

Modern Slavery Statement.

2021/22

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Introduction.

The UK Modern Slavery Act 2015 (the ‘Act’) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. At Tesco, we are fully committed to playing our part in eradicating modern slavery. We firmly support transparency and collaboration to eliminate the risks of modern slavery.

This statement refers to the financial year ending 27 February 2022 and sets out the steps taken by our business, where we have operations in the UK, Republic of Ireland, Central Europe and relevant subsidiaries¹ to prevent modern slavery and human trafficking in our own operations and supply chains. Due to the nature of their businesses, Tesco Bank, Tesco Mobile, dunnhumby, One Stop and Booker [publish separate Modern Slavery Statements](#).

As we have continued to develop our human rights work, we have gained greater insight into risk and trends relating to modern slavery, which has enabled us to strengthen our approach. Over the past 12 months we have:

- Published an updated Modern Slavery Strategy, created in consultation with external experts.
- Continued to identify and mitigate modern slavery risks, including those heightened by the ongoing global COVID-19

pandemic, monitoring the impact of international labour shortages and Brexit in the UK.

- Delivered modern slavery training to all key UK distribution colleagues.
- Commenced verification of our responsible recruitment requirements within our Thailand and Malaysia supply chain, and led targeted action on responsible recruitment and the Employer Pays Principle with our suppliers.
- Launched a new modern slavery workplan for our Clothing and General Merchandise supply chains.

In the year ahead we will continue to develop our approach to managing the risk of modern slavery within our business and supply chains and ensure our strategy continues to respond to changing risks as we aim to eradicate modern slavery.

This statement was approved by the Board of Tesco PLC.

Ken Murphy
Group Chief Executive

13 May 2022



1. Entities required to publish a statement under the Modern Slavery Act and therefore covered by this Group Statement include: The Tesco Atrato Limited Partnership, The Tesco Passaic Limited Partnership, The Tesco Navona Limited Partnership, The Tesco Property Limited Partnership, The Tesco Aqua Limited Partnership, Tesco Stores Limited, Tesco Distribution Limited, Tesco Maintenance Limited, Tesco Freetime Limited, Makro Self Service Wholesalers Limited, Tesco Ireland Limited, Tesco Mobile Ireland Limited, Tesco Polska sp. z o.o., Tesco Franchise Stores CR s.r.o., Tesco International Clothing Brand s.r.o., Tesco Stores CR a.s., Tesco Stores SR a.s., Tesco-Global Aruhazak Zrt, Tesco Bengaluru Private Ltd., Tesco Family Dining Limited

Our business and supply chains.

Tesco is one of the world’s leading multinational retailers. Our largest operations are in the UK, where we have over 3,600 stores. We also have businesses in the Republic of Ireland, Czech Republic, Hungary and Slovakia.

Across the Tesco Group, our 345,000 colleagues serve millions of customers per week online and in-store. At the heart of everything our colleagues do is our renewed core purpose – serving our customers, communities, and planet a little better every day. This means we always keep customers at the heart of what we do, while also reflecting our responsibilities to the communities we serve, source from, and to society more broadly.

To learn more about Tesco’s purpose, [see here](#).

These values reflect that our responsibility for the welfare of people goes far beyond those we employ directly. We want everyone who works for or with Tesco to have their human rights respected and we know our customers, colleagues and suppliers do too. We believe that our trade with people across the countries we source from should have a positive impact, creating jobs and opportunities for people all over the world.

Our human rights strategy, which covers the most serious challenges faced by workers, delivers against our value to treat people how they want to be treated. As part of this, we have committed to:

- Ensure international human rights standards are respected at all our suppliers’ sites.

- Focus on the most serious risks to workers throughout our supply chains, working transparently with NGOs, unions, and others to identify and address them.

We have thousands of direct and indirect suppliers who grow, make and move hundreds of raw materials and finished products across global supply chains. These suppliers range from large agriculture businesses to smallholders and manufacturing companies. We also work with other partners who help run our distribution centres, keep our offices and stores clean and secure, and much more.

Starting with our own business operations and service providers, and then increasing the visibility we have of our global supply chains, we work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified.

Our purpose is underpinned by our three values:

- 1 No one tries harder for customers
- 2 We treat people how they want to be treated
- 3 Every little help makes a big difference



Policies in relation to modern slavery.

At the heart of our approach to human rights are a number of important internationally recognised declarations, standards and codes. These are the foundations for how we work across the Tesco Group, and include:

- The UN Universal Declaration of Human Rights.
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- The UN Guiding Principles on Business and Human Rights.
- The UN Global Compact.
- The Base Code of the Ethical Trading Initiative (ETI).

Our approach to addressing modern slavery sits within this wider human rights agenda and is supported by our Code of Business Conduct and human rights policy which set out our obligations to customers, colleagues and communities in our own operations and supply chain.

We take any allegations of a breach of our policies extremely seriously. We provide independent and confidential [‘Protector Lines’](#), communication channels that enable our colleagues, suppliers and their staff around the world to raise concerns.

As part of our membership of the Consumer Goods Forum (CGF), we helped to develop and strongly support the CGF’s Priority Industry Principles.

These principles have underpinned the development of our modern slavery strategy, and we are one of the leading companies supporting collaborative efforts to combat forced labour in the consumer goods sector. Such collaboration is

particularly important in lower tiers of supply chains where we do not have direct commercial relationships.

As members of the Institute of Human Rights and Business Responsible Recruitment Leadership Group, we also actively support the Employer Pays Principle that ‘No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer.’

Following a review in 2020 which included engagement with a number of key stakeholders (representatives from the ETI, the Office of the Independent Anti-Slavery Commissioner, the Consumer Goods Forum and key suppliers) we published our updated [modern slavery strategy](#) in 2021. This sets out our approach for tackling modern slavery, priority areas and key milestones.



EVERY WORKER SHOULD HAVE FREEDOM OF MOVEMENT >>>>

NO WORKER SHOULD PAY FOR A JOB

NO WORKER SHOULD BE INDEBTED OR COERCED TO WORK

Governance.



Overall governance and progress monitoring of our human rights work, for all markets and subsidiaries, sits with the Board’s Corporate Responsibility Committee, which meets four times during the year. More detailed information on the work of the Corporate Responsibility Committee is set out in the [Tesco PLC Annual Report and Financial Statements 2022](#).

“Responsible Sourcing” is highlighted as a principal risk within our business-wide risk assessment and is reported within the PLC Annual Report. Exploitation of workers and human rights breaches remain the key drivers of this risk. We update on current and future risks, progress and performance, and breaches of our policies, to the Group Risk and Compliance Committee chaired by the Group CEO, plus the business unit Risk and Compliance committees, on at least an annual basis.

The Group Responsible Sourcing Director leads our human rights strategy and chairs an internal modern slavery working group, comprised of human rights and Group security colleagues that meets bi-annually, at a minimum, to monitor progress against our [Group modern slavery strategy](#) and report on alleged breaches.

Human rights due diligence.

We follow a robust due diligence process that was developed in line with the UN Guiding Principles on Business and Human Rights, and in consultation with internal and external stakeholders.

We assess the potential modern slavery risks within our own operations and supply chains by considering the country of origin where we are sourcing products, raw materials, or services from. We use the Food Network for Ethical Trade (FNET) risk ratings to inform this, combined with our own understanding of labour rights and modern slavery risks in our key sourcing sectors.

As the next stage of our risk assessment, we consider the type of work being carried out (skilled or semi-skilled) and the type of labour (seasonal, permanent, agency, migrant labour).

We gather intelligence about emerging risks through our in-country human rights specialists and strong relationships with local groups, NGOs and organisations, such as the ETI, FNET and the Consumer Goods Forum. Campaigners, activists and whistleblowers can also play an important role in helping us identify where some of the biggest risks lie, engaging with human rights campaigners and learning from their experience wherever possible. We recognise the important role played by investigative journalism in identifying current and emerging risks, and we review all credible investigations relevant to our business and supply chain.

With over 40 dedicated human rights specialists, based across 10 key sourcing countries, we are well-placed to gather on-the-ground intelligence through direct engagement with suppliers and other relevant stakeholders. This includes capturing the views of workers through conversations, confidential interviews, and surveys. Where we do not have on-the-ground capacity, we work with a range of experienced partners, including consultants and NGOs, who are supported by our commercial buying and quality teams. In the past 12 months, COVID-19 has continued to impact our ability to directly engage with workers, despite the lifting of some restrictions. We continue to explore creative solutions to enhance worker voice as well as re-introducing in-person assessments wherever possible, more detail of which is provided on page 20.

Our due diligence framework has five stages:

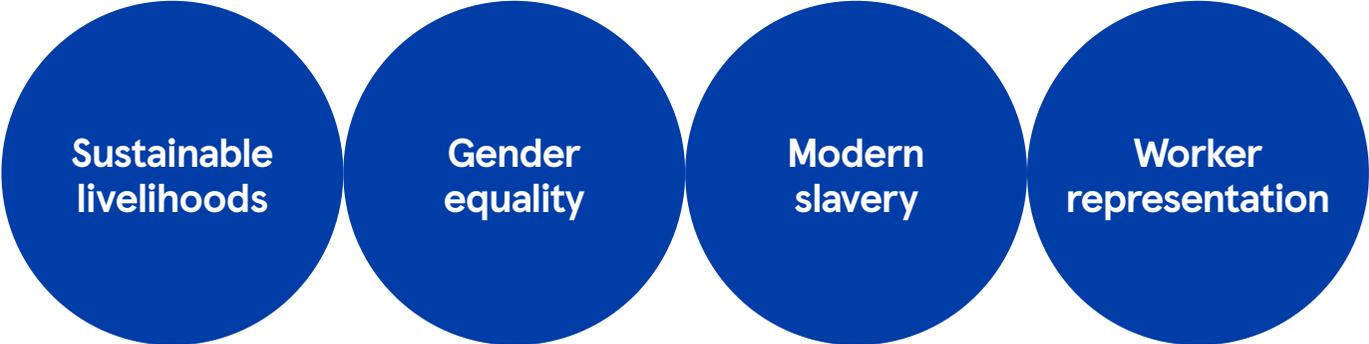


Human rights due diligence continued

We use the information gathered to continually reassess and respond to the potential and actual risks in our business and supply chains. The learnings from this due diligence framework then inform our human rights strategy.

Our broad human rights strategy was developed in consultation with 25 key stakeholders, including suppliers, academics, NGOs, and internal stakeholders. We also spoke to trade union representatives to bring the voice of people in our supply chain to inform our strategy development.

Our four focus areas reflect the most salient risk areas within our supply chains and are aligned with stakeholder priorities.



We have a three pillar approach to taking action in line with our strategy:

1. Improve
Driving improvements to working conditions on sites where we have direct leverage together with our suppliers, so that we know we are sourcing from better sites and farms.

2. Transform
Where we cannot solve complex sector-wide issues alone, we work together with others to drive transformational change by tackling the root causes of endemic issues.

3. Advocate
We collaborate with our peers to call for wider change or to influence regulation and legal frameworks where there is a need.

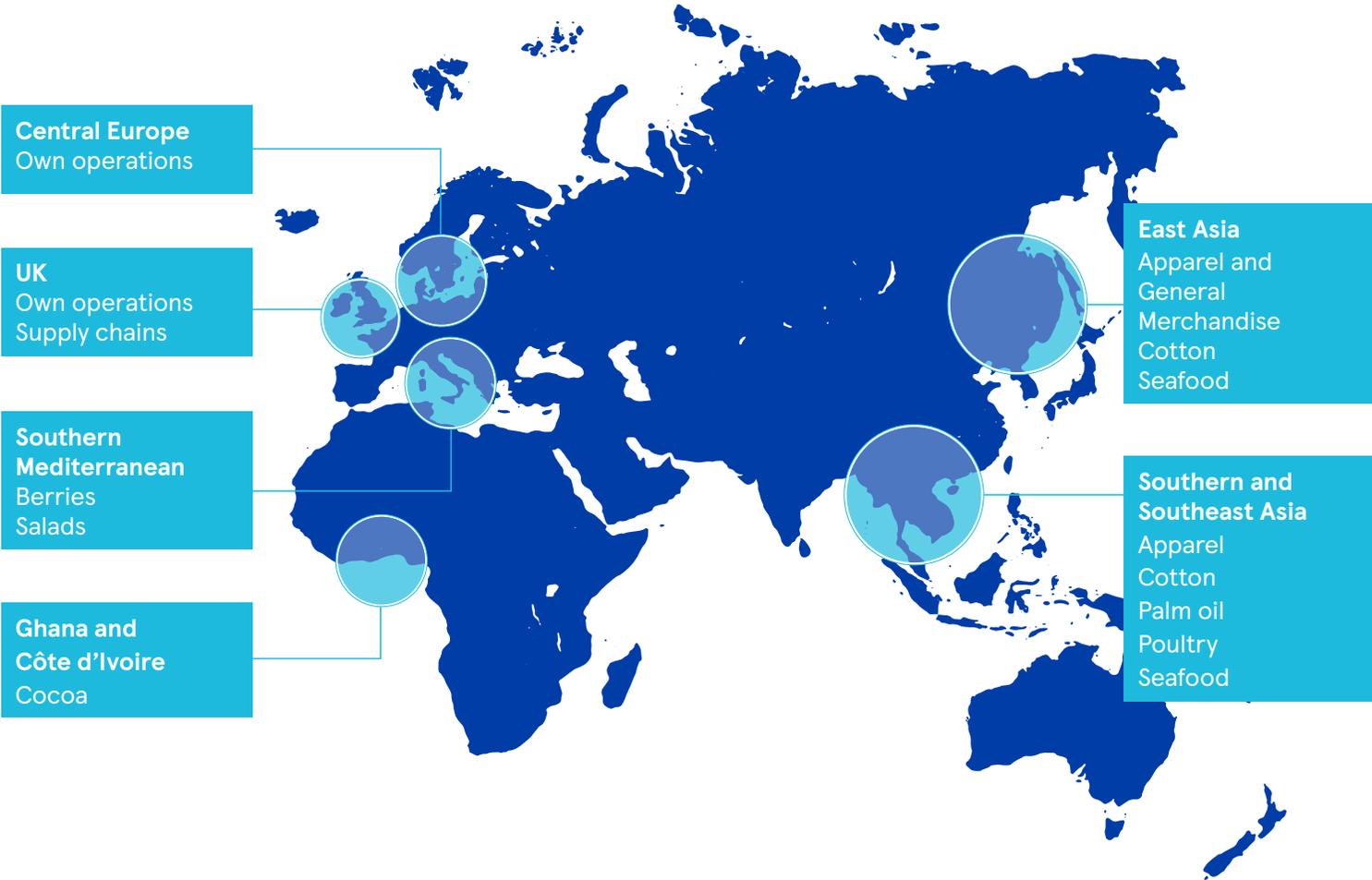
Assessing and tackling modern slavery risks.

Our approach to preventing, identifying, and mitigating modern slavery is based on the five factors which we believe create the enabling environment to eradicate modern slavery.

All five factors¹ are important – Government legislation and enforcement, Responsible recruitment, Freedom of movement, Effective grievance mechanisms, Remediation. We continue to work collaboratively to drive progress across each of them. However, we will initially focus more on responsible recruitment given that recruitment fees and costs, which can lead to debt bondage, are the most common modern slavery risk indicator in our business and supply chains.

We then considered our leverage (volume of products we buy, cost of goods sold and our direct and indirect relationships) to identify the regions or supply chains where we believe we are best placed to drive systemic changes.

We identified our most salient modern slavery risks in the following priority regions, supply chains and operations within our Modern Slavery Strategy.



1. See diagram 1 on page 8.

Responsible recruitment

We recognise that debt bondage caused by excessive recruitment fees charged to workers can make them more vulnerable to situations of forced labour. As members of the Institute of Human Rights and Business Leadership Group for Responsible Recruitment we have committed to the Employer Pays Principle that no worker should pay for a job, and the costs of recruitment should be borne not by the worker, but by the employer.

It is a policy requirement that all suppliers of food, non-food, and goods and services not for resale into Tesco UK align with the Employer Pays Principle. However, we continue to work to operationalise this commitment. We recognise that COVID-19 has continued to exacerbate risks to migrant workers, with evidence of the fees and costs associated with recruitment having increased. As borders begin to reopen, we have maintained close engagement with our suppliers in priority supply chains.

We continue to sponsor and work closely alongside the Responsible Recruitment Toolkit and strongly encourage suppliers to make use of their free training and resources. Under UK law, certain recruitment fees remain legal, and as such we recognise that for many UK suppliers, the transition to the Employer Pays Principle may take time. We are committed to working collaboratively with industry towards this, with an initial focus on the UK Seasonal Worker Scheme. We also continue to pursue advocacy as a key tool to addressing the root drivers of recruitment fees. Further details of this are on page 15.

We recognise that audits have the potential to provide helpful insight into recruitment practices. This year we have updated our second-party auditor training to better equip auditors in spotting the signs of modern slavery and accurately reporting data relating to recruitment fees and costs. We also continue to engage with Sedex,

one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains, on their ethical trade audit standard and guidance, to make sure identification of recruitment fees and costs is fully supported.

Diagram 1: The five factors



Tackling modern slavery – our business operations.

In 2021, we updated our new Human Rights Requirements for Group Procurement, launched in 2020 following consultation with key suppliers and industry experts. This prioritises key business areas in the UK based on our analysis of evolving risk in the sector, worker contract types, the level of skill involved in the work, wages, and our visibility of the service provider. In our Tesco UK stores the majority of our colleagues are employed on permanent contracts. The greatest risks of modern slavery exist for workers not in permanent employment, or employed through labour agencies, of whom we have less direct visibility, and often work in roles for shorter periods of time.

Our focus areas in our business operations are:

- Agency workers in our distribution and fulfilment centres.
- Workers providing retail labour services, such as security and cleaning, for our offices, stores and distribution centres.
- Workers in car washes situated in store car parks.
- Workers in the construction industry who build, maintain and fit-out our stores.
- Goods not for resale manufactured in high-risk countries.

We continue to evolve our understanding of risks in the sector, together with suppliers and other external stakeholders. As a result, in 2022, the additional following focus area will be added to our policy:

- Couriers working for third-party delivery partners.

Under our policy, identified suppliers are required to undertake robust mitigating steps, such as:

- Independent ethical audits, which include a review of the supplier’s management systems (to ensure they are adhering to the ETI Base Code), worker interviews, and how worker recruitment is managed.
- Attend tailored modern slavery training hosted by Stronger Together. This a UK-based, multi-stakeholder initiative aiming to reduce modern slavery through guidance and training.
- Complete the self-assessment within the Responsible Recruitment Toolkit, of which we are a founding sponsor. This capacity-building tool, an initiative led by the Association of Labour Providers and Alliance HR, supports businesses to embed responsible recruitment practices in their supply chains.
- Attend bi-annual meetings with the Tesco human rights team to ensure we continue to strengthen and coordinate our approach to identifying and mitigating risks of modern slavery. This is also included as a key aspect of ongoing supplier performance reviews carried out in conjunction with our commercial teams.

UK distribution centres

In 2021, we additionally conducted site visits and worker interviews alongside an expert independent third party at 10 of our distribution centres. We identified no indicators of modern slavery, but did find some common issues faced by our agency colleagues, including:

- A lack of guaranteed working hours.

- Disparity in treatment between directly employed and agency colleagues, including lack of career opportunities.
- Health and safety concerns.

We work closely with our distribution colleagues and labour providers to implement corrective actions. For example, in September 2021 we introduced a new policy to guarantee a minimum of 30 hours work per week to all agency distribution colleagues who would like them. Furthermore, all booked shifts must be honoured so that no worker will be asked to finish their shift early at short notice and therefore lose out on planned income.

Labour shortages have also been felt within our own operations. In 2021 we have continued to closely monitor weekly working hours of all our agency distribution colleagues and meet regularly with our labour providers to balance business needs with worker welfare. We ensure that working hours stay within acceptable limits, based on the ETI Base Code.

In 2021 we completed the reimbursement of recruitment fees paid by up to eight workers identified within one of our distribution centres. This was identified in 2020 and further detail can be found below under ‘Impact and monitoring’ and within our 2020/21 Modern Slavery Statement.

We are committed to conducting due diligence across our UK distribution sites and have further human rights assessments planned at six sites in early 2022. A further six visits will be conducted later in 2022.

Central Europe due diligence

As per our modern slavery strategy, our operations across our business in Central Europe (the Czech Republic, Hungary, Slovakia) business is a key priority. We believe the greatest risks of modern slavery exist amongst our colleagues employed through agencies working in our distribution centres and certain retail roles such as security and maintenance.

We have committed to working with an expert, independent third party in 2022 to conduct in-depth assessments of working conditions for labour agency colleagues working in distribution and retail labour services. This was originally planned for 2021 but was delayed due the ongoing COVID-19 pandemic. We will use the outcome of this assessment to develop a strategy for our operations in Central Europe and introduce improved methods to capture worker feedback. We will work collaboratively to identify any potential or actual elements of labour exploitation and ensure appropriate remediation if any cases are identified.

Responsible car wash scheme

The car wash sector in the UK is widely acknowledged as being high risk for modern slavery, and we have worked for many years with our own sole car wash provider, Waves, on strengthening standards and employment compliance.

Recognising we also have a role in driving sector standards, in 2018 we helped launch the [Responsible Car Wash Scheme \(RCWS\)](#), which aims to tackle modern slavery by promoting employment compliance, sharing best practice and introducing a new accreditation for operators to allow customers to make responsible choices about which car wash they use. The scheme is a collaboration between the Downstream Fuel Association, four major supermarkets, the Police, the Health and Safety Executive, Her Majesty's Revenue and Customs, the Environment Agency, the Car Wash Association, the Gangmasters & Labour Abuse Authority (GLAA), and the anti-slavery charity Unseen.

We believe that statutory licensing has the potential to better protect vulnerable workers in this sector and ensure compliance with broader regulations. In 2021, the RCWS began to roll out a pilot for mandatory licensing of car washes. The RCWS members continue to meet regularly to monitor progress and will continue advocacy for mandatory licensing nationwide. Waves continues to lead best practice in this sector, informing policy decisions at UK Government and law enforcement levels, investing in technology and people as well as raising consumer awareness to drive wider behavioural change. In 2021, we supported Waves to also gain access to Unseen's Business Portal to give greater insight into reports of exploitation and industry-wide trends.

The Consumer Goods Forum

We continue to participate in the Consumer Goods Forum (CGF) Human Rights Coalition – Working to End Forced Labour, which brings together retailers and manufacturers to drive meaningful sector-wide change. In 2020 a workstream on tackling modern slavery within our own operations was launched, based on the CGF 2016 Social Resolution on Forced Labour, which we have continued to actively participate in throughout 2021. The CGF members developed a Human Rights Due Diligence (HRDD) Maturity Framework designed to tackle forced labour in own operations. The Fair Labor Association is supporting CGF members to deploy the framework as a self-assessment in their own operations by 2025. A comprehensive training programme for internal colleagues has been developed to go alongside this self-assessment focused on our identified higher-risk areas of distribution and fulfilment. In 2022, we will implement a targeted action plan based on the self-assessment and training programme to strengthen processes to identify, address and remediate forced labour. This will include facilitating specific training for colleagues most likely to be exposed to modern slavery.

Goods and services sourced from Xinjiang Province

Following credible reports, media coverage and UK Government guidance relating to systemic human rights abuses including modern slavery against the Uighur population living in the Xinjiang province of China, we conducted an in-depth assessment of our procurement supply chains to identify any supply from the region. We do not source directly from the region and continue to monitor this in our supply chains. In 2020 we responded to a request from the UK Parliament on potential sourcing risks from this region, which can be accessed [here](#).

Instant delivery services

As part of our commitment to be the most convenient supermarket for customers, we partner with third-party companies to provide instant delivery services. However, this sector often relies on recruiting couriers on a temporary and irregular basis, which can heighten the risks of certain types of exploitation such as minimum pay rates, deductions, or excessive working hours. We are committed to ensuring the human rights of anyone working for us through a third party are respected. Our human rights team has conducted due diligence with our partners and internal teams and will continue working collaboratively with them to address any risks over the coming year. In particular, we have updated our Group procurement policy to include these partnerships as an area of heightened due diligence and will develop requirements for partners in the coming year to include activities such as modern slavery training and regular compliance meetings.



Tackling modern slavery – our supply chains.

Food

Ethical audits

For the supply chains of Tesco UK stores, we require all primary supplier sites (known as ‘Tier 1’ sites) in high-risk countries to have a human rights audit before they start supplying Tesco, and then on an annual basis. This represents around 35% of our total Tier 1 suppliers. These audits are conducted against best practice international labour standards as set out in the Base [Code of the ETI](#). In addition, we require audits end-to-end of key supply chains where there are high risks of human rights issues. For example, fruit, vegetable, and meat sites are audited to the farm level in high risk countries. We also require all primary suppliers to link to Tesco through Sedex, a platform for suppliers and retailers to share ethical data and audit records, giving us full visibility of their ethical audit performance.

Independent auditors, who have been approved by Tesco, visit the supplier sites to conduct an in-depth audit once a year, and we reserve the right to audit on an ad-hoc basis where concerns are raised. We monitor the effectiveness and service quality of the audit companies we use on an on-going basis and reserve the right to audit on an ad-hoc basis. In 2021, we delisted two auditors for failing to identify critical issues that our own in-house specialists later identified.

During the closing meeting for all audits, all non-conformances with the ETI Base Code are discussed and a Corrective Action Plan Report (CAPR) is agreed between the supplier and the auditor. We categorise non-conformances as critical, major, or minor, as defined by the Sedex Members Ethical Trade Audit (SMETA) methodology. If any critical non-conformances are found, the audit company notifies us directly. In 2021/22, critical non-conformances were identified at 34% of primary high-risk supplier sites. The most common of these were excessive working hours and inadequate health and safety practices. This is broadly similar to previous years, but we have noticed an increase in incidences of excessive working hours globally.

Over the year 2021/22, 91% of the primary high-risk supplier sites where critical non-compliances were identified had resolved these within six months – for further detail, please see our [Human Rights Factsheet](#). For the remaining sites, we continue to work with them to resolve the issues as long as they demonstrate commitment and capability to do so. Our first aim is always to ensure issues are remediated for workers and practices are put in place to avoid recurrence. However, if we believe sustained improvement will not be achieved, we will seek to exit sourcing from a site in a responsible way. In the past 12 months we exited three supplier sites as a result of human rights breaches.

In some cases, non-conformances are the result of systemic human rights issues in a particular country and require cross-industry collaboration and long-term partnerships to address them. Analysis of our audit data helps us identify where a different approach is needed. Beyond our ethical audit programme, we also seek to improve conditions by endorsing certification and increasing access to worker voice, more detail of which can be found below.

Thailand and Malaysia – Partnership with Issara on primary sites and poultry end-to-end

Our human rights specialist in Thailand maintains close relationships with our primary suppliers and end-to-end poultry sites in Thailand and Malaysia to ensure our ethical standards are met and the risks of modern slavery are mitigated. Our continued partnership with the Issara Institute ensures our supply chains in Thailand are also monitored independently and workers are provided with independent grievance channels, alongside those of other Issara partners. The key focus of Issara is on enabling workers to raise concerns and ensure they are addressed and that supplier systems are strengthened, which is crucial for the empowerment of migrant workers who are often vulnerable to exploitation. In 2021, our partnership enabled

Tackling modern slavery – our supply chains continued

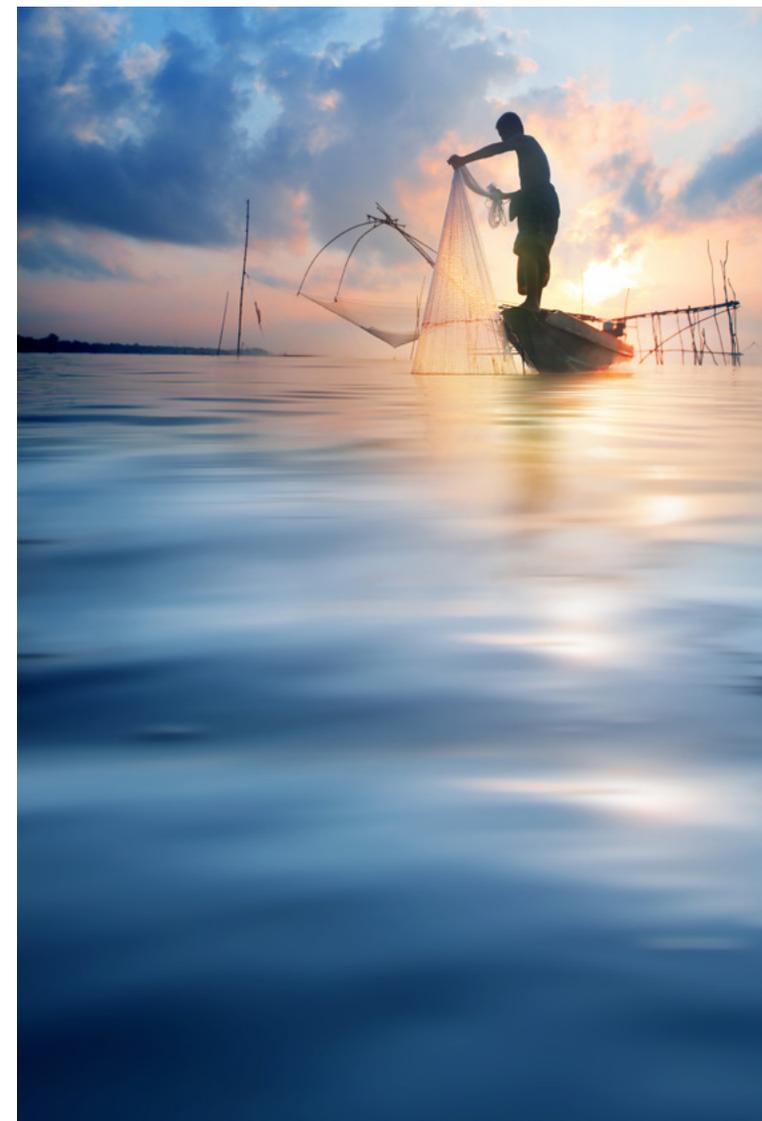
us to identify that COVID-19 measures had resulted in restriction of movement from worker accommodation as well as post-resignation and several cases of delayed pay and underpayment. Working alongside Issara, we were able to ensure the resolution of these issues whilst also meeting government safety protocols and enforced restrictions. This year we have begun expanding our partnership with Issara to our primary sites in Malaysia.

In 2021 we began the process of verifying compliance with our [Responsible Recruitment Requirements](#). Launched in March 2020, this policy requires all primary food sites and poultry end-to-end sites to implement the Employer Pays Principle, in line with the ILO definition of recruitment fees and costs. In 2021, we expanded this requirement to all non-food sites. The policy now covers over 25,000 migrant workers across the two countries. Verification, which includes both paperwork review and worker interviews, is being led at several sites by the Issara Institute, and by other independent third parties. To date, the verification process has enabled us to identify a site where workers have continued to pay some fees related to their ongoing employment. We are currently working in collaboration with the site and Issara to develop an action plan against these findings and agree appropriate remediation.

The closure of borders associated with the COVID-19 pandemic delayed our ability to complete verification as cross-border migrant worker recruitment was prohibited. However, now that restrictions are easing, we intend to conclude this exercise by the end of 2022 in line with our Key Performance Indicator (KPI) ‘Zero workers pay for a job in 100% of primary sites in Thailand and Malaysia’.

Priority fisheries

Poor recruitment practices, excessive working hours, lengthy fishing trips and modern slavery indicators are commonplace in parts of the fishing sector, and as such our due diligence work focuses on these risks. We source many different species of wild-caught fish and seafood from around the globe. The details of our sourcing are publicly available as part of the Ocean Disclosure Project. Whilst we support the transparency measures for Marine Stewardship Council (MSC) certified fisheries that are now in force, we continue to advocate for further change across the sector, in particular to ensure effective grievance mechanisms are in place and to map and address recruitment fees.



Tackling modern slavery – our supply chains continued

SEA Alliance

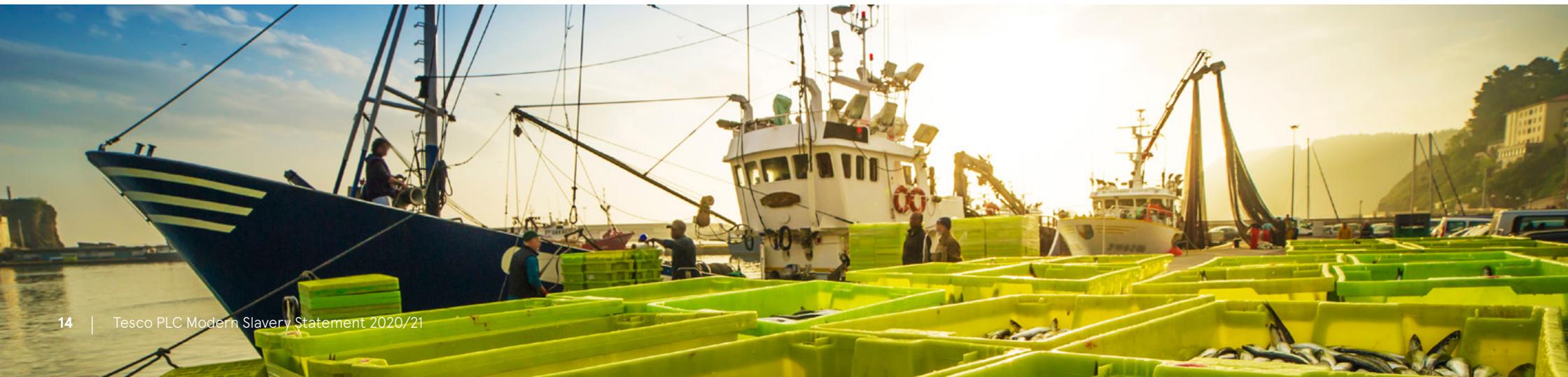
We are an active member of the Seafood Ethics Action Alliance (SEA Alliance) – a group of retailers, brands and fish processors working together to better understand human rights risks in seafood supply chains, and to work pre-competitively on driving positive change across the global seafood industry. The SEA Alliance has worked with an expert consultant to undertake a desk-based risk assessment of 297 fisheries supplying the UK market, supported the development of further guidance on due diligence in seafood supply chains, and written to the EU regarding concerns about human rights risks in seafood supply chains. To complement this, we sit on the steering committee for research to investigate worker voice, grievance mechanisms and freedom of association in the fishing industry. This work has been continuous in 2021 and will remain ongoing in 2022.

Fishery progress

In 2021, Fish Choice released the Fishery Progress Human Rights and Social Responsibility Policy. The objective of the policy is to help Fishery Improvement Projects (FIPs) mitigate the risk of human and labour rights abuses and to provide a common framework for reporting on social performance in fisheries. All FIPs reporting on Fishery Progress are required to comply with the policy and report progress against it. We continue work as members of the Fishery Progress Social Advisory Committee, alongside nine other organisations within the industry, working to continually enhance the requirements of the policy, provide guidance of timelines for FIP compliance, analyse information submitted and better enable FIPs' abilities to report on the positive progress they make on social responsibility.

Enhanced due diligence

We part-fund a three-year PhD at Heriot-Watt University to map the social responsibility tools available to the fishing industry, to enable enhanced due diligence of source fisheries. The first year of the project is now complete and focused on mapping the current social responsibility tools within global seafood supply chains and understanding the strengths and weaknesses of each. With our input, the PhD will focus on case studies within the Maldivian tuna, Scottish nephrops and Peruvian anchovy industries, to develop a set of best practice recommendations on human rights due diligence within the seafood industry.



Tackling modern slavery – our supply chains continued

UK seasonal workers – Produce

In recent years the UK has relied on temporary migrant labour in order to fulfil the seasonal need for additional labour within the produce sector. In March 2019, the UK Government launched a new [Seasonal Workers Pilot Scheme \(Pilot\)](#), which allowed two licensed operators to recruit up to 2,500 temporary migrant workers to work in the UK edible horticulture sector for up to six months. In 2021, the number of workers under this scheme in the UK rose to 30,000, with increasing numbers of workers from countries such as Nepal, Tajikistan and Barbados.

There are heightened risks of exploitation of these workers such as recruitment fees, discrimination, and poor accommodation standards, among other forms of labour abuses. We work collaboratively with industry to tackle these risks. We fed into the development of Seasonal Worker Scheme Good Practice Guidance with FNET and have shared this amongst our produce suppliers. Included in this was a grower survey, the results of which will be assessed in 2022 and used to inform our future approach. We continue to collaborate on human rights considerations of this scheme with the Association of Labour Providers, National Farmers Union, DEFRA and other stakeholders.

Through ongoing sector-wide engagement on this issue, we have also been made aware of the risk of recruitment fees or exploitative practices through direct recruitment into all other UK sectors and continue to monitor this closely.

We collaborate in a UK recruitment fees working group, facilitated by FNET, with a focus on identifying advocacy opportunities, promoting responsible recruitment tools and guidance, and gathering further evidence of the prevalence of recruitment fees and costs.

Prison labour

Following an allegation of involuntary prison labour within our supply chains in late 2019, we engaged with experts to identify where voluntary prison labour schemes, conducted within the highest ethical frameworks, could make a positive difference to prisoners' rehabilitation. In 2020, we began mapping where suppliers had engaged with, or were considering, responsible prison labour schemes as means of supporting rehabilitation. These programmes often include providing vocational training to those serving custodial sentences or approaching release, giving participants an opportunity to develop skills necessary for the job market and encourage financial independence. We are working closely with a small number of primary suppliers exploring such programmes to ensure they are conducted with a strong focus on respecting human rights.

In the UK, the Release on Temporary Licence (ROTL) scheme, which allows prisoners access to paid work, is gaining traction. In collaboration with our key supplier Huntapac, and several other retailers, we supported a pilot whereby prisoners gained employment at a packing factory. This pilot has been conducted in consultation with key stakeholders and was assessed by an independent human rights expert consultant. The findings from this pilot will be published, and we will continue to work collaboratively to advocate for the ethical and careful use of voluntary prison labour schemes.

We ran a successful pilot of responsible prison labour at one of our Distribution Centres, helping those approaching their release prepare for the job market. This pilot was closely monitored by our human rights team and assessed by the same independent human rights expert consultant who worked on the Huntapac pilot. The outcome of this report showed that the pilot was conducted to the highest ethical standards and has provided a positive experience for those who took part on their journey to rehabilitation. We will now carefully consider how we may expand from this pilot elsewhere in our distribution network.

Non-food

Non-food modern slavery workplan

In 2021 we launched a new modern slavery work plan for our Clothing and General Merchandise supply chains. Building on our progress to date, this work plan seeks to further address the risks of modern slavery most salient to our non-food supply chains, including:

- Unprofessional behaviour at supervisory level including instances of forced overtime and prohibited leave.
- Withholding of wages.
- Restriction of movement, particularly at worker accommodation.
- State-enforced prison labour.
- Excessive working hours.
- Recruitment fees.

The work plan includes targeted action in our key sourcing regions – Bangladesh, China, India, Thailand, Malaysia and the UK – and includes details on our approach in cotton, actions beyond tier 1 and capacity building.

Beyond tier 1

In recognition that greater risks of modern slavery exist further down supply chains, we continue to map our clothing and textile supply chain, including spinning mills, fabric mills and other processing sites. In 2021 we ran training for our preferred mills which account for 80% of our overall volume, highlighting our expectation that they comply with the ETI Base Code and Employer Pays Principle. We are now in the process of finalising new minimum ethical requirements for our preferred fabric mills and select spinning mills. These will be launched in 2022.

Our due diligence has identified that there are risks of modern slavery in the lower tiers of our supply chain in India. To mitigate and remediate these, in 2021 we have:

- Assessed the working conditions of the top 42 spinning mills and fabric mills used by our suppliers and ensured any non-conformances were resolved.
- Identified recruitment fees being paid by 92 workers equivalent to one month's salary. All workers were reimbursed, and preventative measures were introduced.
- Continued to work in collaboration with the ETI to ensure the prevention of Sumangali, a form of modern slavery where workers are recruited through contracts under which they are paid a lump sum at the end of a three-year period, and have restrictions placed on their movement. To date, we have not identified any cases of Sumangali in our direct supply base.

Culture of respect, Bangladesh

In 2018 we launched the 'Create Workplace Culture of Respect' programme in partnership with local NGO, SHEVA. The ambition of the programme is to ensure a harassment-free workplace, including the prevention of forced overtime and prohibited leave. Our training programme, directed at on-site supervisors, has now been implemented across all tier 1 supplying sites in Bangladesh with 6,179 supervisors trained across 73 factories. Of these, 49 were trained in the 2021/22 financial year. Following our training programme:

- 97% of surveyed workers reported visible positive changes in supervisors' behaviour.
- 100% of participating supervisors agreed they had successfully learnt new skills for both work and personal life.
- 100% of factory management confirmed that the workplace atmosphere became more friendly.

This year the ETI also conducted an impact assessment of the programme with their findings report due to be finalised later in 2022.

Tackling modern slavery – our supply chains continued

Cotton

Cotton remains a priority under our human rights strategy, as a commodity with associated risks of human rights abuses, including modern slavery. In 2017, we signed the “Sustainable Cotton Communique”, otherwise known as the [2025 Sustainable Cotton Challenge \(2025 SCC\)](#) to source 100% sustainable cotton by 2025. Through our partnerships with Global Organic Textile Standard (GOTS), Global Recycled

Standard, Good Earth Cotton, US Cotton Trust Protocol and the Better Cotton Initiative, we are on track to achieve this ambition. We also continue to work with external partners to include the latest technology and testing of our cotton, striving towards transparency and traceability in our supply chain. More information on our work in cotton can be found [here](#).

Payment of wages

Workers are less vulnerable to modern slavery risks if they are not in debt. One issue we monitor particularly closely in key sourcing countries is that wages are paid on time and in full for all hours worked, including overtime premiums where relevant. Through our own checks, we occasionally find cases where wages are not paid on time and/or in full. Where we identify a shortfall in payment, we require suppliers to pay back any missed wages. In the rare occurrence that suppliers do not agree, we exit our relationship with them in a responsible manner. In 2021/22 we identified 86 cases, affecting 11,848 workers, where payments had fallen short of what should have been paid, including premiums for overtime, downtime wages or unpaid wages during COVID-enforced lockdowns. These were subsequently addressed with a total of US\$415,521 repaid to workers as result of our intervention. To enable this, we also signed a letter to the Sri Lankan government, alongside other brands and the ETI, seeking clarity on the payment of wages during the COVID-19 pandemic. Further detail on our responsible sourcing approach to non-food can be found [here](#).



Tackling modern slavery – partnerships.

We play an important role in improving working conditions for workers, including reducing the risk of modern slavery, through collaboration with suppliers, NGOs, industry bodies and government.

Working in partnership with others pre-competitively is vital to addressing risks of modern slavery, particularly further down the supply chain where our direct commercial influence may be less significant. Over the past 12 months, we have continued to engage in a number of multi-stakeholder initiatives to tackle systemic issues. All of these initiatives, examples of which are below, have sought to factor in the impact of the COVID-19 pandemic on workers. We continue to prioritise initiatives that align with our strategy and where we have meaningful leverage.

Clear Voice Interpreting

Many workers, both within our own operations and supply chains, may not speak English as a first language and may feel more comfortable discussing their working conditions in their native tongue. Clear Voice Interpreting is the trading arm of the NGO Migrant Help which provides vital interpreting services to those experiencing the asylum process in the UK.

Informed by their experience of interpreting needs, Clear Voice Interpreting provides an on-demand phone service and pre-booked virtual interpretation services to those in need. In 2021, we began working with Clear Voice Interpreting to access independent, professional interpreters adept at working with survivors of abuse when conducting worker engagement and human rights

assessments. In 2022, we will continue to use remote interpreting across a range of due diligence activities.

Unseen partnership

Since 2019 we have partnered with the anti-slavery charity Unseen, which runs the UK's 24/7 independent and confidential Modern Slavery & Exploitation Helpline. The Helpline's trained advisors support potential victims of modern slavery as well as offer a way for businesses and the public to raise suspicions or concerns, complementing our own Protector Line. Real-time translation is available in over 180 languages. We require our primary supplying sites in the UK to promote the Helpline, enabling us to continue to raise awareness of modern slavery. In 2021 we promoted the Helpline to over 600 UK stores as well as expanding the requirement to all non-food sites in the UK. In 2022, we plan to further expand promotion of the Helpline to all colleagues within our distribution centres.

Through the Unseen business portal, which provides us with information about concerns reported to the Helpline, we have gained visibility of three potential cases relating to our own operations and four linked to our supply chains in 2021.

Modern Slavery Intelligence Network

The Modern Slavery Intelligence Network (MSIN) is a non-profit collaboration in the UK food sector created in response to the findings of Operation Fort, the UK's largest-ever modern slavery investigation. We have taken leading roles in the legal and external stakeholder workstreams.

Throughout 2021, members have met regularly and engaged with external stakeholders, including but not limited to law enforcement agencies, to share plans and seek guidance on the approach the MSIN should take in order to achieve successful outcomes. The members of MSIN are working together to ensure, as far as possible, that robust mechanisms are in place to safeguard those who may be impacted by modern slavery and/or worker exploitation, and their data. This has required a significant commitment from all members involved and engagement with several internal functions including human rights, ethical trading, legal, data protection, privacy and IT security.

MSIN has selected the NGO and independent international charity STOP THE TRAFFIK, to provide a secure platform for information and intelligence sharing, along with expert analysis and guidance on modern slavery prevention and remediation. It is intended that members will share details of potential or actual incidents of modern slavery or worker exploitation through the online platform with STOP THE TRAFFIK, who will then analyse and enrich the data using dedicated tools and resources.

This enables the MSIN to build a robust evidence base that can be shared with members and, where appropriate will give the MSIN a body of information and/or intelligence that can, in appropriate circumstances, be shared with law enforcement bodies. Live intelligence sharing is due to start in early 2022. Following the success of the pilot, the MSIN aims to be in a position to launch formally, later in 2022 and to report publicly on the findings from its pilot.

Tackling modern slavery – partnerships continued

Food Network for Ethical Trade (FNET)

Together with our suppliers and other retailers, we continue to participate in FNET, a network developed to support collaboration throughout supply chains, including addressing priority risks such as modern slavery.

This year, FNET has continued to serve as an invaluable forum for members to share details of the challenges faced as a result of the pandemic, including increased risks of modern slavery. Members highlighted emerging issues such as excessive working hours, supply chain pressures and audit effectiveness.

We continue to participate actively in the FNET Responsible Recruitment workstream where members seek to map recruitment fees in key supply chains and seek alignment on due diligence.



Spanish Ethical Trade Forum

The Spanish Ethical Trade Forum was established in 2015 as a collaborative initiative to address ongoing human rights risks and promote better working conditions within the agri-food produce sector in Spain. The Forum improves the wellbeing of workers through embedding sustainable and ethical good practice. We participate in the Forum along with eight supermarket brands and in the Forum's Governance Group. We have committed to continuing this in 2022.

In 2021, the Forum's working groups developed a number of practical tools for members. These include a checklist for the responsible use of labour agencies, grievance mechanism guidance and an anti-harassment protocol.

The Forum was able to hold seven in-person events in 2021 in the key sourcing regions of Murcia, Huelva, and Almeria, and an additional 10 online webinars. These events aim to build capacity on key topics and give an opportunity for participants to share learnings and best practice. The most recent event in November 2021 included a presentation from the Responsible Recruitment Toolkit, with the aim of building capacity amongst suppliers to address their own risks around modern slavery and recruitment fees. Suppliers and growers local to high-risk regions have been engaged through the Forum to share their challenges and help retailers understand the support and resources needed to embed better human rights standards.

ETI Italy Working Group

We continue to participate in the ETI Working Group for Italian agriculture. This group is currently developing a set of capacity-building materials on good labour practices targeting cooperatives. Led by a local consultant, the overarching aim is to build trust among local processors and cooperatives, encouraging further collaboration and dialogue on wider issues pertaining to labour practices in the industry, such as the 'caporalato' recruitment system.

In 2021, the group continued to focus on the human rights risks, particularly modern slavery and the 'caporalato' system, within the Italian tomato supply chain. We fed into the group's 2022 workplan which contains a strategy for increasing the impact of the group in the coming year. Our main supplier of canned tomatoes is also engaged in this group. Key activities will include piloting improved access to grievance mechanisms for workers at grower level, leveraging the collective influence of the group to advocate for improved recruitment practices, strengthen due diligence processes across the supply chain alongside key stakeholders, and expanding group membership through engagement with other groups such as FNET.

Investigating modern slavery allegations.

Where issues are identified, we work to an agreed internal incident management and escalation process to ensure that we receive all relevant information and act quickly and effectively. We are able to receive information 24 hours a day, everyday of the week, and we have clear procedures to ensure that senior colleagues are made aware of incidents, and that appropriate actions are taken. Allegations are investigated by human rights and Group Safety, Security and Resilience (GSSR) colleagues with a range of expertise and experience, including former law enforcement officers and investigators.

We continue to engage proactively with the UK Gangmasters and Labour Abuse Authority (GLAA), police forces, the office of the Independent Anti-Slavery Commissioner and relevant experts to better understand risks and address any identified issues. We are committed to sharing information that will help stop or prevent the exploitation or abuse of workers, whilst ensuring that this information is handled sensitively and within data protection requirements.

When we receive intelligence through ethical audits, our own site visits, Protector Line or NGO or media reports, we immediately investigate. Where our suppliers identify possible indicators of modern slavery within their own operations, we support and monitor their investigations.

Where cases of modern slavery or other human rights abuses are identified, we work to ensure remediation, partnering with charities and NGOs as required.

In the past 12 months, we have identified 19 allegations containing some indicators of either labour abuse or

modern slavery. Seven of these were within our own operations and 12 within our supply chains. Four instances of potential labour abuse were confirmed within our own operations, and four within our supply chain. No confirmed instances of modern slavery were found within either. In every instance of confirmed labour abuse, we promptly implemented robust and thorough corrective plans, working closely with suppliers and internal teams where appropriate. In any case where the human rights team is not satisfied that suitable corrections can be evidenced within agreed timeframes, we will move to exit relationships in a responsible manner.

Grievance mechanisms

We know that effective grievance mechanisms are key to identifying human rights allegations. As part of our broader human rights strategy, in line with the UN Guiding Principles, we continue to ensure access to grievance mechanisms within our supply chains and own operations. More detail on our approach to grievance mechanisms can be found [here](#).

The human rights team conducts ad hoc visits and worker interviews to both supplier and own operations sites. The team has significant expertise of identifying potential human rights abuses or worker welfare concerns. We ensure any interviews are done from a worker-centred approach and are voluntary.

Over the past two years we have piloted &Wider's worker voice technology at high-risk sites in Spain, Turkey, Asia, and Africa. Given the lack of mobility during the pandemic, in-person audits were unable to be conducted and worker

engagement was limited. This technology helped us gain valuable insights into the challenges workers were facing during the pandemic and how to best support suppliers and their workers during COVID-19. We are currently working with &Wider in South Africa to understand how worker voice technology can strengthen our current due diligence processes across the South Africa fruit industry.

In 2021, Reckitt, one of our key suppliers, commissioned the development of a practical toolkit to improve companies' grievance mechanisms enabling workers to raise grievances in a safe, trusted, and transparent manner. Reckitt initially commissioned the toolkit to pilot within its own supply chain, then partnered with us to increase the scope of the pilot to include flowers, produce and packaged foods. Learnings from these pilots will inform the final toolkit which will be publicly available in 2022 and provide best practice on the effective implementation of operational-level grievance mechanisms.



Awareness raising and capacity building.

Raising awareness of modern slavery, both within our business and our supply chains, is an important part of our strategy. We know that identifying potential and actual cases requires upskilling colleagues and suppliers to understand the drivers of modern slavery as well as the possible indicators.

This year we continued to run online training, targeting the colleagues in our business (see figure on page 23) who have direct contact with workers in our own operations and supply chains, including:

- Tailored modern slavery training for UK colleagues in distribution and fulfilment, including Distribution Managers and People Partners. Recognising that risks of modern slavery are dynamic, this training is updated annually.
- Human rights and modern slavery e-learning for all of our Technical Managers.
- Ongoing promotion of our modern slavery e-learning training to commercial colleagues, including those responsible for procuring labour and retail labour services.
- Piloted new modern slavery training for colleagues based in our six sourcing hubs, which will be launched in Spring 2022.

To date we have trained over 90 of our UK Technical Managers. We receive qualitative and quantitative feedback on all the training we deliver.

We continue to require all Tesco suppliers, including service providers such as labour agencies, based in the UK to attend ‘Stronger Together’ training on tackling modern slavery. This requirement also includes the second-tier suppliers of our key UK food suppliers. Over the past six years, 2,353 representatives from our food supply chains have attended this training. We strongly encourage all fruit and wine producers to attend ‘Stronger Together’ training in South Africa with 674 individuals trained to date. In 2021, we also mandated the completion of the Stronger Together Progress Reporting Tool for all UK-based suppliers. Using this online self-assessment, companies can track the progress they have made in addressing modern slavery risks and identify the next steps for their businesses and supply chains, to ensure their approach continues to evolve.

Recognising that dedicated ethical resources at supplier level leads to better working conditions, we established the Tesco Ethical Change-Makers (TSEC) programme within our non-food supplier base. TSEC participants complete a comprehensive training programme which includes in-depth discussion regarding our values and standards as well as operational skills such as management systems. As well as driving compliance with our responsible sourcing standards, the TSEC offers an opportunity for participants to share their experiences and examples of best practice. In the past 12 months, 171 participants have been TSEC certified at supplying sites in Bangladesh, China, India, Pakistan, Sri Lanka, and Turkey.



Impact and monitoring.

Under our updated modern slavery strategy, we use the following Key Performance Indicators to track progress:

By end of	Target	Measure	Status
2021	100% priority colleagues ² and primary suppliers in the UK trained on forced labour.	% of priority colleagues and primary suppliers trained.	90% ³ of priority colleagues and primary suppliers trained in the UK on modern slavery, including forced labour.
2023	Zero workers pay for a job in 100% of primary sites in Thailand and Malaysia.	% of in-scope sites compliant with the Responsible Recruitment requirements – Thailand and Malaysia.	To be completed by the end of 2022.

In our 2020/21 Modern Slavery Statement we communicated a third goal: ‘Zero workers pay for a job in 100% of primary sites in priority supply chains/regions’ to be achieved by the end of 2023. We remain committed to eradicating all recruitment fees and costs across our supply base, however the hidden nature of many recruitment fees and costs means this can be challenging. Additionally, in supply chains and regions where we have less leverage, we are more reliant on industry-wide action and government engagement. We continue to engage our key stakeholders to build comprehensive timebound action plans and we are reviewing how we track progress against this goal in a robust way.

We track progress against our commitment to provide training to our colleagues using the following KPI:

By end of	Target	Measure
2022	100% of colleagues in the Buying team trained on forced labour.	% of in-scope Tesco colleagues trained on modern slavery, which includes forced labour.

2. Priority colleagues defined as Tesco UK Technical Managers and Technologists, Distribution Centre Managers, People Partners and Security Managers.

3. 100% of Distribution Centre colleagues completed training. 83% of UK Technical Managers and Technologists completed training due to personnel turnover and timescales. 90% of in-scope suppliers completed training within the specified timeframe due to onboarding of new suppliers. The ongoing pressure of COVID-19 on operations in 2021 further delayed completion of training. We continually review our processes to ensure all priority colleagues receive adequate training and outstanding requirements will be completed in 2022.

Impact and monitoring continued

We will continue to report annually within this statement on the below additional metrics and measures of success:

Measure	Status 2021/22
Number of primary suppliers in the UK trained on modern slavery.	641
Number of Tesco colleagues trained on modern slavery.	360
Number of cases with modern slavery indicators identified in own operations and supply chains.	4 (none of these was substantiated through investigation)
Number of cases with labour abuse indicators identified in own operations and supply chains.	15
Number of modern slavery cases successfully remediated.	We did not identify any confirmed cases of modern slavery in 2021/22.
Amount of recruitment fees remediated in our own operations.	Recruitment fees to the value of £2,950 were repaid to eight workers at Lichfield Distribution Centre after being identified in 2020. Further detail in our Modern Slavery Statement 2020/21 .
Number of primary suppliers stating, 'We have a "No Recruitment Fees" policy' in Sedex self-assessment questionnaire.	163 UK food suppliers.

Impact and monitoring continued

We also monitor progress⁴ against the commitments we make within our Modern Slavery Statement each year.

Aim	Outcome	
Conduct a gap analysis against the Consumer Goods Forum human rights due diligence own operations roadmap.	This work is ongoing whilst the Consumer Goods Forum further develop their gap analysis framework following member feedback. We expect to complete the gap analysis in 2022.	
Analyse the outputs of our ethical audit programme in UK own operations.	30 SMETA audits of our labour and retail labour service providers were conducted in the past 12 months, detecting two critical non-conformances (NCs). We work closely with suppliers and internal colleagues to ensure prompt closing of NCs and ensure high levels of ethical compliance.	
Continue to review priority areas under our human rights requirements for Group Procurement.	We continue to work closely with Group Procurement colleagues to assess the impact of the requirements and consider emerging priority areas. For example, in early 2022 we have expanded due diligence around retail partnerships and third-party delivery services.	
Commence a review of human rights risks within our Central Europe business.	In 2021 we conducted an ethical audit of our Beckov distribution centre through third-party experts Elevate. The ongoing COVID-19 pandemic restricted our access to further on-site due diligence in 2021, but we plan to continue this in 2022.	
Continue to support the pilot of a blueprint for the mandatory licensing of car washes.	We continue to support the licensed car wash pilot scheme through regular attendance at Responsible Car Wash Scheme meetings, and through close work with our car wash partner, Waves, which is leading the way in driving human rights progress within the sector.	
Identify opportunities for enhanced due diligence in UK supply chains, drawing on our learnings from our own operations.	We have identified opportunities, for example mapping the tools for enhancing due diligence in the fishing industry, which we are exploring further. We will continue to inform and develop our due diligence approach based on learnings from these opportunities and our own operations.	

4. Ratings are based on the following: Green – Action fully completed, Amber – Action partly completed, Red – Less than 50% of the action completed.

Impact and monitoring continued

Aim	Outcome	
Verify compliance with our responsible recruitment requirements for suppliers in Thailand and Malaysia, providing access to capacity-building training and tools where necessary.	We commenced verification, which includes both paperwork review and worker interviews, at our supplying sites in Thailand and Malaysia. The closure of borders due to the ongoing COVID-19 pandemic stopped new cross-border migrant worker recruitment for suppliers. Subject to restrictions being lifted, we expect to complete verification in 2022.	
Identify additional priority supply chains/regions for our responsible recruitment requirements.	Through the consultation on our modern slavery strategy, we have now identified UK seasonal workers – Produce and Priority Fisheries ⁵ as additional priority supply chains. Our approach to embedding responsible recruitment will however differ between supply chains and regions.	
Provide additional training to ethical auditors on modern slavery and responsible recruitment.	We have updated our second-party auditor training to better equip auditors in spotting the signs of modern slavery and accurately reporting data relating to recruitment fees and costs.	
Commence two further human rights impact assessments in key supply chains.	In 2021 we published our human rights impact assessment on the prawn supply chain. The ongoing COVID-19 pandemic restricted access to conduct effective impact assessments in key supply chains. We plan to commence a human rights impact assessment in 2022 and complete two assessments by early 2024.	
Finalise road maps for key priority areas under our broader human rights strategy.	We will complete these road maps in 2022.	

In addition to publishing this Modern Slavery Statement, we report annual progress on our human rights programme to our Group Risk and Compliance Committee at least once a year. This includes any critical breaches of our policies, the results of ethical audits, and progress against our commitments to responsibly source priority raw materials.

5. Priority fisheries are defined as fisheries that employ migrant workers from Least Developed Countries (LDCs), and those identified through the risk assessment process developed with the Seafood Ethics Action Alliance.

Plans for 2022/23.

In the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chain and ensure our strategy is responsive to changing risks. We will act immediately to address any concerns identified.



Own business and operations

- Widen the scope of our Human Rights Requirements for Group Procurement to include delivery partnerships and work closely with these third-party partners to better understand and mitigate modern slavery risks.
- Identify a third-party expert for a human rights impact assessment of our operations in Central Europe and begin the assessment work.
- Support the finalisation and dissemination of ETI Prison Labour best practice guidance.
- Expand promotion of the Modern Slavery & Exploitation Helpline across our distribution network.
- Conduct a review of modern slavery training with priority colleagues to identify other priority colleagues to be trained.
- Facilitate colleagues attending specialised forced labour training by the Consumer Goods Forum and Fair Labour Association.
- Conduct a gap analysis against the Consumer Goods Forum human rights due diligence own operations roadmap.
- Conduct due diligence across key UK distribution sites.

Our supply chains

- Continue support of Heriot-Watt University PhD to map social responsibility tools within the fishing sector.
- Verify compliance with our responsible recruitment requirements for suppliers in Thailand and Malaysia, providing access to capacity-building training and tools where necessary.
- Commence two further human rights impact assessments in key supply chains.
- Finalise road maps for key priority areas under our broader human rights strategy.
- Use the outputs of the Seasonal Worker Scheme growers survey to inform an approach to responsible recruitment in the UK.
- Continue to work with industry to embed responsible recruitment principles in UK produce supply chains and priority fisheries.
- Monitor the ongoing impact of labour shortages on human rights risks, including modern slavery.
- Continue to engage with the Modern Slavery Intelligence Network.
- Use outcome of Reckitt pilot to inform strategy for operational-level grievance mechanisms.
- Launch new minimum requirements for preferred fabric mills in our non-food supply chains.
- Continue to trial alternative avenues for worker voice and grievance reporting, such as &Wider, as a means for identifying risks.

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