

Co-op Modern Slavery Statement 2018

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This is Co-op's third modern slavery and human trafficking statement¹. It sets out the steps we've taken during our financial year 2018 to prevent modern slavery and human trafficking in our business and supply chains.

This year's statement focuses on our key activities and achievements in 2018, and provides updates on how we are:

- Taking action to prevent modern slavery, and dealing with it when it arises
- **Driving change** regularly reviewing our strategies and activities to make sure they're working
- Exploring solutions, both in supply chains, and through our work with victims and Bright Future (our programme offering employment to survivors of modern slavery)

CEO Statement

In 2017 our Co-op made a commitment to not only address the causes of modern slavery, but the domestic consequences too.



Our work over the past few years has been a powerful illustration of what makes us a different kind of business. At the Co-op, when we see a problem in our supply chain we work to resolve it rather than simply walk away.

As this year's statement shows, we're making strong progress to stop slavery playing any part in our business or in the production of our goods and services, both here in the UK and globally. Our new Future of Food strategy highlights our commitment to ethical trade and human rights including the elimination of unfair recruitment fees, identified to be one of the root causes of slave labour. Last year we were also the first business client to commit to a new GLAA Construction Protocol aimed at stopping slavery in the UK construction industry.

We know we can't tackle all of the challenges presented by modern slavery by ourselves, so key to our approach is collaborating and partnering with other businesses and organisations to address issues in all parts of our supply chain (page 7). One example of this that I'm particularly proud of is our Bright Future programme, now adopted by 16 other businesses. Our programme supports some of the most vulnerable people in society to recover their self-worth and self-confidence through paid employment. Through our partnerships, we've developed a model of good practice now being taken up across the country.

We're also campaigning at a national level by calling on the government to extend the support it gives to modern slavery survivors so they have more time to recover from their ordeals and begin rebuilding their lives. To this end, I was pleased to speak on behalf of the Co-op as part of *Global Citizen's* work last April to highlight modern slavery during the Commonwealth Heads of Government meeting in London.

I am proud of the work we've done over the last year on such an urgent global issue, and I've been inspired and humbled by the people I've met along the way, including survivors themselves.

This year we'll celebrate 175 years of the consumer co-operative movement in Britain. Our business was set up to address social injustice through a commercial enterprise. Today, I see our work to tackle modern slavery as central to our responsible approach to doing business in the 21st century.

Sqlfundli

This statement was approved by the Board of the Co-op²

Steve Murrells CEO, Co-op Group April 2019

Key achievements in 2018

In our Food business we:

- launched our <u>Future of Food strategy</u>, setting out our human rights ambitions to 2030, including our commitment to eliminate recruitment fees from our global supply chain
- prioritised and shared our most significant labour rights risks (page 4)
- piloted worker voice technology and participatory techniques in due diligence processes (page 5)
- joined Seafood Ethics Action Alliance and ILO-ETI Ship to Shore Rights Project (page 7)

In our wider procurement work we:

 led the way in construction by becoming the first 'client signatory' of the GLAA Construction Protocol (page 6)

- worked collaboratively with major retailers to develop new minimum standards for labour providers (outside GLAA licensing standard requirements) (page 7)
- helped colleagues improve how we work with suppliers, by delivering ethical sourcing training to 42 supplier managers (page 7)

Through our campaign we:

- expanded Bright Future into a multi-partner initiative, involving 42 organisations co-operating to support victims throughout the UK (page 8)
- continued to raise awareness of modern slavery in government and wider society (page 9)
- supported Bright Future's National Matching System and 6 charities with funding of over £300,000 (page 9)

'The terms 'Co-op Group', 'Group' or 'Co-op' are all used to refer to the Co-operative Group Limited, which consists of Co-operative Group Food Limited, Funeral Services Limited, Co-operative E-Store Limited, Co-operative Legal Services Limited and CIS General Insurance Limited (among others). ² This includes the Boards of Co-operative Group Limited, Co-operative Group Food Limited, Funeral Services Limited, Co-operative Legal Services Limited and CIS General Insurance Limited. The Statement covers the financial year (53 weeks) ending 5 January 2019.

Our business

We're the UK's largest co-operative, owned by 4.6 million members. We're a major <u>food</u> retailer, the largest <u>funerals provider</u> in the UK, an <u>insurance</u> and <u>legal services</u> provider. Our businesses are all UK based and our main offices are in Manchester. Find more information in our <u>2018 Annual Report</u>.

- 4.6 million members
- 2,500 food stores
- 1,000 funeral homes
- 62,500 people employed across the Co-op Group³

Our supply chains

We buy products and services from thousands of suppliers across the globe. Some are for re-sale and others we use in our own business.

Co-op Food own-brand products. Just under half (47%) by turnover) of the goods we sell in our food stores are own-brand products, in a variety of categories⁴. Our supply chain is complex and varied, and includes farms, abattoirs, fishing vessels, processing factories, finishing, canning, packing facilities and assembly units. Our Food ethical trade monitoring programme now covers 1,984 sites (862 Tier 1 and 1,122 beyond Tier 1) and over half a million workers across 6 continents and 74 countries (click on the map below for more information).

Other own-brand and third party products and services we sell.

We also sell a wide range of third-party branded products and services in Co-op Food, Co-op Funeralcare, Co-op Insurance and other parts of our business. For example:

- Co-op Funeralcare sells coffins and caskets, headstones, memorial stones and flowers, some of which are Co-op brand products, as well as offering wider services (eg through suppliers of specialist vehicles). Funeralcare products are sourced from a variety of countries. Our masonry comes mainly from India and China; over 95% of the coffins we manufacture are FSC certified.
- Co-op Legal Services provides inheritance planning, probate, personal injury, employment and family law services in England and Wales. All colleagues and direct service providers are based in the UK.
- Co-op Insurance sells car, home, travel and pet insurance policies, and provides claims fulfilment services through a number of suppliers. The majority of our ~150 Tier 1 suppliers are based in the UK.

Goods and services not for resale (GSNFR). Our Procurement function is responsible for sourcing the goods and services we need to run our businesses (such as phones and computers, uniforms and cleaning services). We buy from approximately 4,000 suppliers across five categories. In 2018 we spent over £1bn, mainly through our top 100 suppliers. Our largest spend category is Construction and Facilities Management⁵.



³In 2018 we directly employed 62,578 colleagues, and also engaged around 430 contractors via agencies. ⁴Defined at the Co-op as bakery, beer, wine and spirits, dairy, food to go, grocery (impulse/staples), prepared, non-food, produce, and protein. ⁵Representing approximately a third of our total spend (excluding rents, rates, energy and property management).

Managing the risk of modern slavery

Policies and processes

Policies: Our commitments on ethical trade, human rights and modern slavery are set out in a number of policies and protocols, including the following.

- People policies: Our <u>Code of Conduct</u>, <u>Whistleblowing</u> and <u>Eligibility to Work</u> policies are helping us address the risk of modern slavery.
- <u>Future of Food</u>: Our human rights ambitions to 2030, including our commitment to eliminate recruitment fees from our global supply chain.
- Ethical Trade and Human Rights Policy Position Statement:
 Our approach to protecting the fundamental rights of workers in our supply chains, including from forced labour.
- <u>Sound Sourcing Code of Conduct:</u> The workplace and employment standards we expect of all our suppliers.
- <u>Retailer Protocol</u> for Handling Reported Cases of Modern Slavery in the UK Supply Chain: A new protocol to drive good practice in handling reported cases of modern slavery⁶.
- <u>Sustainable Procurement and Supplier Policy</u> (SPSP):
 The sustainability and ethical standards we expect of our suppliers of goods and services not for resale (GSNFR).
- Buying Goods and Services Policy (GSNFR): Guides anyone buying GSNFR at Co-op; supported by an ethical sourcing process.
- **GSNFR One Co-op Supply Management Framework** (New): Minimum standards for managing our GSNFR suppliers, including guidance on ethics.
- **Supplier guides to ethical trade**: Our expectations of food and non-food suppliers in meeting our ethical standards.

Contracts: Our expectation for food own-brand suppliers to meet ethical trade requirements is included in supplier contracts and approval processes. GSNFR contracts typically contain a standard clause requiring compliance with Co-op policies, including on ethics. In 2018 we included specific clauses on modern slavery in new contracts and a requirement to register on Sedex if requested (page 5).

Governance: Development and oversight of ethics and sustainability policies happens in different Co-op-wide forums.

These feed into our Ethical Trade & Human Rights Steering Group, which provides reports to the Board and Members' Council. We'll be reviewing our governance of ethics and sustainability across Co-op in 2019.

Assessing and managing risk

When managing risk of modern slavery and wider labour abuses, our main responsibility is for our Co-op brand suppliers and supply chains. Our food business accounts for 72% of our business (by turnover), and our Co-op brand supply chain is where we can have the biggest impact.

(i) Our Co-op Food own-brand supply chain

Our 'business as usual' risk assessment and monitoring processes for Co-op Food own-brand suppliers are based on over 20 years' experience (see our <u>Food website</u> for more details). Box 1 summarises the scope of our ethical trade programme in 2018.

In 2018 we focused on:

- increasing transparency. We've continued to increase transparency of our supply chain beyond Tier 17, where some of the serious issues in our supply base take place. We'll be sharing a list of our <u>Tier 1 suppliers</u> on our website by mid-2019, along with our priority labour rights risks and plans (below)
- prioritising our labour rights risks. In 2018, through our work with the Food Network for Ethical Trade (FNET)⁸ and following extensive consultation, we've initially prioritised 8 salient labour rights issues⁹ across 15 countries. Details of the issues and the steps we're taking to mitigate these risks are on our website.
 We'll be building on this in 2019 to incorporate findings from our wider work on responsible sourcing of priority commodities
- trialling the use of worker reporting technology and participatory techniques in due diligence processes, to help improve our effectiveness in identifying modern slavery (Box 2)
- continuing to build suppliers' capacity to manage risk in their own supply chain and rolling out our supplier performance matrix to assess their ability to make that happen
- rolling out the Stronger Together <u>Progress Reporting Tool</u>

Box 1 Co-op Food ethical trade monitoring programme in 2018

- 1,984 sites with over half a million workers (862 Tier 1 and 1,122 beyond Tier 1)
- 100% of Tier 1 sites⁷ with Self-Assessment Questionnaires (SAQs) complete
- 100% Tier 1 high-risk sites¹⁰ independently audited
- Over 1,100 Tier 2 sites and beyond now in our monitoring programme with SAQs complete
- 812 sites with valid audits*
- 530 audits in 2018 (334 Tier 1 and 196 beyond Tier 1)

2,947 issues were raised from valid audits. Of those, 34 issues (1.2%) were categorised as a breach of the Sound Sourcing Code Principle of 'employment is freely chosen' (reflecting issues such as unclear policies on forced labour and inadequate checks on documentation, for example). Almost 68% of the issues had been addressed by the supplier by end of 2018. (See our Co-op Way Report for more details.) We don't rely on audits alone to identify modern slavery, and also work through initiatives like Stronger Together and the Sedex Stakeholder Forum to improve the identification of modern slavery in other ways.

 ${}^*\!Audits\,that\,meet\,our\,requirements\,in\,terms\,of\,protocol,\,audit\,body,\,and\,being\,within\,our\,required\,validity\,period.$

Box 2

Piloting new techniques to identify modern slavery

In 2018 we piloted two new tools designed to help improve the way we identify modern slavery, and other issues:

- Stronger Together's Organisational Performance Assessment tool, which uses participatory techniques to provide an independent assessment of supplier performance in tackling modern slavery. Feedback from a pilot with five Co-op suppliers indicated this was a positive, collaborative process, which would drive continuous improvement.
- Direct Worker Reporting technology, which anonymously
 gathers worker feedback on their employment before and after
 an ethical audit. Working with <u>&Wider</u>, we ran two pilots with
 suppliers in the UK and Kenya. We will be using lessons from the
 plots as we roll out in 2019.

(ii) Products and services we use in our own business

Our 'business as usual' ethical risk management processes for GSNFR are set out in our 2017 statement (page 9). We continued to focus attention on our highest risk categories¹¹: Co-op branded goods, Construction, Electronics, Facilities Management, Repairer Networks, Warehouse and Distribution Services, and Labour Providers.

In 2018 we focused on:

- assessing ethical risk as part of tender evaluation, including: introducing a new supplier performance matrix to measure suppliers' capability to identify and manage ethical issues in their own business (based on our Food business' model)
- developing a new GSNFR Supplier Guide to Ethical Trade which
 outlines our expectations of suppliers in meeting our ethical and
 relevant due diligence and transparency requirements if they're
 successful in their tender. This is now sent out with all Requests
 for Proposals
- requesting a completed Sedex Self-Assessment Questionnaire (SAQ) from our higher-risk suppliers when they're awarded new contracts, following a pilot with our funeral business last year. At the end of 2018, 147 GSNFR suppliers had linked to us on Sedex, and 119 had completed an SAQ
- issuing a tender for our Funeralcare masonry services, which will lead to changes in our supply chain. All newly contracted masonry suppliers will need to register on Sedex, complete an SAQ, and develop action plans to deal with the risks of modern slavery
- working with other retailers to develop minimum standards for labour providers that supply to areas outside the scope of GLAA Licensing Standards (Box 7). These are the minimum standards we expect to help ensure that labour exploitation, modern slavery and human trafficking have no place in our business. Our three main labour providers have committed to meeting these standards, and we'll extend its use to our other high-risk areas in line with new contracts

Case study: Dealing with issues

In February 2018, a whistleblower alerted one of our protein suppliers in Cornwall to the possibility that an unlicensed gangmaster and an illegal loan shark were operating on the site. The supplier immediately reported this to Co-op, and started an internal inquiry. Following investigations by the police, the <u>Gangmasters and Labour Abuse Authority</u> (GLAA) and Trading Standards, one person was dismissed for running an illegal moneylending business on site (and for using the supplier's staff in another business off-site).

Although there was no gangmaster operating on the site, colleague morale and esteem was very low. To help address this, the supplier worked with a specialist provider to develop and run a training programme based on staff feedback and site-specific issues.

The training was designed to instil a 'people first' approach and help colleagues regain respect for themselves and each other. All colleagues at the site took part in the training, along with Co-op and other customers.

The training is helping the site turnaround, and now forms part of colleague inductions. It's also being rolled out across all 17 of the supplier's UK sites, reaching over 6,000 colleagues.

We worked closely with the supplier and other stakeholders throughout the investigation and on the plan to address the issues. We've used lessons from this case in our supplier engagement programme, and also delivered the training at our 2018 Supplier Ethical Trade Conference.

⁷A Tier 1 site is a production site where goods are finished, ready for supply to, or sale by, the end company. A Tier 2 site is a production site that supplies goods or materials to a Tier 1 site for incorporation into the finished product. Sites 'beyond Tier 1' include sites at Tier 2 and further down the supply chain, depending on the nature and complexity of the supply chain. FFNET aims to improve human rights in global food supply chains through establishing a common approach to managing ethical trade. 'Those labour issues which present the most risk in terms of negative impact on human rights. ¹⁰Our risk assessment takes into account: country, industry, self-assessment information, use of temporary workers and commercial/strategic importance, previous audit results. Our list of high-risk countries is informed by the frequency of issues, media coverage and academic research, local labour law, enforcement systems and other expert knowledge. ¹¹Based on the following criteria: sectors and suppliers with (i) a high proportion of low-paid, unskilled labour (particularly temporary, migrant labour, or high use of agency labour) and (ii) whose supply chains extend into high risk countries, and high-spend and business critical suppliers.

Box 4

Tackling modern slavery in our construction supply chain

There is a high risk of labour exploitation and modern slavery in construction, which is also one of our highest-spend areas. That's why our Construction and Facilities management category has been a priority in our ethical supply chain work.

In 2018 we:

- became the first client signatory of the <u>GLAA's Construction</u>
 <u>Protocol</u> demonstrating our commitment to working with this sector, and enabling us to work collaboratively with the industry to address slavery and labour exploitation
- held a labour exploitation risk assessment workshop for some of our Construction Leadership Team to map our supply chain,

- identify our greatest risks, and consider control measures
- re-tendered contracts with our 'main contractors'* and included specific ethical requirements as a condition of award.
 Successful suppliers will need to attend Stronger Together's 'modern slavery in construction' training
- included modern slavery and labour exploitation as specific items in our Strategic Supplier Conference for Construction and Facilities Management, reaching over 200 suppliers
- *Our Construction and Facilities management category includes 'main contractors' (who carry out refits of food stores and funeral homes, and new space projects), shop fitting, cleaning and waste service providers.

Training and collaboration

Training and collaboration have a huge role to play in helping prevent slavery and human rights abuses. We engage with our colleagues and suppliers, and collaborate across the food industry, business and non-governmental organisation (NGO) communities to help drive change.

(i) Our suppliers and our supply chains

In our Food business. We provide bespoke and interactive training for suppliers through our ongoing Co-op Food ethical trade supplier engagement programme (Box 3). Feedback continues to be positive, and highlights the value suppliers get from the programme in terms of integration, networking, ownership, collaboration and innovation.

We also continued to hold bespoke, interactive events to help build suppliers' ability to address modern slavery. Highlights from 2018:

- Held a roundtable on 'labour shortages and Brexit' for key suppliers and senior Co-op HR, buying and technical colleagues.
- Launched a series of ethical trade webinars on our supplier platform, the Co-op Channel of Manufacture 2030¹².
- Trained produce suppliers on the Fresh Produce Consortium temporary accommodation guidance, and collaboratively developed e-learning tools to roll out in 2019.
- Worked with Stronger Together to pilot training on responding to issues, and promoted interactive workshops in the UK and South Africa to provide producers with tools and guidance to tackle forced labour.
- Confirmed our sponsorship of the <u>Responsible Recruitment</u>
 <u>Toolkit</u> to provide our suppliers with subsidised access to the tool and free training.

We have continued to build our training and engagement activities in our GSNFR supply chains. Labour exploitation was included as a separate agenda item at two of our main strategic supplier conferences - construction (Box 4) and IT, reaching around 400 suppliers.

Having participated in a Co-op event on modern slavery, one of our Insurance supply chain partners has rolled out awareness-raising training and briefings to its wider network of building repair suppliers.

Box 3

Co-op Food supplier engagement in 2018

- 18 supplier events in the UK, Spain and Kenya
- 903 delegates reached
- 625 sites included
- over 5,900 hours supplier training/engagement



Supplier training and engagement in Cote d'Ivoire, the UK and Spain

(ii) Our colleagues

We focus our internal training on colleagues in key technical and supplier-facing roles, as well as those with responsibility for procurement and HR policies.

- Food buying and technical colleagues: We rolled out our Advanced Ethical Trade training for 66 buying and technical colleagues (running three mandatory half-day sessions).
- Food store and depot colleagues: We ran a comprehensive communications campaign to raise awareness of modern slavery among colleagues in all retail stores and logistics depots, reaching around 52,000 colleagues across Co-op. We placed posters in stores and similar information on screens in logistics depots, and included a supporting script in internal communications briefings.
- Non-food procurement colleagues: A further 42 supplier managers across our businesses attended our Introduction to Ethical Sourcing training in 2018. 15 new Procurement colleagues also received training on ethical sourcing as part of their induction.
- Ethical trade practitioners across Co-op: Although our Ethical Trade and Human Rights Practitioners' Group only met once in 2018, we continued to share experience and knowledge on ethical trade across the business. We'll resume regular meetings in 2019.

(iii) Collaborating with others

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We're active members of the Ethical Trading Initiative (ETI), Stronger Together, Sedex and FNET, and continue to play an active part in other collaborative working groups¹³ (Boxes 5-7).

Box 7

Collaborating to drive positive change in GSNFR

In 2018, as an active member of the Sedex GSNFR Working Group 14 we have:

- worked closely with Sedex to make sure their Self-Assessment Questionnaire (SAQ) is suitable for our suppliers of GSNFR
- jointly developed Minimum Standards for Labour Providers (page 5)

The group has now grown to 10 member organisations¹⁵ and, in recognition of our wider ambitions to address ethical trade in GSNFR ('indirects') supply chains, has evolved into the re-named Indirect Procurement Human Rights Forum.

Box 5

Collaborating across the food industry

In 2018 we joined two new collaborative alliances to tackle labour abuses in **the seafood industry:**

- ILO-ETI Ship to Shore Rights Project: aims to drive improvements across the seafood industry including fishers, vessel operators and other parts of the food industry through the development of training and standards
- SEA Alliance (Seafood Ethics Action Alliance): a new alliance to help share information on emerging issues, agree best practice solutions, and provide a forum for action on ethical risks and social compliance issues related to wild capture fisheries internationally and in the UK

We continued to collaborate to counteract exploitation in **Italian** agriculture supply chains:

- Grower Survey on Labour Resources: we piloted a survey with Italian agriculture seasonal suppliers to better understand the use of permanent and temporary labour, as part of ETI's working group
- High-level roundtable at the British Embassy, Rome: we were invited to discuss how to promote an ethical approach in the supply chains and counter labour exploitation

Box 6

Greater Manchester Modern Slavery Business Network 2018

Since we launched our network in January 2018¹⁶, increasing numbers of companies from around the Greater Manchester area have come together to share good practice, experiences and challenges in addressing modern slavery. We hosted the first two meetings at Co-op in January and July 2018, and supported the BBC to host a third meeting in December 2018 - helping establish this as a member-led network.

We also spoke at a number of major conferences to share what we're doing to tackle modern slavery in our business and supply chains.



52,000 colleagues

reached, with a comprehensive campaign to raise awareness of modern slavery

¹³ We have also played a lead role in creating supplier forums in key sourcing countries (see <u>food.coop.co.uk/food-ethics/people/ethical-trading)</u>. ¹⁴ John Lewis Partnership, Kingfisher, Tesco and Selfridges. ¹⁵Co-op, Tesco, Selfridges, John Lewis Partnership, Kingfisher, Morrisons, BBC, Princes, Winterbothom Darby, Sedex. ¹⁶With the support of Programme Challenger, Greater Manchester's partnership approach to tackling serious organised crime in all its forms, including modern slavery (www.programmechallenger.co.uk).

Campaigning on modern slavery

In all our efforts to help prevent modern slavery taking place in our business and supply chains, we never lose sight of those affected by modern slavery. For the past two years we've been raising awareness of modern slavery among our colleagues, members and society, and campaigning for better support for victims. Through our Bright Future programme, we've also been providing the opportunity of a paid work placement and a job in our Food business to those who have been rescued from modern slavery.

(i) Bright Future

We launched <u>Bright Future</u> in March 2017. Our initial partnership with the charity City Hearts has since grown into a multi-charity, multi-business partnership, co-ordinated through a National Matching System (NMS) - with the needs of victims at its heart.

Bright Future in 2018

25 charity partners

17 business partners

77 referrals to the NMS

18 permanent roles

47 survivors in/completed placements





25 survivors

offered a permanent role since the start of Bright Future

Working in a store brought back my ability to laugh and enjoy myself ""

Survivor who was offered permanent employment through Bright Future

Our focus in 2018 has been on:

- creating new work placements: There were 77 referrals to the National Matching System in 2018, making a total of 104 since Bright Future started. In 2018 we created 35 placements - 27 in the Co-op Group and eight more in five other businesses (including Mid-Counties Co-op, Dixons Carphone Warehouse and three Co-op suppliers) - making a total of 50 placements since the programme began. A total of 25 survivors have been offered a permanent role with their employer since Bright Future started
- supporting other businesses and charities to join us:
 Our work to promote Bright Future and encourage others to join us is having a real impact. 42 organisations are now co-operating to support victims into work across the UK. Our focus has been to provide survivors with more opportunities in sectors where they have the skills and desire to work, like retail, food production, hospitality and construction
- sharing experience and best practice: In April 2018 we held a workshop for our new charity partners. And in September 2018 we brought Bright Future business and charity partners together to share experiences, discuss challenges, and help shape the future of the programme

The pathway for Bright Future candidates in 2018

- 61% of survivors referred to Bright Future started or are about to start paid work placement, and 72% (18) of those completing the placement found a permanent role
- A further 13% of survivors referred to Bright Future found alternative employment (outside the NMS)
- However, 17% of those referred could not take up this opportunity to regain control of their lives because of issues around accommodation, health, ID or immigration status
- Sadly, 9% of those slavery survivors referred to Bright Future left support and disengaged often simply disappearing

(From a baseline of 77 referrals, 2018)

Our next steps for Bright Future include:

 working with City Hearts to make sure the National Matching System is efficient and makes an impact. This includes training frontline support staff to help reduce the time between referring and placing survivors, and supporting Bright Future to become an independent partnership from 2020.



Highly Commended for Human Rights Co-op and Bright Future Ethical Corporation Responsible Business Awards 2018

- growing the partnership to increase the number and variety of work opportunities for victims. We'll continue to explore how better to support those not ready or eligible for paid work, and those who continue to need longer-term support as they move into permanent employment.
- commissioning the University of Liverpool to carry out a second review of the programme in 2019, to help ensure the programme is successful in the long term, and to build the evidence base for better government support for victims¹⁷.

(ii) Engaging with government and lobbying for change

We're proud of what we're achieving through Bright Future, but without changes to the wider support available to victims from government, thousands of individuals are at risk of homelessness, poverty and re-trafficking¹⁸.

During 2018 we continued to push for change through new partnerships, forums and targeted campaigns. We:

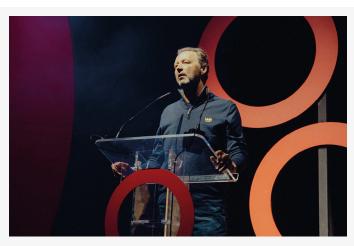
- were the only business to join the <u>'Free for Good'</u> coalition to support Lord McColl's <u>'Modern Slavery (Victim Support) Bill'</u> to increase government support for victims
- partnered with Global Citizen to help gain support for Lord McColl's Bill. Bright Future candidate 'Cherry' appeared in the film shown at the 'Global Citizen Live' event in April 2018 to launch the campaign (Box 8)
- organised a **Parliamentary Roundtable** hosted by Rt Hon Frank Field MP - to bring businesses together to discuss support for survivors

on their Bright Future programme, which helps victims of modern slavery get back into work...

The meeting showed that UK victims of modern slavery are being let down by an inadequate level of support from the government.

That's why both the Co-op and myself are supporting the #FreeForGood campaign

Rt Hon Frank Field MP



Steve Murrells, Co-op CEO, presents at Global Citizen Live London Photo credit: John Phillips, Getty Images for Global Citizen

(iii) Raising awareness of modern slavery

We've continued to highlight and raise awareness about modern slavery, among our members, communities and more widely.

- Where possible we use the voice of victims and their experience to communicate the reality of the situation, as when a Bright Future survivor told his story on a BBC broadcast in January 2018¹⁹.
- We invited Co-op members to 'Join In' our efforts to tackle modern slavery asking them to write to their MP as part of the Free For Good campaign. Over 2,000 members visited the website (Box 8).

Thank you for helping us all make a difference "

Co-op member, in response to our Join In email

Box 8 Campaign actions with Global Citizen 2018

'No Human Should be Bought or Sold. Ask the UK to Give More Support to Victims of Modern Slavery'

3,544 emails sent, reaching 630 MPs*

748 tweets reaching 381 MPs

'Ramp Up the Pressure: Call on the UK Government to Prioritise Support to Modern Slavery Survivors'

7,067 emails sent to Rt Hon Theresa May MP and Rt Hon Sajid Javid MP

4,107 tweets

*Of the total 650 MPs in the UK

¹⁷An initial review was carried out in October 2017 (Bright Future Report.pdf). ¹⁸House of Commons Work and Pensions Committee, 'Victims of modern slavery: Twelfth Report of Session 2016-17', HC 803, 30 April 2017 (publications.parliament.uk/pa/cm201617/cmselect/cmworpen/803/803.pdf); C. Beddoe, L. Bundock and T. Jardan, 'Life Beyond the Safe House for Survivors of Modern Slavery in London: Gaps and Options', Review Report, Human Trafficking Foundation, 2015. ¹⁸https://colleaguestories.coop.co.uk/2018/01/18/raising-awareness-of-the-hidden-horrorour-fight-against-modern-slavery-hits-the-bbc-headlines/

- We placed an advert in the Daily Mail on Anti-Slavery Day, to raise awareness of the plight of victims of modern slavery, and what we are doing to help.
- We've raised the profile of Bright Future and our charity partners, and generated much-needed funding for their work supporting victims to rebuild their lives (Box 9).
- In Autumn 2018, we went with City Hearts to talk about modern slavery at our Co-op Academies and held a competition for students to design a logo for Bright Future (Box 10).



Highlighting the issue of modern slavery in the Daily Mail

Box 9

Over £650,000

generated to help fund Bright Future and the work of 20 charity partners supporting victims of modern slavery. This includes commercial sponsorship, supplier donations (at our Pioneer Awards and charity sporting events), sales of festive ranges, support through our Local Community Fund, and colleague fundraising^{20.}





£50,000

raised for Stop the Traffik through sales of our festive sandwich range.

Box 10

Co-op Academy students design a new logo for Bright Future

"This was such a wonderful opportunity for our young people - to learn more about a worrying and very current issue that is happening so close to home, and at the same time be so inspired by the work being done to help victims. And what an exciting project - for the students to have their designs 'brought to life' by a professional design colleague."

Laura Morley, Co-op Academy of Manchester



Co-op Academy Failsworth students Daniel Aitken and Jamie Brabin, designers of the new Bright Future logo, with (L-R) Antony Hart (Co-op Studio), Phill Clayton (City Hearts), Dr Richard Benjamin (International Slavery Museum), Steve Murrells (Co-op CEO) and Frank Norris (Co-op Academy Trust)

 20 Including £125,000 from Co-op for the National Matching System and City Hearts; £5,900 Co-op sponsorship for Snowdrop charity bike ride; £300,000 from our Pioneer Awards; £80,000 from sales of Co-op's festive sandwiches (£50,000) and cards/wrapping paper (£30,000); £72,600 for Sophie Hayes Foundation from our supplier Charity Golf Day and sporting challenge; £7,500 from Co-op Local Community Fund; £12,000 Co-op colleague fundraising.

Tracking our progress

How we did in 2018: We set ourselves some challenging targets on modern slavery last year. Overall we have achieved or are on track with 12 of the 20 targets we set ourselves, close to target on a further two, and behind with or not yet met six of our targets. We've included some updates in this statement, but for a full account of our progress against each target, please see our <u>online</u> table.

Plans for 2019 and beyond: We'll be building on the activities and progress we've made over the past year, and have signalled some of our planned areas of focus in this statement. Specific targets for 2019 and beyond are shown in the table below.

1. Managing the risk of modern slavery

(a) In our food business

- Improve the lives of workers, by carrying out and publishing independent human rights impact assessments in high-risk food supply chains by 2021, using our findings to drive change
- By 2020 we'll work with key suppliers to map the use of recruitment fees and identify hotspots, and develop action plans to meet our goal to eliminate recruitment fees by 2025
- We are committed to supply chain transparency and will share details of suppliers at all tiers of three of our highest-risk food categories by the end of 2020

Outstanding from 2018: Carry out ten pilots to integrate worker voice technology and participatory techniques into due diligence processes in three of our sourcing countries, to improve our effectiveness in identifying hidden issues such as modern slavery

(b) In our other operations

- Ensure appropriate management of our 27 strategic suppliers of GSNFR by rolling out our One Co-op Supply Management Framework and establishing appropriate governance
- Reduce the impact of identified risks by conducting risk meetings with 80% of those GSNFR strategic suppliers we have identified as our highest ethical risk
- Improve our effectiveness in identifying and managing ethical risks in our supply chain by developing an ethical audit strategy for GSNFR suppliers and requesting SMETA audits from 80% of suppliers in-scope of that strategy
- Improve our understanding of risk and control measures by holding internal risk-assessment workshops for a further two
 of our highest risk categories (Logistics and Facilities Management)
- Better identify and manage ethical risks in our Funeralcare supply chain by requiring 80% of Funeralcare's key suppliers of coffins, stationery and cremation commemoration to register on Sedex and complete an SAQ

Outstanding from 2018: Ensure all our Funeralcare Tier 1 masonry service providers are registered on Sedex and complete an SAQ

2. Training, capacity building and collaboration

Support Co-op Food suppliers to be global advocates for change to improve human rights across our supply chains
through the delivery of our global capacity building programme reaching over 1000 delegates in 20 events annually

Outstanding from 2018: Complete training of key HR colleagues to identify, report and manage potential modern slavery cases in our own business, and include in their inductions

3. Campaigning on modern slavery

- Support Bright Future to become an independent, sustainable partnership from 2020 and beyond (with the Co-op as a partner) so that victims can continue to access work placements and paid employment in future
- Publish a second independent evaluation of Bright Future and use the findings to improve the Bright Future model in 2019
- Produce a full report of our campaign activities 2017-19 ('Three years on') to raise awareness of Modern Slavery and make the case for enhanced Government support of victims

Outstanding from 2018: Recruit 20 referring partners to the National Matching System

Co-operative Group Limited

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www.co-operative.coop/modern-slavery