

Modern Slavery Statement 2019

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Introduction

01



At its core, retail is a people business.

Almost 19 million customers shop with Asda each week, served by 146,000 Asda colleagues in hundreds of communities across the UK. Our supply chain touches many more, in the UK and globally.

The fact that modern slavery exists anywhere in the world in 2019 is unacceptable, and at Asda we're determined to do everything we can to identify and address it within our business processes and supply chain.

This is our third modern slavery statement, and it details the work we've done in 2018 to further refine our approach to the way we assess, engage and prioritise our work to combat modern slavery. The steps taken have allowed us to better understand how we can maximise our impact and collaborate across the industry. We are working closely with our suppliers, service providers and in line with our parent company Walmart's global Responsible Sourcing programme to address the issue in a number of innovative ways, and are pleased to report these actions and activities in the following Statement.



Roger Burnley

President and CEO

Signed on behalf of the Asda Board

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken in relation to part 6, section 54, by Asda Stores Limited and where appropriate, other relevant group companies to prevent modern slavery and human trafficking in our business processes and supply chains. It relates to our financial year ended 31st December 2018.

It covers the activities of Asda Stores Ltd, Asda Group Ltd, McLagan Investment Limited, The Burwood House Group Limited, Power4All Limited, International Procurement & Logistics Limited (IPL), Forza Foods Limited, Kober Limited, and Asda Home Shopping Cards Limited ("Asda").

Our business

02

Our business is made up of:



146,000
Colleagues



639
Stores



26
Distribution
centres



4
Home shopping
centres



19m
Customers/week



9
Home offices



7
Global production
facilities*



Global
Food, GM &
clothing network



Thousands
Direct & indirect
suppliers

* Excluding UK

Our approach to addressing modern slavery

03

Modern slavery is an umbrella term that refers to situations of exploitation that a person is not able to refuse or leave because of threats, violence, deception and/or abuse of powerⁱ.

In 2018 we built on previous work to develop a holistic engagement strategy to combat modern slavery within business processes and supply chains. Core to the work we deliver is the role of the Modern Slavery Working Group (MSWG), which meets quarterly to review

progress, set objectives and drive this work forward within our business. The group has three core themes highlighted by the infographic below, used to drive our engagement with the risk of modern slavery across our business processes and supply chains;



Building our strategy

Our collective approach to modern slavery.

Engaging through initiatives & partnerships

How we collaborate to address issues and build capacity alongside partners and other retailers for the benefit of all.

Assessing the risk

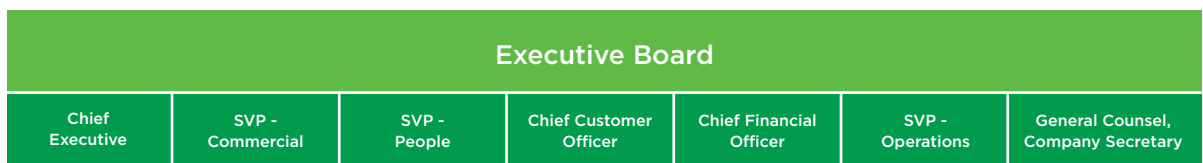
A data led assessment of modern slavery across our business processes and supply chains.

Our committees & governance

04

In order to properly assess risk and drive change in the business, we have a strong governance structure of committees, working groups and executive board interaction to oversee the execution of the modern slavery strategy and provide guidance and approval.

■ Committee ■ Attendees



Our most senior authorising level comprising of Asda Board members who will ultimately sign off our modern slavery statement.



Enables Asda to continue to operate in accordance with applicable laws and regulations. In this instance, any authorisations or recommendations regarding modern slavery that require approval come to this forum.



Made up of senior leaders from across Asda this group provides strategic direction to how we combat modern slavery. It is the corner stone to our work and is essential for bringing the topic into the spotlight at the most senior levels. It is chaired by our Senior Vice President for commercial.

Our policies

05

To effectively communicate our expectations on modern slavery, we have implemented policies and procedures that are designed to support our high standards in ethical and responsible supply chain practices.

They cover how we source our products, employ people appropriately, and how we operate and interact with modern slavery legislation in our business and with suppliers.

Our modern slavery policy

All Asda colleagues, contractors and third-party workers are expected to adhere to our Modern Slavery Policy. It sets out the responsibilities of each colleague, including the requirement to immediately report any concerns or suspicions of modern slavery.

Colleague responsibilities



- Follow Asda's Recruitment Policy at all times, ensuring modern slavery risks are mitigated.
- Managers to issue all new colleagues with a contract of employment stating rights and entitlements and follow all appropriate checks - evidence that bank accounts belong to the colleagues, right to work checks e.g. obtain proof of ID.
- Use Asda's approved employment agency partner only - they are verified and are regularly audited.
- Ethical recruitment practices - under no circumstances must bribes be accepted to recruit or favour workers.
- Hourly paid colleagues must always clock in and out.

The policy also includes details of what the business is doing to combat modern slavery at a corporate level, such as creating and sharing supporting policies and procedures that touch many parts of the business. We are committed to raising awareness of modern slavery through colleague training and communication campaigns enabling our colleagues to have the most up-to-date information to remain engaged with this complex issue.

We also have specific policies on recruitment of agency workers, another high risk area. This recruitment is only carried out through one managed services provider. In 2018 a new modern slavery toolkit has been rolled out and implemented to all agencies that source through our provider. The toolkit is intended to support their panel of agencies to implement a strategy for their business to tackle modern slavery, as well as clarify our shared expectations of placing modern slavery as a key focus on their corporate social responsibility activities.

Responsible sourcing

Responsible Sourcing is a key subject matter area working closely with our Ethics and Compliance programme, where resources, structure and guidance are provided. With oversight of more than 6,000 facilities worldwide, we are committed to promoting worker dignity, including addressing issues such as modern slavery.

Our Standards for Suppliers are the foundation of the Responsible Sourcing programme and reflect the deeply rooted values of service to the customer, respect for the individual, striving for excellence and acting with integrity. The Standards provide clear fundamental expectations for suppliers and their supply chains. At Asda we own the relationship with our suppliers, and in turn suppliers own the relationship with the facilities that produce the products we sell. As such we expect our suppliers to cascade our values throughout their supply chains. Failure to adhere to the Standards for Suppliers may result in consequences up to and including

termination of business.

All suppliers of own label Goods for Resale (GFR) products, are required to comply with our [Standard for Suppliers](#) and the [Responsible Sourcing Disclosure Policy](#). This means all supplier facilities must be disclosed and made available for audit, in accordance with our Risk Based Approach.

In 2018 we put in place specific requirements for suppliers of Goods and Services Not for Resale (GNFR) to be fully aware of our expectations of their conduct. The policy is available to all suppliers via our externally facing [supplier website](#).

In 2019 we will provide additional wording covering all Goods for Resale (GFR). In addition to this we have amended our Business Process Management process for on boarding suppliers to allow them to self certify that they are compliant with the Modern Slavery Act.

Our Risk-Based Approach

Any supplier facility disclosed to us in-line with our Disclosure Policy may be subject to an audit at any time. We allocate audits based on the risk level of the country in which a facility is located so we can drive the biggest impact in our broad and diverse supply chain.

Responsible Sourcing activity in Thailand and Malaysia



In 2018 we focused on the risks migrant workers face in Thailand and Malaysia, working with the [International Organisation for Migration](#) on a joint initiative to provide evidence and tools to support the design of future work, develop better understanding and data on the patterns of labour migration and migrant worker practices. It will allow us to tell the story associated with this journey within our supply chain. We expect this to be delivered in 2019.

We are working closely with suppliers to remind them of their obligations under the legislation and are partnering with them to move the industry forward. In addition to the above, our IPL business is currently reviewing the steps needed to implement wording into their GNFR requirements to match that of their GFR requirements.

Looking ahead we will continue to work to increase the effectiveness of our Responsible Sourcing strategy by placing a special focus on areas that make the biggest difference to workers in the supply chain.

Assessing risk

06

Our internal understanding of risk is informed by data accessed through a number of tools that have allowed us to create a modern slavery hierarchy of risk. The hierarchy of risk contains three tools;

Modern Slavery Risk Register

Establishes inherent strategic risks that modern slavery presents to our business processes and supply chains, logs existing mitigations and presents a prioritised list of focus areas within a Risk Register.

Forced Labour Dashboard

The FLD dynamically presents comprehensive indicators on suppliers/functions audit performance to establish metrics to track improvement and further focus our approach.

Subject matter experts / local knowledge

Subject matter experts within markets and business functions sense check findings, address concerns, establish initiatives and collaborate with suppliers to bring about the required change.

To ensure we are learning and focusing on areas where we can have the maximum impact we feed information back to the Risk Register and update our Forced Labour Dashboard to represent the change seen at a strategic level risk.

In 2018 we established a Modern Slavery Risk Register, to better understand the likelihood and impact of modern slavery occurring within our business processes and supply chains. Using the register, we have been able to mitigate risk using established and new initiatives to assist us in our journey to combat modern slavery.

By analysing information disclosed via audit and Self-Assessment Questionnaires (SAQs) from suppliers, we have developed a dynamic dashboard, called the Forced Labour Dashboard, that allows us to identify strategic level risks and translate

them into actionable, quantifiable objectives. This approach enables us to interpret complex issues and create concise objectives to deliver with the help of our colleagues and partners.

Once we have our outputs from the Modern Slavery Risk Register and Forced Labour Dashboard, we work with colleagues, subject matter experts, in-market offices, suppliers and partners to best understand the relevance of the information to our business and how we could potentially better understand steps that could be taken.

Our apparel business

George.

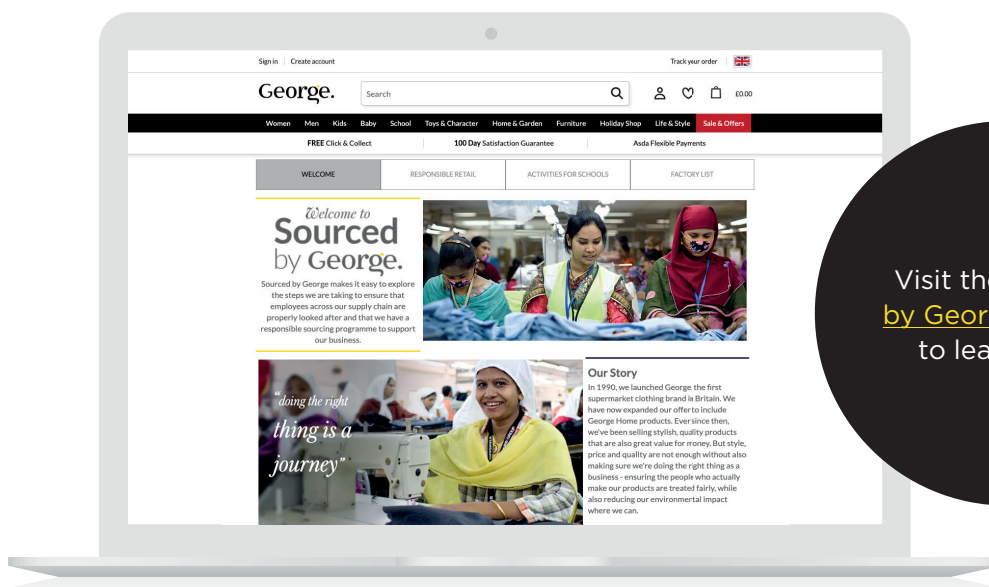
Launched in 1989, George is exclusive to Asda and is now sold in over 560 stores and through George.com, one of the fastest growing online fashion businesses serving over 800,000 customers a week.

Sourcing from 294 suppliers and 735 factories in 21 countries, George prides itself in on its quality, affordability, and style across all product areas from jewellery and accessories, to footwear and clothing.

In 2018 we used the hierarchy of risk approach to undertake a risk assessment of our apparel business. Themes emerged that we are currently exploring further with a number of suppliers, colleagues and subject matter experts from our business, within the supply chain and the wider industry.

In 2019 our specific focus will be the prominence and proximity of our supply chain, commercial practices and suppliers' operations relating to working practices in China.

As part of this, we will work with our suppliers in China and global Responsible Sourcing teams, to understand more about commercial buying practices, the situation on the workfloor and their collective experiences of local focus topics such as excessive overtime and the impact it may have on workers and facilities, to assess how we best can collaborate to mitigate any issue.



Visit the [Sourced by George](#) website to learn more

Our food business



Incorporated in April 2004, International Procurement and Logistics Limited (IPL) was acquired by Asda in 2009 and is now one of the largest privately owned food processing businesses in the UK.

IPL operates from ten sites across the UK and seven sites worldwide, providing a sustainable sourcing model and helping Asda to deliver value to its customers.

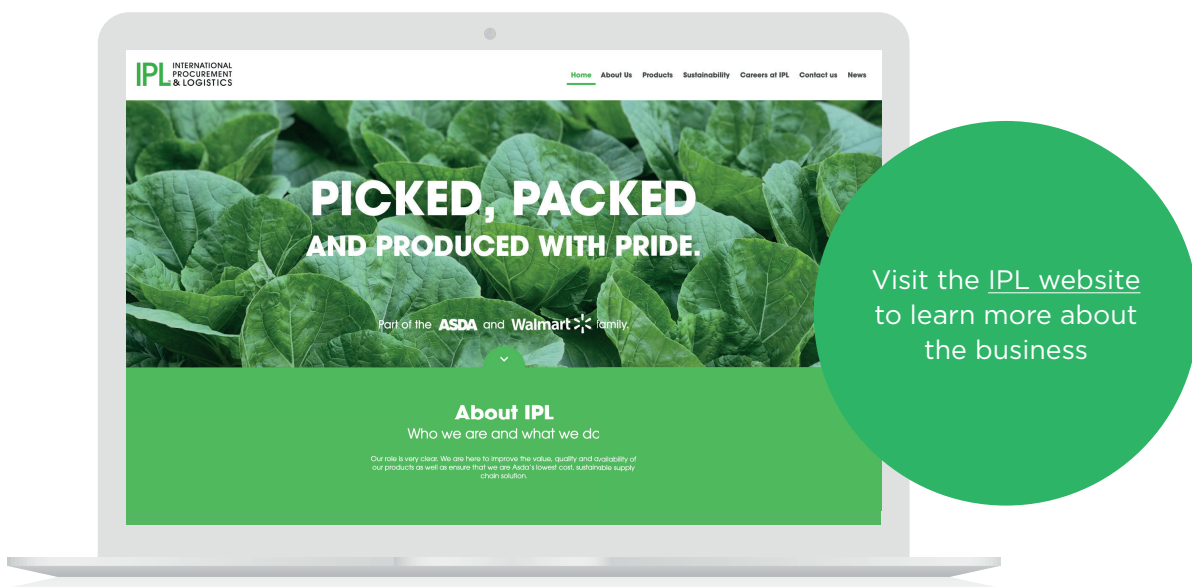
Sourcing from 526 suppliers in 51 countries, IPL's aim is to procure the best produce, beverages, protein and nuts at the best price.

Within our IPL business we have tailored our hierarchy of risk to the nature of our food business, establishing focus areas for 2019;

- 1. Bananas** - Colombia & Belize
- 2. Vegetables** - United Kingdom

Whilst we believe that audit data gives us insight into where we can be most impactful for our business, we realise there are limitations of the data at this time. The trends highlighted for both our George and IPL businesses represent indicators and not certainties, but as we refine and develop our assessment tool further we intend to add more sophistication to the allocation and alignment of risk.

Finally, we will work with our colleagues at IPL and their subsidiary companies to build upon existing policies and processes to combat modern slavery.



Due diligence

07

Asda leverages a risk-based approach to establish scope of audits globally, working closely with approved third-party audit providers such as the Business Social Compliance Initiative, Responsible Business Alliance and Sedex Members Ethical Trade Audit to promote continuous improvement. Efforts are focused on all aspects of our Responsible Sourcing programme, with particular attention paid to issues related to forced labour and trafficking, both issues within modern slavery.

For example, our approved audit programmes are encouraged to continually enhance the methodologies used to identify and report forced labour indicators and to find ways to effectively evaluate compliance with the Employer Pays Principle. We revised our overall escalation criteria with a particular emphasis on potential indicators of forced labour. Through our enhanced and refined escalation process we have seen increased escalations of possible incidents of forced labour, which we believe to be the result of additional training and awareness raising.

While our programme relies upon third-party audits, we assess each audit independently and review it for certain higher-risk findings, including indicators of forced and underage labour, and unsafe working conditions. If these indicators are present, the audit is escalated within the business for additional review and potential investigation.

In 2018 Asda has engaged with our Top 25 GFR suppliers on their conformance with the Modern Slavery Act to ensure that we are sharing our expectations around compliance.

We intend to grow these relationships and this visibility further in 2019 where we will introduce similar engagement and reviews of all Own Brand Suppliers (including IPL) and Exclusive Suppliers within the scope of Responsible Sourcing. In addition to this we also reviewed all GNFR suppliers.



Employer pays principle

Workers should not pay for a job and that the costs of recruitment should be borne not by the worker but by the employer.

Initiatives & partnerships - collaboration

Collaboration is key to successfully addressing modern slavery. The risks are complex, systemic, industry-wide and beyond the ability of any single organisation to solve. By working with industry stakeholders, non-profit organisations, governments and others, we are striving to improve transparency, empower workers and create positive change throughout supply chains.

We're doing this in four ways;

- 1 Collective partnerships**
 Large strategic industry groups collaborating to find solutions to complex, global issues within modern slavery.
- 2 Asda specific initiatives**
 Our own initiatives to combat modern slavery and support survivors.
- 3 Targeted initiatives**
 Issue-specific initiatives that address risk within defined parameters.
- 4 Political engagement**
 Responding to consultation requests and contributing to best practice.

Global memberships

Initiative/group	Role	Information
Leadership group for responsible recruitment (Institute for human rights and business)	Steering Committee	Developed as an initiative of the Institute for Human Rights and Business, the Leadership Group operates as a company-led collective advocacy platform harnessing the leverage of major international brands to promote responsible recruitment practices amongst business, the recruitment industry, and government. All members of the Leadership Group are publicly committed to the Employer Pays Principle and its implementation throughout their supply chains ⁱ .
Responsible labour initiative (Responsible business alliance)	Steering Committee	Launched by the Responsible Business Alliance, the Responsible Labour Initiative is a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labour in global supply chains are consistently respected and promoted ⁱⁱⁱ .
Issara institute	Strategic Partner	Independent NGO based in Southeast Asia and the United States tackling issues of human trafficking and forced labour through technology, partnership, and innovation ^{iv} .

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Consumer goods forum	Member	Bringing consumer goods retailers and manufacturers together globally, they are a CEO-led organisation that helps the world's retailers and consumer goods manufacturers to collaborate, alongside other key stakeholders, to secure consumer trust and drive positive change, including greater efficiency. It has established the Forced Labour Priority Industry Principles, to assist in changes to eliminate forced labour ^v .
Bali process government and business forum	Member	The Bali Process focuses on people smuggling, human trafficking and related transnational crimes. This forum brings together business leaders and ministers from 45 countries and four UN organisations. The focus is to implement regional strategies which complement global efforts to eradicate forced labour, modern slavery, human trafficking and child labour under Sustainable Development Goal Target 8.7 ^{vi} .

Asda memberships

Initiative/group	Role	Information
Ethical labour working group (British retail consortium)	Member	This forum brings together retailers, public officials and charities to respond to issues and advocate for solutions impacting modern slavery from remedy to legislation changes.
Stronger together	Member	Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third party exploitation of workers ^{vii} . They provide guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation.
Modern slavery working group (Ethical trading initiative)	Member	Providing a number of functions, this group has reviewed legislation, provided evaluation frameworks, undertaken research (e.g. benchmarking) alongside a number of advocacy roles.
Food network for ethical trade (FNET)	Member	A supplier-led organisation working collectively to improve human rights in global food supply chains, focusing on recruitment fees, supplier engagement, risk assessment, transportation and logistics and worker representation.

Engaging with survivors

Bright future

In 2018 we assessed how we can help survivors of modern slavery to move forward, build confidence and gain independence. As part of this, we are working to understand how we can implement Bright Future, a work placement programme with a route to employment for survivors of modern slavery, within our business.

Ingredients for life – an Asda specific initiative

We also developed plans to leverage our own assets and expertise to help survivors on the journey from a supported environment to independence.

Our aim is to do this through piloting a cooking skills course at the innovation kitchens within our head office in Leeds for survivors of modern slavery. Asda - Ingredients for Life will be developed in collaboration with [City Hearts](#), who seek to restore lives torn apart by modern slavery. The programme will use food and

cooking to engage survivors in a relaxed, informal setting, building vital life skills and boosting confidence.

The pilot will produce an outcome report with recommendations on the sustainability and scalability of the project where we hope to work with supply chain partners to continue this work.



Our business processes

In 2018 we reviewed a number of our business processes to understand the risk of modern slavery.

Hand car washes are well-documented as a high risk industry. Asda has 38 manned car wash operations, operated by third parties. In 2018 we joined the [Responsible Car Wash Scheme](#), established by the Downstream Fuel Association, GLAA, HSE and a number of national retailers including Asda, to make sure affiliated operators act ethically and, improve the industry as a whole, and to mitigate a prominent business process risk.

The aim of the organisation is to target unethical labour practices and ensure compliance with regulations via ethical audits and certification, allowing customers to select an ethical car wash and allow enforcement agencies to focus on more unscrupulous operators. Asda has been involved in the establishment of this programme and is working as part of the pilot stage within the Midlands. We believe involvement in initiatives such as this will drive improvements within the industry as a whole ensuring legal trading, adherence to environmental regulations and the appropriate protection of workers.

Advocacy & political engagement

To promote greater awareness, we regularly speak at conferences and forums to move forward global efforts to combat modern slavery. These have included specialist events hosted by partners such as [Stronger Together](#) and working alongside the Home Office to assist other governments in the development of their own modern slavery legislation by providing a business perspective.

Training & awareness



We are equipping Asda colleagues with the skills they need to engage with the complexities of modern slavery, whether that's part of their role at Asda or as they go about their daily lives. An educated and informed colleague is vigilant to these issues and can respond accordingly.

All Asda Home Office line managers and selected retail colleagues receive modern slavery training via an e-learning module designed in partnership with Stronger Together. The module defines modern slavery and indicators to look out for, and provides information on UK legislation, case studies, best practice and what to do if a colleague has concerns for someone's safety. In 2018, 2,644 colleagues undertook this training.

The modules available to Asda colleagues and suppliers are shown in the tables below. Via our Responsible Sourcing Training Academy these modules have formed the foundational training modules for global audiences.

In 2018 we saw the direct benefit of a workforce that is aware and ready to respond. An incident of suspected modern slavery was reported following awareness-raising training, and we were able to take action and inform the relevant authorities to investigate further.

When incidents do occur, we are focused on investigating thoroughly, supporting colleagues, testing our reporting process, learning and improving.



Case study

Reporting incidents of modern slavery

Two colleagues reported to HR that they believed they may be victims of modern slavery. They indicated that another person was holding their identification documents, bank cards and had control of their bank accounts. The colleagues had been transported from Poland to work and whilst in the UK their movements were restricted.

As per our internal policies, our HR department immediately reported this matter to our Legal Team in addition to logging the incident with our Ethics Hotline, who advised to contact the local police. Representatives from the business attended the police station with the colleagues involved and supported them through the interview process, ensured that they had a safe location to go to and money for food and clothing. We also followed up over the weekend to make sure that the colleagues were safe and comfortable in their new location.

This incident triggered a full police investigation with the matter being referred to the Crown Prosecution Service for charges to be brought against the perpetrators. In addition, we have documented our learnings to manage our response to future events and ensure that we are robust in our business processes and due diligence towards modern slavery

The two colleagues have been able to move on with their lives and happily both decided to stay within our business.



In addition to training, in 2018 we marked National Anti-Slavery Day (October 18) by launching a communications campaign to around 135,000 colleagues, aiming to boost their understanding of the indicators of modern slavery.

The campaign was developed and delivered in partnership with Stronger Together, and gave colleagues the tools they need to identify a person who may be a victim of modern slavery.

Module name	Syllabus information
Modern slavery eLearning module	Provides an insight into the issue of modern slavery and how you can help prevent it and deal with it if you suspect it. Includes case studies and best practice for hiring managers.
Tackling forced labour in global supply chains – UK	A customised course that works with selected industries covering specific roles and how issues may manifest themselves in the trainees industry.

Suppliers, partners and colleagues have access to our global Responsible Sourcing Academy which provides training to raise awareness on issues such as modern slavery.

Currently more than 5,000 suppliers are enrolled into the Academy. Enrolled suppliers have access to a number of modules to aid their efforts to combat modern slavery and forced labour.

Module name	Summary
Responsible recruitment of facility workers	Describes effective recruitment practices that can help build a skilled and productive workforce and aid compliance with labour laws.
Responsible sourcing for suppliers	Describes how a responsible sourcing management system is an important component to a well-functioning business. When suppliers and/or facilities purchase and source products, raw materials, and components, responsible sourcing helps to reduce risk to their business.
Communication and feedback process	Describes the communication and feedback process, provides key elements and examples for consideration in an effective worker communication strategy, and suggests guidelines for creating a communication and feedback process policy.
Wages and hours	Describes the benefits of having a wages and hours management system to help facilities remain compliant on a number of topics; wages (compensation), hours, benefits, breaks, rest days, holidays and leave. It aims to prevent illegal or excessive wage deductions or withholdings, delayed wage payments and irregular payments.

All new starters at Home Office attend an Ethics and Compliance new hire orientation. This event focuses on the work of our Ethics and Compliance teams and how we operate within Asda, including the expectation of our colleagues to do the right thing. Within the presentation there is a section on how we are combating modern slavery. In 2018 687 new colleagues undertook this mandatory course.

Progress against 2018 objectives

09

We are pleased to report our progress against last year's objectives.

Objective	Status	Evidence
Assess sourcing risk down to primary production in key fresh produce supply chains	On-going	284 suppliers have received Agri-Initiative survey
Review the training provided to agency colleagues and all hiring managers	On-going	Training content subject to review with Asda HR, 2,644 hiring colleagues have completed this e-learning module.
Complete 2nd Tier supplier mapping in selected supply chains	Complete	Mapped - 40 suppliers and 224 facilities.
Ensure all relevant colleagues complete the e-learning module 'Tackling Forced Labour In Global Supply Chains'	Complete	581 colleagues have undertaken this training
Introduce a toolkit for our recruitment agencies focused on tackling modern slavery	Complete	All 37 sub-agencies have access to new bespoke tool kit
Continue to review all service suppliers in relation to modern slavery including specifically construction, facilities and catering services.	Complete	MSA compliance assessed, specific focus given to high risk areas within 2018

Objectives for 2019

10

Our objectives for 2019 are as follows;

Priority	Specific focus
<p>Improve our risk assessment</p>	<ul style="list-style-type: none"> • Further refine and evaluate tools developed in 2018 to assess risk and measure progress • Undertake additional due diligence of tenants and service providers to further evaluate them within our hierarchy of risk • Further evaluate the output of our hierarchy of risk for George and IPL focus areas
<p>Increased training and awareness</p>	<ul style="list-style-type: none"> • Review and update the e-learning modules • Increase awareness of the indicators of modern slavery for colleagues who may have closer proximity to those in conditions modern slavery • Tailored messaging to assist colleagues in understanding purchasing practices and their associated impact: <ul style="list-style-type: none"> - Technical Managers (Produce) - Buyers / Merchants (Commercial)
<p>Steps to strengthen policy</p>	<ul style="list-style-type: none"> • Implement and communicate our Modern Slavery Policy to GFR suppliers to drive awareness and compliance
<p>Increased focus on partnerships</p>	<ul style="list-style-type: none"> • Engage with external partners to benchmark our objectives and inform our strategy in 2019 • Explore our new partnerships and integrate them within our business processes and supply chains
<p>Increased focus on scalable initiatives</p>	<ul style="list-style-type: none"> • Deliver Asda: Ingredients for Life pilot - a culinary programme that puts survivors of modern slavery, their skills and journey to independence at its core • Identify sites where Bright Future could be successfully implemented within our IPL business

- i **Global Slavery Index**
<https://www.globalsslaveryindex.org/2018/methodology/overview/>
- ii **Leadership Group for Responsible Recruitment**
<https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>
- iii **Responsible Labour Initiative**
<http://www.responsiblebusiness.org/initiatives/rli/>
- iv **Issara Institute**
<https://www.issarainstitute.org/>
- v **Consumer Goods Forum**
<https://www.theconsumergoodsforum.com/who-we-are/overview/>
- vi **Bali Process**
<https://www.baliprocess.net/>
- vii **Stronger Together**
<https://www.stronger2gether.org/about-us/>