrounding communities. Furthermore, 'Village Based Advisors' have been trained to earn additional incomes through installing clean energy cookstoves and managing tree nurseries. 289 women benefited from increased access to finance through training on digital financial tools and the formation of 'Village Savings and Loan Associations'. Gender mainstreaming was embedded throughout the programme. In particular this was achieved through a 'Social Norms' training programme which promoted joint decision-making at a household level and gender empowerment to encourage more women to take on leadership roles.



CASE STUDY

Promoting health of women workers, China

Results from our Better Jobs China 2021/22 survey and findings from a previous worker resilience project identified a need to support the overall wellbeing of women workers at key supply chain sites. Women make up a large proportion of the manufacturing workforce and have specific health concerns and needs which were not being adequately recognised by management. The project aimed to support women by increasing everyone’s understanding of these needs, sharing knowledge on how to address them and changing behaviours to promote inclusive and supportive working environments.

Over the course of a year, the programme carried out needs assessments at five participating factories. On site health training was undertaken, which was accompanied by a tailor made health manual. Training was tailored to each factory and included topics such as managing emotional impact, handling domestic violence and understanding menopause. Participants in the training were supported by an online WeChat community.

Overall the project directly supported 114 women workers. An additional 64 women workers attended in-depth onsite training. Learnings shared by participants demonstrated a better understanding of women’s needs and improved workplace dynamics. We saw a positive shift in attitudes and trust amongst women workers towards their employer. 90% of participants agreed the programme had been valuable to them and that they will be taking positive actions for their health as a result.

“I was very, very surprised to hear the term ‘domestic violence’ in the factory. I just recently escaped from domestic violence, and I’ve been working in this factory for less than a year. I want to share my experience with everyone, and I feel very fortunate to work in such a company where I feel completely safe.”

Female worker

“Verbal abuse is also a form of violence! Next time someone insults me, I’ll tell them it’s not right!”

Female worker

“The project conveys a message to our women workers, that the factory’s attention brings them a warmer feeling, not just a simple transaction of ‘you come here to work, and I pay you a salary.’”

Factory Management

“The project helped us collect the voices and needs of employees and also increased employees’ identification with the company.”

Factory Management

“In the training our female workers feel the care from the factory. After the training, we made some improvements. Firstly, we established a mutual support group for female workers, and I am the management representative.[...] Now, at regular intervals, we inquire about the workload, duration, and mood of our female workers. If there are any issues, we contact the management to resolve and adjust. I feel that it has improved the quality of life for female workers. Their job satisfaction has increased, and there is a bit more improvement in efficiency and product quality.”

Factory Management

Collaborations

ETI

We have worked collaboratively with the ETI on programmatic activities over 2023, and in responding to Base Code violations identified in our supply chain, we have also joined a number of ETI convened working groups (eg. in Turkey see page 12).

In our 2022/23 report we provided an update on collaborative industry work in the Italian fresh produce sector. The formal working group for this was closed in January 2023 and the programme took a wider focus, with a working group formed to look at **Grievance Mechanisms in Agriculture**. This two-year project, funded by the third phase of the UK Government’s Modern Slavery Innovation Fund aims to improve access to grievance mechanisms for vulnerable agricultural workers. It also aims to improve information sharing on recruitment practices and emerging risks for migrant workers through the creation of a Modern Slavery Prevention Network in countries of origin and transit.

Waitrose is one of a group of 20 retailers and suppliers involved and the initial focus will be on five agricultural regions in Spain and Italy. To begin to understand the key factors affecting the availability, awareness, accessibility and use of operational grievance mechanisms, the initiative commissioned four research projects carried out across Italy, Spain, Tunisia, Morocco, Guinea and Senegal. More information on the initiative can be found at ethicaltrade.org. In line with our reporting years, we will be sharing more detail in next year’s report.

Our factory Herbert Parkinson has begun to participate in the ETI responsible purchasing practices initiative for manufacturers. ETI and partnering organisations have developed a **Common Framework for Responsible Purchasing Practices** (CFRPP). Through a series of workshops, structured around the principles of CFRPP, the programme seeks to understand to what extent the principles and tools can be applied to manufacturing in the general merchandise sector. We hope to be able to report on progress in our next report.

International Accord

John Lewis has been a signatory of the International Accord since its inception in 2013 to improve factory building safety in Bangladesh. In January 2023 we also became a signatory of the Pakistan Accord to ensure worker health and safety standards in our garment and textile supply chains in Pakistan. At the end of 2023/24, we had 20 active apparel factories in Bangladesh, all of which were registered on the International Accord programme and who actively participated in their site audits and any follow-up action plans. There are nine sites in Pakistan who have registered on the Accord programme.

Spanish Ethical Trade Forums (Asociación Foros De Comercio Ético)

During 2023 the Ethical Trade Forums Association (ETFA) developed a grievance mechanism project pilot called Canal Foros. Four of our Spanish fresh produce sites have registered in the process. The grievance mechanism, being designed in collaboration with Ulula and the ETI, will collect information on issues from workers through anonymous digital technology. Farms will be able to view grievances and track remediation in real time and will be supported in doing so, through tailored training and workshops by ETFA. Over 2023, seven capacity building sessions took place with site managers and five sites began training their workforce on using Canal Foros. The pilot concluded in March 2024 and learnings are being used to inform a subsequent roll out.

Food Network for Ethical Trade

We continue to be an active member of the Food Network for Ethical Trade (FNET). Our Senior Human Rights Manager is a member of the FNET Board and we participate on a number of their working groups. Over the course of last year FNET have been active in the development of the Seasonal Workers Taskforce (see page 11) and have supported retailers to come together on joint investigations where human rights issues have been identified in the supply chain. For example, following media attention into alleged human rights abuses in the fishing sector in Northern Ireland, the Seafood Ethics Action Alliance (SEAA) with the support of FNET facilitated a platform for retailers, seafood businesses and the fishing sector to come together to launch an investigation. FNET also convened retailers to share feedback regarding the new Sedex SAQ and agree a collective date by which suppliers should complete it, therefore simplifying the process for suppliers.

Modern Slavery Intelligence Network (MSIN)

The Partnership is a founding member of MSIN, a not-for-profit collaboration created in 2020 in response to the findings of Operation Fort (the UK’s largest ever modern slavery investigation). MSIN’s aim is to share intelligence across the UK’s food industry to understand patterns and trends of modern slavery and use these to disrupt traffickers. Stop the Traffik runs the intelligence sharing platform, helping to spot trends which can be used to inform action by members.

Over 2023 MSIN has continued to grow its membership of food retailers and tier one suppliers. The annual MSIN conference in September was an opportunity to share insights and review current trends in modern slavery. The conference was attended by more than 150 industry and NGO representatives and included a keynote speech from the Rt Hon Theresa May MP. In 2024, MSIN will continue to focus on increasing the quality and quantity of intelligence processed.

Seafood Ethics Action Alliance (SEAA)

We continue to participate in the Seafood Ethics Action Alliance (SEAA), a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence in the global seafood supply chain. We have shared our work in UK fishing with the SEAA (see page. 11) and participate in their Advocacy and UK Action Plan working groups.

ISSARA

We continued to work with Issara (an independent NGO tackling human trafficking and forced labour) throughout 2023, making use of their platform to promote worker voice across a number of our Asian sites. Our partnership formally ended in December 2023 as our supply base no longer aligned with the countries in which Issara operated.

Improving livelihoods

Our human rights programmes ultimately aim to improve the livelihoods of workers in our supply chains. We have a target to improve the livelihoods of more than 200,000 workers by the end of 2025.

A key part of our strategy to achieve this goal is to ensure that workers have a voice within our supply chain. This mirrors our own Partnership model. We work on a number of initiatives across our John Lewis and Waitrose brands to promote worker voice and use learnings to drive improvements to worker livelihoods.

Better Jobs Survey

We began running our Better Jobs survey in 2019 as a way in which to develop a greater understanding of the experience of workers within key supply chains. We then use insight from the surveys to develop action plans to drive improvements for both workers and their employers.

China

The Better Jobs China surveys carried out during 2020/21 identified that workers were struggling to cope with the pressures of work and home life, this was particularly evidenced in vulnerable groups and those with caring responsibilities. This pressure may lead to stress, poor health and poor performance at work. Based on these insights, we developed a programme, which was completed in May 2023, to help support the resilience of 696 workers across five factories. Working groups were developed at the factory comprising management, supervisors and workers to discuss and understand triggers of pressure and what support for workers could look like. Tailored factory plans were then put in place, and peer to peer sessions across factories helped promote best practice. Workers were supported through education resources shared via WeChat. Each factory committed to at least three actions to support ongoing improvements to worker experience, including introducing flexible working policies, financial subsidies to support workers outside of peak season and widening worker access to labour unions. See table below.

Two of the sites involved in the programme are now providing training to upskill workers so that they can take on multiple jobs at the site and increase the flexibility of their role. Working groups also suggested that attracting family members to work at the factory would help increase the stability of the workforce. To support the upskilling of existing workers, one of the sites also provided opportunities to family members of 8 workers.

India

Following completion of our Better Jobs survey across ten factory sites in India in 2022, we recognised a need to support women’s wellbeing. The survey told us that 53% of female workers had daily childcare responsibilities and 38% also had caregiving responsibilities for other family members. We noticed a correlation between these caregivers and those that told us they felt under pressure and anxious at work. We are now partnering with the Society for Labour and Development (SLD) to understand what affects women workers’ wellbeing at three factory sites and how improvements can be made. Workshops between workers and factory management representatives will take place to help co-create solutions and SLD will support factories during 2024 to implement changes suggested.

Planned actions by sites to improve worker resilience											
	Flexible working policy	Multi-skill training	Off-season subsidy	Accommodation subsidy	Education subsidy	Migrant worker subsidy	Job support to workers and families	Labour union	Gym and entertainment centre	Worker engagement	Number of workers livelihoods positively impacted
Site 1											140
Site 2											228
Site 3											90
Site 4											170
Site 5											68
											696

The Waitrose Foundation

Our flagship supply chain initiative, The Waitrose Foundation, is now in its 19th year of supporting improved livelihoods within Waitrose's fresh produce and flower supply chains. In 2023 the Foundation accrued £2.4m of funding through the sale of 137 Foundation labelled products. This enabled the delivery of 254 community and worker-led projects across ten countries. This benefitted 65,307 farmers and workers and 101,042 wider community members.

We have continued to scale and develop our most impactful projects over the last year. This includes: provision of microloans and fuel efficient stoves in East Africa; the development of renewable energy sources and early years classroom provision in South Africa and the successful School Farm Project in Ghana. This latter project has now been handed over to a local incubation hub, Kosmos Innovation Centre (KIC), to further develop the scale of the programme beyond its initial communities.

In Senegal and The Gambia we are in the final year of a three year programme of worker voice projects, including development of school facilities, a maternity ward and a reforestation programme. As a result of the Foundation's activity so far, the programme has provided improved access to education to 2,287 students and improved healthcare for 6,184 workers.

In Kenya, a key area of focus has been supporting improvements in smallholder livelihoods. This has included provision of a range of farm equipment for outgrowers, such as drip irrigation, motorised sprayers, charcoal coolers to improve productivity and beekeeping starter kits to promote income diversification. As a result 78% of outgrower farmers have reported increased yields which will enable them to achieve a better price for their crop. Together with our regional partner, Farm Africa, we won the Business Charity Award for Food and Drink Partnership of the Year at the Business Charity Awards 2023.



Across all Foundation countries, training remains a key activity. In the last year 528 people took part in courses including Worker Committee Training, Management Training and Project Coordination Training. We also delivered a range of wellbeing training courses in South Africa, such as supporting workers' emotional health and managing substance abuse, which reached 452 people.

We continue to focus on improving our Monitoring and Evaluation data, including collecting new indicators at farm level. In 2023 we also completed a study into how the Foundation has contributed to improved incomes in East Africa. We estimate that the current cost of living gap in our East African farms is 35%, however Foundation projects such as microloans and the provision of cookstoves have contributed to reducing this gap. We will use the report findings to improve our projects and training, which can in turn benefit household incomes.

CASE STUDY

Waitrose Foundation Global Strategic Fund

Our Global Strategic Fund continues to invest in climate resilience initiatives. Following last year's commitment to fund £1m worth of climate resilience programmes by 2025, we are now delivering five projects in Kenya, South Africa, Senegal and The Gambia. £770,000 which has been invested so far will support over 35,000 Waitrose Foundation farmers and workers.

In Kenya, we are completing our original climate resilience project. This project supports flower farm workers with tools to increase their resilience to the impact of climate change, including the provision of clean energy cookstoves. The programme has reached over 4,000 farmers, enabling them to adopt renewable energy measures, establish new agricultural business models to diversify incomes, and access credit. To read more about how the Work and Opportunities for Women (WOW) programme supported women workers in this project, see page 13. In addition to this project we have recently established a new water security project which will provide improved access to water to over 1,000 workers and smallholders.

In South Africa, we have extended our existing UK partnership with WWF to deliver a water security programme in the Western Cape. The programme will convene stakeholders to clear alien invasive species, allowing native species to thrive, ensuring a stable supply of water through the catchment and ultimately help support the long term employment prospects for 30,000 Waitrose Foundation workers given the criticality of water supply.

In Senegal and The Gambia, we are delivering two similar projects which will provide climate-smart agricultural inputs to farmers and deliver training opportunities through digital learning resources, an apprenticeship programme and farm exchange visits.

Training

Training is an important element of our Human Rights Programme. By supporting our Partners (employees) and suppliers with up to date and relevant training we aim to reduce incidences of modern slavery and human rights abuses in our supply chain.

Partner training

We refreshed our bespoke online modern slavery training module for Partners working in our Supply Chain operations (distribution). This training aims to reach 100% of Supply Chain Partners who are most likely to be working alongside agency workers during the peak season. Over 2023, 987 of our Supply Chain Partners completed the training and since it launched in 2021 the training has reached 8952 Partners in total. During the year we have revised the way that training is assigned to Partners and so will be adjusting this target going forward to enable us to report more effectively. We have also developed a new Human Rights online training module, accessible to all Partners, which launched in Spring 2024.

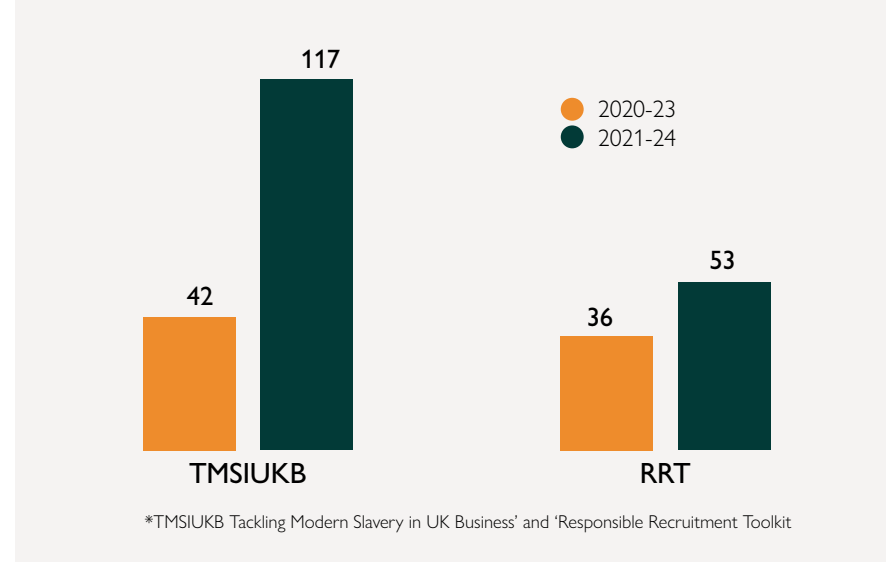
We also worked with Stronger Together to train Waitrose Partners on spotting the signs of Modern Slavery. In total 28 Partners from across the Ethics and Sustainability and Quality and Technical Teams attended the Tackling Modern Slavery in UK Business course. Six Partners also attended the Advanced course.

As noted in our 2022/23 report we amended the process for managing ethical compliance data for John Lewis own brand suppliers and factories, transferring audit data to the Sedex platform and requiring all sites to have Sedex membership and complete the Sedex self-assessment questionnaire (SAQ). As a result our soft furnishing factory Herbert Parkinson carried out its first SMETA audit, and since then have become approved as per our Ethical Compliance Policy. At the time, a number of non-conformances were raised relating to health and safety, wages and working hours. A site level action plan was developed to resolve the non-conformances and Slave Free Alliance were commissioned to support the site training. Fourteen Partners were trained in understanding modern slavery and how to spot it. A further eight Partners attended internal training on company ethos and disciplinary measures.

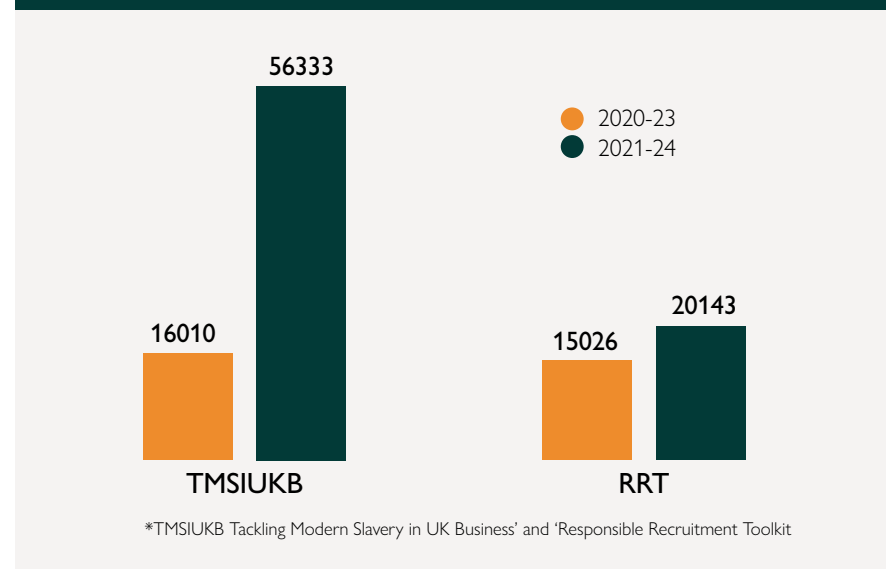
Supplier training

In August 2023 we updated our ethical compliance policy to mandate core Stronger Together and Responsible Recruitment Toolkit training for suppliers with UK-based sites. We believe this is an important step in raising awareness of modern slavery risks and mitigation steps within our supply chain. We recognise that this training cannot just be a one-off as there may be both operational changes and changes in personnel over time, so we request sites to re-complete this training after a three year period. We held a supplier webinar, attended by 137 people, to demonstrate the benefit of engagement with these initiatives. Our original target was for 25% of eligible sites in our supply chain to complete Stronger Together training and 10% of eligible sites to complete Introduction to Responsible Recruitment over the previous three years. Both targets have been achieved. Stronger Together training (Tackling Modern Slavery in UK Business) has been completed by 26.4% of eligible sites and Introduction to Responsible Recruitment has been completed by 11.9% of eligible sites.

Number of sites completing training courses



Number of workers completing training courses



CASE STUDY

Waitrose Foundation Safeguarding Training

We have been working to enhance our safeguarding practices within the Waitrose Foundation over the last year, recognising a need to strengthen policies, processes and awareness amongst Foundation partners, staff and farms.

Working with Coracle International we introduced an updated policy and Code of Conduct which we believe better protects vulnerable people should any harm or maltreatment be caused in the course of delivery of the Foundation’s work. We know that a policy on its own is not enough to drive positive behavioural change in identifying and acting should issues arise. So to ensure the policy was clearly understood we undertook a series of training at all levels within the Foundation. This included training the Global Board, Regional Steering Committees and local Implementation Partners. We have now introduced quarterly reporting requirements across all levels of Foundation governance to ensure that this topic remains a key area of focus and issues are dealt with in appropriate timelines.

Safeguarding is a key area of the work of the Partnership’s Human Rights Team and so the team also took the opportunity to attend a half day training session with Coracle International to develop their understanding of what safeguarding means and how to sensitively handle issues.

Over 2024 we aim to deliver more training for our Implementation Partners, particularly focusing on engaging worker committees at farm level to understand both what we mean by safeguarding and correct processes for reporting concerns.



Effectiveness of our due diligence programmes

When considering the effectiveness of our programmes we look at how good our due diligence process is at finding issues and the approaches taken to resolve these and provide remediation. Our work seeks to identify and address any indicator of modern slavery but it should be noted that any indicator in isolation may not demonstrate modern slavery is present.

Indicators of modern slavery

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

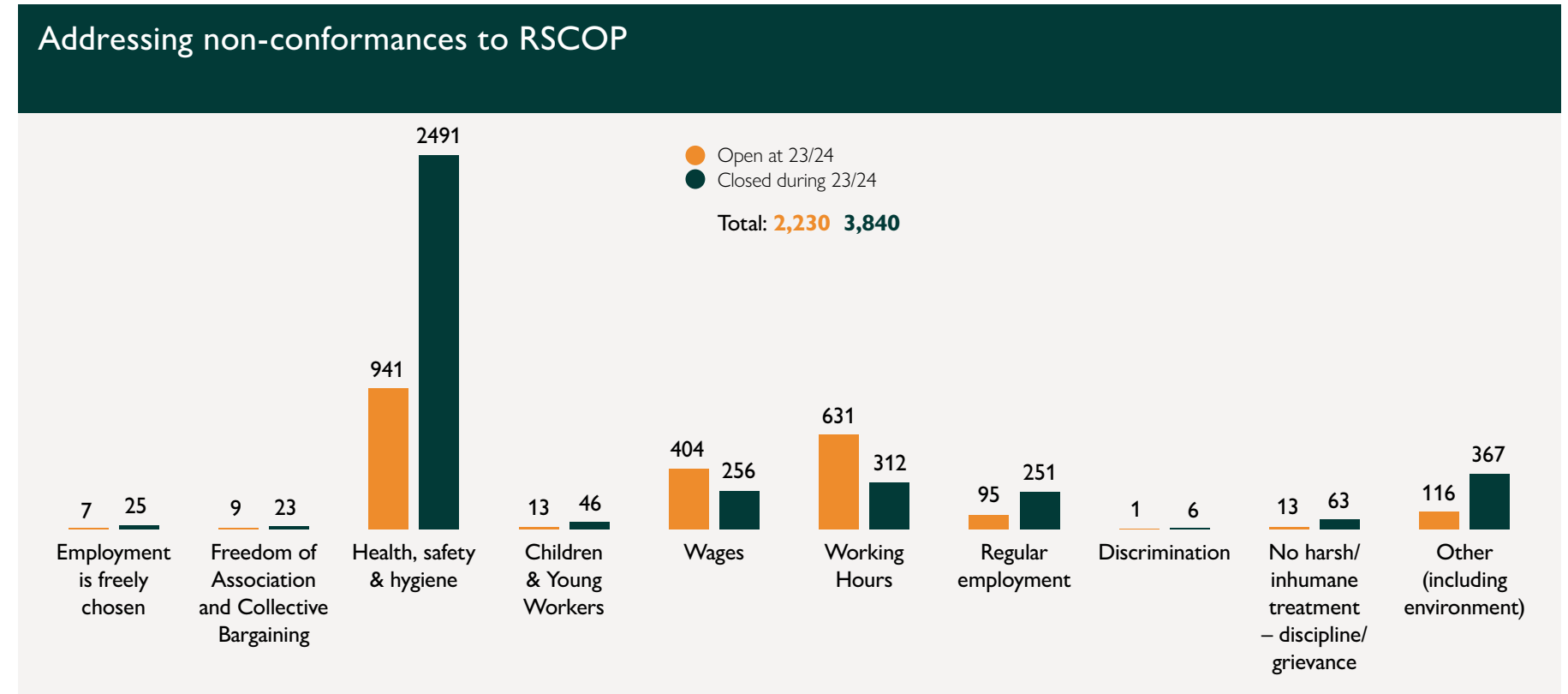
* https://webapps.ilo.org/wcmsp5/groups/public/@ed_norm/@declaration/documents/publication/wcms_203832.pdf

Non-conformance closure

The effectiveness of our work can be demonstrated through the closure of issues identified in the audit process. A majority of non conformances (NCs) identified through audits related to health, safety and hygiene. Wage issues and incidents of overtime were also common.

As reported last year, we retained a target of closing 20% more non-conformances in 2023/24 than we did in 2022/23. We have retained this target for two years but recognised that reaching this was likely to be challenging. 2022/23 had been an exceptional year where we were able to close 139% more non-conformances than 2021/22. This was partially driven by the volume of audits being undertaken at that time.

We recorded 11% fewer open NCs at the end of the full year 2023/24, than in the previous year. Similarly the numbers of health and safety NCs also reduced, this time by 17%. We successfully collaborated with suppliers to close a higher number of NCs over the course of the year, but missed our overall closure target and finished the year with 15% more non-conformances closed during 2023/24 than 2022/23.



Spot checks

As described on page 8, spot checks are an important tool for us to test the effectiveness of our due diligence process. We had a target of completing 16 spot checks over the course of the year. We ended the year with 15 complete.

We have now been running the spot check programme for a couple of years and it has given us greater visibility of conditions in our supply base over that time. During the reporting year, the majority of spot check audits conducted on randomly-selected approved sites came back showing that the approval was valid.

The spot checks conducted by Slave Free Alliance into our operations and service supply chains (see page 9) once again found no evidence of modern slavery, demonstrating the effectiveness of processes to date. We recognise that labour patterns and risks change over time so will be continuing to strengthen our work in this area over 2024.

Grievance mechanisms and whistleblowing

All workers in our supply chains are encouraged to raise any workplace issues they have via site-based grievance mechanisms, or alternatively to use external resources such as hotlines hosted by Stronger Together and the Modern Slavery Helpline. These channels enable us to receive information on any grievances raised in our supply chain and cases are managed in line with our internal whistleblowing process.

In 2023/24 there were 79 reports* from whistleblowers at sites from which we sourced products, which is a significant increase on our 2022/23 figure of 47. This is generally an indication that the mechanisms we have in place to understand challenges within our supply chain are more effective and our due diligence programmes are working.

* Reports relate to incidents at sites from which JLP sources but may or may not relate directly to production of goods for JLP.

Where cases are reported, we work collaboratively with other brands and retailers involved, as well as other stakeholders, to understand more about the issue and reach a resolution that works for all parties. For example, over 2023 there have been numerous media reports of allegations of violence towards workers at the Del Monte plantation in Kenya. Alongside other retailers we called for Del Monte to conduct a human rights impact assessment (HRIA) to understand the issues in more detail and in September 2023 suspended sales of products from this site. We continue to monitor Del Monte's progress against their HRIA action plan.

Whistleblowing cases

Contact method	2023/24		2022/23		2021/22	
	Cases	Countries	Cases	Countries	Cases	Countries
UNSEEN business portal	5	UK	2	UK	2	UK
Local MP	0	N/A	0	N/A	1	UK
Media	2	UK	3	UK, Greece	7	UK, Spain, Portugal, Malawi
Trade unions/Industry bodies	0	N/A	0	N/A	1	Bangladesh
Issara	47	Thailand, Malaysia	25	Thailand	15	Thailand
Sedex/Audit company	0	N/A	1	China	1	UK
Direct letter from a whistleblower	0	N/A	0	N/A	1	UK
ETI/Other NGO	5	Turkey, China, Kenya, Thailand	4	UK, Sri Lanka	1	UK
Direct from Tier 1 supplier	6	UK, Ireland, Kenya	6	UK, China, Thailand	0	N/A
Direct from authorities	0	N/A	0	N/A	0	N/A
International Accord	13	Bangladesh	6	Bangladesh	0	N/A
Alerted by other retailers	1	UK	0	NA	0	N/A
TOTAL	79		47		29	

Looking forward

We are proud of our work over the last year to drive improvements for workers within our supply chain, but we recognise there is always more to be done. Risks to workers continue to change over time and we need to ensure we are effectively horizon scanning to understand what these risks may be. Current examples include our consideration towards a just transition and what the impact of increasing use of Artificial Intelligence may be on human rights.

Changing regulatory landscape

The EU Corporate Sustainability Due Diligence Directive will be a positive step towards improving human rights and environmental protections by business. Although not directly impacted as a UK retailer, we share supply chains with many of our European counterparts and we welcome the opportunity that this legislation provides in driving sustainable change and improvements for workers. We have supported calls for a UK Human Rights Due Diligence act and attended a parliamentary APPG in May 2023 to discuss this.

Ethical compliance with our RSCOP

In 2023 we adjusted our Ethical Compliance Policy to bring fresh produce tier 2 sites into the scope of our programme. We recognise fresh produce remains a risk area from an ethical perspective, given the often seasonal nature of supply and reliance on low paid migrant labour. Although compliance of sites through their supply chain was already a requirement of our direct suppliers, having oversight of this by Waitrose teams will help us to better understand some of the challenges within these supply chains and how we can support improvements.

To allow us to report on this information we have developed a fresh produce specific online database. This will enable our Technical and Commercial teams to understand where the greatest risks are across our supply base and allow them to have informed conversations with sites when visiting or discussing sourcing decisions.

Addressing broader issues through collaboration

Homeworking

The Partnership acknowledges and welcomes the presence of homeworkers in the supply chain, but recognises that working conditions in home working situations can be poor. To make improvements for these workers we are working with The Centre for Child Rights and Business to refresh our Homeworkers Policy and our guidance documents for suppliers. We will then work with The Centre to gain a better understanding of where homeworkers are within our supply chains and develop an action plan for how we might better support these workers in the most high risk supply chains.

Responsible recruitment

We continue to work collaboratively with retailers, industry groups and Government to look at ways in which the UK's Seasonal Workers Scheme can be improved to ensure that workers' rights are protected. A key concern within this scheme are the costs borne by workers in securing their jobs. This is not an issue unique to this supply chain, or indeed the food sector, but is seen across supply chains globally. We support the ILO's Employer Pays Principle and this year will be looking to put in place a clear policy and action plan for our business covering how we move towards alignment with this principle. This will be developed in collaboration with our supply chain.

Gender based violence and harassment

We have begun work with the ETI on two collaborative projects looking at gender based violence and harassment. One project will focus on food supply chains, and the other on apparel. We hope these projects will provide us with valuable learnings on how to drive progress in addressing these issues. We will update on outcomes in next year's report.

Egyptian cotton, impact assessment

Following our assessment into the Egyptian Cotton supply chain (see page 9) we will be putting together an action plan and working in collaboration with industry partners to run a programme of work to drive improvements. We will be looking particularly at how to improve traceability of cotton within our supply chain as we see this an important step in enabling improvements for smallholder farmers within the industry.

Ensuring workers have a voice

China

Following the success of our activity in China in 2023/24, we will be continuing to extend our programme activity. Our programme focused on Promoting Health of Women Workers will be extended to an additional four new factories and four of the factories involved in the programme to date will take part in a project focusing on diversity and inclusion.

We will also be extending our Resilience Building project (page 16) with participation from an additional eight factories.

India

Our work with the Society for Labour and Development (SLD) will enable us to better understand what affects women workers' wellbeing at three targeted factory sites. Over the course of the year we will be designing programmes with SLD to address issues raised. See page 16

Who we work with

Our business

Governance

Policies

Our Human Rights Programme

Basic working conditions

Salient human rights risks

Improving livelihoods

Training

Effectiveness

Looking forward

Who we work with

Legal statement



Legal statement

This report outlines the steps John Lewis Partnership has taken during the financial year ending 27 January 2024 to protect the rights of workers in our operations and the supply chains of goods and services provided to our business.

Based on the areas recommended by the Home Office, we include disclosures on the following:

- a. Organisation structure and supply chains (see pages 3-5)
- b. Policies in relation to slavery and human trafficking (see page 5)
- c. Due diligence processes (see pages 7-10)
- d. Risk assessment and management (see pages 10-17)
- e. Key performance indicators to measure effectiveness of steps being taken (see pages 20-21)
- f. Training on modern slavery and trafficking (see page 18)

This group statement of John Lewis Partnership plc (the parent company) has been published in accordance with the Modern Slavery Act 2015 (the Act), and also covers its subsidiaries John Lewis plc and Waitrose Limited.

This report and statement has been approved by the Board of John Lewis Partnership plc on 11 July 2024 and signed on its behalf by:



Sharon White
Chairman

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Incorporated and registered in England and Wales
under Company No. 233462



JOHN LEWIS

WAITROSE