

HUMAN RIGHTS POLICY

I. Introduction

This policy has been designed to set out the John Lewis Partnership (the Partnership) commitment to respecting the human rights of those within its own operations, the supply chains (Goods For Resale and Goods Not For Resale) and the charities that the Partnership works with. It covers requirements around maintaining safe workplace conditions, offering secure grievance mechanisms, treating workers with equity & inclusivity, protecting indigenous communities, ensuring clean water & sanitation, and maintaining a healthy environment.

The partnership recognises that the primary human rights it has an impact on are labour rights in its operations and supply chains. The [Responsible Sourcing Code of Practice](#) (RSCOP) sets out the Partnership's expectations of suppliers on issues such as pay, working hours, child labour, worker rights and representation. The provisions mirror the Ethical Trading Initiative (ETI) Base Code, which in turn is based on International Labour Organisation (ILO) Conventions. Policy 50124 Responsible Use of Labour Providers sets out the requirements of suppliers who procure agency labour.

The Partnership is aware that its impact on human rights may extend beyond the reach of existing policies and it has developed this overarching human rights statement to demonstrate its commitment to respecting the rights of the people who pick, make, pack and transport its products and provide its services, as well as those living in surrounding communities. The Partnership remains committed to actively working in collaboration with other retailers, NGOs, trade unions and other stakeholders to ensure human rights are realised within its supply chains and their communities.

2. Scope

This policy and its requirements applies to:

- John Lewis supply chains
- Waitrose supply chains
- Partnership goods-not-for resale supply chains (both goods and services)
- Charity partners from whom the Partnership procures services or donates to
- The Partnership's own operations

- For the purpose of this policy, 'supplier' means the entire supply chain behind every product and service: Commercial agents such as importers/exporters through to the last tier in the production or sourcing process, including the ingredients or raw materials (including conflict minerals).
- All the services related to the production, distribution and selling of the products and services.

This policy must be read in conjunction with the following:

- Policy 50124 Responsible Use of Labour Providers [[Waitrose Engage](#)] [[JL Connect](#)]
- Policy 50144 Ethical Compliance [[Waitrose Engage](#)] [[JL Connect](#)]
- [Responsible Sourcing Code Of Practice](#)

3. Interpretation

This document has been produced by the Ethics & Sustainability Department at the John Lewis Partnership, within the Regulatory Policy Framework. The contents are not intended to remove the need for suppliers to develop and maintain knowledge of the regulatory framework necessary for ensuring they respect human rights - as laid out in the International Declaration of Human Rights. Where a difference in interpretation exists, the higher standard will be implemented.

4. Policy Purpose

This policy sets out the commitment to respecting the human rights of those within JLP supply chains and JLP operations and the surrounding communities. The Partnership commits to the [UN Guiding Principles on Business and Human Rights](#), and the [International Bill of Human Rights](#). The policy also follows the principles and guidelines laid out in other UN documents, such as the [Women's Empowerment Principles](#), and ILO guidelines, such as [General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#), [ILO Declaration on Fundamental Principles and Rights at Work](#), the [OECD Guidelines for Multinational Enterprises](#) (Part I, chapter IV related to human rights) and [OECD Responsible Business Conduct](#)

5. Policy Requirements

- 5.1. Where elements of local law and RSCOP differ, workplace conditions must meet, as a minimum, the requirements which offer workers the greatest protection.
- 5.2. Workers, suppliers and people from communities that the Partnership sources from must be able to raise grievances where they feel their rights have been or are at risk of being infringed on. This grievance process must be inclusive for all, irrespective of gender, gender reassignment, sex, sexual orientation, marriage or civil partnership status, migration status, refugee status, racial or ethnic group, religion, belief, pregnancy or parental, disability, or age. They must be able to do so without fear of retribution or reprisal.
- 5.3. Workers, suppliers and people from the communities that the Partnership sources from must be treated with equity and equality, irrespective of gender, gender reassignment, sex, sexual orientation, marriage or civil partnership status, migration status, refugee status, racial or ethnic group, religion, belief, pregnancy or parental, disability, or age. Particular attention must be paid to ensuring the application of JLP policies (including RSCOP) is inclusive for vulnerable groups and their specific needs, and sensitive to barriers such as language.

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- 5.4.** The Partnership prohibits its supply chain from charging workers to secure work, including the payment of [recruitment fees or associated costs](#) as defined by the ILO. This is particularly relevant for migrant workers.
- 5.5.** The rights of local and indigenous communities with respect to land, water and natural resources must be respected by all suppliers in the Partnership's supply chains as demonstrated by supplier company policy and by practices that align with [Accountability Framework Initiative's guidance](#),
- 5.6.** The Partnership will only source products and raw materials from supply chain businesses that are committed to upholding the rights of local and indigenous communities. The following action is required:
- 5.6.1.** Risk assessment and due diligence process and decision making must be undertaken in alignment with the Partnership's sourcing policies, and the [Accountability Framework Initiative's guidance](#).
- 5.6.2.** Commitment and transparent business processes in place to ensure that the principles of [Free Prior and Informed Consent](#) (FPIC) and of contractual transparency are adhered to, wherever proposed actions may impact on the rights of local and indigenous communities.
- 5.7.** Workers must have access to sufficient, safe and clean drinking water and free sanitation services that are physically accessible to all. Suppliers must ensure that their operations do not have a negative impact on the surrounding communities' access to clean water. Workers are also entitled to a clean, healthy and sustainable environment according to the [UN Resolution 48/13](#).
- 5.8.** Suppliers both direct and indirect, to the John Lewis Partnership, and their operations must not not negatively impact clean, healthy, and sustainable environments according to [UN Resolution 48/13](#).
- 5.9.** The Partnership will undertake human rights impact assessments of its supply chains on an annual basis or where a particular issue has come to our attention. This will help identify unintentional negative impacts that Partnership policies and behaviours, or those

of suppliers, have directly or indirectly had on workers and farmers in supply chains. The supply chains identified for these assessments in any given year will be determined via a risk assessment process (which will refer to country risk, industry/sector risk and specific risks identified through other means).

- 5.10.** The Partnership reserves the right to audit charity partners from whom services are procured or to whom products are donated for compliance with the requirements of this policy.
- 5.11.** Where there is a breach of this policy, suppliers will fall in scope of the underperforming supplier policy. As detailed in that policy, the Partnership is committed to working with, and supporting, our suppliers to make improvements

6. Policy Implementation

- 6.1.** This policy, [RSCOP](#) and the Policy 50124 Responsible Use of Labour Providers are applicable to workers, suppliers and the communities that the Partnership sources from and are not based on a person's characteristics. However, suppliers must ensure they apply these policies in an inclusive way. For example a person's sex or gender may have an impact on implementation due to intersectionalities of gender with other aspects of vulnerabilities.
- 6.2.** Compliance to RSCOP is monitored through:
- Ethical Compliance Policy (50144)
 - Responsible Use of Labour Providers (50124)
 - Waitrose Farm Assessments
 - [RSQS for GNFR suppliers](#)
- 6.3.** Suppliers must have in place a documented grievance policy in accordance with the requirements laid out in Policies 50144 Ethical Compliance and 50124 Responsible Labour Provision and [Human Rights Impact Assessments](#). The Partnership supports

suppliers to strengthen their own site-level mechanisms that have been designed and implemented in conjunction with their workforce.

- 6.4. The supplier grievance policy must include provision to ensure that workers have the ability to safely raise sensitive gender-related grievances. Where there are restrictions on women joining trade unions, or there are few or no female workers' representatives, suppliers must ensure that views and opinions of women are properly advanced and addressed.
- 6.5. Workers in the Partnership's operations, including agency workers and contractors, are encouraged to raise concerns via the [internal whistleblowing process](#).
- 6.6. As per the [remediation best practice guidance](#), the Partnership will play the required role in providing access to remedy where it has caused or contributed to human rights violations. Where the Partnership is linked to human rights violations through its suppliers or service providers, the supplier is required to take on this role but the process and outcomes will be monitored by the Partnership in order to verify that appropriate action is undertaken.

7. Accountabilities and responsibilities

- 7.1. This policy has been created by the Regulatory Policy Framework, which has ensured that it is consistent with the Partnership Constitution and applicable regulatory requirements. This document will be reviewed annually. The Owner of this Policy is the Senior Manager Human Rights Programmes. The Policy Owner is responsible for creating this Policy and ensuring that it is consistent with the Partnership Constitution and applicable regulatory requirements, and for reviewing this Policy annually. It is the responsibility of the Senior Manager of Human Rights Programmes, relevant Buying teams and Category Leads (including Technical teams) to ensure that this policy is governed and complied with.
- 7.2. Work in this area is overseen by the John Lewis Partnership Ethics and Sustainability Committee. The Committee is chaired by the Chairman and comprises one

Non-Executive Director and one external independent member with four Executive Directors: Finance, Strategy & Commercial Development, John Lewis and Waitrose. Its purpose is to assist the Board, to whom it reports, in fulfilling its responsibilities in this area by ensuring that human rights remain central to the Partnership's way of doing business. This also ensures that every part of the business is clear about the responsibility to respect human rights.

8. Monitoring of Controls

- 8.1.** Suppliers are encouraged to communicate with the Partnership openly and honestly about any concerns with compliance to this policy.
- 8.2.** Suppliers' compliance with this policy will be monitored through a continual risk assessment and due diligence process conducted by the JLP Human Rights Team, including human rights impact assessments in selected supply chains. Allegations of non compliance with this policy through any form of whistleblowing will be fully investigated.

9. Reporting

Reporting for compliance against this policy will be undertaken via reporting the outcome of whistleblower investigations and via the findings of human rights impact assessments undertaken by third parties. Specific issues will form part of the public reporting including the Partnership's [human rights report and modern slavery statements](#).

10. Assurance

Assurance on the effective operation of the Policy will be provided to the Regulatory Policy Steering group at least annually by the Senior Manager - Human Rights Programmes.

Document Version and Control

Amendments		
Version Number	Date	Detail
I	April 2022	New Policy

Written By	Sustainability & Ethics Regulation, Policy & Compliance
Approved By	Regulatory Policy Framework
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