

Co-op Modern Slavery Statement 2021

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It's what we do

About the Co-op

The Co-op Group is the UK's largest consumer co-operative, with more than four million active members and a presence in every postal district in the country.

We're a major food retailer and wholesaler; we're the largest funerals provider in the UK; we are a major provider of regulated consumer legal services, particularly probate and wills; and we're a major provider of life planning and insurance products. Our group also includes Co-op Power – the UK's biggest energy buying co-operative. Our businesses are all UK-based and our main support centre is in Manchester.

Since 1844 the co-operative movement has promoted organisations with a clear social purpose and our Co-op continues that tradition.

How we run our business is important to us. We set ourselves high standards for responsible retailing and service. By offering great products and services we grow our customers, our membership and the positive Co-op impact and value we can bring to wider society.

You can read more information about our business in our [2021 Annual Report](#). For more information on our responsible business performance please see our [Co-operate Report](#).

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 (44% by turnover) of the goods we sell in our food stores are own-brand products, across a variety of categories.¹ Our supply chain is complex and varied, including farms, abattoirs, fishing vessels, processing factories, finishing, canning, packing facilities and assembly units. Our Food ethical trade monitoring programme² now covers 2,620 sites (733 Tier 1 and 1,887 Tier 2³) and over 700,000 workers across six continents and 70 countries.

We are committed to supply chain transparency, and we publish details of our Co-op Food own-brand Tier 1 sites and disaggregated worker data on our website. In 2021 we further increased transparency by mapping details of **all** tiers of three of our high-risk supply chains⁴. We are continuing to map our supply chains beyond Tier 1 in high-risk categories as part of our ethical risk strategy (page 5).

Other own-brand and third-party products and services we sell. We also sell a range of third-party branded products and services in Co-op Food, Co-op Funeralcare and Co-op Insurance.

- **Co-op Funeralcare** sells coffins and caskets, headstones, memorial stones and flowers, some of which are Co-op brand products. We have around 31 key suppliers across these categories, which are centrally managed and contracted.

- Our Co-op brand coffins are manufactured in the UK, as are the majority of those from third-party suppliers. We also source coffins from the Far East and Canada (5% of our total volume). Our masonry comes mainly from India and China; 98% of the coffins we manufacture are FSC certified.

- Funeralcare also offers wider services through local third-party suppliers (eg for specialist vehicles and funeral flowers).

- **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** works with a wide range of trusted partners to provide comprehensive and specialist coverage across car, van, home, travel, pet and life insurance.

Goods and services not for resale (GNFR). 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 3,000 suppliers across five categories – Property, Logistics, HR & Professional Services, Technology and Marketing.

In 2021 we spent over £1.3bn, mainly through our top 245 managed suppliers. Our largest spend category is Property, which accounts for approximately 30% of our total spend.

¹ Defined at Co-op as dairy & frozen, produce & protein, impulse, food to go & in-store bakery, bakery & local, meals & events, health and personal care, edibles, beers, wines, spirits & soft drinks, and grocery staples.

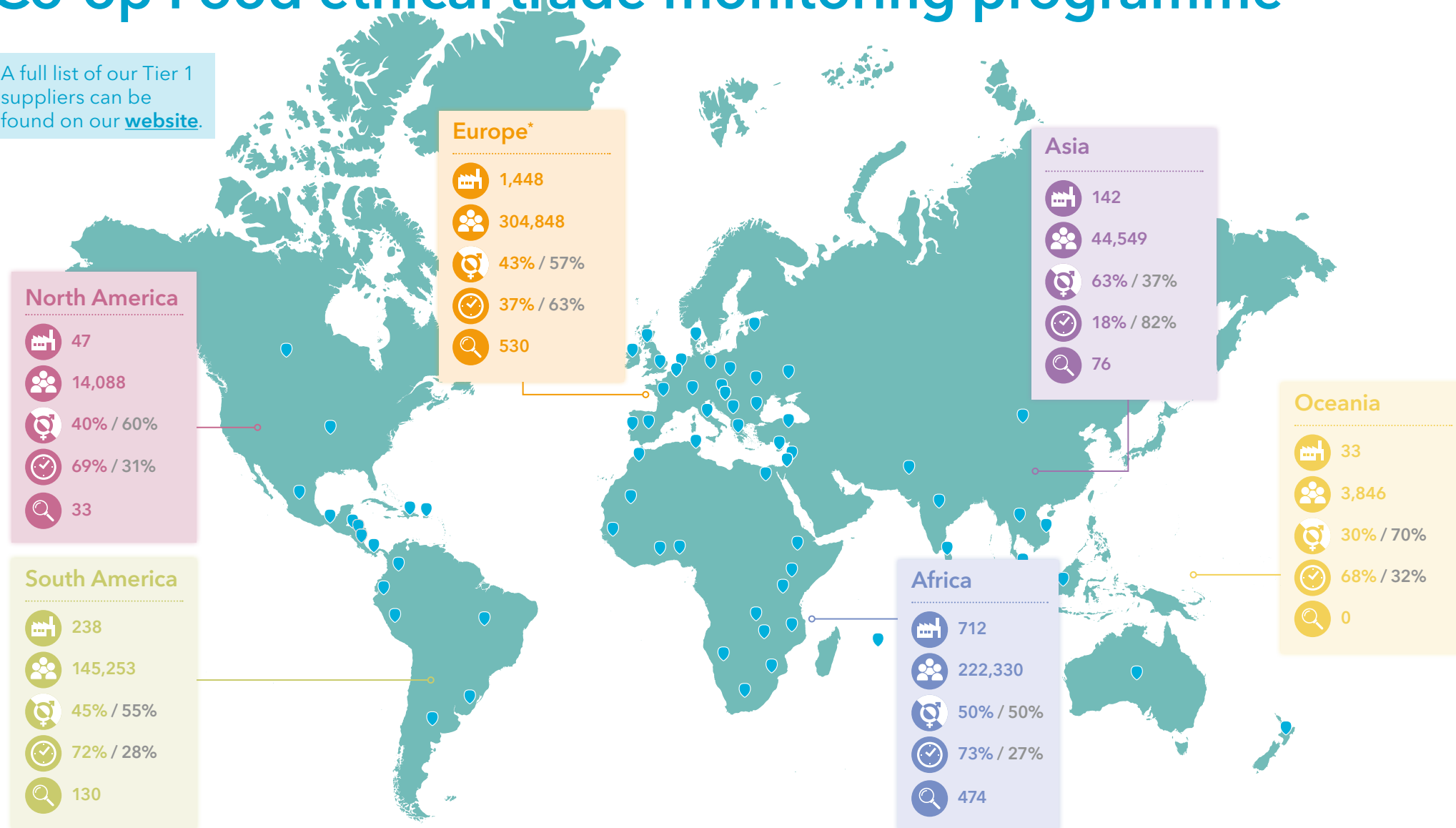
² Nisa Heritage brand products are included in Co-op Food ethical trade monitoring programme.

³ A Tier 1 site is a production site where goods are finished, ready for supply to, or be sold 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 products. 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.

⁴ Top fruit and Stone fruit (eg apples, pears, peaches and plums), prawns, and pork.

Co-op Food ethical trade monitoring programme

A full list of our Tier 1 suppliers can be found on our [website](#).



2,620
Total sites

734,914
Total workers

46% Female identifying workers
54% Male identifying workers

54% Temporary workers
46% Permanent workers

1,243
Valid audits

*Europe includes all UK data. In the UK specifically, the Co-op Food ethical trade monitoring programme covers 761 sites and 159,999 workers, of which 37% identify as female and 63% identify as male. 29% are temporary workers and 71% are employed on a permanent basis. There are 314 valid audits in the UK across the 761 sites.

Policies and governance

Ethical trade and respect for human rights are rooted in our co-operative heritage. Our Co-operative Values and Principles underpin why we value ethical trade and human rights, and how we do business.

Policies

Our approach to ethical trade and human rights focuses on protecting the fundamental rights of workers in our supply chains. These encompass all international labour rights including protection from forced labour, modern slavery and harsh or inhumane treatment. Our work is rooted in the principles of the Universal Declaration of Human Rights, core International Labour Organisation (ILO) standards, the Ethical Trading Initiative (ETI) **Base Code**, and national and international laws. We are guided by the UN **Guiding Principles** on Business and Human Rights in how we protect and respect human rights across our operations.

Our commitments are set out in policies and protocols that guide the recruitment and behaviour of our colleagues, our sourcing of products and services, and our relationships with suppliers and partners.

Colleague policies

- **Eligibility to work process:** Ensures that everyone who works with us has a legal right to work in the UK. This also helps ensure we are not engaging anyone who has been trafficked and can't legally work in the UK. We updated our policy in 2021 to reflect changes associated with the UK's withdrawal from the European Union, and invested in a new Right to Work app which further reduces the risk of illegal working.

- **Whistleblowing policy:** Encourages colleagues to speak up if they have concerns about illegal practices at the Co-op, including possible modern slavery in our business or supply chain. Workers at our Tier 1 own-brand supplier sites in the UK also have access to this independent whistleblowing line.
- **Code of business conduct:** Sets out expectations of how colleagues should engage with our members, customers, suppliers and the wider community.

Supplier and supply chain policies

- **Ethical trade guidance for colleagues:** Separate guides to support both Co-op Food Technical Team colleagues and **Group Procurement** colleagues buying and managing products and services for our own business. An updated 'Buyers guide' for colleagues in our Food business includes a new escalation process to help address emerging risks and non-conformances.
- **Sound Sourcing Code of Conduct (SSCC):** The workplace and employment standards that we expect of all our suppliers (Food and GNFR), based on the Ethical Trading Initiative (ETI) Base Code.
- **Sustainable Procurement and Supplier Policy (SPSP):** The sustainability and ethical/labour standards we expect of suppliers of goods and services not for resale. The SPSP underpins our GNFR ethical screening process (page 10).
- **Third-Party Supply Management Policy:** Guidance for colleagues buying products and services for use in our business. The policy was strengthened in 2021 to include spend on trials and is supported by an ethical sourcing process, ethical screening, and e-learning for all colleagues engaged in spending the Co-op's money.⁵

- **One Co-op Supplier Management Framework:** Governance requirements for managing GNFR suppliers, including regular ethical reviews with highest-risk suppliers.
- **Protocols on handling reported cases of modern slavery:** Good practice guidance for the Food retail and Construction sectors.

Contracts: Our expectation for suppliers to meet our ethical trade requirements is included in our supplier contracts and approval processes. We assess the ethical trade capability of suppliers in high ethical-risk categories as part of our tenders. We also recognise the importance of longer-term contracts in supporting sustained improvements in working conditions.

Governance

Development and oversight of ethics and sustainability policies take place in different Co-op-wide forums, including our Ethical Trade & Human Rights Group. Our Food Policy Governance (FPG) forum and our Procurement Risk and Audit Committee (PRAC) have oversight of ethical trade from a Food and GNFR perspective.

Ethics and human rights are also embedded in our risk framework, with consideration of modern slavery included in our Brand, Reputation and Ethical Risk category. Oversight of the risk categories sits with our Business Risk and Assurance Committee (BRAC), which reports directly to the Board.

Overall responsibility for modern slavery sits with our Board and our Modern Slavery Statement is signed off by our CEO.

⁵ The Third-Party Supply Management Policy was updated in 2021.

Assessing and managing risk

We have well-established programmes in place to ensure that workers making the products and services we sell or use are treated responsibly. In 2021 we continued to adapt our ways of working, to ensure they are fit-for-purpose in the face of the ongoing Covid-19 pandemic.

We've continued to see labour shortages in our supply chains in 2021, as a result of both the ongoing pandemic and changes immigration laws. And we're now seeing workers from a wider range of countries, with increased confusion over new rules and visa schemes meaning we need to be extra diligent. We need to ensure workers are not being exploited by middlemen charging unlawful recruitment fees or taking advantage of vulnerable workers.

Workers are experiencing real financial hardship as a result of Covid. Many have taken out loans which they are struggling to repay, with people taking on more than one job and being even more vulnerable to exploitation.

It's continued to be challenging to carry out site visits and see suppliers face-to-face, and virtual audits/assessments are still being used where required. We've been working hard to get greater visibility at all tiers of our high-risk supply chains, and have seen increased use of virtual assessments and direct worker reporting (pages 6 and 11). Sharing information and collaborating with peers continues to play a vital role in managing the risks of modern slavery (page 14).

Co-op Food own-brand supply chain

When managing the 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 69% of our business (by turnover), and our Co-op brand supply chain is where we can have the biggest impact.

Assessing and managing risk

All Co-op Food own-brand Tier 1 sites must complete a self-assessment (SAQ) questionnaire on Sedex⁶, and Tier 1 sites in high-risk countries must have an independent audit in place prior to approval.⁷ Once trade has started, our ethical trade team carries out

a quarterly risk assessment of all sites, with high-risk sites prioritised for audit.⁸ We use a variety of tools to assess and identify risk, including site assessments and audit, direct worker reporting, and information raised through channels such as whistleblowing lines or grievance mechanisms.

- **Supply chain transparency.** In 2021, we completed the mapping of all tiers of three high-risk supply chains – top fruit and stone fruit⁹, warm water prawns and pork. This provides us with greater transparency, and the ability to identify and address potential labour abuses. Beyond our Tier 1, we have 1,887 sites with 483,216 workers included in the scope of the programme.



⁶ Supplier Ethical Data Exchange (Sedex) platform (www.sedex.com).

⁷ The list of high-risk countries has been informed by the frequency of issues, media coverage and academic research, local labour law and enforcement systems, and other expert knowledge.

⁸ The risk assessment process takes the following factors into account: Country, SAQ information including worker profile (especially sites with high proportion of agency/temporary labour), industry sector, commercial importance/leverage and previous audit results.

⁹ Top fruit: Fruit grown on trees, not bushes (eg apples, pears). Stone fruit: Fleshy fruit grown on trees with single seed/'stone' (eg peaches, plums, cherries).

- Site audits and virtual assessments.** We resumed our audit programme in 2021, following the easing of Covid restrictions. We continued to use [Sedex Virtual Assessments](#) (SVAs) where site visits have not been possible and accepted 110 virtual audits. We welcome Sedex's new [Audit Quality Programme](#) which will help improve the detection and reporting of onsite issues, and ensure consistency of auditing techniques.

Details of our ethical trade monitoring programme are shown in **Box 1**.
- Gender-sensitive audits.** We have been working with Tesco, Partner Africa and Sedex to understand how standard audit methodologies can be more effective at identifying risks of gender discrimination in supply chains. The project involves piloting a new gender-sensitive audit methodology across supplier sites in Africa and will be completed in 2022.
- Direct worker reporting.** Following trials last year, we continued to work with [Wider](#) to roll out the use of mobile phones for workers to raise issues directly. Information gathered is providing valuable insight on issues, including potential indicators of modern slavery, and is informing future activities (see **Box 2**). We also provided over 3,000 workers the opportunity to participate in direct worker reporting on flower farms in Kenya as part of the FCDO projects (page 14).
- Issues raised through non-audit channels.** We don't rely upon audits alone to identify potential cases of modern slavery or other labour rights issues. We also use information raised by workers through grievance mechanisms and whistleblowing lines, along with other independent sources of information – see **Box 3** for examples of issues raised and how we responded.

Box 1

Co-op Food ethical trade monitoring programme 2021

- 2,620 sites with over half a million workers (733 Tier 1 and 1,887 Tier 2)*
- 100% of Tier 1 sites with Self-Assessment Questionnaires (SAQ) complete
- 99% of high-risk Tier 1 sites independently audited**
- 1,243 sites with valid audits
- 835 audits in 2021 (347 Tier 1 and 488 beyond Tier 1)

6,823 issues were raised in valid audits. Of those, 81 issues (1.1%) were categorised as a breach of the Sound Sourcing Code Principle of 'employment is freely chosen' (reflecting issues such as isolated occurrence of deductions taken from workers' wages, compulsory overtime and excessive fees paid upon termination of contract). 78% of the 81 issues had been addressed by the supplier by the end of 2021, resulting in changes such as policies to reduce workers' fees, revised T&Cs in contracts and clearer payment processes. See our 2021 Co-operate Report for more details.

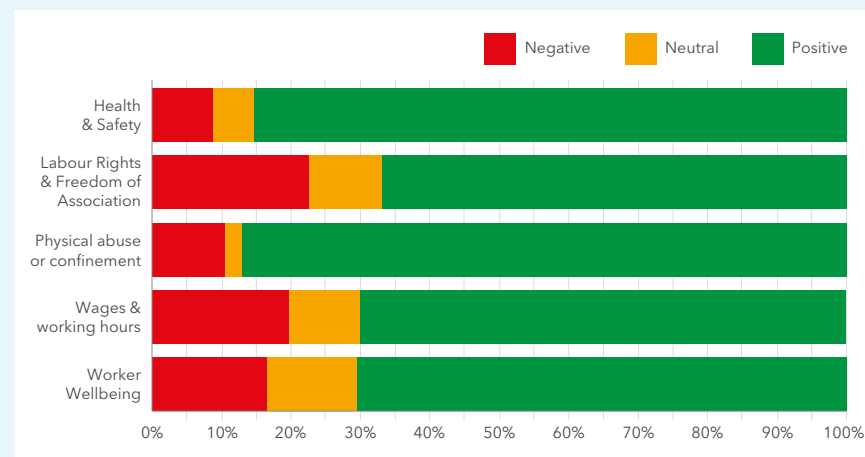
* A Tier 1 site is a production site where goods are finished, ready for supply to/sale by the end company. A Tier 2 site is a production site that supplies goods or materials to a Tier 1 site for incorporation into the finished products. Sites 'beyond Tier 1' include sites at Tier 2 and further down the supply chain, depending on the nature and complexity of the supply chain. Note: Nisa Heritage brand is in scope of our Food ethical trade monitoring programme.
** The outstanding site was audited in February 2022, due to delays caused by Covid.

Box 2

Direct worker reporting 2021 (Food)

In 2021 1,500 workers in our food supply chain had the opportunity to participate in independent direct worker reporting through direct Co-op engagement with suppliers, using [Wider's](#) survey tool. The graph shows the issues workers reported against, and a summary of workers' feedback across all survey cycles and countries*.

*Dominican Republic, Egypt, England, Greece, India, Scotland, South Africa and Thailand.



Box 3

Issues raised in our Food supply chains through non-audit channels

We can be alerted to potential modern slavery or other labour rights abuses through routes such as whistleblowing lines, independent helplines, grievance processes and media reports. In 2021, we became aware of a number of issues through various contact channels, 11 of which indicated potential labour exploitation. Examples of these are shown below, along with actions we took in response. Although none of the investigations resulted in us finding modern slavery, some did highlight practices that could potentially result in bonded labour. We take a collaborative approach to resolving issues where possible.

Contact channel	Country	Issues raised and actions taken in response
Whistleblower	UK	Allegations of verbally abusive staff, mismatches in payslips and forced overtime for temporary workers led to an independent investigation. The issues raised were not substantiated.
Whistleblower (via ETI)	UK	Allegations of bullying, lack of access to grievance mechanisms, lack of training and inadequate safety provisions were made by a whistleblower at a manufacturing site. Multi-stakeholder collaboration led to an independent investigation. Some allegations relating to PPE and training were substantiated. We have continued to engage with key stakeholders to create and implement a corrective action plan and long-term remediation process.
Whistleblower	UK	Allegations of workers paying recruitment fees and sexual harassment of workers were made by a whistleblower. An independent investigation including worker interviews was carried out in partnership with other retailers. None of the issues raised were substantiated.
Direct letter from a whistleblower	UK	Allegations of the falsification of documents and poor staff treatment were made by a whistleblower at a UK food manufacturing site. We commissioned an independent, unannounced investigation which found these allegations were unsubstantiated. However, an action plan was put in place to strengthen grievance mechanisms and improve the ability to detect any potential issues in future.
Media	Spain	Media reports highlighted harsh treatment and incorrect pay at a fresh produce site. Independent investigations including worker interviews were carried out, but the issues raised were not substantiated. However, industry-level labour shortages were recognised as a factor in increasing the risk of labour exploitation in the industry. A long-term plan to mitigate risk of these issues is in place at the site. The supplier is now leading multistakeholder, industry-wide action to raise awareness of risks associated with worker shortages in Spain.
Whistleblower	UK	Allegations of bonded labour and inadequate accommodation were made by a whistleblower on a UK fruit farm. Follow-up investigations by the supplier including worker interviews did not substantiate allegations raised. However minor issues relating to accommodation maintenance were found and resolved.
Media	Kenya	Allegations were made of injury at work related to manual handling of tea. A court case is ongoing. An independent investigation has been commissioned to examine current working practices, and regular high-level cross-functional meetings are taking place with the supplier to follow-up on allegations.
Direct supplier	Kenya	Our supplier shared information that workers on farms in Kenya were forced to take unpaid leave, reduce hours or even move farms as a result of pressures of the pandemic. Following negotiations between Unions and management, remediation plans were put in place to protect and support workers.
Whistleblower	UK	Allegations of harsh treatment and poor working conditions were made by a whistleblower. Following an independent, unannounced investigation some allegations relating to health and safety and management systems were substantiated. A long-term action plan was put in place to address root causes of issues raised. We are working with the supplier directly on a continuous improvement basis to monitor and support development of employee engagement programmes and working conditions at the site.
Direct letter from a whistleblower	UK	Allegations of aggressive behaviour, bullying and malpractice by a labour provider were raised by a whistleblower. Following investigations including worker interviews, allegations regarding the way supervisors and managers were speaking to workers were found, although other allegations relating to the labour provider were not substantiated. An action plan including training designed to directly address issues and worker engagement was agreed with the supplier.
Direct supplier	Malawi	Allegations of gender-based violence were raised by our supplier. This led to retailer, NGO and ETI engagement and an independent investigation. A remediation plan was put in place to support workers and address root causes. We continue to be involved in industry-wide activity addressing systemic human rights issues such as gender-based violence.

Our priority labour rights risks

Following a rigorous process of analysing and prioritising our labour rights risks, we have identified eight priority human rights risk areas, covering 17 sourcing countries – see **Box 4**. You can read more about these issues and the actions we are taking to address them on our [website](#).

One of our focus areas is **fish and seafood in Indonesia, Thailand and Vietnam**. Systematic violations of human rights and forced labour in the seafood industry is exacerbated by the high use of migrant labour. In 2021 we revised our Seafood Human Rights Strategy to ensure it meets our commitment to the Environmental Justice Foundation's [Charter for Transparency](#). We also initiated an independent human rights impact assessment in our warm water prawn supply chain in Vietnam.

Another of our priority areas is our **non-food supply chains in China**.¹⁰ There has been increasing concern about human rights violations in the Xinjiang region of China particularly, with the UK Government carrying out an enquiry into the issue. In light of this, we carried out a mapping exercise to better understand our potential exposure to risks in our supply chain – see **Box 5** (page 10).

Box 4

Our priority labour rights risks (Food)

Priority risk area	Category	Sourcing country
Modern slavery, Vulnerable workers	Fresh produce, Protein	UK
Modern slavery, Vulnerable workers, Worker voice	Fish and seafood	Indonesia, Thailand, Vietnam
Modern slavery, Vulnerable workers	Fresh produce	Spain
Modern slavery, Vulnerable workers	Canned tomatoes, Fresh produce	Italy
Vulnerable workers, Worker voice	Fresh produce	Egypt, Morocco
Modern slavery, Vulnerable workers, Worker voice, Smallholders	Fresh produce, Flowers, Tea, Wine	South Africa, Kenya
Vulnerable workers, Worker voice	Non-food	China
Vulnerable workers, Worker voice, Smallholders	Cocoa, Bananas, Sugar	Belize, Colombia, Costa Rica, Cote D'Ivoire, Dominican Republic, Peru

¹⁰ Eg toys, paper goods, kitchenware, sports equipment, cleaning products, and packing facilities.

Box 5

Human Rights, China

Over the past year, there has been increasing awareness and allegations of human rights violations in the Xinjiang region of China, particularly targeted at the Uyghur population. Reports indicate a significant risk of forced labour at workplaces in the region, and potentially across China.

In 2021 we carried out a number of mapping projects to better understand our risk exposure in terms of sourcing from the region.

In our Food supply chain

- We have no direct (Tier 1) Food supplier sites in the Xinjiang region.
- We worked with technical and commercial colleagues to identify ingredients coming from this region, and have engaged with suppliers who source sub-ingredients such as paprika or tomato paste, that potentially could be sourced from Xinjiang.
- Where possible we encourage suppliers to find alternative sources. If ingredients are being sourced from the region we expect to see a plan in place to move to an alternative source as soon as possible.

We see collaboration and joint working as key to addressing human rights risks in the region, as we recognise we have limited ability to effect change in Xinjiang on our own. We are actively engaged in industry conversations to share intelligence and develop guidance, including through the Ethical Trading Initiative (ETI), Food Network for Ethical Trade (FNET), and the British Retail Consortium (BRC).

In 2021 we developed and co-delivered a webinar for suppliers in China, focusing on recruitment practices (page 12).

In our GNFR supply chain

- No supplier of a Co-op branded product sources goods from the Xinjiang region.
- Based on prioritisation following an initial risk assessment, we worked with commercial colleagues and suppliers to identify any sourcing from the region. One supplier confirmed sourcing two products from Xinjiang; both have since been replaced by an alternative.
- We are currently reviewing our approach to contracts where we specify the use of a particular brand or product - based on an initial assessment of risk (eg security cameras, solar and EV charging points).

Funeralcare

We continued to develop and embed our Funeralcare Ethical Sourcing Programme in 2021. All 31 Tier 1 suppliers in scope of the Programme are registered on Sedex and have completed a Sedex Self-Assessment Questionnaire (SAQ). Information from the SAQs is helping us better identify and manage potential risks in our supply chain.

We also introduced requirements for all new Tier 1 suppliers to be registered on Sedex prior to commencing trade, and are developing guidance for branch colleagues in relation to locally managed suppliers.

A key area of focus for 2021 has been to consolidate our flower supply base, and we have now formalised contracts with the reduced number of 251 third-party florists. We are also exploring the possibility of introducing Fairtrade flowers into our offering.



Products and services we use in our own business

Our Responsible Sourcing Strategy provides the overarching framework for assessing and managing risk in our GNFR supply chains. Ethical trade forms a key pillar of the Strategy, and in 2021 we continued to run a comprehensive training and capacity building programme with Procurement colleagues, to further embed our ethical trade processes into everyday practice (page 13).

Of our higher ethical risk categories, we continued to prioritise our waste and recycling supply chain in terms of ethical trade and human rights. This included embedding our ethical requirements in a new waste tender, as well as leading the IPHR Waste and Recycling Working Group (page 14). The Covid-19 pandemic continued to affect the driver and warehouse labour markets, and we have further strengthened our due diligence response since initial actions last year.

Assessing risk (GNFR)

We have a well-established process for assessing and prioritising high-risk suppliers in terms of modern slavery and human rights. While we have a greater ability to influence our Tier 1 suppliers, we know that some of our greatest ethical and human rights risks lie in our Tier 2 supply chain. Although we don't directly manage these Tier 2 suppliers, we do include them in our ethical trade programme and risk mapping where appropriate.

We assess and prioritise risk for each GNFR category using criteria such as existing and emerging risks, and the supply chains we know are particularly vulnerable to exploitation. The process for identifying high-ethical-risk suppliers includes:

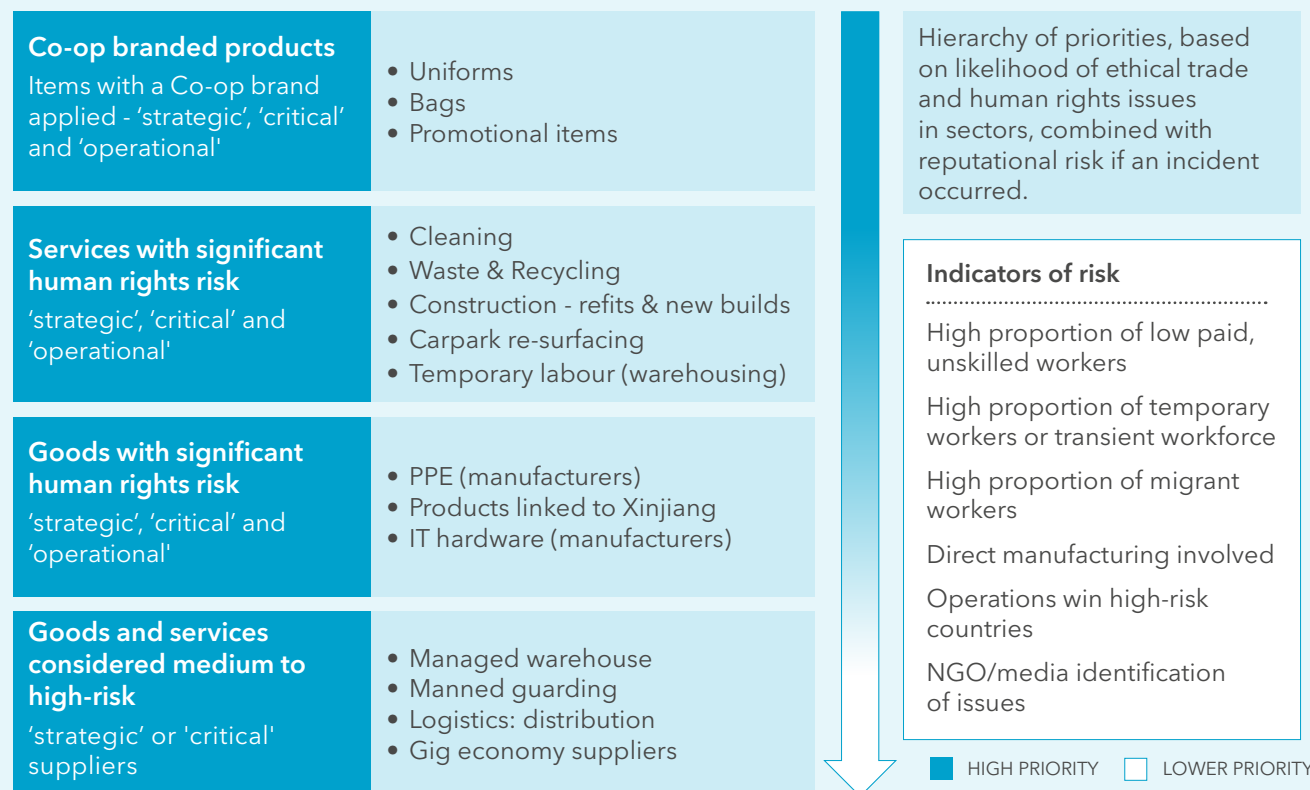
- Desk-based risk assessment and screening of new GNFR ethical high-risk suppliers against our SPSP.¹¹
- Prioritisation of risk for each category, based on criteria including: the amount of temporary and migrant labour typically used in the sector; the proportion of low-paid, unskilled labour involved; and information from media and NGOs - See **Box 6**.

- Incorporating questions which flag ethical and sustainability risk factors in all Requests for Proposals, and asking tailored questions for the highest ethical risk categories.

The resulting high-risk categories and our focus areas in 2021 are shown in **Box 6**. In addition, we carried out a mapping exercise on any GNFR supply chains potentially linked to Xinjiang, China (**Box 5**).

Box 6

Ethical risk assessment and high-risk categories (GNFR)



¹¹ For high ethical or environmental risk contracts with total anticipated spend of more than £100,000 over their lifetime. This process also applies to non-food own-brand products and services we sell in other parts of the business.

Impacts of Covid: We've seen significant shortages of labour in the driver and warehouse sectors, which has resulted in some of our sites urgently needing to source temporary labour outside of our main contracted labour agencies. This is something we first experienced in 2020 and, as a result, we've strengthened our due diligence in this area. When we need to work with new agencies in higher ethical risk categories (eg warehouse staff), the agency has to adhere to our minimum standard requirements, including completing a Sedex self-assessment and signing up to our ethical policies.

Managing and mitigating risk (GNFR)

In 2021 we formalised our approach to ethical audits as part of our refreshed GNFR Ethical Trade Strategy (which forms a key pillar of our Responsible Sourcing Strategy).

We use a range of tools to manage and mitigate risk, including the use of:

- **Sedex and ethical audits:** see **Box 7**.
- **Responsible Recruitment Toolkit:** In 2021 we required suppliers of our driver and warehouse temporary labour contracts to complete the Responsible Recruitment Toolkit (RRT) Online Assessment. We will use lessons from this process to decide whether to make this a requirement for other high-risk sectors in 2022.
- **Direct Worker Reporting:** We completed our trial of Direct Worker Reporting with some of our providers of in-store cleaners in 2021. Using automated calls, workers were able to report directly and anonymously on ethical trade issues/working conditions (see **Box 8**). This work is

helping us identify and understand potential risks associated with third-party employees working on our sites, and we are considering extending this work to other categories in 2022.

Use of these tools is underpinned by our Supplier Management Framework, which provides a structured way to monitor and manage risk within our top 245 suppliers, including minimum standards to be followed depending on their segmentation.¹² The Framework also helps ensure that identified risks and actions are tracked and performance is monitored. In 2021 we continued to develop our internal reporting on ethical trade, including reporting to our Procurement Risk and Audit Committee to maintain visibility and accountability within our Procurement leadership team.

Box 7

GNFR ethical trade monitoring programme 2021

92 suppliers in scope *

(76 Tier 1, 16 Tier 2)

122 sites linked on Sedex

(100 Tier 1, 22 Tier 2)

80 SAQs complete

(65 Tier 1, 15 Tier 2)

12 audits

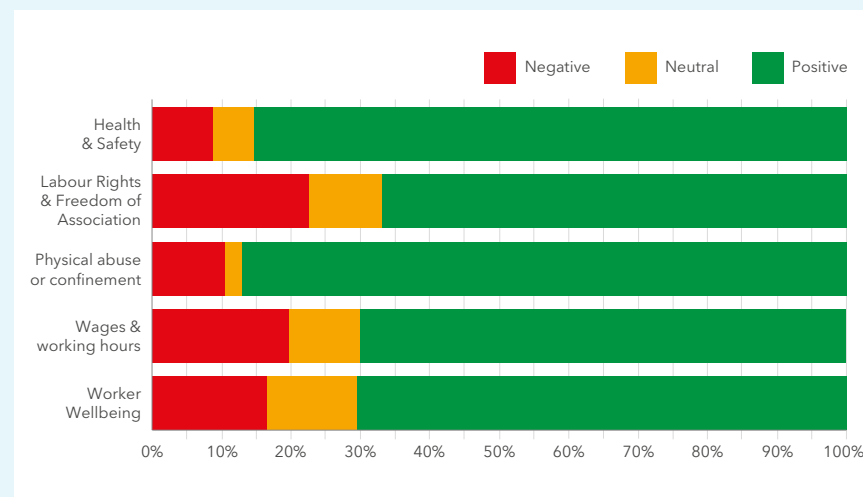
(1 Tier 1, 11 Tier 2)

*Including three suppliers that are engaging with us via a similar ethical monitoring programme, which provides us with a satisfactory view of their due diligence process.

Box 8

Direct worker reporting 2021 (Cleaning)

In 2021 2,400 workers from our in-store cleaning contractors had the opportunity to participate in independent direct worker reporting, using &Wider's survey tool. The graph shows the issues workers reported against, and a summary of workers' feedback during the third call cycle. A total of 325 workers participated in this call cycle.



¹² Our Supplier Management Framework sets out how we segment suppliers into 'strategic, critical, operational and transactional', based on responses to a series of questions which define the risk and value they can bring to the Co-op.

Training and collaboration

Training and collaboration play a major role in helping prevent slavery and human rights abuses. We work closely with our colleagues and suppliers to help build their capacity to identify, manage and deal with risks of modern slavery.

In 2021 we continued to participate in collaborative initiatives – to share what we know and combine our efforts. We believe collaboration is essential to developing sustainable solutions to issues that put workers' interests first.



Co-op Food supplier training

We have a well-established ethical trade supplier engagement programme, which enables us to listen to and support our suppliers in tackling human rights issues affecting workers globally. Key activities in 2021 are shown below and in the section on collaboration (page 14).

- **Sourcing labour responsibly**

- **UK:** Significant labour shortages continued to affect UK growers/fresh produce suppliers in 2021, resulting in increased risks of illegal working and exploitation of workers. In 2021, we provided a range of opportunities for our suppliers to better understand and manage these risks. These included supporting a collaborative webinar on 'Sourcing labour responsibly this season'. 87 delegates attended the session run by FNET, which provided information on changes to immigration rules and potential impacts on business. We also provided our suppliers with free access to expert support and guidance on sourcing labour responsibly through the Association of Labour Providers (ALP) helpline.
- **China:** Responsible recruitment is also a focus of our work with suppliers in China. In 2021 we ran two webinars on ethical recruitment and supply chain transparency for our suppliers in China, in partnership with Natura & Co and ETI. Over 130 delegates participated, with one event aimed at UK agents and another for suppliers in China. The sessions provided advice on local legislation, risk management and remediation processes.

- **UK Ethical Trade Forums.** We continued to run our Strategic and Regional supplier forums online in 2021. A key focus has been to build supplier understanding of the increased and evolving risks of worker exploitation, and how to manage those risks. Our interactive seminar with an expert speaker panel reached over 120 participants, and included practical tools and resources for our suppliers to use, and supplier case studies.
- **Treating People Fairly Awards.** In 2021 we launched our 'Treating People Fairly Awards', in recognition of the continued commitment our Co-op suppliers have shown to protecting people in our supply chain over the past 18 months. The awards are designed to celebrate excellence in human rights practice, encourage suppliers to learn from each other and inspire new ways of mitigating future threats to worker welfare. Supplier entries were assessed by an independent, expert panel and resulted in one Winner and three Highly Commended awards, which were presented at our Co-op Ethical Trade Strategic Forum meeting.
- **Prison labour collaborative project.** Chronic labour shortages in the UK have led to an increased interest in the potential of recruiting prison labour to fill vacancies in food production. In 2021, we joined a collaborative project to explore the potential for employing prisoners on Release on Temporary Licence (ROTL) in an ethical and legal way. We shared our learning from the pilot scheme through a collaborative webinar and case study, along with recommendations for ethical good practice guidance.

GNFR training and engagement

- **The Co-op's Procurement team (GNFR)**

We have developed a comprehensive engagement programme for our GNFR Procurement team, to provide them with the skills and knowledge they need to identify and manage potential human rights issues in the supply chain, including modern slavery. This involves training, capacity building, focus groups and one-to-one support to upskill the team.

- **Property Risk, Health Safety and Environment (RHSE) team**

In 2021 we delivered ethical trade and modern slavery training to our RHSE colleagues. These colleagues are often out on site, have greater visibility of supplier activity and conduct supplier and site audits. The training will help early identification of potential ethical trade issues. The RHSE team also updated Property's Code of Conduct for suppliers to include our expectations on labour standards.

- **GNFR suppliers**

We provided our GNFR suppliers with access to webinars and training through some of our collaborative networks and groups in 2021. Topics included:

- 'clandestine migrants' for the transport and logistics sector (through FNET, Stronger Together and IPHR Forum);
- exploitation and labour abuse in the cleaning sector (IPHR and FLEX);

- ethical recruitment and supply chain transparency in China (through ETI, Co-op and Natura & Co (page 12)
- tackling Modern Slavery in the waste and recycling sector (see **Box 9**);
- responsible recruitment (through RRT - see page 15).

- **Supplier recognition**

We launched our first supplier recognition programme for GNFR, which included a category for 'wellbeing winners', which recognising suppliers that put people's wellbeing at the heart of what they do.

Across our own business

- We continue to require all colleagues across the business who work with suppliers to complete annual online training on 'Spending the Co-op's money', which includes consideration of ethical issues.
- Having completed the roll-out of mandatory training on modern slavery for key members of our HR & Resourcing Services team, we made the module available to over 400 additional colleagues across our wider HR teams (page 20).
- In 2021, we created further awareness of Modern Slavery and exploitation among both our colleagues and 'third-party workers' on our sites, by rolling out a poster campaign across our Food stores and distribution centres.
- On International Anti-Slavery day, we ran two 'lunch and learn' sessions for colleagues, and published a [blog](#) on modern slavery.

Box 9



Tackling modern slavery in waste and recycling

Waste and Recycling is one of Co-op's high-risk GNFR categories in terms of modern slavery. We continued to chair the IPHR Waste and Recycling Working Group in 2021 - a cross-sector network with the shared objectives of identifying and assessing labour rights issues in the sector, and raising awareness and engagement levels. Through the collective commitment of the 20+ members, the Group developed a brand-new toolkit on Tackling Modern Slavery in Waste and Recycling. The toolkit was launched at a webinar on Anti-Slavery Day 2021, and is available as a free resource via the [CIWM website](#).




Wider collaboration and activity

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We are active members of a range of collaborative initiatives across the food sector and others. See the table below for an overview of the groups we are involved in, and a snapshot of our activities in 2021.

Initiative	The Co-op's role	Key activity in 2021
Ethical Trading Initiative (ETI) – Italy Working Group 	Founding member of this ETI Working Group, which aims to eliminate exploitative practice in the tomato sector and wider agricultural sector in Italy.	In 2021 the Italy Working Group drove greater supply chain transparency by producing a map of co-operatives and a farm risk assessment. A pilot training session was delivered to 12 co-operatives (for up to 100 growers) to address current risks, raise awareness of the Italian government's strategy to address labour exploitation, and share emerging initiatives to support growers. The training programme will be expanded in 2022.
FCDO ¹³ Vulnerable Supply Chains Facility (VSCF) projects	Partner* in two projects funded under FCDO's VSCF to help build resilience of workers in East Africa and address the impact of Covid-19 in flower and agriculture supply chains. * In collaboration with Fairtrade Foundation, ETI and other retailers and suppliers.	We completed the two collaborative projects to help build resilience of workers in Africa to address the impact of Covid-19. Highlights from the two-year projects include: <ul style="list-style-type: none"> • better understanding of the impacts of Covid through the use of direct worker reporting; • provision of immediate support to workers (eg health packages, Covid-19 training for flower farm committee members); • retailer collaboration and industry learning on sustainable business, purchasing practices and long-term resilience; and • policy recommendations for UK and Kenyan governments based on research into market behaviours in the UK during the pandemic.¹⁴
Food Network for Ethical Trade (FNET) 	Participant in this member-led initiative which uses the collective leverage of suppliers and retailers to bring about positive change in working conditions in supply chains. The Co-op's Senior Human Rights Manager is a Member Director on the FNET Board.	2021 activities included: <ul style="list-style-type: none"> • delivering fortnightly calls where members share how they are managing current human rights risks; • 11 working group meetings and many sub-group meetings to develop tools/resources to tackle recruitment fees, improve worker representation and mitigate human rights issues; • 5 webinars including on gender, climate change and living wages; • support to members on issues including Xinjiang and forced labour, Indian labour laws and prison labour in the UK; and • collaboration with NGOs, governments, industry bodies and others to improve labour conditions in UK agriculture, tackle workers' rights in warehousing and logistics, and other issues.
Indirect Procurement Human Rights Forum (IPHR)	Founding member of the Forum, comprising UK retailers, brands and manufacturers working to protect and respect human rights in their GNFR supply chains. The Co-op's Ethical Sourcing Manager is Chair of the Waste & Recycling Group and a member of the Steering Group.	Covid-19 continued to impact our Steering Group activity in 2021. Meetings were held virtually and we focused on core working group activities. Through collaboration we have been able to pool our collective knowledge and expertise to identify shared priority risk areas, to help address exploitation and protect our businesses and supply chains.

¹³ Foreign, Commonwealth and Development Office (UK aid to protect high street supply chains)

¹⁴ Better wages and working conditions on farms are key to East African flower sector's post-pandemic recovery, Fairtrade and partners tell industry - Fairtrade Foundation.

Initiative	The Co-op's role	Key activity in 2021
Modern Slavery Intelligence Network (MSIN)	Member of MSIN - a pioneering non-profit collaboration in the UK food sector created in 2020 in response to the findings of <u>Operation Fort</u> (the UK's largest ever modern slavery investigation).	Members met regularly in 2021, including with external stakeholders (eg law enforcement) to share plans and seek guidance on MSIN's approach. The Network has established effective ways of working and ensured that robust mechanisms are in place to safeguard survivors and their data. This has required a significant commitment from members, and engagement with teams across their own business (eg ethical trading, legal, data protection, privacy and IT security). In 2021, MSIN appointed international NGO Stop the Traffik as a data sharing partner to develop an online platform and trial it using dummy data. Live intelligence sharing is due to start in early 2022 with plans for a formal launch in June 2022.
Responsible Recruitment Toolkit (RRT) 	Sponsor of the RRT. As a sponsor, our suppliers can access unlimited free places on new online training courses, as well as free tools and guidance on responsible recruitment practices.	We know the pandemic has increased the risk of poor practices in the recruitment and supply of workers, and the risk of exploitation and modern slavery. In 2021, we supported the delivery of 18 online training courses reaching 196 delegates from 113 suppliers. These covered issues such as elimination of recruitment fees, labour supply chain due diligence and safe work for agency and contract workers.
<u>Sedex</u>	We use the Sedex platform to manage our ethical trade monitoring programmes. The Co-op's Senior Human Rights & Ethical Trade Manager served as an elected Member Director on the Sedex Board for six years (up to May 2021).	We continue to embed Sedex's new Forced Labour tool into our Food ethical trade monitoring programme. In 2021 we played an active role in the new community programme to improve knowledge sharing and capacity building.
<u>Spain Ethical Trade Forums</u>	Played a key role in creating the Spain Ethical Trade Forums (in 2012).	In 2021, we ran 13 events, webinars and seminars, reaching 1,302 delegates. Output from working groups include <u>harassment prevention</u> , <u>grievance management mechanisms</u> and a new pilot on <u>workers and management representative dialogue</u> .
<u>Stronger Together (UK and Spain)</u>	Founding sponsor of Stronger Together - a multi-stakeholder initiative providing training and resources to help reduce modern slavery. As a sponsor, our suppliers have free access to workshops, workplace posters and leaflets.	In the UK, we supported the delivery of: <ul style="list-style-type: none"> • 29 foundational workshops reaching 607 participants from 397 suppliers (the Co-op: 163 delegates from 108 suppliers); • 11 advanced workshops reaching 106 participants from 88 suppliers (the Co-op: 36 delegates from 32 suppliers). We ask our strategic suppliers to use Stronger Together's Progress Reporting Tool to assess their modern slavery prevention strategies. <ul style="list-style-type: none"> • 59 suppliers have completed the Progress Reporting Tool to date; • In 2021, 25% of strategic suppliers' scores had increased from the previous year. We continued to support Stronger Together Spain, and rolled out five workshops to 15 delegates from 14 suppliers in 2021.
Unseen	Member of Unseen's <u>Helpline Business Portal</u> , which gives us access to Helpline reports of modern slavery or labour abuse within our operations and supply chains, as well as unique trend analysis.	This partnership helps support the 24/7 operation of the independent Modern Slavery and Exploitation Helpline, which provides a vital lifeline to those with nowhere else to turn, as well as expert guidance to frontline professionals. In 2021 we had access to 53 cases through the portal, four of which were linked to the Co-op supply chain. We have worked collaboratively with Unseen and other portal users to investigate and remediate issues found.

Campaigning

In all our efforts to help prevent modern slavery in our business and supply chains, we never lose sight of those affected by modern slavery.

In 2021 we continued to advocate for human rights to be respected, and for stronger legislation to help protect workers and prevent modern slavery, including:

- joining ETI and other retailers in advocating the importance of Occupational Safety & Health (OSH) being part of the Fundamental Principles and Rights at work and to put a road map in place to drive improvements in health and safety in workplaces globally;
- supporting Fairtrade's public advocacy report, which put forward recommendations for building fairer and more resilient flower supply chains in East Africa;
- supporting a statement advocating for a new law mandating human rights and environmental due diligence; and
- campaigning for climate justice as part of our Ten-Point Climate Plan.

Although several strands of our modern slavery campaign have come to an end, we have continued to support initiatives that help survivors build their confidence and move into paid employment. Through our involvement in Bright Future, we play a practical role in providing work opportunities for those rescued from slavery.

Lessons from our campaign

We published an independent review of the Co-op's modern slavery campaign in March 2021 so that we, and others, could learn from our experience. The report, 'Campaigning for Change', highlighted the success of our 'asset-based approach' to campaigning, through which we leveraged existing strengths and resources across the Co-op to support our aims of raising awareness and providing better support for the victims of modern slavery. We shared this report and its learning at a seminar in 2021, and we're using it to inform strategy across the Co-op's other public policy campaigns.

“ This approach of carefully and pragmatically designing campaign elements that used its assets... meant the Co-op could create a coherent whole: a series of mutually reinforcing campaign activities. ”

Support for victims

- **Employability and confidence building**
We supported St Mary's University to hold a Summer School in July 2021.¹⁵ The initiative, co-funded with HSBC, was designed to help survivors of modern slavery to develop their life and employability skills, and build their confidence. The 'Horizons Summer School' included a session on Bright Future (see below), run by the charity City Hearts. An evaluation of the initiative reported 'the project has demonstrated that a truly collaborative approach aimed at meeting the needs of survivors can yield huge results' and that 'the Higher Education sector [...] has a place in promoting the integration and reintegration of survivors'.
- **Opening the door**
A recent report shows that survivors who are given permission to work and to learn, exit from the Government's National Referral Mechanism (NRM) much sooner.¹⁶ Their integration into society becomes more complete, their physical and mental health improve, and their reliance on the state recedes. The role that Bright Future has played in enabling survivors to integrate, form networks and meet their financial needs is recognised in the report.



¹⁵ Co-op provided £25,000 to St Mary's University for the summer school, which was due to run in Summer 2020 but was postponed because of Covid.

¹⁶ 'Access to work for survivors of slavery to enable independence and sustainable freedom', March 2021, Coalition AccessToWork_report_v3.pdf.

Bright Future

We launched our Bright Future programme in 2017 – working with the charity City Hearts to offer the chance of a paid work placement and a job in our business to those who have been rescued from modern slavery. In 2021, Bright Future completed its transition from a network of business and NGO partners to a fully functioning, independent co-operative organisation.

Building Bright Future co-operative

Following Bright Future's move to an independent co-operative, work has continued to establish robust governance and procedures, and the new Society held its first AGM in November 2021.

The process of transitioning Bright Future partners to 'members' of Bright Future co-op has progressed well, and by the end of 2021 there were 27 members.¹⁷ We were particularly pleased to have been able to introduce charities and businesses alike to the potential of the co-operative model, and look forward to more partners transitioning to full membership in the coming months.

In 2021, we provided £10,000 to fund City Hearts and, along with all business members of Bright Future co-op, will continue to pay an annual subscription as part of our membership.

Bright Future placements in 2021

It has continued to be a challenge to support Bright Future placements in 2021, due to the ongoing impact of Covid-19 in the workplace. Like many food retailers, colleagues in our food stores have been operating under great pressure. In addition, many candidates expressed nervousness about working in a public-facing role. Bright Future's goal of creating 300 placements has been significantly impacted as a result.

There were 123 referrals to Bright Future in 2021, making a total of 389 since the programme started. In 2021 there were seven placements created, one of which was in Co-op Group, making a total of 86 placements since the programme began. Six candidates moved into permanent roles, one of which was in the Co-op.

Bright Future

Bright Future in 2021¹⁸

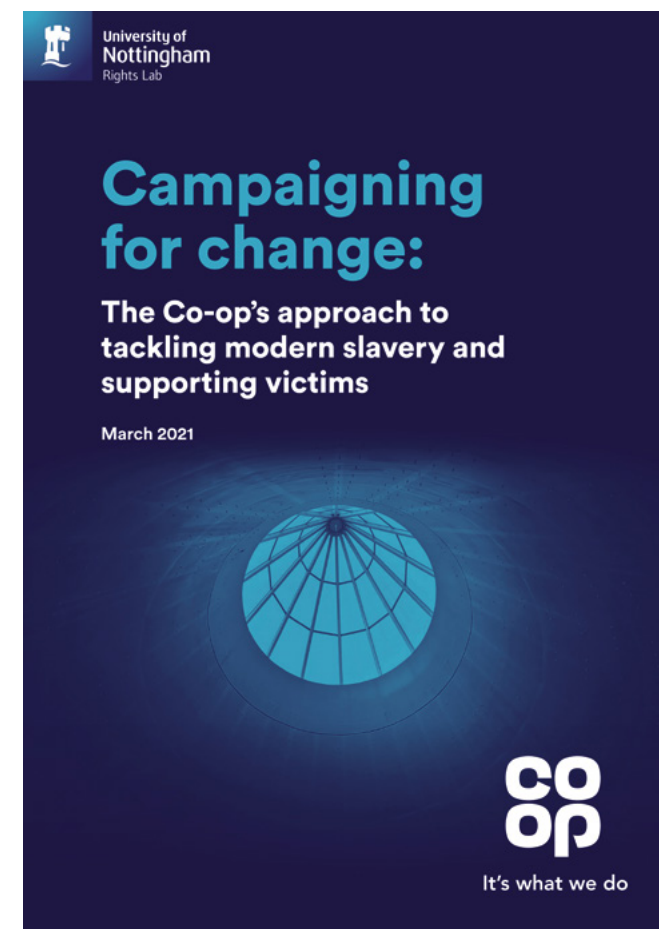
18 referrer members

9 business members

123 referrals to Bright Future

7 candidates started placements

6 candidates started permanent roles



¹⁷ Business members: Arco Ltd, Body Shop, Co-operative Group, Currys (formerly Dixons Carphone), Greencore Manton Wood, Marshalls PLC, The Midcounties Co-operative, Pilgrim's UK (formerly Tulip), Prince's Ltd. Referrer members: Adavu Project, Bramber Bakehouse, Black Country Women's Aid, Caritas Bakhita House, City Hearts UK, Ella's Home, Haven of Light CIC, Hestia Housing and Support, Hope for Justice, Hull Homeless Community Project, Jericho Foundation, Kalayaan, Medaille Trust, Migrant Helpline, Palm Cove Society, Sophie Hayes Foundation, The Snowdrop Project, Unseen.

¹⁸ Reduction in number of partners reflects Bright Future's transition from an informal partnership to a formally constituted co-operative society.

Tracking our progress

We set ourselves some challenging targets on modern slavery last year. Overall we have achieved or are on track with seven of the ten targets we set ourselves and close to target on a further three. We've included updates in this Statement, but for full transparency we have summarised our progress against each target in the table on page 19.

Targets for 2022 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 2022 and beyond are shown below.

In our Food business

- We will support our suppliers to improve human rights across our supply chains through the delivery of our global capacity building programme, reaching over 1,500 delegates in 25 events in 2022.
- We will improve the lives of workers, by carrying out and publishing independent human rights impact assessments in three high-risk food supply chains in 2022, using our findings to drive change.
- We will champion the role of women and vulnerable people in our supply chains, and in 2022 we will join two new projects to address gender issues in our supply chain.
- We will continue to work collaboratively to eliminate illegal and unfair recruitment fees in our global supply chain by 2025.

In our other operations

- We will undertake a review of our Direct Worker Reporting pilot (page 11) and explore the possibility of using this approach in our waste and recycling supply chain in 2022.
- We will review the use of the Responsible Recruitment Toolkit, learning from our labour providers' responses and experiences, and will explore its suitability for use in other sectors with a high use of temporary labour in 2022.
- We will increase our engagement with our high-risk categories, identifying opportunities to foster collaboration and shared learning between suppliers on common ethical trade risks and challenges.

Progress against our 2021 targets

Business/function	What we said we'd do in 2021	How have we done?	What have we done?
1. Managing the risk of modern slavery			
(a) In our food business			
Food	We will improve the lives of workers, by carrying out and publishing independent human rights impact assessments in three high-risk food supply chains in 2022, using our findings to drive change.	On track	In 2021 we progressed our work on two independent Human Rights Impact Assessments (HRIAs) in our protein supply chains, and will publish the completed assessments in 2022. These in-depth assessments have involved extensive stakeholder engagement, with a strong focus on worker interviews. In 2022 we will start work on a new HRIA focused on a key high-risk produce supply chain.
	We will champion the role of women and vulnerable people in our supply chains and will develop and launch a gender strategy in 2021.	Close to target	In 2021 we continued our work to increase visibility of gender data across our supply chains, and started a new pilot project to improve our effectiveness identifying gender-related workplace issues. We also rolled out projects to empower women in our supply chain through our support of two FCDO projects in East Africa (page 14) and projects in our Fairtrade supply chains.
	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 2021.	Close to target	Working closely with our key suppliers we have mapped full of details our pork, seafood and stone fruit supply chains, including worker profile data - further increasing visibility of all our Tier 1 sites. We will publish the data in 2022.
	In 2021 we will work with key suppliers to map the use of recruitment fees, identify hotspots, and develop action plans to meet our goal to eliminate illegal and unfair recruitment fees in our global supply chain by 2025.	On track	We continue to work with our key suppliers to map the use of recruitment fees and put in place action plans where issues are identified. 65% of our key suppliers have targets on responsible recruitment fees embedded in their objectives, and in 2021 we continued to roll out free training on responsible recruitment (page 15). We have also been working collaboratively through FNET to agree common principles on recruitment fees, and will be embedding these into Co-op policies.
(b) In our other operations			
Procurement	In 2021 our providers of warehouse and driver contingency labour will complete the Responsible Recruitment Toolkit (RRT) assessment, and work with us to make improvements where needed.	Achieved	As part of our mobilisation process for new warehouse and driver contingent labour contracts in 2021, we worked with suppliers to complete the RRT online assessment. This was an extensive process, and we will focus on understanding the outputs fully in 2022.
	We will review and develop our ethical risk management strategy, building a revised ethical audit strategy for implementation in 2021.	Achieved	We developed our new ethical risk management and audit strategy, which has been signed off by our Procurement Leadership Team and implemented in 2021.
Funeralcare	In 2021 we will review SAQs from all suppliers in scope of Funeralcare's ethical sourcing programme and develop mitigation plans for identified risks.	Achieved	We have reviewed the completed SAQs from all 31 suppliers in scope, and have developed mitigation plans to manage risks (page 9).

Progress against our 2021 targets

Business/ function	What we said we'd do in 2021	How have we done?	What have we done?
2. Training, capacity building and collaboration			
Procurement	We will deliver training on Sedex to the GNFR Procurement team, to enable them to work effectively with suppliers and drive change.	Close to target	We were not able to progress our Sedex reporting to the extent we had planned in 2021, due to delays in the development of Sedex's reporting platform. However, we have delivered a programme of training for the Procurement team, enhancing their knowledge to enable them to use the available information and work with suppliers to identify areas for improvement.
HR	We will complete training of key HR colleagues to identify, report and manage potential modern slavery cases in our own business, and include in their inductions. [Rolled over from 2018]	Achieved	In 2021 the mandatory training was completed by 90 key colleagues in HR & Resourcing Services, helping raise awareness and understanding of this issue by colleagues dealing with pay, terms and conditions, thus helping reduce risks of modern slavery. We also made the Modern Slavery module available to over 400 additional Co-op colleagues across our People Operations & Services teams. At the end of 2021, 98% had either completed or were in the process of completing the module voluntarily (page 13).
3. Campaigning on modern slavery			
Policy & Campaigns	We will continue to provide access to work placements and paid employment within Co-op Group, as part of our support for Bright Future.	Achieved	We continued to provide access to work placements, with one candidate starting a placement in 2021.

This Statement was approved
by the Board of the Co-op²⁰



Steve Murrells
CEO, Co-op Group
April 2022

²⁰ 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, Co-operative Foodstores Limited, Funeral Services Limited and Nisa Retail Limited (among others). The Statement covers the financial year (52 weeks) ending 2 January 2022.

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It's what we do