

WORKING IN PARTNERSHIP FOR A HAPPIER WORLD

# Human Rights Report & Modern Slavery Statement

2021/22

JOHN LEWIS  
& PARTNERS

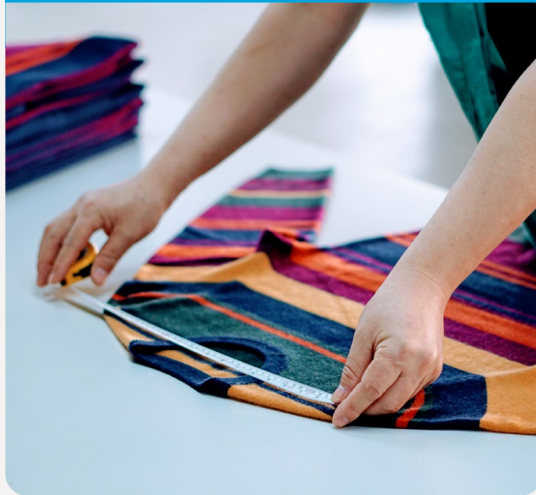
JOHN LEWIS  
PARTNERSHIP

WAITROSE  
& PARTNERS



# 5,979

workers from 55 sites across the UK and China participated in our Better Jobs programme in 2021.



# 37

workers at a Waitrose Food and Grocery supplier in southern Italy are now supported by the establishment of a grievance process.

# 8,545

Partners trained in spotting the signs of modern slavery.



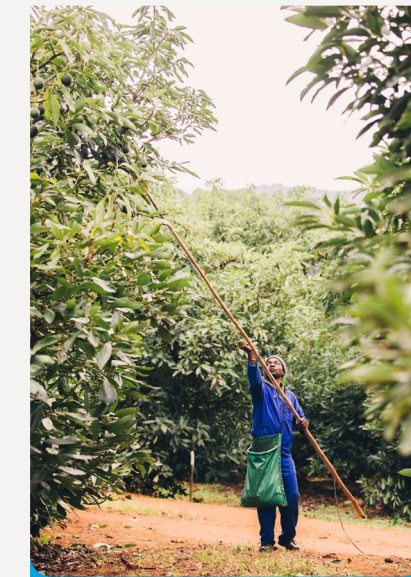
# 1,396

non-conformances closed, each demonstrating an improvement to working conditions in factories that supply our Partnership.

# 734

SMETA audits were carried out at our sites, supporting our ambition to demonstrate that basic working conditions are in line with the Responsible Sourcing Code of Practice (RSCOP).

**SMETA**



# £2.4m

was generated for the Waitrose & Partners Foundation to invest in improving livelihoods, empowering workers and building stronger supply chains.

# ETHICAL COMPLIANCE POLICY

The latest update was released, further aligning the requirements for Goods For Resale (GFR) suppliers across both our brands.

# 20,000

workers benefitted from representatives of 44 own-brand supplier sites attending Stronger Together's 'Tackling Modern Slavery in UK Businesses' course.

**stronger together**  
tackling hidden labour exploitation

## Our 2021/22 highlights

# 172

Worker Livelihood Projects were delivered by Waitrose & Partners Foundation in ten countries, benefitting more than 75,000 workers and their communities.

# 2

Partners upskilled to provide expert, on-the-ground monitoring for workers in our artisan supply chains in India.

# £2.2m

generated in Fairtrade Premium through the sale of Fairtrade products. This was paid to farmers on top of the Minimum Price to invest in their businesses and communities.

**FAIRTRADE**  
FOUNDATION



# 1,461

livestock farmers completed our livestock self-assessment questionnaire, giving us visibility of working conditions on these farms.



# 2

Our second 'Women in Supply Chains' report was published, detailing the challenges of women working in global supply chains and what we are doing to address the issues.



# Reflections from our Chairman

The John Lewis Partnership was founded in 1929 by John Spedan Lewis as an experiment to find a better way of doing business – one with social purpose and a desire to do good at its heart. Nearly a century later our new Purpose – *Working in Partnership for a happier world* – is the modern incarnation of this historic vision.

The increasingly complex and challenging world in which we live means that not only do we have to work together to maintain a successful and sustainable business, we must also strive to create a happier world – including for our Partners, customers, suppliers and the communities in which we operate.

This report highlights the steps we've taken this year to help protect the human rights of people in the Partnership's own operations and supply chains. It reflects not only our successes but also the challenges we continue to face as we work to help create a fairer, happier and more sustainable future for generations to come. In many ways, this report is a reminder of the scale of that task. Although we've achieved a lot, there is still much work to do.

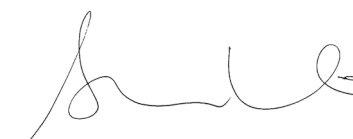
The impact of the pandemic continues to be felt by many people – with the poorest and most vulnerable across the world being most affected. Global supply chains continue to be significantly disrupted, including shortages in raw materials and rising freight costs, a situation made worse by the tragic war in Ukraine. This disruption has directly affected the number of employment opportunities and types of work available. Elsewhere, traditional international migrant worker routes have been displaced, leading to staff shortages. More than ever, the past year has reminded us how improving conditions for workers and tackling exploitation requires a firm and long-term commitment.

We have continued to develop our Better Jobs programme that we started with John Lewis suppliers in the UK in 2019. Aimed at improving working conditions and job satisfaction for workers in our supply chains, the programme gathers direct feedback from workers at our supplier's sites

and supports our suppliers to act on the feedback. This year, the programme has expanded to include a number of Food and Grocery and Goods Not For Resale suppliers. Nearly 6,000 workers across 55 sites have completed the survey. We're working with our suppliers to develop action plans that address areas for improvement, supporting them with tools and events over the next 12 months.

We must always have in our minds the individuals and communities – in the UK and globally – that are behind the amazing products and services we sell or use in the Partnership. People who work directly or indirectly with us have a right to safe employment, free of fear and exploitation – and it is our duty to help make that happen.

I would like to thank all our Partners, customers, NGOs, businesses and workers from across the globe who have contributed to our efforts. I look forward to seeing how our work together improves the lives of those who work directly or indirectly for the Partnership.



**SHARON WHITE**  
Partner & Chairman



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Our business

The John Lewis Partnership is the UK’s largest employee-owned business and parent company of our two cherished retail brands, John Lewis and Waitrose, which are owned in trust for over 78,000 employees (who are Partners in our business). We have 36<sup>1</sup> John Lewis shops including one outlet and 331 Waitrose shops across the UK, along with johnlewis.com and waitrose.com. We also have two international sourcing offices, a soft furnishings factory, various distribution centres, 4 Waitrose cookery schools, a content production hub, a heritage centre and our own Waitrose farm.

331 Waitrose shops in the UK and Channel Islands	36 John Lewis shops in the UK <sup>1</sup>	4 Waitrose cookery schools
1 Partnership Heritage Centre	1 John Lewis shop-in-shop, Gibraltar	2 head offices, one in London and one in Bracknell
22 customer delivery hubs <sup>2</sup>	2 sourcing office locations in India and Hong Kong	1 content production hub
11 distribution centres <sup>3</sup>	42 countries and territories stock Waitrose products	70 own-brand product sourced from over 70 countries
2,000 Over 2,000 Goods For Resale Tier 1 <sup>4</sup> own-brand supplier factories	8 customer contact centres <sup>5</sup>	1 soft furnishings factory, Herbert Parkinson
1 Waitrose farm, the Leckford Estate	5 Partnership hotels for Partners to use	

You can find out more about our business in our [2022 Annual Report and Accounts](#).

1. Figure includes John Lewis Canary Wharf and John Lewis Swindon Outlet.  
2. Figure includes three customer fulfilment centres, one of which is run by a third party.  
3. 6 of the 11 distribution centres are run by a third party.  
4. A tier is defined as a stage in the supply chain carrying out a particular activity in the production of a product. For example, Tier 1 is defined as sites manufacturing or assembling a finished product.  
5. Five of the contact centres are run by a third party.

Reflections from our Director of Ethics & Sustainability

I am proud of the achievements we have made over the last year but recognise that the need to protect the rights of those working within our own operations and the supply chains providing goods and services to the Partnership has never been greater. The past few years have seen critical shocks to our global supply chains which have had huge impacts on people. Covid-19 was a very direct humanitarian crisis. We are already seeing the impacts of climate change being felt by workers within our supply chain and, looking forward, we are aware that issues like water scarcity will become increasingly prevalent in some of our key sourcing regions. Rights to water and safe, healthy environments are becoming increasingly complex to uphold.

We have committed to set science-based climate targets and are currently developing a decarbonisation pathway for our operations and supply chain. We remain committed to being net zero in our operations by 2035. Whilst this is critical to halt the impacts of climate change, we face some tough decisions and recognise that there will likely be unintended consequences for those we are also trying to protect. As we make these decisions we are committed to ensuring that we deliver a just transition and take a human rights-based approach to our climate change mitigations. Enabling workers in our supply chain to realise their fundamental human rights remains a core ambition, and we look forward to continuing our work to ensure this is a reality.



MARIJA ROMPANI  
Partner & Director, Sustainability & Ethics





# Our Purpose

## WORKING IN PARTNERSHIP FOR A HAPPIER WORLD

Our Partnership is the UK's largest employee-owned business with over 78,000 Partners who are all employee-owners. Our Founder, John Spedan Lewis, established it as a better way of doing business and to drive positive change in society.

Our Constitution protects the values that underpin our business, enshrining our governance into a single written document that can only be changed with the consent of both the Partnership Council and the Chairman. While our Constitution has evolved since it was first published almost a century ago, it continues to embody the essence of the extraordinary vision and ideals of our Founder.

The Principles and Rules set out in our Constitution define our Partnership's role in society and our responsibilities to Partners, customers, suppliers and the communities in which we operate. It also states that we are required to make 'sufficient' not 'maximum' profit, and that's why we are focused on reinvesting our profits back into our Partners and to pursue our Purpose.

In 2021, to ensure our Purpose is fit for the future of our Partnership, we invited discussion, input and feedback from Partners across the business on what our refreshed Purpose should be. Our new Purpose – 'Working in Partnership for a happier world' – makes it clear why we exist, our ultimate aim as a business, and gives us an exciting opportunity to do things differently.



### Happier people

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

We treat people with fairness, courtesy and respect, and we work with others who do the same.

We create an inclusive environment and celebrate diversity with our Partners, customers and the communities we serve. We're at our best when we all feel welcomed and free to be ourselves.

We take pride in making our customers happy. We put everything we have into everything we do, earning the loyalty and trust that we need to be successful.



### Happier business

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

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

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



### Happier world

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

We build trusted business relationships, acting with integrity and doing what's right.

We take responsibility for our impact on the planet. We work tirelessly to protect and restore nature, creating a more sustainable future for generations to come.





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

# Responsible Sourcing Code of Practice

The RSCOP is approved and signed by the Chairman and is applicable to all suppliers of goods and services to our Partnership, in all sourcing countries and at all tiers of our supply chain.

Suppliers trading with our Partnership are expected to comply with the RSCOP and, in so doing, must also comply with all other relevant national and applicable laws. Where there is a difference between the protection offered by the law and that offered by the RSCOP, the higher standard should always be applied. If suppliers are unable to comply with a provision of our Code, they must explain to us how their own policies, processes and standards address the fundamental principles of that particular provision. They must also show us how their standards have been developed in collaboration with their workforce.

As outlined in this report, the RSCOP is the first stage in a continuous improvement journey. We consult with internal and external stakeholders including government bodies and NGOs on strengthening our approach, including policy development, to improving the human rights of workers in supply chains supplying the Partnership.

To demonstrate compliance to the RSCOP, risk assessments and due diligence are undertaken in our supply chains. The initial focus is on high risk supply chains and those where we can have a direct impact. These assessments seek to make sure the required standards within our supply chains are upheld and also highlight where improvements can be made. Recognising the limitations of risk assessments and ethical audits, however, our Human Rights Team monitors the international economic, environmental and political landscape to also ensure we can anticipate any new risks that might arise and develop action plans to address these in our own supply chains.

We recognise our direct impact on the human rights of workers in our own operations and supply chains; however, we are also aware that we have a broader impact through our wider business activities. Whilst implicitly required of our suppliers, we had not previously published a policy which clearly laid out our expectations to uphold the broader human rights of those touched by these activities, for example, smallholder farmers and those living in the surrounding communities. This includes recognition of our indirect influence on the right to free and informed consent and access to water (as highlighted in our 2020/21 report).

As a result, we consulted with relevant stakeholders, including NGO partners, to formalise our requirements in a Human Rights Policy. This policy has a reach and relevance that is broader than the RSCOP and has been designed to set out our commitment to respecting the human rights of those within our own operations, the supply chains (Goods For Resale and Goods Not For Resale) and the charities we work with. It includes requirements for maintaining safe workplace conditions, offering secure and effective grievance processes, treating workers with equity and inclusivity, protecting indigenous communities, ensuring clean water and sanitation and maintaining a healthy environment.



# Governance

Strong governance over how we manage and mitigate the risk to human rights – including modern slavery – in supply chains providing goods and services to our Partnership is critical to ensuring we are meeting and exceeding our responsibilities as a business, and the requirements of the Modern Slavery Act 2015.

Governance of human rights in our Partnership forms part of our wider ethics and sustainability governance. In recognition of the importance of our responsibilities to Partners, to those with whom we build strong relationships – including suppliers, customers and communities – and to the environment, the Board agreed in July 2021 to the re-establishment of the Ethics & Sustainability Committee (ESC) as a Board Committee. Prior to this, the ESC was a subgroup of our Executive Team.

The Committee currently comprises the Chairman, one Non-Executive Director and four Executive Directors who are responsible for John Lewis, Waitrose, Strategy & Commercial Development, and Finance. The terms of reference for this Committee state that its purpose is to “assist the Board in fulfilling its responsibilities for setting the Ethics & Sustainability (E&S) strategy in accordance with our Partnership’s Purpose and Values and ensuring that this strategy is embedded into [our] operations”.

Nina Bhatia, Executive Director of Strategy & Commercial Development, has accountability for human rights and responsible sourcing performance across our Partnership.

## Our Ethics & Sustainability Committee



**SHARON WHITE**  
Chairman of the Partnership Board



**RITA CLIFTON**  
Deputy Chairman of the Partnership Board and Non-Executive Director



**BÉRANGÈRE MICHEL**  
Partnership Board member and Executive Director, Finance



**JAMES BAILEY**  
Executive Director, Waitrose



**NINA BHATIA**  
Executive Director, Strategy & Commercial Development



**PIPPA WICKS**  
Executive Director, John Lewis

## Human Rights governance 2021/22

Following the re-establishment of the ESC as a Board Committee, we have put in place a programme of regular reporting to the ESC at its quarterly meetings, to ensure there is greater oversight of progress to fulfil our E&S strategy, including human rights. An ethical compliance update is provided each quarter, with the Committee holding to account those responsible for delivery in operational teams. Ethical compliance performance is also monitored via our risk management framework (for further information on this framework, please refer to pages 31-39 of our [Annual Report and Accounts 2022](#)).

Alongside existing business activity, our Partnership’s Human Rights team identifies, and requests funding for, additional project work to support progress against our E&S targets. In 2021/22, human rights-related projects that we initiated included a human rights impact assessment in our tea supply chains, GNFR gap analysis, and plans to extend our Better Jobs scheme to South Africa and India in 2022.

We also invested in new systems and processes. Through our programme of factory audits of our Tier 1 sites we know that there is room for improvement in our management of factory compliance. To address this we have introduced new systems and processes during the past 12 months, including enhanced reporting and better capability for escalation and order blocking. This work is ongoing and in 2022 we are committed to implementing and embedding further improvements, including training, system-based controls and internal reporting.

We also continue to invest in programmes that will increase transparency and traceability beyond Tier 1 and across our extensive supply base, while actively identifying the best partners and initiatives to address the salient risks we’ve identified.



# Our Human Rights Programme

Our Human Rights Programme – made up of a number of strands of activity – forms part of the wider ‘People in Supply Chains’ area within our Ethics & Sustainability Strategy.

SUPPLY CHAINS



PEOPLE IN SUPPLY CHAINS

Protecting the rights of workers in our supply chains and championing the worker voice

The ambition of the programme is to enable everyone in our supply chain to realise their fundamental human rights. We believe that championing worker voice and building supply chain relationships creates lasting value for both our Partnership and those with whom we work.

Our risk assessment and due diligence programme ensures that suppliers adhere to the RSCOP, whilst our capacity building programmes aim to improve the understanding and application of our policies.

Our leadership programmes, including Better Jobs and the Waitrose & Partners Foundation, alongside our capacity building programmes, go further than compliance. These programmes require greater investment of time and resources at an individual site level and engage multiple stakeholders (suppliers, managers and workers) with the aim of addressing systemic human rights issues in a holistic manner. These stakeholders have valuable insight into issues at a local level within the context of the broader economic and political landscape.

We are also increasing our levels of engagement with trade unions and this year we have been consulting with the International Transport Workers Federation (ITF) on specific issues relating to transport and fisheries.





# Ensuring basic working conditions are in line with our Responsible Sourcing Code of Practice (RSCOP)

At a minimum we require conditions for those working within supply chains supplying our Partnership to comply with the RSCOP. We verify compliance through tailored risk assessments based on several factors: the level of associated supply chain risk – including country of origin, industry and product type – and the level of influence and impact we are able to have on a particular supply chain.





## Self-assessment questionnaires

At the most basic level, a self-assessment allows us to gather some of the most vital information and provides us with a good baseline for understanding working conditions on a site. This information includes worker numbers and demographics, primary site activity and details on labour policies and processes already in place. Collecting this data enables us to make informed decisions about the level of further due diligence required, such as an ethical audit, in-depth assessment or a spot check audit to verify that the information provided in the self-assessment questionnaire is correct.

“A self-assessment allows us to gather some of the most vital information and provides us with a good baseline for understanding working conditions on a site”

### Fresh produce packhouses

We plan to broaden our Ethical Compliance Programme to include in-country fresh produce packhouses. This is an important step in our compliance programme as we recognise that the fresh produce sector remains an area where there is a higher risk of human rights violations. To begin to understand the challenges at a packhouse level, a number of our fresh produce sites have completed a self-assessment questionnaire over the last year. Through this self-assessment, we can identify where positive actions are taking place, or where there are risk areas that we need to look into in further detail. To date, 130 sites across 30 countries have completed the questionnaire, and from that we have identified 96 risk areas to investigate further. These risk areas do not necessarily reflect a failure to comply with the RSCOP, but highlight where it is important for us to look at root causes. The risk areas identified largely relate to payment of fees by workers and use of agency labour. We will be working with our suppliers to investigate and verify risk mitigations, and to ensure that information and support is provided to growers where this is needed.



#### CASE STUDY

## Self-assessments in livestock supply chains

As set out in our 2020/21 Human Rights Report, in early 2021 we undertook our biennial worker welfare self-assessment within our livestock supply chains. Thanks to this self-assessment we can identify areas where improvements have been made, support continuous improvement and highlight risk areas that may require further investigation.

For the 2021 assessment we updated the questionnaire to better align with the leading worker welfare ambitions under our Waitrose Agriculture Plan, and to place more emphasis on compliance with the RSCOP. It also enables us to use the same questions for our global supply chains, such as fresh produce. The updated questionnaire raises the bar on worker welfare standards for our livestock farmers.

In 2021, 1,461 farms completed the self-assessment and we identified 843 high risk areas. The areas identified did not necessarily mean that there was a non-compliance to the RSCOP, but provided an indicator as to whether further investigation was needed to identify the root cause of the risk, or if farmers required further support to make improvements.

The findings and trends were presented to our supplier-led Waitrose Farming Partnership Livestock Steering Group. Supplier members have since continued to work directly with their farmers to verify risk mitigations and to ensure that further information and support has been provided to farmers where this was needed. We have closed 820 of the high risk areas identified and are developing the working group's action plan, which focuses on the following key areas:

1. Attracting workers/labour to ensure sustainability of the sector.
2. Retaining workers by being fair employers.
3. Training farmers and workers on issues such as health and safety, discrimination and basic right-to-work checks.
4. Farmer wellbeing and ongoing support.



## The Partnership's Ethical Compliance Policy

All Tier 1 sites supplying finished own-brand or branded exclusive Food and Grocery and General Merchandise products to our Partnership fall within the remit of our Ethical Compliance Programme, along with high risk own-brand Tier 2 food sites. Historically, we had separate Ethical Compliance policies for Food and Grocery and General Merchandise.

In 2021, we published our Partnership's [Ethical Compliance Policy](#) that further aligned requirements across all Goods For Resale (GFR) and introduced changes to our GFR Ethical Compliance Programme. Key changes to the policy include:

- Removal of audit exemption for General Merchandise sites with a low turnover.
- Risk assessments for both brands to determine the frequency of audits.
- Alignment across both brands on our audit grading process.
- A robust derogation process for sites exempt from the requirement to undergo a SMETA audit.

We retain specific requirements where it is currently not feasible to fully align requirements across Food and Grocery and General Merchandise.

## Risk assessment

Firstly, we undertake risk assessments for each site. For Food and Grocery sites, this includes completion of a self-assessment questionnaire (SAQ) on the Sedex platform. For General Merchandise sites we use a risk calculator that we developed with our factory compliance Partners. The calculator takes into account site location, industry and products being manufactured, previous audit grading and ability to close non-conformances, to determine whether a site is low, medium or high risk. For Food and Grocery sites, only those classified as high or medium risk require a SMETA audit, every two years and every three years respectively. For General Merchandise, high, medium and low risk sites require an audit every one, two and three years respectively.

## Ethical audits

Ethical audits are undertaken using an industry-wide and internationally recognised audit methodology, SMETA (Sedex Members Ethical Trade Audit). At a minimum we require a two-pillar SMETA audit that covers the nine key requirements of our RSCOP. We require all social compliance audits to be carried out by an Association of Professional Social Compliance Auditors (APSCA) certified auditor. APSCA is the professional standards body which certifies auditors' competence and oversees the ethics and integrity of members, both audit firms and auditors.

A SMETA audit is designed to assess a site's compliance with the [ETI Base Code](#), which the RSCOP mirrors. The Base Code was founded on the Conventions of the International Labour Organization (ILO) and notes nine clauses that reflect the most relevant labour practice conventions of the ILO. It is viewed as a global reference standard and is widely used as a benchmark for minimum standards.

During the audit the auditor will note any good practice examples, plus observations and any non-conformances against the ETI Base Code/RSCOP. All non-conformances are given a criticality score of either minor, major, critical or business critical. Once complete, the audit is given a green, amber or red rating that determines whether the site is compliant with our Ethical Compliance Policy. Sites with a red-rated audit are non-compliant to our Policy and considered in breach of the RSCOP. All sites, no matter the audit grading, must take corrective actions to resolve non-conformances within the timeframe specified on the audit. These actions are verified either online or in-person by the auditor to formally 'close' the non-conformances identified in the initial audit.



Ethical audits are undertaken using an industry wide and internationally recognised audit methodology, SMETA”



# Sites in scope of the Partnership’s Ethical Compliance Programme

Below we have detailed the number of sites that fell within the scope of our Ethical Compliance Programme in 2021/22, the number of audits that were carried out, and the number of non-conformances that were opened and closed during the same period. Sites supplying our Partnership are categorised as food, grocery, fashion or home.

During 2021/22, a greater number of non-conformances were opened versus 2020/21 due to the high number of audits that took place after a backlog from pandemic restrictions. We are working with sites and suppliers to ensure non-conformances are resolved effectively and are prevented in the future.

Goods for Resale sites in scope <sup>6</sup> of the Partnership’s Ethical Compliance Policy		
	Number of sites	Number of audits undertaken in 2021/22
Food	942	375
Grocery	80	35
Fashion	344	97
Home	804	227

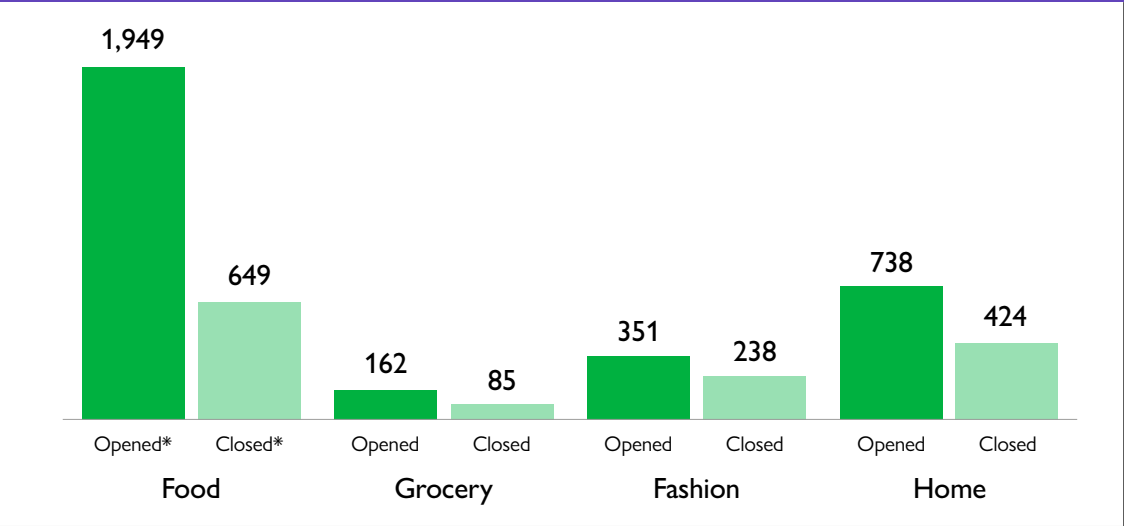
6. Number of sites in scope at 2021/22 financial year end dated 29 January 2022.

7. Only audits of sites in scope of our Ethical Compliance Policy – all Tier 1 sites assembling or supplying finished own-brand or branded exclusive Food and General Merchandise products to the Partnership, and high risk own brand Tier 2 food sites – are included in these figures.

8. Includes all non-conformances categorised as regular employment, management systems, entitlement to work, business ethics.

9. Includes all non-conformances categorised as environmental or other.

Number of audit non-conformances opened and closed\* in 2021/22<sup>7</sup>



Number of audit non-conformances opened and closed in 2021/22 by ETI Base Code Clause

ETI Base Code clause	Food		Grocery		Fashion		Home	
	Opened*	Closed*	Opened	Closed	Opened	Closed	Opened	Closed
Employment is freely chosen	38	9	7	1	0	0	0	0
Freedom of association and collective bargaining	13	13	6	1	2	1	3	1
Health, safety and hygiene	844	312	87	60	190	193	419	351
Children and young workers	34	11	4	0	1	0	1	1
Wages	225	59	17	8	58	10	101	8
Working hours	281	76	17	2	57	6	120	4
Regular employment <sup>8</sup>	418	76	15	5	22	15	52	33
Discrimination	16	7	2	0	0	0	0	0
No harsh/ inhumane treatment – discipline/ grievance	51	12	4	1	0	0	8	5
Other <sup>9</sup>	29	74	3	7	21	13	34	21

\*Opened: This refers to the number of non-conformances opened on audits carried out in the financial year ended 29 January 2022.

Closed: This refers to the number of open non-conformances closed out during the financial year ended 29 January 2022.



## Exploration of tier 2 in general merchandise supply chains

Having refreshed our Ethical Compliance Policy we identified the need for due diligence to be carried out below Tier 1 across General Merchandise supply chains. In some supply chains, Tier 1 sites assemble a product before it is boxed and shipped to a retailer, therefore providing us with little or no visibility of the site where the main component is produced. We are developing our due diligence programme for sites below Tier 1 and this year have undertaken a pilot. In collaboration with one of our main lighting suppliers, we have identified the Tier 2 sites where key components in John Lewis branded lights provided by this supplier are made. During 2022/23, Partners in our Hong Kong sourcing team will begin to conduct on-site assessments at these Tier 2 sites. We will directly address any issues that are uncovered during these site visits and the learnings from undertaking these assessments will be used to develop the due diligence programme for sites below Tier 1.



## Spot checks

To test the effectiveness of the due diligence within our Ethical Compliance Programme, we conduct spot checks using audit (namely SMETA two-pillar audits) or tailored methodologies at relevant sites and farms in our global supply chains.

We reserve the right (stipulated in our Partnership policy) to commission and conduct an audit at sites and farms in any tier as part of our spot checks.

Spot checks are commissioned and paid for by our Partnership and may be driven by specific concerns, or as part of a random selection process to ensure the effectiveness of our due diligence programme.

## Gap analysis – GNFR

In 2020, we reviewed our Partnership's use of agency labour and carried out a gap analysis of our GNFR procurement policies, processes and procedures, including four 'deep dive' ethical assessments, to understand whether the requirements of the RSCOP were being upheld by our third-party labour providers. A number of risk areas were identified and, as a result, in 2021, we began working with Slave-Free Alliance (SFA) to look in more detail at what could be done to support improvements in our operations supply chains. The first step was for SFA to carry out a detailed assessment at our largest distribution centre, Magna Park, over the peak period at the end of 2021. The assessment review identified positive steps being taken by our Operations team to ensure responsible recruitment of labour, but it also identified some improvements to be made in the relationships between management and staff which would create a more inclusive environment rather than an 'us and them' mentality. Recommendations for how to improve communication about grievance mechanisms and key employment conditions such as benefits and career progression opportunities are currently being worked through with the support of SFA.



## Industry-led audit programmes

Our Partnership actively participates in a number of international programmes that collectively seek to improve human rights through industry-wide action. These include:



### International Accord

John Lewis has been a signatory of the Bangladesh Accord since its inception in 2013 to improve factory building safety in Bangladesh. Following negotiations of the renewed Accord agreement last year, we continue to support the programme, now known as the International Accord. At the end of FY 2021/22 we had 18 active apparel factories in Bangladesh, all of which were registered on the International Accord programme and who actively participated in their site audits and closure of corrective action plans. At these sites we strive to follow the International Accord guidelines, instigating escalation procedures if remediation isn't effective within the given timescale.

In 2021, we had one whistleblowing incident brought to our attention, via the Accord, from the Bangladesh Independent Garment Workers Union Federation (BIGUF). It was alleged 11 union workers were unfairly dismissed, their pay withheld and that union members were also being subjected to verbal abuse and physical violence. On behalf of the Partnership, the BIGUF and other brands sourcing from the same factory, the Accord facilitated conversations with the factory and union to resolve the issue.



### International Labour Organisation's Better Work Programme

The Better Work programme is a partnership between the United Nations' International Labour Organization (ILO) and the International Finance Corporation (IFC), a member of the World Bank Group, and it was created to improve working conditions and respect labour rights for workers in garment and footwear supply chains. Working with the ILO and the World Bank Group, Better Work supports garment-producing countries to strengthen the policies and industry practices needed to ensure decent work and flourishing businesses, and to drive improvements on a much larger scale.

The Better Work programme approach combines advisory services, assessments and training. It's aimed at delivering clear and continuous improvements in factories by working with governments, employers, trade unions, workers and international buyers to ensure better working conditions that can boost ethical compliance and profitability. The model empowers factory workers, their representatives, supervisors and managers to improve the working conditions in their facilities.

At the end of FY 2021/22 we had eight apparel and footwear factories, across Bangladesh (three factories), Cambodia (two factories), Indonesia (one factory) and Vietnam (two factories) actively participating in the Better Work programme. As part of our Ethical Compliance Policy, these factories, with a total of over 15,000 workers, are exempt from providing a SMETA audit. However, Better Work conducts unannounced site visits, provides sites with a dedicated advisor, industry seminars and training for workers and management. The factory programme changes attitudes as well as behaviours, policies and practices.



## Certification and third party sourcing programmes

Beyond Tier 1 and Tier 2, supply chains become increasingly complex and as such it is often challenging for our Partnership, acting independently, to undertake robust due diligence and to drive improvements. Certification, although not the solution to de-risking supply chains, can be a useful tool in supporting industry wide improvements and ultimately improving opportunities for workers globally.



### Fairtrade

Waitrose has supported the Fairtrade Foundation since its launch in 1994 and in 2020 we achieved our ambition of offering the widest range of certified own-label Fairtrade products of any UK supermarket. We're committed to sourcing 100% Fairtrade across key own-brand categories including coffee, black teas, bananas, sugar, block chocolate and the cocoa used in our confectionery. We recognise the role that the Fairtrade system plays in monitoring and helping to drive improvements in workers' rights in some of the most challenging supply chains.



### Responsible Fishing Vessel Standard (RFVS)

Launched in 2020, the RFVS enables fishing operations to ensure decent working conditions and operational best practices in line with internationally agreed protocols and guidelines. The standard includes requirements relating to crew rights, wellbeing, training and safety. Fishing vessel owners and operators are audited by a third party to demonstrate they comply with this industry best practice standard. Our ambition is to achieve adoption of the RFVS by all UK vessels supplying Waitrose. In Scotland, vessels supplying Waitrose have started to adopt the RFVS; however, there are uptake challenges elsewhere, largely due to already strong sales demand and stakeholders not wishing to incur additional costs without a guaranteed price premium in the sales market. Working with the Global Seafood Alliance (GSA), which owns and operates the scheme, and Flatfish, our main supplier of UK wild-caught fish, we've held roadshows at UK ports encouraging more vessel operators to sign up to the RFVS. As the challenge continues, we will work collaboratively with the GSA, fishers, suppliers and other relevant organisations to overcome the hurdles to adoption.



### Better Cotton

Our Partnership has committed that 100% of the cotton used in own-brand products will be from more sustainable or recycled sources by 2025.

We've been a member of Better Cotton since 2013 and continue to engage with the non-profit, multi stakeholder group on its mission to help cotton communities survive and thrive whilst protecting and restoring the environment. This includes supporting Better Cotton to continue to build robust requirements regarding decent work into the principles and criteria of its framework. In January 2022, our Senior Manager, Human Rights Programmes, joined the Better Cotton Standards Committee that has been established to provide technical and strategic oversight of the revision of the framework. The result of this will provide the Better Cotton Council with a final recommendation of approval for the revised framework before it can be formally approved.

Better Cotton Farmers must work to uphold, and continue to comply with thereafter, four decent work standards:

- Freedom of association and the right to collective bargaining.
- The elimination of forced labour.
- The abolition of child labour.
- The elimination of discrimination in employment and occupation.

The Principles & Criteria framework includes 22 criteria for upholding these standards. Better Cotton Farmers are also required to follow national labour and occupational health and safety laws, unless those laws fall below ILO standards.





## Roundtable on Sustainable Palm Oil (RSPO)

Our Partnership has committed to source 100% of the palm materials in our products from Roundtable on Sustainable Palm Oil (RSPO) Segregated sourced by 2025. Already, 72% is sourced this way, with a further 25% sourced via the mass-balance supply chain model.

Palm oil is a perennial tree crop that is heavily reliant on migrant labour for year-round harvesting of the palm fruit bunches. Conflict over the appropriation of land for palm oil plantations from local and indigenous communities without their free prior and informed consent is also frequent.

Ensuring human rights are upheld is a key concern in the sector, and forms a major part of the RSPO's Principle & Criteria for its certification standard, and its wider programme of work on human rights. The standard sets out the key requirements for certified producers to ensure human rights are protected, respected and remedied.

Respect community and human rights and deliver benefits (Principle 4)

- Protection of human rights defenders
- Grievance, complaints and remediation procedures
- Upholding of the right to free prior informed consent

Support smallholder inclusion (Principle 5)

- Support for smallholder livelihood improvements
- Fair and transparent dealing with smallholders

Respect workers' rights and conditions (Principle 6)

- No discrimination
- Decent living wage requirement
- Freedom to unionise and bargain collectively
- No child labour or exploitation
- No forced or trafficked labour
- No harassment and protection of reproductive rights
- Safe working environment



Certification can be a useful tool in supporting industry wide improvements and ultimately improve opportunities for workers globally”



## The Sustainable Fibre Alliance (SFA)

Our Partnership is committed to sourcing 100% of our pure cashmere used in own-brand products from more sustainable or recycled sources by 2025.

We've been working with the Sustainable Fibre Alliance (SFA) since 2020. The SFA is in the process of reviewing their cashmere standard and will be relaunching it as the world's first global standard in December 2022. It will focus on five sustainability principles: goat welfare, biodiversity and land use, fibre quality, decent work, and effective management.



# In-depth supply chain assessments

Where we have identified a specific concern, or know that a supply chain poses a particularly high risk for human rights abuses, we carry out ‘deep dive’ assessments. These may look at any tier in the supply chain, focusing in more detail on policies, processes and views of workers.



## CASE STUDY

# Understanding working conditions for migrant workers in the UK fishing sector

The fishing industry has been linked to horrific human rights abuses globally. The UK wild-caught sector is characterised by lack of visibility, and there are inherent vulnerabilities for workers, specifically migrant crews. In order to develop an understanding of key issues facing migrant crews, we commissioned Impactt, the ethical trade consultancy, to analyse what processes were in place for workers to

voice grievances by undertaking desk-based research, stakeholder interviews and semi-structured interviews with randomly selected non-European Economic Area (EEA) fishers working on transit visas.

In June 2021, two major Scottish ports were chosen for the semi-structured interviews based on the increased likelihood of finding fishers who met

this criteria. Forty migrant fishers, six skippers and two recruitment agents were selected at random to be interviewed. It was not identified whether those interviewed had any connection to our Partnership. A workshop was then conducted with key industry stakeholders to feed back the initial findings and to establish structured and impactful recommendations.

“Our research identified migrant workers paying recruitment fees, excessive overtime, non-payment of overtime wages”

The research identified some positive findings but there were some concerning discoveries, including the payment of recruitment fees, which was flagged by 13% of those interviewed. It was also reported that key challenges workers faced included not being prepared for the psychological and physical hardship of working on the harsh sea off the coast of the UK, and 38% of those interviewed had either personally sustained injuries or witnessed others injured on UK vessels. More than 75% had worked on average up to 20 hours per day continually across three to four weeks without proper rest and none of the workers received any payment for the overtime hours worked.

We’re now working collaboratively with the industry – including with bodies such as the Seafood Ethics Action (SEA) Alliance – to develop the recommendations from the study into meaningful action and we hope to share an update in future reports.



## Verisio ‘Deep Dive’ audits

With a focus on conducting a greater number of impact assessments, we trialled ‘Deep Dive’ audits, developed by Verisio, with three UK mattress suppliers. We chose to focus the audits in the UK because it’s commonly misconceived as a low risk country, but in fact carries high risk due to it being a key destination for victims of trafficking.

The Verisio ‘Deep Dive’ audit methodology combines a desktop assessment of company documents, such as policies, and a two-stage, on-site unannounced audit consisting of an initial audit and a follow up at roughly six months at which all non-conformances will be reviewed. By completing the desktop assessment beforehand, auditors are able to dedicate more time to the on-site visits.

Key findings included gaps in policies and procedures such as those involving child labour, grievances, disciplinary processes and whistleblowing.

### CASE STUDY

## ‘Deep Dive’ audit – Hypnos

Hypnos, a key own-brand and branded mattress supplier, volunteered two bed-making sites for the ‘Deep Dive’ trial. Findings from the initial audit identified areas where immediate improvements could be made.

Following the challenges and pressures of the recent pandemic, with staff shortages in the office and on the production floor, the audit revealed that the management team at Hypnos could strengthen its connection with its workforce and create greater engagement. The audit closing meeting with the Hypnos leadership team led to some honest conversations and important recommendations, all of which were taken on board. Hypnos was keen to improve and strengthen the business by using the audit findings to drive culture change and enhance workforce wellbeing.



Over the next six months, the leadership team improved its processes by updating existing policies to ensure all necessary points were covered, and introduced new policies where needed. The team also introduced robust procedures to ensure all workers, current and new, had the same positive experience, which improved employee relationships.

“We take all feedback on board and use it to implement any changes that might enable us to become a stronger and more employee-engaged business”

JAMES KEEN  
Chief Executive Officer of Hypnos

Where additional team support was needed, Hypnos worked quickly to recruit and train staff, showing complete commitment to ensuring its workforce had the required help. Furthermore, team leaders on the production floor received training to enhance their management skills and strengthen relationships with their colleagues and overall the business is now feeling the benefits.

James Keen, Chief Executive Officer of Hypnos, commented: “We volunteered to undertake one of the very first ‘Deep Dive’ audits with our collaborative partner, John Lewis. As a transparent, forward-thinking company, Hypnos views audits such as these as hugely valuable ways to enhance our working practices. We take all feedback on board and use it to implement any changes that might enable us to become a stronger and more employee-engaged business. The difference this robust audit and subsequent learnings have made to our business has been extremely positive and allowed our teams to work together as a more bonded unit with even greater motivation. The ‘Deep Dive’ audit helped our business make strategic adjustments which have been a great success. Thank you to the John Lewis team for allowing Hypnos to be one of the first participants in this innovative audit programme.”



## Human Rights Impact Assessments (HRIAs)

Our Customised Human Rights Impact Assessments (HRIAs) consider a broader spectrum of human rights issues and rights holders. Undertaken by experts, HRIAs start with desktop research focusing on corporate policies, industry and country risks to identify the salient issues specific to the business and the supply chain of focus. This is followed by field research that includes interviews with:

- Duty Bearers (e.g. those downstream in the supply chain, such as our Partnership, who have the most leverage and impact)
- Rights Holders (focusing on workers and marginalised groups in the communities who are most vulnerable and have the least ability to raise concerns and have their concerns adequately addressed)
- Relevant parties (eg local NGOs, trade unions and other industry initiatives that support rights holders in the supply chains being assessed)

### Kenya tea HRIA

As we publicly committed last year, our Partnership has undertaken a HRIA within our Kenyan tea supply chains, working with our supplier and another retailer with whom we share the same Fairtrade-certified supply chains. The assessment, run by Partner Africa, will look in particular at the challenges faced by smallholder farmers in Kenya. Field research took place at the end of 2021, with a validation workshop held in early 2022. We plan to work alongside key stakeholders in the Kenyan tea sector to develop actions that will address the assessment's forthcoming recommendations.



### Pork and lamb HRIA

In 2021, we commissioned Impactt to run a HRIA in our pork and lamb supply chains in collaboration with our supplier and another retailer. Impactt's HRIA methodology is informed by the Danish Institute for Human Rights' framework and is designed to identify negative human rights impacts of purchasing practices and business relationships. Research was conducted between October 2021 and early 2022 across the supply chains, from farms to abattoirs and processing sites. We will be reviewing the findings with our supplier to identify areas where we can help to drive improvements.

## Impact assessments in our Waitrose & Partners Foundation supply chains

Ghana is a significant source of prepared own-brand fruit for Waitrose, and is a key country for the Waitrose & Partners Foundation, which is in its 12th year of operation there. We are working with the University of Northampton, our supplier, and the Dutch retailer Albert Heijn on a piece of research to look at the impact of our activity, both positive and negative, over this time. We hope to understand how the Foundation's activities and interventions have resulted in changes to local livelihoods and to identify how we can make improvements going forward.

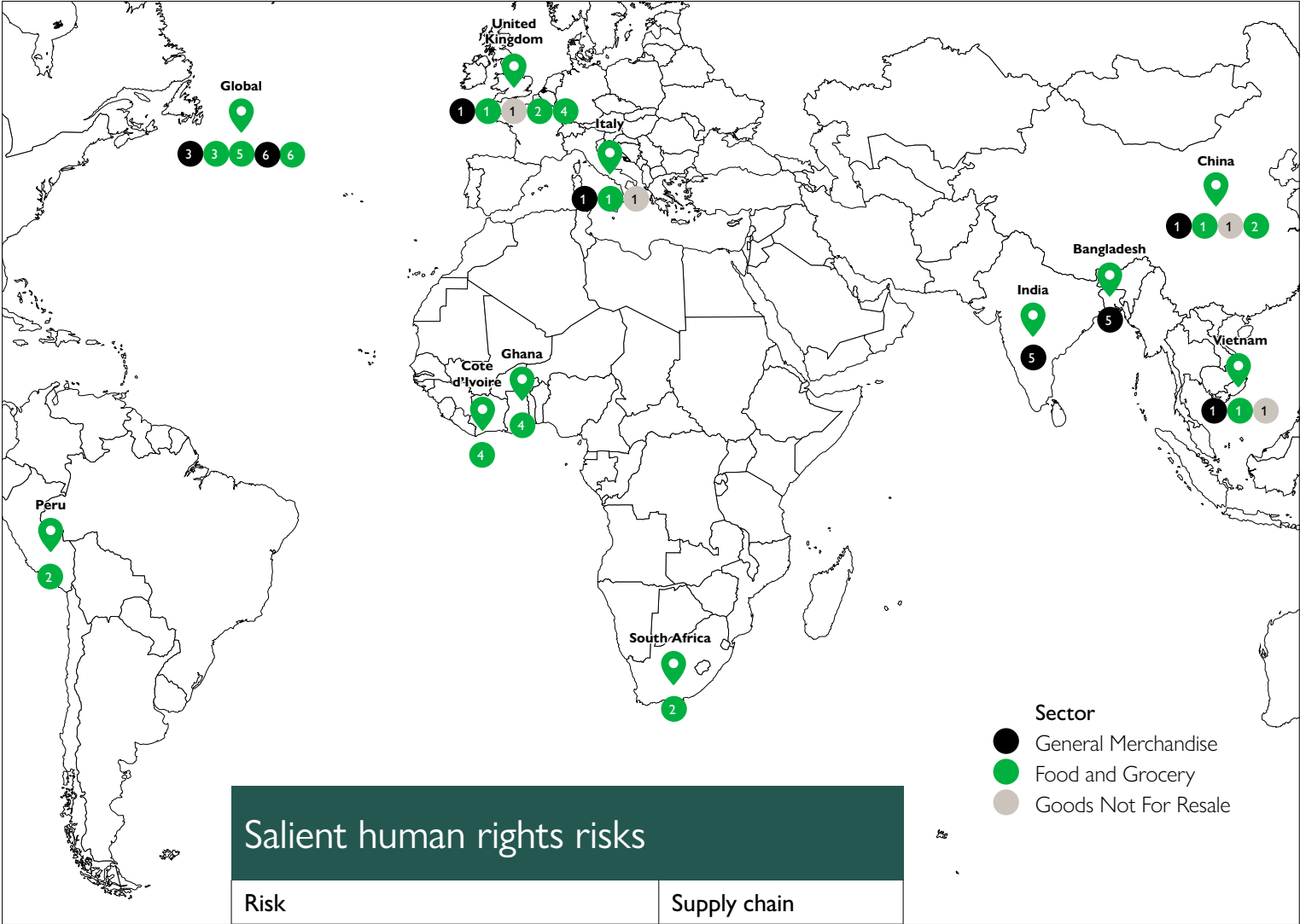




# Salient human rights risks

In 2021/22 our Partnership updated the issues identified as the most salient human rights risks within supply chains, using data to assess the severity and likelihood of them occurring. These risks have taken priority for programme development and selection for the reporting year.

To ensure we're constantly improving our ability to identify salient human rights risks, in September 2022, our Human Rights team participated in training with the Ethical Trading Initiative (ETI). This training focused on how to identify actual and potential human rights risks and covered topics including recognising labour rights as human rights, understanding human rights due diligence frameworks and implementing mitigation and remedy.





# Addressing broader human rights risks through collaboration

We focus our capacity building, leadership programmes and activities on the identified salient human rights risks, as these are the areas where we believe we can have the most impact and influence.





# Employment is freely chosen

When conducting ethical audits and self-assessment questionnaires in supply chains supplying our Partnership, the International Labour Organization's (ILO) indicators of forced labour – including withholding wages, debt bondage, abusive living and poor working conditions – are used to highlight risk areas in our supply chains. Forced labour and human trafficking are both forms of modern slavery, a particularly complex crime. Migrant workers are often especially vulnerable to these forms of exploitation and with an increasingly challenging labour market and refugee crisis in Europe, the risk of forced labour is high.

In the UK, a combination of factors including leaving the EU, and the pandemic has meant that many migrant workers have returned to their home countries. Recruitment in the fresh food labour market is at a major disadvantage due to physically demanding work, seasonal demand and fluctuation in work available. Our Partnership continues to engage with the UK Government to share insights into these challenges, and to identify ways to support the food and farming sector. We're also working in collaboration with others in the industry to tackle these issues.

## Modern Slavery Intelligence Network (MSIN)

In 2020/21, we reported that Waitrose had joined a pilot scheme for a new Modern Slavery Intelligence Network. Created in response to Operation Fort, the UK's largest-ever modern slavery investigation, MSIN's mission is to disrupt and prevent modern slavery and labour exploitation. In 2022, the UK sees the launch of this network, which is a non-profit collaboration of retailers and suppliers from the UK food and agriculture sectors.



**Forced labour and human trafficking are both forms of modern slavery, a particularly complex crime”**

## Release on Temporary Licence (ROTL)

Given the challenges regarding recruitment of labour, a number of suppliers have been considering options to diversify the workforce. Recruiting offenders has been explored as a way in which to provide opportunities of employment and work experience for those nearing the end of their prison sentence. To better understand the opportunity and associated risks, since September 2021 we have been working with one of our suppliers, Huntapac, along with the consultancy NGaje and other retailers, to understand Huntapac's experiences of recruiting offenders through the ROTL scheme. Working collaboratively, we have developed a guidance document for other suppliers considering using this labour pool. The case study has been shared at the Food Network for Ethical Trade (FNET) and ETI webinars and has been made available to our suppliers.

## ETI Italy agriculture working group

Waitrose is a member of a tripartite working group helping to address salient human rights issues affecting the Italian agriculture sector. Key issues identified in studies<sup>10</sup> over the last ten years relate to the use of illegal contracts (black and grey work), the use of illegal recruitment practices, poor working conditions and cases of forced labour<sup>11</sup>.

The ETI-led group, involving local stakeholders, suppliers and retailers, aims to address these issues by using the collective leverage of members to support farms and cooperatives to strengthen due diligence processes, better worker engagement and advocate for improvements in wider labour practices. In 2021, the group focused on developing resources for capacity building. This included designing farm risk assessment criteria and an ethical due diligence checklist for suppliers, as well as running a presentation for local cooperatives to help raise awareness of the role they can take in promoting legal practices amongst their member growers.

In January 2022, the working group also began collaborating with local NGOs to promote their existing local multilingual [help desk](#) that provides workers with information on local support services. Between June and December 2021, the help desk received 993 enquiries and as a result 437 listening and information advice services were provided to workers to help resolve their question or concern. 40% of the users were agricultural workers; however, we cannot verify whether these workers were working in Food and Grocery supply chains supplying our Partnership.

10. Oxfam, 2021, The Workers Behind Sweden's Italian Wine: An illustrative Human Rights Impact Assessment of Systembolaget's Italian wine supply chains, 01.06.22, <https://policy-practice.oxfam.org/resources/the-workers-behind-swedens-italian-wine-an-illustrative-human-rights-impact-ass-621266/>

11. Oxfam, 2018, Human Suffering in Italy's Agricultural Value Chain, 01.06.22, <https://policy-practice.oxfam.org/resources/human-suffering-in-italys-agricultural-value-chain-620479/>



## Uyghur autonomous region and cotton sourcing

For many years pressure has been increasing from a variety of stakeholders, including NGOs, governments, consumers and the media, for businesses to have greater oversight of raw materials supply chains. More recently, this pressure has focused predominantly on reports of Uyghur Muslims being detained in ‘re-education’ camps in Xinjiang and forced to work in a number of industries, including cotton supply chains.

Our Partnership recognises that the traceability of cotton is an industry-wide challenge due to its long and complex global supply chains. We are committed to addressing this challenge, both through our own actions and by working collaboratively with others, which is crucial to implementing the improvements needed.

During December 2020, our Partnership was invited to contribute to the Foreign Affairs and Business, Energy and Industrial Strategy Committees’ inquiries into the Xinjiang region. Our response to the inquiry was published in January 2021 on the Parliament website. Following this response, we met with the Department for Business, Energy & Industrial Strategy (BEIS) in May 2021 to discuss the topic, including how we map our supply chains and how we conduct our due diligence.



We remain vigilant to the high risk of modern slavery within the region. However, our policy remains unchanged: our Partnership does not source goods or services that have been made (or provided) using forced labour. We have not introduced a country- or region-specific policy and we continue to monitor the situation.

**We remain vigilant to the high risk of modern slavery from the Xinjiang region. Our policy remains unchanged: our Partnership does not source goods or services that have been made (or provided) using forced labour”**

## ‘Three-on-the-spot’ Vietnam

During 2021, the pandemic continued to heavily impact many of our supply chains. In June 2021, Vietnam experienced its fourth wave of the virus, which severely affected the lives of its population and the capability of factories to maintain production levels. The Vietnamese authorities introduced a very strict policy, known locally as a ‘three-on-the-spot’, in an attempt to curb the spread of the virus among workers whilst allowing factories to continue operating under safe conditions. The policy meant that in order for factories to remain open, workers had to live, rest and work on the premises and whilst there they and managers had to follow strict Covid-19 prevention measures including social distancing and regular testing. This was entirely optional for both factories and workers, but the risk of managers exploiting vulnerabilities was heightened. During this period we kept in contact with our key suppliers in the region and offered support to those living at the factories away from their families. For more information, please see our [2021/22 Ethics & Sustainability Report](#) (page 13).



# Health, safety and wellbeing

Health and safety remains a salient human rights risk in our global supply chains. During 2021/22, 1,540 health and safety-related non-conformances (NCs) were reported at sites supplying own-brand Food and Grocery and General Merchandise to our Partnership. Key health and safety risks include, but are not limited to, fire safety, hazardous working conditions, first aid facility and workers' training.

Over 40% of the 3,200 NCs opened in 2021/2022 are categorised as health and safety. This is largely the same when looking at non-conformances across both brands, as health and safety non-conformances can be seen to make up 44% and 56% of Food and Grocery and General Merchandise non-conformances respectively. This demonstrates the salience of health and safety risks for those working in factories from which we source.

To help support our sites, our UK-based Human Rights team and sourcing offices in Hong Kong (HKSO) and India (ISO) are able to offer guidance in understanding ethical compliance and closing non-conformances. Our Partners directly support factories offering on-site instructions for improvement and we also offer broader training on key safety topics. For example, in December 2021, the HKSO held a virtual supplier conference which included improving suppliers' understanding and awareness of health and safety non-conformances.



## CASE STUDY

# Improper emergency evacuation structure – changing the mindset

A soft furnishings manufacturer in India, employing over 50 workers, had rolling shutters installed on three emergency exits on the production floors, additionally these exits did not open outwards in the direction of evacuation. The intention was to provide added security at the premises but in fact the fire safety standards were compromised. The Factory Compliance team from our India Sourcing Office (ISO) worked with the management in resolving the issue, demonstrating why the rolling shutters needed to be replaced as they were too slow and inefficient to open in an emergency. Our team also explained how emergency exit doors should always open outwards to provide egress without contravening the fire safety standards, especially when a factory houses flammable raw materials. The management understood the importance of fire safety standards in adherence to the local law and removed all of the rolling shutters and ensured the exits opened outwards in the direction of evacuation.



A spokesperson for the factory commented: “Working with your Partnership compliance team has really helped us to understand the reasons as to why they asked us to remove the rolling shutters and also to keep the emergency exit doors open outwards. These changes were needed to ensure the safety and wellbeing of our own staff and we are pleased that the result is a safer workplace for workers and for the smooth working of our factory.”



## Child labour

The impact of the pandemic is likely to be felt by children for some time. Lockdowns and school closures during 2020-2021 limited children's access to education, and reports by UNICEF and the International Labour Organization (ILO) have suggested that child labour has increased in recent years<sup>12</sup>.

Whilst we were not aware of and were not alerted to cases of child labour being found in our supply chains during the year, we know there are areas where the risk of it occurring is high; for example, in agriculture, where children often support their parents in the family business. Our expectations regarding child labour are outlined in the RSCOP.

Child labour is a particularly high risk in the cocoa sector. In 2020, Waitrose moved all cocoa in its own-brand confectionery to Fairtrade. To achieve Fairtrade certification, no child labour (as defined by the ILO minimum age and the most serious forms of child labour conventions) should be employed. Paying a Premium for Fairtrade products enables families to earn a sustainable living and in doing so, it is hoped that they become less reliant on their children for additional income. More broadly, we support the commitment the Fairtrade Foundation is making to fight the root causes of child labour and to prevent exploitation and child abuse. Waitrose is also a founding member of the Retailer Cocoa Collaboration (RCC).

12. UNICEF/ILO, 2021, Child Labour: Global estimates 2020, trends and the road forward, 01.06.2022, <https://data.unicef.org/resources/child-labour-2020-global-estimates-trends-and-the-road-forward/>

## Low wages and sustainable incomes

### Low wages in handwoven rugs supply chains

Since 2019, we've been developing our approach to improving traceability and due diligence in our artisan hand woven rugs supply chain, with a particular emphasis on the lower tiers. Workers in the subcontracted parts of this supply chain usually work on an informal basis, without written employment contracts in place.



We are working on a project that will improve the transparency of the workers' conditions of employment, which should be at least in line with legal minimum wages. We will begin working to implement this monitoring process in 2022.



### Living wages in banana supply chains

Low wages are a systemic challenge for workers in the banana industry. Our commitment to purchasing only Fairtrade-certified bananas means that both smallholder farmers and workers on plantations receive the Fairtrade Minimum Price, which ensures they can meet the cost of production, as well as receiving Fairtrade Premiums to invest in improvements to their environment and community. In July 2021, the new Fairtrade Base Wage in bananas was introduced for hired labour, which is helping to improve wages for workers in the sector and move towards a living wage. However, we recognise that this will take time and over the last year we've started to work with IDH Sustainable Trade Initiative, making use of IDH's Salary Matrix, to understand the gap between current wages and a living wage in our supply chain. Our shared ambition is to bring together UK retailers to collaboratively drive sector improvements to wages.





## Fairtrade Premium

Waitrose sources 100% of its own-brand tea, coffee, bananas, sugar and cocoa in confectionery on Fairtrade terms. Through our Fairtrade sourcing we generated more than £2.2m in Fairtrade Premium in 2021 – the additional sum of money paid on top of the purchase price. The Fairtrade Premium provides a valuable opportunity for our producer groups to invest in their business and community and improve their economic livelihood. Across our Fairtrade supply chains, some Premium spend includes investing in fertilisers which support farm productivity, pest-resilient seedlings, financial services, housing improvements and education services including school resources and scholarships. Our coffee supply chain alone generated approximately £530,000 in Fairtrade Premium, of which around 31% was invested in productivity projects, and 13% in living income projects.

## CASE STUDY

# Working hours and wages

When audited, a factory in China supplying our Partnership had a number of visible non-conformances in Health and Safety, but there were also more hidden issues such as the auditor being unable to verify the working hours between production records and time records. This could have been an indicator that working hours were excessive and it also meant that it was not possible to verify that the correct wages were being paid. Subsequently the factory was transparent in letting us know that there were overtime issues. Our team at the Hong Kong Sourcing Office (HKSO) suggested the factory engage with a consultancy service to understand the root causes of the overtime hours, and to develop a plan to address all of the issues systematically. This independent advisor visited the factory approximately once a month (six visits in total) between April and November 2021 to give advice and check the progress on the open issues. After this intervention, the factory has started to implement new ways of working to resolve the critical issues as soon as possible.



Thank you for your support. The consultant has been very helpful regarding the production situation of our company to make a reasonable plan and rectification plan. The consultant gave us a reasonable deadline to make improvements and answer our questions based on the problems on site and documents. Let us no longer be confused”

FACTORY MANAGER



# Gender and discrimination

We have continued to develop our focus on gender and women's empowerment over the last year, recognising that there is still much to be done. In 2022, our Partnership formally endorsed the UN Women's Empowerment Principles (WEPs). The Principles form a holistic framework for businesses to demonstrate their action in empowering women in the workplace, marketplace and community. We are proud to have become signatories and are committed to creating gender-inclusive supply chains in partnership with our suppliers.

**“We are proud to have become signatories of the UN Women's Empowerment Principles and are committed to creating gender-inclusive supply chains in partnership with our suppliers”**

In our Fairtrade supply chains, we continue to support programmes that go beyond certification in helping to address gender issues. For example, in Colombia we are working on a cross-supply chain programme which includes 36 women, supporting them to improve the quality of the coffee crop and enable greater market access. These women have also been trained in preventing contamination of organic products, traceability and quality control.

In Malawi, following reports in March 2021 of gender-based abuse on the Lujeri Tea Estate, we stood by our direct supplier to ensure that improvements at the estate were made. This has included establishing clear grievance processes and a training programme for workers, which is underway, on recognising and tackling discrimination.

For more detail on the work we are doing to address the most significant challenges for women within supply chains supplying our Partnership, we published our 'Women in and around John Lewis Partnership Supply Chains 2022' report for International Women's Day 2022. This report provides an update from the previous report; it details what we are currently doing to help support improvement in opportunities and sets out where we have plans to do more.





# Ensuring all workers have the voice and capacity to drive improvements to their livelihoods

## Freedom of association and supporting effective worker voice mechanisms

The freedom to join a trade union of your choice is one of the basic human rights as defined by the Universal Declaration of Human Rights. Trade unions play an important role in democracy and support their members to negotiate with their employers. We recognise that not every worker in supply chains supplying products and services to our Partnership wants to join a trade union, and in some cases union representation is not in place. Our Partnership encourages and supports effective processes to give workers a voice and worker committees.





## CASE STUDY

# Grievance mechanism to improve worker voice – southern Italy

In 2021, our Partnership worked with Oxfam Business Advisory Service to develop a pilot to address the lack of effective grievance mechanisms for supply chain workers in the Italian tomato industry. We worked with a site in the region to analyse its existing grievance policies, design improved procedures and policies alongside workers, and create an exit strategy to ensure new processes were sustainable without external support.

As a result of this project, the site has implemented new grievance and resolution policies, and improved the quality and quantity of grievance-raising methods for workers. They have also introduced a grievance committee to support implementing new processes, and created a grievance support role into which workers can be elected. The worker in this role can be contacted by other workers to provide support when raising a grievance or navigating the process.

The project closely aligns with the ETI working group's objective of establishing grievance mechanisms (page 22); therefore, in order to boost mutual learning we have shared our findings with ETI members. Design of a second phase is currently underway and is due to take place in 2022.



We're seeing a more collaborative dialogue... We already can see during the trial period the amazing wish of the workers in participating in the project and in the updating of the policy, and the incredible number of ideas and information rising from them"

ANGELA  
(Account Executive)

## Engaging with unions

In the run-up to Christmas, the media widely reported the challenges regarding sea freight and the build-up of cargo at ports, in part as a result of changing border requirements following Brexit and ongoing global supply chain challenges. To ensure that these challenges did not impact on our ability to meet Christmas demand, we chartered additional space on cargo ships. We recognised the risk this increase may bring for workers (for example, increased working hours) and as such began discussions with the International Transport Workers' Federation (ITF) on how best to ensure the wellbeing of workers on vessels used by our Partnership. This resulted in the inclusion of worker welfare requirements as part of our tendering process for our sea-freight services.

## Peru social dialogue programme

As reported in our 2020/21 Human Rights Report, the ETI initiated a social dialogue programme in Peru. The programme was due to launch at an event in 2020; however, this was paused following political unrest in the country. Instead, the 'Fruits of Peruvian Dialogue' programme was inaugurated in 2021 through a virtual webinar.

The purpose of the programme is to develop dialogue among the buyers, growers, exporters and other stakeholders in the Peruvian agriculture industry to improve working conditions, raise awareness of health and safety issues, model and test the implementation of living wages for workers and promote sustainable business growth. Since its launch, the programme has delivered two multi-stakeholder webinars and supported dialogue and an agreement between agribusiness workers union (FENTAGRO) and the Association of Agricultural Producers Guild of Peru (AGAP). It has also supported successful dialogue and intervention on industrial disputes. In 2022, the ambition is to further define the programme's thematic focus areas, and establish key performance indicators.

## Issara Institute (Project Assara)

Issara Institute is an independent non-profit organisation, based in South East Asia, focused on tackling modern slavery, human trafficking and forced labour through data collection, technology, partnership and innovation. At present, our work with Issara is focused at food factories in Thailand that supply own-brand products to Waitrose, monitoring and adjusting labour conditions by partnering with businesses to empower workers to make themselves heard.

In August 2021, Issara released the second stage of its 'Golden Dreams' smartphone application. The app supports workers from Cambodia and Myanmar to access safe and reliable work in Thailand by offering job seekers and workers a way to review employers, recruiters and service providers and share their feedback with others. The update provides key information and peer-to-peer sharing on employment and recruitment conditions, as well as policy and news updates, at both source and destination – critical information for both job seekers and workers. Workers are also able to give their perspective on labour conditions, and access information to help them adapt and to avoid exploitation. This aims to reduce exploitative recruitment, forced labour and human trafficking by empowering job seekers and workers with information and support, and by increasing the transparency of recruiters and employers.



# Worker voice-led leadership programmes

## Better Jobs programme

Our Better Jobs programme aims to improve worker conditions and job satisfaction for the people who make our products and provide our services. In light of global challenges, it's never been more important to give workers in our supply chains an opportunity to share their views and experiences of being at work, so that we can work collaboratively on improvements that will have a positive impact. The Better Jobs programme launched in 2019, starting with UK factories supplying own-brand General Merchandise to our Partnership.

In 2021, we introduced a further theme to the framework, Business Relationships, enabling suppliers to consider how their business relationship with us supports their commercial success and impacts worker happiness. We're proactively looking to understand better how our ways of working with suppliers can be improved and we've welcomed this feedback to inform how we can act going forward.

This year, the programme expanded to include Food and Grocery and GNFR suppliers. In total, 50 suppliers completed the programme: 29 in the UK covering 31 sites and 2,399 worker responses, and 21 in China covering 24 sites and 3,580

worker responses. We're working with all suppliers to develop action plans that address areas of improvement identified through their participation this year, and will be supporting them with tools and events over the next 12 months.

Having run the Better Jobs programme for three years, we are beginning to better understand where opportunities exist for us to collaborate more closely with our suppliers to improve aspects of workers' experience of their jobs. We will be focusing more on this collaboration in future, giving more time to address the underlying issues that are identified. We're therefore making a change to the programme and from 2022 will be surveying workers every two years, with the intervening year focusing on building capacity and making improvements in the areas that each site has identified. This will also give factories more time to implement changes and embed initiatives fully before workers are surveyed again, giving us a more accurate picture of workers' views on the improvements made. We will be publishing country-specific action plans later in 2022, which will outline the areas of focus for the UK and China programmes.

### CASE STUDY

## Better Jobs workshops to promote worker and management dialogue in China

In 2021, two workshops were held in Shanghai and Guangzhou in China across 13 factories participating in the Better Jobs China programme. Using fun activities, the purpose of the workshops was to promote open and effective communication between workers and factory management.

In total, the workshops were attended by 17 managers and 23 workers. Scenarios were used to educate both parties in how to feel confident in establishing mutual and effective communications, through theatrical exercises and role plays.

Workshop participants commented:

"The team game was the most impressive session because it was quite fun and taught me about the goal of communication. No matter what kind of way we use to communicate, the ultimate destination is to achieve our goal."

"The training was very interesting. I've learnt how to improve my language when I communicate with my manager."

It was clear both management and workers learnt from and enjoyed the day's activities, highlighting that when given the opportunity to participate in off-site activities, it actually encouraged them to learn from each other and foster a stronger relationship, an important lesson in particular for management.



"The theatrical exercise was very practical. It helped me learn about a better way of communication with employees. It is difficult now to recruit workers. Better communication could build a better worker relationship, which is good for the growth of the company"



## Better Jobs programme expansion

After the UK and China, India represents our third largest sourcing country for General Merchandise own-brand products. We have a sourcing office in India with a team of experts that works closely with our suppliers. In 2022 we have therefore chosen to expand our Better Jobs programme there.

The Waitrose & Partners Foundation is well established in South Africa, a country where effective worker voice mechanisms are often lacking. As noted in previous reports, we had intended to carry out collaborative industry activity on this issue in 2020, but this was delayed due to the pandemic. Instead, we now plan to pilot the Better Jobs initiative in South Africa in 2022, enabling us to take some practical action to address these challenges. This will be the first time Better Jobs has been trialled in our Partnership food supply chains there.

We have appointed advisory group representatives in both India and South Africa as we prepare to launch the programme in both locations. We look forward to sharing the results of the worker insight gathered in the first year.



## Waitrose & Partners Foundation

Since the programme's inception in 2005, it has generated more than £17 million to support our workers in Waitrose own-brand supply chains supplying our Partnership and their communities. In 2021, we raised £2.4m for the Foundation through the sale of more than 200 product lines, including flowers, green beans, grapes, mango and berries, to deliver 172 projects which supported 75,000 individuals across 424 farm partners in ten countries.

Over the past year, as part of the Foundation's Global Strategic Fund, we continued to deliver our Covid

Relief Programme. Since 2020 we have invested more than £530,000, with £200,000 invested in 2021. This investment was used to provide PPE to workers and local schools, hardship funds and yield improvement projects, supporting more than 45,000 workers and their communities.

We have also completed 157 Worker Voice projects, suggested and developed by workers to meet their local needs. These have been across our five categories: Water and Sanitation, Health and Wellbeing, Environment and Green Energy, Access to Finance and Education.

Projects included the provision of microloans, construction of school classrooms, gender empowerment programmes and the refurbishment of vocational training centres.

For more information on Waitrose & Partners Foundation activity, see our [2021/22 Waitrose & Partners Foundation Annual Report](#).



# Training

Ensuring our Partners and suppliers have up-to-date knowledge and awareness of human rights risks is essential in enabling us to prevent and tackle modern slavery and human rights abuses within supply chains. Training plays a critical role in upskilling individuals and teams to ensure that our policies are upheld and that we are vigilant in identifying where breaches may have occurred.





# Partner training

Our Human Rights Specialist delivered a two-hour training session for Partners in our General Merchandise Quality & Technical team. The training covered topics including our Ethical Compliance Policy, the RSCOP, detail on the SMETA audit process, including non-conformance grading and closure and escalation of non-compliant suppliers. Eight Partners whose roles are directly responsible for ensuring ethical compliance attended. The session was positive and supported those Partners to improve their understanding of ethical compliance.

During 2021, the Ethical Compliance team conducted a virtual roadshow for the John Lewis Trade Board and subsequently all Heads of Category, serving as a reminder of the importance of human rights due diligence and to highlight our ambitions for human rights programmes within our supply chains. The roadshow included data insight and introduced teams to a new ethical compliance business intelligence dashboard to monitor up-to-date information on the ethical audit status of factory sites within their category mix. Trading teams were also given an overview of the wider market context, outlining why upholding human rights in own-brand producing factories is such a priority for the industry. This roadshow led to a strengthening of relationships between our Human Rights team and Trading Partners, setting our new teams and structures up for positive collaboration going forward.

**85%**  
of our Supply Chain team completed training on spotting the signs of modern slavery



## Spotting the signs of modern slavery

During the peak trading period of 2021, we set ourselves the target to train 100% of our Supply Chain<sup>13</sup> Partners to spot the signs of modern slavery. Training was delivered through a bespoke online module with the aim of reaching Partners who would be working alongside agency workers. In

total, more than 6,000 Supply Chain Partners completed the training (which represents 84% of that team) and more than 8,500 Partners took part in total. Our Partnership's Human Rights team also distributed the helpline posters in various languages at our warehouses and distribution sites.

## Rugs programme – capacity building of the ISO

In 2021, two Indian Sourcing Office (ISO) Partners participated in a workshop with expert local consultancy, ASK India, covering a review of known risks in artisan handwoven rugs supply chains and the process of carrying out risk assessments and identifying non-compliances in supply chains of this type.

An additional workshop was held in January 2022 looking at the legal requirements for producers operating in the rug making area around Varanasi in India, with framework tools provided for use on site visits.

This training is invaluable as we now have in-house expertise to support factories in our handwoven rugs supply chains. This will be supplemented with visits from ASK India consultants to provide independent third party reviews and additional expertise where needed.

13. Our Partnership Supply Chain team works in service of both Waitrose and John Lewis to ensure our customers can access the products and services they want and need wherever, whenever and however they choose.



# Supplier training



## Stronger Together

Modern slavery is one of the most salient risks affecting workers around the world. Stronger Together is a multi-stakeholder initiative that aims to reduce modern slavery through providing guidance, training and resources, and building a network for stakeholders to work together to reduce exploitation.

During 2021, 44 UK-based sites supplying own-brand products to our Partnership, employing over 20,000 workers, attended Stronger Together's 'Tackling Modern Slavery in UK Businesses' course. Delegates were provided with a range of measures they can put in place to prevent modern slavery from occurring in their own operations and were advised on how to spot signs that workers might be victims of exploitation or slavery.

Stronger Together UK also provides a Progress Reporting Tool (PRT), a free online self-assessment tool that enables suppliers to measure the progress they have made in addressing modern slavery risks within their own operations and supply chains. Developed in alignment with the UN Guiding Principles on Business and Human Rights, the framework provides data analytics which allows suppliers to track their progress over time, benchmark their performance against peers and identify improvement opportunities. Since launch, 18 of our UK suppliers have begun completing the progress-reporting tool with an average progress percentage of over 44%.



## Responsible Recruitment Toolkit (RRT)

We recognise that one of the biggest risks to workers becoming trapped in slavery is the requirement to pay back recruitment fees.

The Responsible Recruitment Toolkit (RRT) is an industry leading online tool designed to support businesses to develop robust, ethical and professional recruitment practices. In addition to online training courses, RRT offers a full toolkit online providing sites with step-by-step guidance on adhering to and demonstrating compliance with international ethical standards.

Since February 2019, 46 of our food manufacturing suppliers, representing over 16,000 workers, have signed up to use the RRT. Using the tool allows them to progress through a series of modules focused on international ethical standards and record actions they've taken.

Of those 46 suppliers, 14 of them – employing over 6,000 workers combined – completed the 'Introduction to Responsible Recruitment' training course in 2020 and 2021, and three completed the 'Eliminating Worker-Paid Recruitment Fees' course. Each course teaches a fundamental area of responsible recruitment. For example, 'Introduction to Responsible Recruitment' provides a gateway into the topic and explains the business case for it, whereas 'Eliminating Worker-Paid Recruitment Fees' teaches delegates how to eliminate recruitment fees and what they should do if they find out workers have paid them during the process of securing employment with them.

In 2021, we worked with RRT to further promote its training programmes to our suppliers and develop a strategy to increase supplier uptake.



## Waitrose & Partners Foundation

In 2021, the Foundation delivered training for ten worker committees at Foundation farms across South Africa, East Africa and Ghana. In South Africa, the training covered how to develop a successful project plan, as well as teaching soft skills to workers to help them develop confidence and feel empowered when participating on their farm. In Kenya, the training provided an overview of ethical trade principles, as well as leadership skills and expectations of Foundation committees.

The Foundation also delivered additional capacity building training courses. In South Africa, 25 participants took part in Project Coordinator training and 22 participants took part in People Management for Supervisors training. These courses improve skills and aim to support a wide group of workers into managerial positions on Foundation farms.



# Effectiveness

## Effectiveness of our due diligence programmes

In the second half of 2021, we focused on the effectiveness of our due diligence programmes, in particular for own-brand General Merchandise sites. Previously we placed orders at supplier level rather than at site level, meaning we were unable to link an individual own-brand product with its manufacturing site on our ordering systems. Purchasing at supplier level also meant we were unable to enforce a sanction on an individual non-compliant site without impacting on all of the supplier's sites. Working with John Lewis Trading teams, we implemented a system solution to directly link product codes to the site of manufacture. Suppliers are now responsible for ensuring they provide the site details for each order and are reminded to declare if any data is incorrect. Furthermore, after developing this capability, we're able to block orders from sites that, after ample opportunity to comply, remain non-compliant. Building on these improvements, work on gaining greater visibility and improved ethical compliance remains ongoing (see page 11).





Spot checks

Spot checks are designed to support our due diligence programme at sites. This year we undertook a spot check in one of our Kenyan fresh vegetable supply chains to understand whether a farm’s labour practices met the requirements of regular employment ETI base code clause. In addition to findings regarding fixed-term contract renewal, the spot check uncovered differences between the benefits afforded to temporary and permanent workers, such as access to savings and loans programmes. As a result, we widened the criteria of our Waitrose & Partners Foundation ‘Access to Finance’ programme to temporary workers at the farm to ensure that, together with the farm, we were meeting the needs of a higher proportion of workers.

However, as a result of prioritising improvements to supply chain transparency over the past 12 months, we were unable to carry out our planned number of spot checks in 2021/2022. Going forward, we’ve committed to utilising the spot check programme more effectively by increasing the number of checks carried out and continuing to use the programme to carry out independent investigations when we are alerted to issues of possible breach to our RSCOP. Our target is to carry out 16 spot checks over the course of the 2022/23 financial year.



Fairtrade tea producers – Assam

Over the last year the number of Fairtrade-certified producers of Assam tea has reduced<sup>14</sup>. The Assam region is a particularly challenging setting, with poor living and working conditions, low wages and increasing costs of production. Fairtrade requires a high set of standards to be met and systemic challenges in the region have meant a number of producers have been unable to maintain compliance with these standards. As a result, Fairtrade is working to develop a new approach to Assam tea certification. Waitrose is involved in the consultation

14. Fairtrade Foundation, 2021, Fairtrade Sourcing In Assam, 01.06.2022, <https://www.fairtrade.org.uk/tea/>

process for this, alongside local producers and other retailers. Whilst this is being developed we have continued to pay a Fairtrade-equivalent price and Premium, an additional sum of money to enable investment in the community. This is being monitored by a third party, Impactt, to ensure funds are used to benefit workers and their communities.

Whistleblowing

We have a number of channels and contact points that enable individuals working in supply chains supplying our Partnership to contact us. All correspondence is handled in accordance with our internal whistleblowing guidelines. We are developing our existing Partnership policy to ensure these channels are effective and consistently managed.

In 2021/22, we had 29 reports from whistleblowers, mostly alerted to us via The Issara Institute, compared to 21 in the previous year. To continue harnessing an environment where workers can report grievances to us, we will keep utilising a range of sector and location-specific whistleblowing channels, including those listed in the table below. We also work collaboratively with other brands and key stakeholders to share information, resolve issues and provide solutions where appropriate.

Whistleblowing cases				
	2021/22		2020/21	
Contact method	Cases	Countries	Cases	Countries
UNSEEN business portal	2	UK	4	UK
Local MP	1	UK	1	UK
Media	7	UK, Spain, Portugal, Malawi	2	UK
Trade unions/Industry bodies	1	Bangladesh	2	UK
Issara	15	Thailand	1	Thailand
Sedex/Audit company	1	UK	1	China
Direct letter from a whistleblower	1	UK	5	UK
ETI	1	UK	1	Zimbabwe
Direct from tier 1 supplier	0	N/A	3	UK
Direct from authorities	0	N/A	1	UK
Total	29		21	



## Advocacy work

During 2021, our Partnership, alongside 35 other businesses and investors, called on the UK Government to bring forward important legislation that would mandate companies to carry out human rights and environmental due diligence. As we move into 2022, we will continue to monitor and support the progress of this legislation, which will help drive higher standards of human rights and environmental due diligence across more supply chains and, most importantly, ensure justice for those who have been victims of poor practices.

## Driving change through collaboration

Our Partnership participates in a number of industry initiatives, forums and membership communities that engage on global human rights issues. These collaborations enable all involved to bring about change in an effective way utilising our combined resources, experience and leverage. Key partnerships include:



### Ethical Trading Initiative (ETI)

We actively participate in a number of the ETI's initiatives across the Food and Farming and Apparel sectors. These include the Italy Working Group and the newly established 'Transitions' workstreams. We're able to work with other retailers and key industry stakeholders to share findings from our programmes, learn from the work of other projects and collaborate on ensuring that industry best practices are well known and accessible to all. One example is the work we've done with the Italy Working Group in sharing our learnings from a grievance mechanism project that we initiated in southern Italy (page 29).

We also participated in the FCDO-funded project 'Securing Workers' Rights in a Covid-19 Context in East African Agriculture Supply Chains', alongside several other retailers and suppliers, coordinated by the ETI. See page 12 of our [2021/22 Ethics & Sustainability Report](#) for more detail.

The ETI also gives us an effective mechanism to engage with other companies, NGOs and trade unions to find resolutions to whistleblower cases or grievances which impact on the wider industry. Working through the ETI helps us to ensure that all efforts to obtain resolution are coordinated, prompt and effective.



### Food Network for Ethical Trade (FNET)

Waitrose, alongside a number of other UK retailers and suppliers, is a member of the Food Network for Ethical Trade. The FNET aims to improve working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration. Our Senior Manager - Human Rights Programmes, is an FNET Board member and we actively participate in a number of the FNET working groups, including those focused on improving worker representation and tackling issues around recruitment fees. FNET provides us with a space in which to share learnings and, over the last year, regular updates on regulations and risks in relation to Covid-19 have been invaluable to enable us to understand challenges within our supply chain.



### Ethical Trade Forums in Spain

Waitrose has actively supported the Ethical Trade Forums (ETF) since its formal inception in 2015. The group aims to improve working conditions in the Spanish horticulture sector through promoting good practice, facilitating collaborative working and building capacity through training. In addition to volunteering to represent UK retailers in the ETF's governance sub-group, we are part of two of the working groups: event support and increasing active engagement. Our involvement in these groups helps to ensure the ETF achieves its vision in a sustainable way, as we are able to share our expertise and use our leverage to refine and shape its work.

The programme operates by issuing a survey to growers in the three main regions they operate in, Murcia, Huelva and Almería, to ensure focal areas for region-specific work are relevant. The 2021 Sector Survey revealed the most common challenges currently facing growers are labour challenges, including a lack of workers, managing working hours, understanding customer requirements, and environmental challenges including water management, waste and the impacts of climate change.

To address these concerns, the ETF hosted ten online seminars and three one-day events online in 2021. Topics ranged from discussing how to apply technology to managing people and workplaces, to providing training on the importance of due diligence in social auditing and labour migration, and responsible use of water. Introductory guides were also developed, focusing on areas such as implementing an emission-reducing climate strategy, developing grievance procedures, improving dialogue with worker representatives and preventing workplace harassment. These were shared with relevant growers and uploaded to the ETF website for public use. As of February 2022, the guide for improving dialogue with worker representatives<sup>15</sup> has been downloaded 38 times.

15. Conexión Social, 2022, Ethical Trade Forums Newsletter, 01.06.22, [https://foroscomercioetico.com/wp-content/uploads/2022/03/boletin\\_febrero\\_22\\_ENG.pdf](https://foroscomercioetico.com/wp-content/uploads/2022/03/boletin_febrero_22_ENG.pdf)



# Looking forward

We are proud of our work and achievements over the past year to protect the human rights of every person in our own operations and the supply chains supplying our Partnership, yet we recognise there is more to do.





## Ensuring basic working conditions are being met in line with RSCOP

### Ethical compliance

As noted in the Effectiveness section, our work towards greater visibility and improved ethical compliance is ongoing and in 2022 we are committed to implementing and embedding further improvements, including training, system-based controls and internal reporting. We continue to invest in programmes that provide increased transparency and traceability beyond Tier 1 across our extensive supply base and are actively identifying the best partners and initiatives to address the salient risks identified. Identifying risks to human rights in these tiers continues to be a challenge due to the complexity of global supply chains. At present, we take a risk-based approach beyond Tier 1 but recognise we need to do more.

As part of our commitment to ensuring our ethical compliance programme is delivering effective due diligence, we have a target to undertake at least 16 spot check audits in 2022/23.

This year we were able to close 65% more non-conformances identified during SMETA audits at sites supplying our Partnership, an increase from 846 in 2020/2021 to 1,396 in 2021/2022. To ensure sites are continuously improving, we have set ourselves a target of closing 20% more non-conformances in the coming year. Although this is a smaller increase than last year, we believe this is achievable given the competing priorities of sites whilst dealing with ongoing challenges in supply chains.



We're working with stakeholders in the fishing sector to support improvements to working conditions in the industry"

## Addressing broader human rights risks through collaboration

### Human Rights Impact Assessments (HIRAS)

Our new Partnership Human Rights Policy (as referenced on page 6) formalises our requirements relating to the respect for human rights within our direct supply chains and the communities from which we source. We have started two HRIAs to look at these broader requirements and will be putting in place plans to address the recommendations from these during 2022/23. We are also planning to commission two new HRIAs in 2022/23 with a focus on cotton and farmed fish supply chains.

### Expanding our work with the ETI Italy agriculture working group

In 2022, our work will expand to include establishing grievance mechanisms, promoting good purchasing practices and advocating for change, working with local NGOs and engaging additional retailers with our work so we can ensure broader collaboration across the EU.

### Addressing human rights in the UK fishing sector

Our research into the experiences of migrant fishers in the UK wild-caught fishing sector highlighted some areas where our influence could help to drive improvements, particularly in relation to supporting migrant workers in better understanding their rights in the UK. We're currently working with stakeholders in the fishing sector to put in place a plan of activities, which will combine both practical tools to support migrant fishers, but also the development of an industry roundtable to advocate for improvements in the sector.





## Addressing pressures in UK manufacturing

As manufacturers continue to feel the pressures of the pandemic and struggle with labour shortages, we have identified a need for providing support at our General Merchandise sites in the UK. In 2022, we will be supporting management teams and production workers by conducting webinars, site visits and training for suppliers.

## Promoting living wage payments

Recognising the importance of the living wage, during 2022/23 we will continue to work collaboratively with the IDH and the UK retail sector on identifying the gap between current and living wages in banana supply chains, with a view to working towards a sector commitment regarding wage improvements. We are due to complete our assessment of wages in banana supply chains supplying Waitrose in late spring and will look at using these findings to drive positive action over the next year.

# Ensuring all workers have the voice and capacity to drive improvements to their livelihoods

## Understanding worker satisfaction

This year we will carry out worker satisfaction and responsible recruitment surveys at the most high risk sites supplying our Partnership that are registered with Issara. This will enable us to identify shortfalls in worker welfare that we can support each site to address, and which will provide us with better data on the recruitment fees that migrant workers in Thailand are being subjected to. This will help to inform our country-specific programmes and provide a baseline for measuring improvements as a result of responsible recruitment work.



## Strengthening worker representation on farms

As labour shortages in the UK continue to impact, in particular, food supply chains, we will support a programme of work with the FNET to improve the effectiveness of worker representation within UK and global food supply chains supplying our Partnership. The pilot will include ten suppliers, six of whom supply fresh produce to Waitrose, and we will report on the results in our next Human Rights Report.

## Promoting worker-voice mechanisms through our Better Jobs programme in India and South Africa

We have set a target to expand the Better Jobs programme to include at least 20 sites across India and South Africa in 2022. In order to complete the programme, sites will now need to demonstrate that their management questionnaire has been fully completed, and that at least 20% of employees have completed the worker survey. This ensures robustness of the data and also demonstrates a commitment to the process of continuous improvement required by the programme.



## Promoting a 'Just Transition'

We're in the process of establishing science-based targets in line with limiting global temperature rise to 1.5°C for operations and supply chain (scope 1, 2 and 3). Building on our existing commitments, these will ensure that our business follows a credible and scientifically verified carbon reduction pathway, but will likely impact on the livelihoods of workers within some of our global supply chains.

We have partnered with the Foreign, Commonwealth & Development Office (FCDO) on its 'Work and Opportunities for Women' programme, managed by PwC, to undertake research into the current impacts of climate change on women workers, focusing particularly on the Kenyan horticulture and fresh produce sectors. More broadly, the research will also make recommendations for ensuring that our policies lead to a just transition, demonstrating how potential net zero strategies would have positive and negative impacts upon these workers. In 2022/23, we will use this research to inform our own policy and share with the wider sector.



# Modern Slavery Statement

Modern slavery is one of the most severe breaches of human rights imaginable – as outlined throughout this report, we are steadfastly determined to make a difference in rooting it out and preventing human exploitation. We cannot tackle this alone and are committed to continuously sharing our insights and collaborating with external stakeholders to do so.

In its totality, this report outlines the steps taken during the year to 29 January 2022 (the financial year-end of these entities) to protect the human rights of workers in our Partnership’s operations and the supply chains of the goods and services provided to our Partnership. This includes the prevention of modern slavery (including forced or compulsory labour) and human trafficking. The table below outlines where, in this report, the six areas recommended for disclosure in a Modern Slavery Statement by the Home Office can be found.

Disclosure	Page number/s
Organisation structure and supply chains	Page 4
Policies in relation to slavery and human trafficking	Page 6
Due diligence processes	Pages 11-19
Risk assessment and management	Pages 9-11, 20-31
Key performance indicators to measure effectiveness of steps being taken	Pages 33, 35-36
Training on modern slavery and trafficking	Pages 33-35

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

The report and statement has been approved by the Board of John Lewis Partnership plc on 13 July 2022 and signed on its behalf by:



SHARON WHITE  
Partner & Chairman



# Sustainable Development Goals

The United Nations Sustainable Development Goals (SDGs) were created in 2015 to establish a path towards a more sustainable and better future for all. The 17 goals are an interconnected call to action, recognising that activity against one target affects the outcomes of others and that progress must be made across many areas to achieve real change.

In recognition of the role our Partnership plays in meeting these goals, we align our strategy, including our human rights activity, to them. Below is a list of the activities discussed throughout this report aligned to the SDG upon which they have the greatest impact.



## SDG 1 No Poverty

Low wages and sustainable incomes Page 25



## SDG 5 Gender Equality

Human Rights Programme	Page 8
Endorsing the UN Women's empowerment principles	Page 27
Supporting women in the coffee industry in Colombia	Page 27
Supporting the Lujeri Tea Estate	Page 27



## SDG 8 Decent Work and Economic Growth

Responsible Sourcing Code of Practice (RSCOP)	Page 6
Worker welfare self-assessment, livestock supply chains	Page 10
Ethical Compliance Policy and programmes	Page 11
Ethical audits	Page 11
In-depth supply chain assessments	Page 17
Understanding working conditions for migrant workers in the UK fishing sector	Page 17
Human Rights Impact Assessments	Page 19
Grievance mechanism to improve worker voice – south Italy	Page 29
Better Jobs Programme	Page 30
Stronger Together Training	Page 34
Whistleblowing	Page 36



## SDG 10 Reduced Inequalities

Human Rights Programme Page 8



## SDG 17 Partnership for the Goals

Industry-led initiatives	Page 14
Certification and third-party sourcing programmes	Page 15
Understanding working conditions for migrant workers in the UK fishing sector	Page 17
Addressing broader human rights through collaboration	Page 22
Modern Slavery Intelligence Network (MSIN)	Page 22
Stronger Together Training	Page 34
Ethical Trading Initiative	Page 37
Food Network for Ethical Trade (FNET)	Page 37
Ethical Trade Forums (ETF)	Page 37



# Who we work with



## International Accord

A legally binding agreement between brands and trade unions to enable a safe working environment in the Bangladeshi garment industry.



## Ethical Trade Initiative

An alliance of companies, trade unions and NGOs advocating respect for workers' rights around the globe. Our Partnership is a corporate member.



## Slave-Free Alliance

A membership initiative launched by anti-slavery charity Hope for Justice, which partnered with us on 'spot the signs' training for Partners.



## Institute of Employment Studies

A British human resources employment research centre and consultancy which acted in an advisory capacity on the development of the Better Jobs programme.



## Unseen

A registered charity working towards a world without slavery, Unseen runs the Modern Slavery Helpline, which JLP supports through our 'Unseen Business' membership.



## Food Network for Ethical Trade FNET

Established in 2016, the FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration.



## ASK India (Association for Stimulating Know-how)

ASK India is a non-profit organisation that has been working on empowering workers within the sustainable development field since 1993. Based in four states – Bihar, Uttar Pradesh, Rajasthan and Tamil Nadu – its work focuses on child labour, sustainable agriculture and safe migration.



## United Purpose

In 2019, we began working with United Purpose as a delivery partner for the Waitrose & Partners Foundation in Senegal and The Gambia. United Purpose is working closely with our farms to develop plans for how Foundation funding can be best spent in local communities.



## Verisio

We work closely with Verisio to manage and deliver our ethical audit due diligence programme. Using its Optimus software, we are able to ensure Tier 1 suppliers and factories are compliant in supplying valid audits and remediate non-conformances.



## Centre for Child Rights

In 2021, we worked closely with the Centre for Child Rights to address the issues faced by parents working in factories and their children during the pandemic. This included workshops for parents and we hope to continue working with the Centre on future projects related to child rights.



## CIPD

The CIPD is the professional body for HR and people development. It acted in an advisory capacity on the development of the Better Jobs programme. We drew on the CIPD's Good Work Index when designing the Better Jobs employee survey.



## Responsible Recruitment Toolkit (RRT)

We sponsor the RRT, which provides our suppliers with free access to training and an online self-assessment and learning tool to help embed responsible recruitment practices.



## Stronger Together

We sponsor collaborative initiative Stronger Together and roll out its training and guidance on detecting, deterring and dealing with modern slavery to our supply base in the UK, South Africa and Spain.



## Sedex

We are a member of Sedex (Supplier Ethical Data Exchange) and use the Sedex platform to store supply chain assessment data, such as SAQ and audit information, for Food and Grocery sites.



## The Joseph Rowntree Foundation

An independent UK organisation focused on social change research, policy and collaborations that solve poverty. The JRF has acted in an advisory capacity in the development of our Better Jobs programme.



## The Fairtrade Foundation

We work closely with the Fairtrade Foundation to ensure that key commodities including tea, coffee, cocoa, sugar and bananas meet their certification requirements. We collaborate to raise awareness of the difference that Fairtrade makes for farmers in our supply chain and are working with them on additional programmes to drive change.



## Impactt

A worker-focused human rights and business management consultancy with whom we partnered to conduct modern slavery risk investigations and telephone surveys for smaller suppliers.



## Farm Africa

In Kenya we are working with Farm Africa to deliver activity as part of the Waitrose & Partners Foundation. Farm Africa strives to strengthen farm worker committees and support them to develop programmes that meet the needs of their communities.



## International Labour Organization Better Work Programme

A partnership between the UN, the ILO and the IFC, aimed at improving labour standards and competitiveness in global supply chains. We are a brand partner member.



## Issara Institute (Project Issara)

Issara Institute is an independent non-profit organisation, based in SE Asia, focused on tackling modern slavery, human trafficking and forced labour through data collection, technology, partnership and innovation. At present, it mainly works with our food factories in Thailand, monitoring and adjusting labour conditions through partnering with businesses to empower worker voice.



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