

M&S

MODERN SLAVERY

STATEMENT

2024

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INTRODUCTION FROM OUR CEO

This is M&S's ninth Modern Slavery Statement issued in accordance with the Modern Slavery Act 2015. The statement provides an update on the actions we have taken (and continue to take) as a business during the year ending 30 March 2024 to monitor and prevent slavery and human trafficking from occurring in our own operations and supply chain.

At M&S, our mission to deliver exceptional products and be a trusted brand goes together with doing the right thing. This means treating everyone fairly, with respect and taking a zero-tolerance approach to discrimination and unacceptable forms of behaviour. To do this we therefore have a key role and responsibility to play in identifying, preventing, mitigating and remediating human rights risks. To show respect for human rights effectively, we acknowledge that we must act in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Modern slavery is a growing phenomenon, and one that, in an increasingly connected world, means the risk of human trafficking and forced, bonded and child labour is something that is present around us but often hidden. Modern slavery can be more prevalent where the employment of migrant workers is concerned. People seeking work often leave their home countries and can find themselves in vulnerable circumstances and lacking knowledge of their rights in the host country. The seasonal nature of migrant work increases the risk of modern slavery as there is often a need for temporary workers during peak periods. Migrant

workers may be subjected to excessive working hours, substandard living conditions, have their wages withheld, or worse, have their identify documents taken away, restricting their freedom of movement.

Migration across borders due to other external factors such as conflict or climate change is also creating new challenges as workers can find their ways into supply chains. As a retailer with operations in the UK and overseas and with a complex supply chain, our risk-based approach focuses on initiatives where we can identify and prevent modern slavery in seasonal or temporary workers, and in regions with cross-border migration. We prioritise initiatives in the parts of the business with the greatest risk and where we can make the biggest improvements. But we also work in partnership with the wider industry where the risks are shared or where our influence is less direct.



The business is committed to facing the challenges around modern slavery and works collaboratively and collectively with supplier partners to tackle this issue. I am particularly proud of the role M&S has played in the formation of the UK Seasonal Worker Scheme Taskforce (SWST), working with the rest of the industry and with government to address the challenges of seasonal recruitment into the UK produce sector. As we did last year, we reviewed our progress against the Office of the Anti-Slavery Commissioner (IASC) maturity framework, with its four clearly defined stages that help companies assess their approach to managing modern slavery risk. I am comfortable and confident that we remain at the "Evolving Good Practice" level but with some activity in "Leading on Human Rights Innovation". I am also pleased that M&S was referenced in the inaugural [CCLA Modern Slavery UK Benchmark](#) as one of only six companies in Performance Tier 1. However, whilst this recognition is welcomed, there is always more that needs to be done.

This year we have also made progress in strengthening our own approach, including:

- completing a review of our salient human rights issues at a country level and carrying our targeted due diligence into our UK and ROI Own Operations covering; Cleaning and Waste Management, Facilities Management, Security Guarding, Construction, Warehousing and Operations and Logistics.
- the continued use of worker voice technology across our Clothing & Home and Food supply chains; and
- further strengthening our governance with the introduction of the ESG Business Forum.

Our customers and stakeholders expect and deserve to know that we are committed to doing what is necessary to always treat people in our business and supply chain fairly. Doing the right thing by the people who work with and for M&S is a very important part of what makes us such a trusted brand, and the work that we undertake continues to be of great importance.

STUART MACHIN
Chief Executive Officer
Marks and Spencer Group plc

03/06/2024

This statement has been approved by the Board of Directors



OUR BUSINESS

M&S operates as a family of businesses across Food, Clothing & Home and International, each led by its own integrated management team, with functional accountability for their divisions, including marketing, supply chain and finance.

We do this through a network of 1,000 stores and over 30 markets globally. Across our stores, support centres, warehouses and supply chain, over 64,000 colleagues serve approximately 32m customers each year.

OCADO

M&S holds a 50% investment in Ocado Retail, a joint venture relationship between M&S and Ocado Group. Ocado Retail publishes a separate Modern Slavery Statement.

BRANDS

In March 2021, we formally launched “Brands at M&S”. To date, we have launched over 100 brands under owned, wholesale, consignment or collaboration models.

INTERNATIONAL

This statement covers activity within our owned and joint-venture international operations (Greece, Czech Republic – owned, and India – joint-venture).

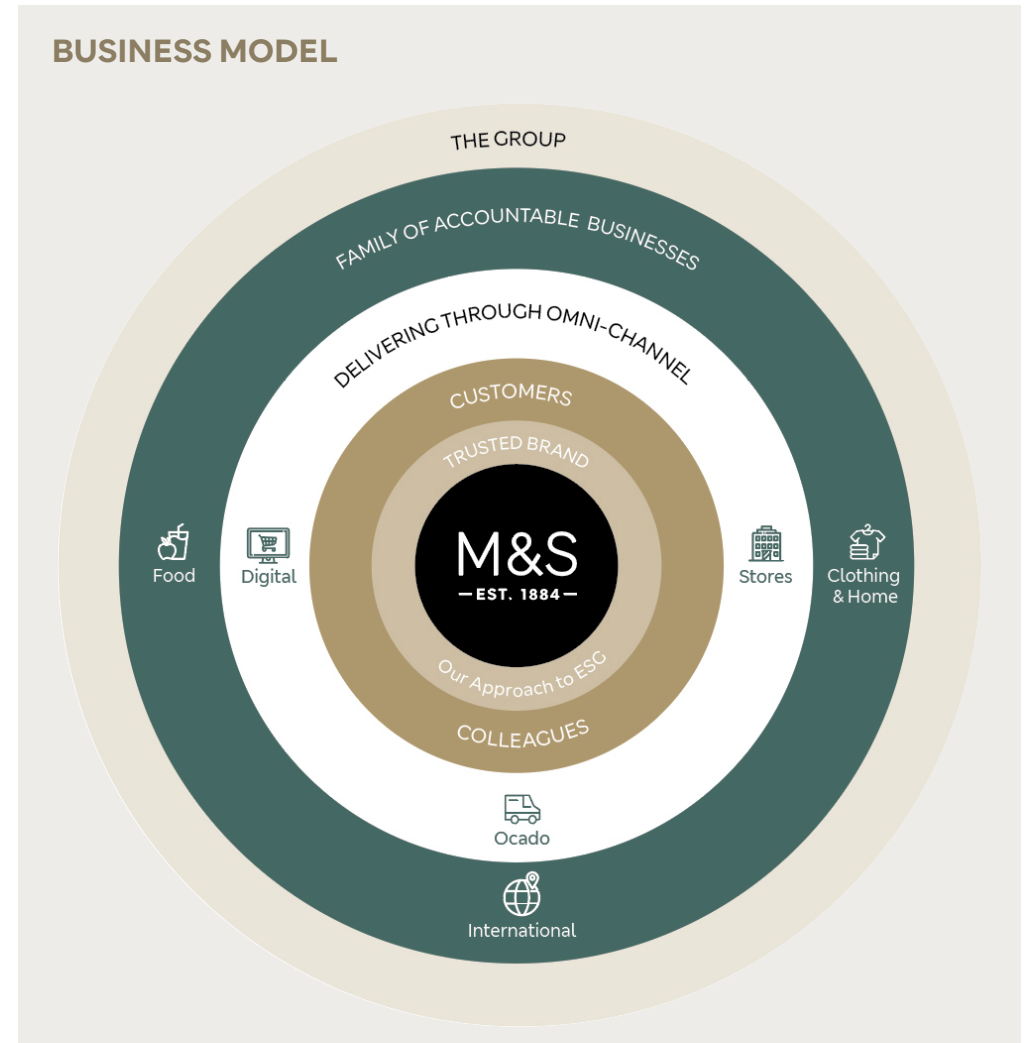
GIST

M&S acquired Gist, our principal Food logistics provider in July 2022. Gist will continue to report through their own [Modern Slavery Statement](#).

SERVICES

M&S Bank is operated by HSBC. Due to the nature of their business. HSBC publish a Modern Slavery Statement separately.

BUSINESS MODEL





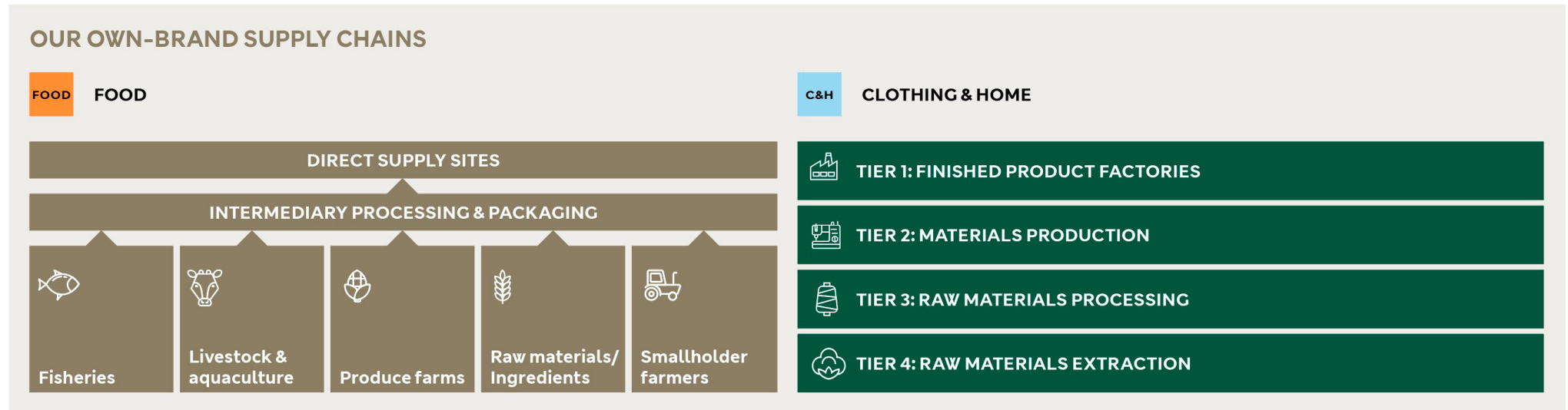
OUR OWN LABEL SUPPLY CHAIN

We predominantly sell own-brand products, manufactured and marketed exclusively under the M&S brand. Our relationships with our supplier partners are built on trust with shared aims.

We have three primary groups of suppliers: Food, Clothing & Home and Goods not for Resale (GNFR):

Reporting transparently on our own-label supply chain practices and operations is core to our approach to sourcing. We publish data within the M&S Interactive Supply Chain Map, disclosing our Tier 1 supply chain across Food and Clothing & Home. This scope also includes some raw materials, including wool, man-made cellulosic fibres, beef, fish and seafood, dairy, tea and coffee, and is updated twice each year.

GNFR includes products and services we buy to run our business and covers Logistics, Operations, Marketing Technology, HR, Property, Facilities Management and Packaging. We have nearly 1,800 GNFR suppliers, 80% of the money we spend is with the top 250 suppliers.





POLICIES AND GOVERNANCE

We have several Group-wide policies in place that are relevant to modern slavery, all of which are signed off at director level. We continually review and develop our policies with input from in-house experts, suppliers and external stakeholders.

Global Sourcing Principles	First introduced in 1998 and extended to all suppliers and partners as of May 2016, these principles set out our minimum requirements and expectations of how we and our supplier partners conduct business to uphold human rights, labour environmental, ethical and legal requirements in their own operations and their supply chains. The Principles were last updated in January 2023
Human Rights Policy	States our commitment to respecting internationally recognised human rights in line with the principles and guidance contained in the United Nations Guiding Principles (UNGPs) on Business and Human Rights.
Code of Conduct	Sets benchmark minimum commitments for our business conduct. The commitments are focused on key policy areas affecting M&S, to ensure we act in line with relevant laws and regulations, industry standards and stakeholder expectations. The code applies to everyone at M&S, including our Board, our management team and all our colleagues, as well as those working in any joint ventures that we control and overseas sourcing offices.
Confidential Reporting Procedures	Aimed principally at our colleagues, but also available to others working in our supply chain, confidential reporting channels are managed by Safecall and concerns can be raised by phone or online in multiple languages. We are also strengthening our approach with digital solutions including worker voice feedback mechanisms.
Grievance Procedure for Clothing, Home and Food Supply Chains	Grievance mechanism to remedy adverse human rights impacts within the Food and Clothing & Home supply chains. The policy sets out how to raise a grievance and our recommended process for investigating and understanding concerns.
Human Rights Due Diligence and Remedy Guidance	To support our approach to human rights due diligence and drive continuous improvement we have developed this guidance to help our suppliers which is regularly reviewed to ensure it remains compliant with the ACAS Grievance Procedure and best practice.

Our grievance policy was last updated in July 2022, and it is regularly reviewed to ensure it remains compliant with the ACAS Grievance Procedure and best practice. Whilst the review did not identify any immediate opportunities to improve the process, it did identify potential opportunities to use the data we gather in a more effective way to help guide decision making across the business.

GOVERNANCE

Overall accountability for the Modern Slavery Statement and risk assessment process is held by the Executive Committee “ExCo”, chaired by the CEO, Stuart Machin. The report is also reviewed by the ESG Committee for content, the Audit & Risk Committee for internal controls, and ultimately approved by the Board.

To further enhance our alignment across our family of accountable businesses, our ESG Business Forum includes senior representatives from each of the accountable businesses. Our ethical trade subject matter experts attend this forum quarterly. They attend to provide business-wide alignment on human rights, provide progress updates on modern slavery commitments and surface any emerging risks.

You can read more about our governance structures in our [ESG Report](#).



RISKS AND ACTIONS

Our annual modern slavery risk assessment is aligned with the M&S Group risk assessment process. This process considers external, internal, and emerging risks and how these are mitigated.

This risk assessment process is annual and covers the relevant business units in Food, Clothing & Home, Retail & Property, International, and the support functions: Finance and Procurement, Digital and Technology, and HR. A Director of each business area and support function is accountable for their risk assessment and due diligence approach. These risks assessments are reviewed internally with relevant incidents reported in this report.

Modern slavery can arise in complex and hidden ways, so our risk assessment includes the following to facilitate us in prioritising actions to mitigate risk:

- detailed mapping of supply chains and operations;
- desk-based research;
- data from our audit programmes;
- supplier engagement and surveys;
- supply chain due diligence;
- discussions with expert stakeholders through multi-stakeholder initiatives.

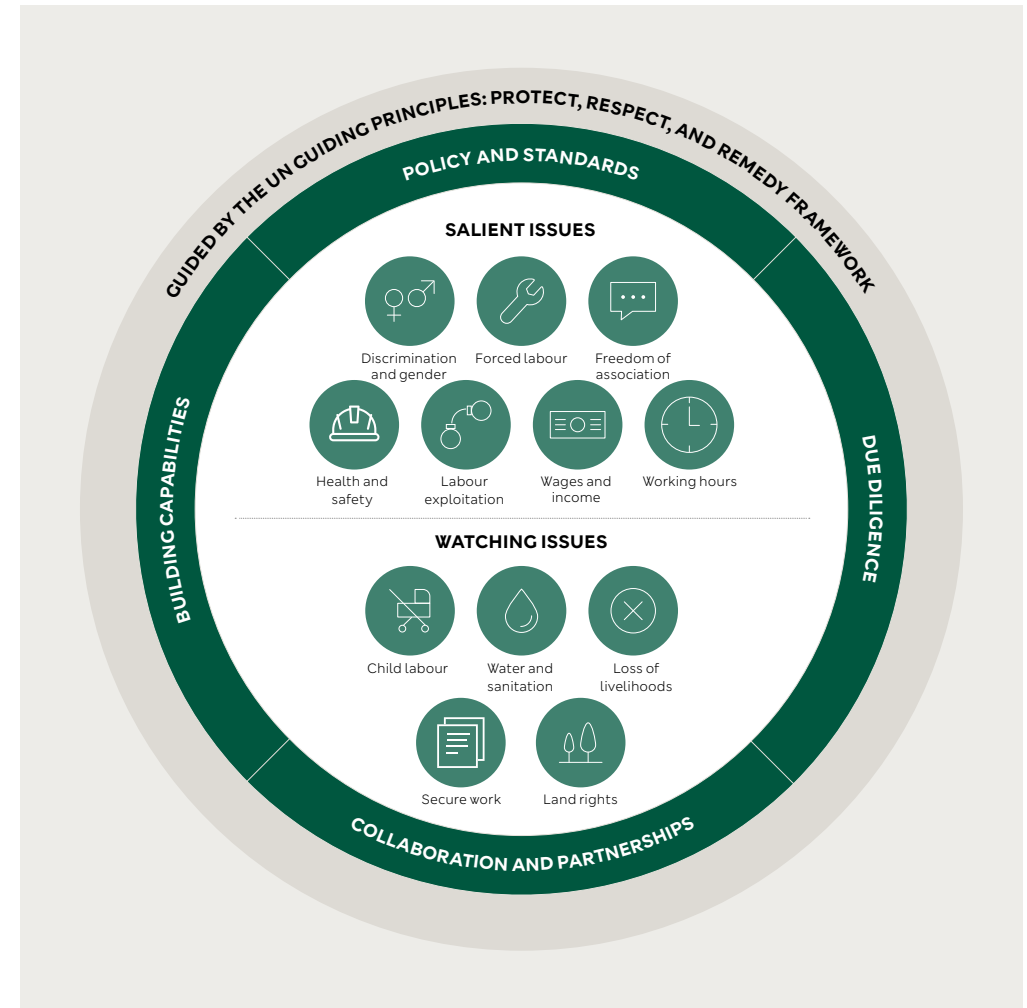
As a majority own-label business, our primary focus is on our Food and Clothing & Home supply chains, where, working closely with our trusted supplier partners, we are able to make the greatest impact. As part of the risk assessment process, we map and regularly review countries and regions in our supply chain that have a higher human-rights risk profile. These

higher-risk countries and regions are those where human rights are at risk systemically either because of poor governance and rule of law, security, discrimination or environmental pressures. Our approach to identifying the countries with the highest risk, includes:

- the SEDEX Radar portal to understand country-level risks of forced labour;
- information and intelligence from our projects on the ground, and local knowledge from our Clothing & Home sourcing teams in our 10 sourcing offices;
- the Food Network for Ethical Trade (FNET) product-specific risk assessment to drill down to the specific ingredients and raw materials per country to identify if these are material to M&S;
- information contained in a report titled “M&S Ethical Trade Risk Index 2023” based on country-level risk indicators and product-specific risk assessment, commissioned with an expert external consultancy;
- a combined human rights and environmental risk assessment of our top 50 raw materials in Foods, undertaken by two expert third parties; and
- information received through our memberships including Ethical Trading Initiative (ETI) and FNET.

Our salient human rights issues were reviewed in 2023, including detail at a country and sector level, with input from internal and external stakeholders. Our salient human rights issues remain largely unchanged year-to-year but with emerging and watching issues that nevertheless

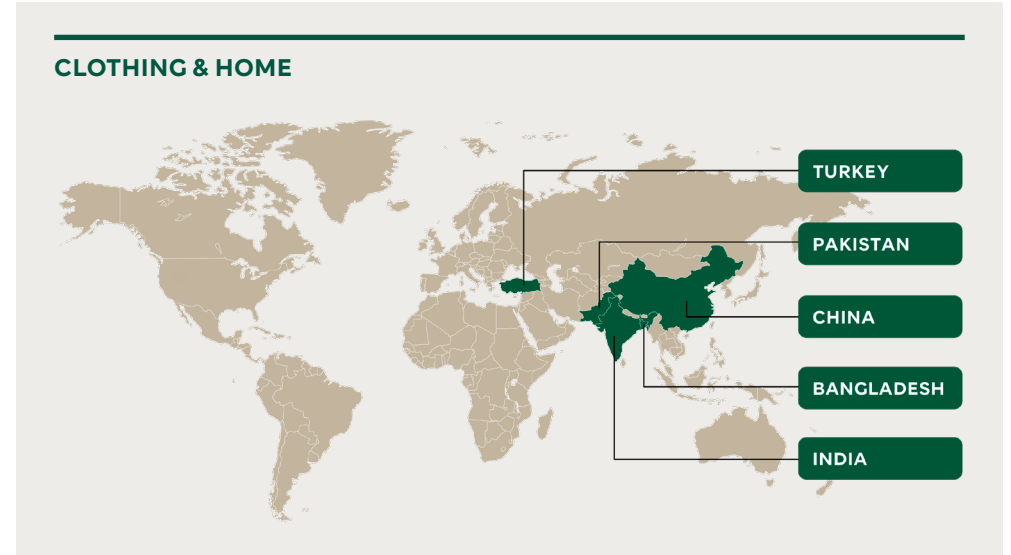
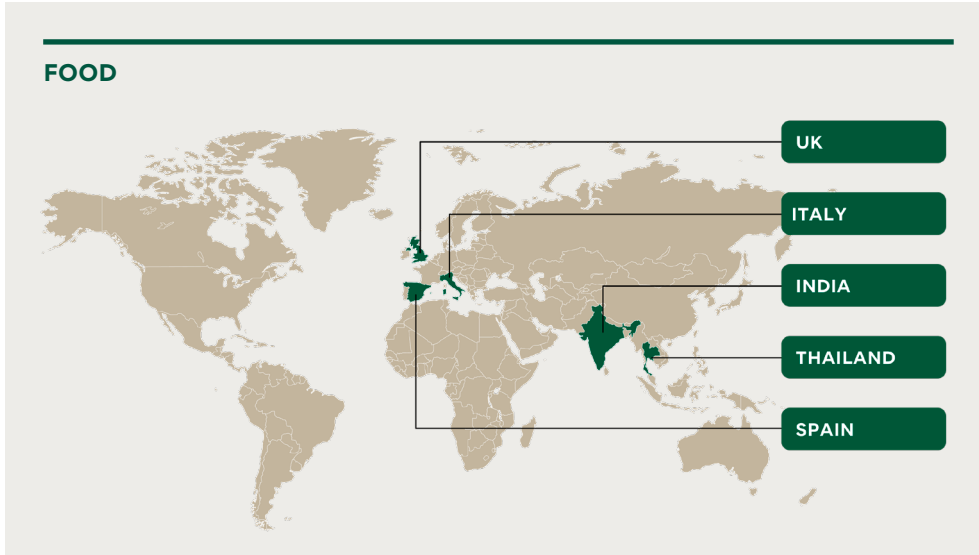
have the potential to increase in risk. As such we undertake a salient human rights review less frequently than the annual risk assessment process. Our next review will be completed no later than the end of financial year 2026/27.





RISKS AND ACTIONS CONT.

In 2023/24 the following countries were identified as highest risk:



RISKS AND ACTIONS CONT.

Our programmes are built on a robust foundation of compliance which allows us to monitor and track our supplier partner's performance against our minimum requirements. You can read more about our approach on our corporate website.

While we are confident that there continues to be a role for compliance and social audit programmes, we recognise their limitations in identifying instances of modern slavery. We will continue to explore modern slavery due diligence methodologies that complement our strong compliance foundation. Where possible, we are using technologies, such as worker voice apps, to allow us to reach further into our supply chains and hear directly from the workers impacted. You can read more about these programmes in our [ESG Report](#).

In Clothing and Home, we have continued to strengthen our compliance programme including:

- Expansion of our Clothing and Home compliance programme into tier 2 sites; and
- Additional due diligence audit checks to strengthen implementation of our audit policies.

Additionally, we will continue to explore modern slavery due diligence methodologies that complement our strong compliance foundation, including:

- Worker voice solutions to allow us to hear directly from workers in our supply chain; and

- Everyone's Business colleague visit app to allow all supplier-facing colleagues to share site observations with the ethical compliance team.

Within Foods, we have also continued to build on our compliance programme through the rollout of our worker voice programme for all first-tier UK supply sites. In 2023/24, 361 sites have taken part which means we have been able to hear directly from 40,807 workers in our UK supply base.

Another core pillar of our Foods Human Rights Standard is the requirement for our supplier partners to develop and embed a robust approach to human rights due diligence (HRDD) in their own operations and supply chain. Key suppliers (by volume and / or human rights risk) are 'nominated' to report on their approach and present this information to commercial, technical and human rights teams within the Foods business. In 2023/24 we reviewed 48 nominated suppliers' HRDD plans and processes in this way.

FOOD AUDIT PROGRAMME

During 2023/24, 18 non-compliances (compared from 38 in 2022/23) relating to 'employment is freely chosen' were identified through audits of in scope suppliers. These related to the payment of recruitment fees, lodging of security deposits or compulsory overtime, with the majority of those found in Thailand and the UK. More detail on our work in Thailand to address these systemic risks can be found on page 11 and in the UK on page 10.

CLOTHING & HOME AUDIT PROGRAMME

During 2023/24, 4 non-compliances (compared with 5 in 2022/23), under "employment is freely chosen" were identified in SMETA audits, including findings relating to management systems and freedom of movement. Audits previously identified two potential instances of recruitment fees. As a result, we commissioned research into common migration corridors and remediation best practice with an independent ethical trade consultant. We will continue to monitor the situation.





RISKS AND ACTIONS CONT.

REPORTING THROUGH OTHER CHANNELS

Any notifications of potential modern slavery issues and risks that are reported to us through other channels, grievance mechanisms, whistle-blowers or any other parties are thoroughly investigated and remediated where required.

In Foods, we partner with a number of initiatives that support our suppliers and workers in our supply chain to identify and report risk of modern slavery. Partnering with Unseen’s Helpline Business Portal enables us to be alerted to any reports of potential labour exploitation within the supply chain. This allows us to respond swiftly to any concerns, in collaboration with other retailers, suppliers and labour

providers, with Unseen providing valuable guidance in investigation and remediation.

Through the Modern Slavery Helpline and other reporting mechanisms, we received 11 allegations or reports with a potential link to labour exploitation or modern slavery in 2023/24. We fully investigate all allegations or reports we receive, following our internal Whistleblowing Standard Operating Procedure and in collaboration with relevant stakeholders and in conjunction with our suppliers where appropriate, to ensure remediation measures and risk mitigation measures are put in place. Examples of risks identified and mitigation actions this year within Foods include:

RISK	INDUSTRY OR FACTORY LEVEL	SOURCE	MIGRATION / REMEDIATION ACTION
UK – Seasonal Worker Scheme	Industry	Industry reports	See detailed section on our activity in the creation of the SWS Taskforce on page 10
UK – potential identity substitution	Factory	Supplier due diligence	Reported to relevant authorities for investigation and ongoing supplier vigilance
Sub-Saharan Africa – recruitment fees	Grower	Supplier due diligence	Third party expert support and ongoing supplier due diligence



This year, in Clothing & Home, (due to the majority of our supply chain workers being permanent and not seasonal) we received some notifications regarding conditions in our partner factories. However, those related to modern slavery risk were predominantly country- or sector- level as detailed below. The information was received from multiple channels, including:

- internal mechanisms: our due diligence, factory monitoring and worker voice programme;
- collaboration: our participation in partnerships and shared projects; and

- external stakeholders: notification from other external parties.

We investigate all allegations and put risk mitigation or remediation measures in place. These measures can either be at a factory level for local issues, or at a country or industry level for wider issues, acting in collaboration with other stakeholders where appropriate.

RISK	INDUSTRY OR FACTORY LEVEL	SOURCE	MIGRATION / REMEDIATION ACTION
Migrant workers	Country level	Internal mechanisms/Audit	See page 12
Homeworkers	Sector level	Internal mechanisms	See page 12



RISKS AND ACTIONS CONT.

FOOD SUPPLY CHAIN

UK AGRICULTURAL SEASONAL WORKERS

In our 2022/23 statement, we referenced our active support for the foundation of the UK Seasonal Worker Scheme Taskforce, to address emerging challenges in the recruitment of seasonal workers in UK produce post the UK's exit from the EU. The Taskforce's mission, as a multi-stakeholder initiative currently with more than 50 member organisations, is to "work collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK Seasonal Worker Scheme and wider UK horticulture". For more information on the Taskforce, see the [Stronger Together website](#).

Formed in March 2023, the Taskforce set out to achieve its mission in two ways. Firstly, developing practical actions that can be implemented within the current Scheme design to improve the responsible recruitment and employment of seasonal workers; and secondly, engaging relevant Government departments on potential changes to the Scheme rules, regulation, oversight and enforcement to address structural issues within the Seasonal Worker visa which may exacerbate worker exploitation risks and undermine efforts to safeguard workers' rights.

Activities delivered by the Taskforce last year included updates to the Just Good Work worker information app, mapping of existing grievance routes available to workers, development of a common Scheme Operator assessment methodology piloted with Pro-Force,

development and delivery of seven regional grower roadshows and a mid-season webinar – supported by a grower good practice toolkit, mapping comparisons of legislation relating to recruitment fees and related costs in different countries' seasonal agricultural migration schemes, and work to refine common policy asks for active engagement with relevant government departments. The Taskforce Workstreams have also been key forums for discussion of emerging salient risks and collaborative sharing of good practice to support continuous improvement.

M&S has supported the Taskforce not only through funding but also as one of two retailer representatives on the Governance Committee and through active involvement in workstreams. The plans for 2024 can be found on [Stronger Together's website](#).

SOUTHERN EUROPE

As we have previously reported, well-publicised risks around forced labour and modern slavery exist in Southern Europe – both in Italy (e.g., tomato processing) and in Spain (fresh produce). Seasonal production and high levels of migrant labour elevate this risk in both countries. M&S has supported several workstreams in Southern Europe over 2023/24 (and prior to this year):

ITALY

In Italy, following longstanding engagement in the Ethical Trading Initiative's Working Group on Italian Produce, we have continued to engage in ETI's subsequent programme, 'Grievance Mechanisms in Agriculture' (GMA), an ETI project funded by the UK Government's Modern Slavery

Innovation Fund III to improve access to grievance mechanisms for vulnerable agricultural workers. It also aims to improve information sharing on recruitment practices and emerging risks for migrant workers through the creation of a Modern Slavery Prevention Network in countries of origin and transit.

Bringing together a group of 20 retailers and suppliers, the initiative focuses on the agricultural supply chains of UK companies in five regions of both Spain and Italy. To understand the key factors affecting the availability, awareness, accessibility and use of operational grievance mechanisms among vulnerable agricultural workers, the initiative commissioned four research initiatives to be conducted in Italy, Spain, Tunisia, Morocco, Guinea and Senegal during 2023. In total, more than 100 stakeholders (employers, experts, organisations and academics) and just over 200 agricultural workers were interviewed, either individually or in moderated roundtable discussions and focus groups. A set of recommendations for UK and European businesses, producers in producing countries and organisations working in migrants' countries of origin and transit will be disseminated in early 2024.

Based on the findings and learning from the research, in 2024 the initiative will pilot effective operational grievance mechanisms at selected producer sites in Italy and Spain and continue to support the newly established transnational network of 37 civil society organisations in Côte d'Ivoire, Morocco and Tunisia to share and disseminate accurate information about the reality of irregular migration to North

Africa and Europe. More information on the initiative can be found on [grievance mechanism part of ETI's website](#).

SPAIN

In addition to our cross-sector work through the ETI programme outlined above, M&S undertook our own focused due diligence in the context of well-publicised human rights risks in Almeria. In 2021, we commissioned an independent risk assessment of one of our key Almerian produce supply chains, in partnership with our supplier, Fresca. The field work for the assessment took place in 2022 with a follow up verification visit in 2023/24. It was key that this assessment was both independent and focused on engagement with rightsholders (those employed by growers and packhouses in our Spanish supply chain) and other stakeholders within the sector. We therefore commissioned a third party, Verite, to carry out the independent assessment and to include a range of interviews with workers and other key informants. Following the assessment and feedback, M&S has continued to engage on the findings with the supplier and growers involved and conducted our own progress verification visit in late 2023. In line with our commitment to transparency, we have published [the summary findings of the Verite assessment](#), the agreed action plan and the progress update following our verification visit. Going forward, we will continue to work with Fresca, our growers, and key partners such as the Spanish Ethical Trade Forums to address the risks raised and to support further industry collaboration across the sector.



RISKS AND ACTIONS CONT.

FOOD SUPPLY CHAIN CONT.

THAILAND

During 2023, we continued our partnership with The Issara Institute, a non-profit organisation tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation in Thailand. We continued to make use of the updated Issara Partner Supplier Dashboard, which allows us visibility of information on recruitment and working conditions reported on a continuous basis directly by workers in our supply chain, through Issara's independent worker voice channels. From January 2024, we are transitioning from our sponsorship of Issara to supporting a more targeted programme of work on responsible recruitment more closely aligned to our supply sites in Thailand. We will report further on this developing work in future statements.

MODERN SLAVERY INTELLIGENCE NETWORK (MSIN)

M&S continues to play an active role in MSIN, a pioneering non-profit collaboration in the UK food sector that was created in 2020 in response to the findings of Operation Fort. Its aim is to share intelligence across the UK's food industry to understand patterns and trends of modern slavery and use these to disrupt traffickers.

During 2023/24, MSIN has continued to grow its membership and work with data sharing partner, Stop the Traffik, to run the MSIN intelligence sharing platform. Members have been encouraged to input data on incidents which have occurred in their businesses or supply chains into the anonymized data sharing platform, allowing other members to investigate similar issues or raise concerns within their own companies and supply chains. Members have gathered at monthly working group meetings as well as for the MSIN Annual Conference in September 2023 to share insights and review trends in modern slavery. The conference was attended by more than 150 industry and NGO representatives and included a keynote speech from the Rt Hon Theresa May MP. In 2024, MSIN will continue to focus on increasing the quality and quantity of intelligence processed, expanding its membership, and driving value for its members in the increased sharing of trends and insights.





RISKS AND ACTIONS CONT.

CLOTHING & HOME SUPPLY CHAIN

MIGRANT WORKERS

Labour migration is a complex phenomenon but not a new one; many countries rely on migrant workers to fill labour shortages and skills gaps and workers with limited opportunities in their home country move to seek better livelihoods. Done well, migrant recruitment has a transformative and positive effect for workers and host countries, but irresponsible recruitment presents challenges and risks for potential exploitation. While some fees may be reasonable and transparent, others can be exorbitant and exploitative, leading to a cycle of debt and vulnerability for migrants.

In 2023/24, following third party audits at two sites in the Far East, we identified unacceptable recruitment practices where migrant workers had paid recruitment fees, health check costs and/or passport/visa fees in their originating countries to secure their jobs.

We conducted investigations at the suppliers to understand the recruitment process and identify the role of all the stakeholders in host and origin countries (Government, Agents, Labour Brokers & Recruiters) and then commissioned research with external experts into recruitment corridors for migrant workers in our supply chain. The suppliers in the hosting country believed they are doing nothing wrong as they were following country law and generating job opportunities through Government bilateral agreements, but they are not checking if recruitment fees have been paid in the departing country.

Our Global Sourcing Principles state that “workers must not be charged recruitment or employment fees”. Finding ethical and sustainable solutions for labour migration when the issue is found, requires acknowledging its complexities, respecting migrant rights, and fostering cooperation between nations and organisations to ensure fair working conditions and shared benefits, as well as protection for workers.

We will continue to monitor the situation and strengthen our policies by; reinforcing communication of ‘no fee policy’; supplier training; carrying out recruitment due diligence mapping in the supply chain to identify where migrants are being hired in the supply chains, how they have been recruited and the costs they are likely to have incurred; and conducting further worker interviews in the migration corridors to gather more accurate and relevant data.

HOMEWORKERS

The question increasingly asked is “who made my clothes.” Workers in the lowest tiers are often not visible to brands because they work in off-site facilities, in their homes, public spaces outside their homes or small workshops close to their homes. While we gather worker demographic information in our 3rd party annual audits, including permanent and temporary workers, we acknowledge that homeworkers are “hidden” and not always identified in audits. In 2023/24, through our compliance teams visits we found 2 factories (in Vietnam and India) using homeworkers that were undeclared in their audits.

Historically, the lack of visibility of homeworkers in supply chains, combined with their complicated employment status in many countries, has made them a vulnerable group of workers. We believe that one of the first steps towards reducing the vulnerability of these workers is to take an open and positive position towards homeworking as sending home workers underground could trigger unintended consequences, prevent progress on improving their labour conditions or remove their sole means of income.

From the perspective of homeworkers, the opportunity to work from home can offer a degree of flexibility not met by traditional site-based work. Working from home, for many people particularly women, is a preferred alternative to working in a factory, as it can offer a degree of flexibility for individuals to balance the need of earning an income with domestic and family responsibilities.

In addition, workers can produce specialist components (which cannot be made by machinery), handicraft (e.g., beading, weaving straw products, hand embroidery, hand knitting/crocheting) or small quantities of intricate or high-quality items. Therefore, we have decided to accept homeworking in some situations, under specified conditions.

We acknowledge that monitoring and improving labour conditions for homeworkers is a complex issue, so we have strengthened our Homeworkers Policy and will publish this in 2024/25 to all suppliers alongside our responsible recruitment toolkit and we are putting procedures in place that seek to ensure improving the

conditions of the homeworkers and have produced a set of guidelines. We will work with our suppliers to monitor Working Conditions; Nature of Agreements; Working hours, Income & Payments; Access to Social Protection; Collective Voice of homeworkers in their supply chain, to mitigate this “hidden” risk and encourage transparency to ensure they are protected in line with our Global Sourcing Principles and guidance such as OECD guidance on Hidden Homeworkers toolkit and ETI Homeworkers toolkit.

COTTON SOURCING

Our Responsible Cotton Sourcing Policy prohibits cotton sourced from Turkmenistan, Uzbekistan, and the Xinjiang region of China due to the high-risk profiles of those countries. All supplier partners are required to declare the cotton country of origin and we regularly share updates to remind existing or new suppliers of this policy. Since September 2022, we have been testing samples of cotton monthly through the Oritain™ laboratory. Oritain™ are a leading forensic and data science company that analyse raw materials to detect naturally occurring elements in a product. Soil composition, climate, altitude, precipitation, and other environmental factors can reveal details of the products’ origin. This helps us to confirm the claim-origin of the cotton and verify any inconsistency with our policy and the prohibited source of origins. Having a strong due diligence programme in place has given us the opportunity to reinforce the dialogue with our supplier partners on cotton sources and gives us added assurance our policy is being followed.

RISKS AND ACTIONS CONT.

GNFR AND SERVICES

To ensure compliance with our minimum standards in our GNFR supply base, all our supplier partners are invited to complete a questionnaire and document-based management system assessment through the EcoVadis platform. This assessment covers the policies and processes supplier partners have in place, covering topics including employee health and safety, working conditions, social dialogue, diversity, child labour and human rights. Once a scorecard has been generated for a supplier, any improvements required are highlighted and issued to suppliers in the form of a corrective action plan, which is then actively monitored on the EcoVadis system.

UK OWN OPERATIONS

Last year we completed targeted modern slavery due diligence with suppliers in the UK and ROI and an initial step was to engage all supplier partners operating operational services (cleaning and waste management, security guarding, construction, warehousing and logistics) to understand more about their processes including their policies, due diligence, training, and whistleblowing channels. A risk assessment approach has continued this year with a focus on security and guarding, facilities management, cleaning and waste management and globally sourced goods not for resale.

FOOD LOGISTICS

Last year, M&S acquired Gist, our principal Food logistics provider, which operates via a network of 16 redistribution centres across the UK and ROI. The acquisition provides a platform to accelerate our plans to modernise our supply chain and support growth and allows us to take closer control of key decisions. Modern slavery and human rights formed part of the due diligence during the acquisition. This year we strengthened the working relationship with Gist's safety, health, environment and quality team who have oversight of human rights with their human resources colleagues.

CLOTHING & HOME LOGISTICS

From last year, our regular physical audit programme in all offshore Container Freight Station locations (CFS) restarted after Covid restrictions. Audits are completed by our International Sourcing Offices and UK Logistics team and they include questions on health and safety, wages, agency work and management systems.

INTERNATIONAL OPERATIONS

Following our investment in a new logistics hub in Croatia last year, we have extended our own due diligence and completed a risk assessment on this facility. The facility is managed by a third party, Maersk, and modern slavery controls were incorporated into contracts. Maersk publish their own Modern Slavery statement.

THIRD PARTY BRANDS

M&S work with over 150 third party brand partners since the launch of the Brands at M&S programme in 2021. We have a dedicated Brands ESG Manager, who works closely with our own label Clothing and Home Ethical Trade and Sustainability teams and this year the additional resource has been added to the Brands Sustainability & Safety Team to further support the roles of the team. We continue to carry out due diligence to understand more about how our brand partners source through a combination of desk-based research and interviews and an annual review of Brands was undertaken throughout the year. Our minimum requirements prohibit our partners from sourcing cotton from Xinjiang, Turkmenistan and Uzbekistan, and we also perform quarterly reporting to highlight changes in Brands ESG strategies. We continue to prioritise reducing the transparency risks by building relationships with our partners and following our risk assessment processes, ensuring minimum contractual requirements are in place to ensure that M&S policies are being met.



TRAINING AND AWARENESS RAISING

Our colleagues and supplier partners play a major role in helping us to identify and prevent modern slavery in our supply chain.

COLLEAGUE TRAINING

We have a mandatory e-learning module for our support centre colleagues that shines a light on the “People Behind the Product”. The module helps our colleagues to consider who the people behind our products are and to understand how the choices they make on a daily basis can impact the people who work in our supply chains. It includes fictional case studies from global supply chains. The module has been completed by 5,792 of colleagues across our Food, C&H, International, Bank and support centre functions, including Corporate Governance, Procurement, Digital and Data, HR and Property. The module is mandatory for new colleagues when they join M&S and will be completed by all colleagues on a bi-annual basis.

In our Clothing and Home business, we also conduct quarterly training sessions for new colleagues on socially responsible manufacturing, covering M&S’ approach to ethical trade in our supply chain.

Within Foods, in 2023/24, we continued our rollout of functional teams’ training by delivering a tailored, one day session for all technologist colleagues. This included identifying and reporting issues of modern slavery in both the UK and globally.

SUPPLIER PARTNER TRAINING

This year we delivered two Foods Supplier Exchanges with the objective of bringing our supplier partners together to engage on key topics, collaborate, and share best practice. This year, sessions covered responsible recruitment and human rights and environmental risk assessment.

In July 2023 we held an online workshop on modern slavery and forced labour risks for our Clothing & Home suppliers in Southeast Asia. This covered forced labour indicators, local risks, relevant legislation and best practice examples in mitigating forced labour risks (22 factories attended).

STRONGER TOGETHER / RESPONSIBLE RECRUITMENT TOOLKIT

In Foods, we continue to work with Stronger Together an impact-driven not-for-profit, working towards a vision of a world where all workers are recruited responsibly and have fair work free from exploitation. Since 2013, through our sponsorship, 2,354 individuals have attended modern slavery training, representing 773 sites and 563 individual businesses. For 2023/24 this represents 430 individuals, 194 sites and 146 individual businesses.

M&S Food has also sponsored the Responsible Recruitment Toolkit (RRT) since 2019, a comprehensive online tool and suite of training supporting businesses to ensure that all workers are recruited in a transparent manner that respects and protects their rights throughout recruitment, work and post-termination. Since 2019, 390 individuals have taken up at least one RRT benefit, representing 232 businesses. In 2023/24, this represents

an additional 58 individuals who have completed an RRT training course from 55 individual M&S suppliers.

Across the two programmes (Stronger Together and RRT), 37 M&S suppliers are business partners, 14 are Advanced Business Partners and 1 is an Advanced Verified Business Partner.

In 2023, M&S also began sponsoring Stronger Together’s South Africa Programme, to support South African suppliers to address the risk of forced labour within their businesses and supply chains. In 2023, 74 individuals have attended forced labour training, representing 41 businesses.

FOOD NETWORK FOR ETHICAL TRADE – RESPONSIBLE RECRUITMENT WORKING GROUP

M&S Food has been a supporter and member of the Food Network for Ethical Trade (FNET) since its creation in 2016. Many of our suppliers are also members, giving them access to tools, resources and peer exchange. FNET has been convening a working group dedicated to responsible recruitment in which M&S and many of our suppliers have been actively involved. Specifically, through the FNET working group and our collaborative membership of the SEA Alliance, we have also supported a multistakeholder project to assess recruitment fees and practices in the tuna processing sector.





PARTNERSHIPS AND ENGAGEMENT

We continue to work with partners to tackle modern slavery, understanding this as a crucial element of confronting some of the global challenges we face within the industry.

ORGANISATION	HOW IT SUPPORTS OUR WORK CONFRONTING THE CHALLENGE OF MODERN SLAVERY
International Accord	M&S were a signatory of the original Accord on Fire and Building Safety in Bangladesh (2013) and have since also signed the subsequent Transition Accord (2018), the Interim Agreement (2021), and the International Accord for Health and Safety in the Textile and Garment Industry (2021 & 2023). In January 2023, M&S also signed the Pakistan Accord on Health & Safety in the Textile & Garment Industry, as part of our ongoing commitment to working conditions in our supply base.
Clear Voice	Interpreting service specialising in telephone, face-to-face and video interpreting. The social enterprise run by Migrant Help allows us to speak to workers through translation during interviews.
The Coalition to End Forced Labour in the Uyghur Region	A coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China, known to local people as East Turkistan. M&S was one of the first companies to formally sign the Call to Action on human rights abuses to exit the Uyghur Region.
Ethical Trade Initiative (ETI)	Membership enables us to work collaboratively with companies, trade unions and civil society on difficult human rights issues, including modern slavery, which cannot be solved by individual companies working alone.
Food Network for Ethical Trade	M&S was a founder of the charitable organisation. FNET drives ethical trading down the supply chain and works with industry partners and suppliers on challenging ethical issues.
ILO Better Work Programme	M&S is a partner of Better Work, which is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect for labour rights for workers.
Reimagining Industry to Support Equality (RISE)	Formerly known as Empower@Work, RISE brings together the women's empowerment programs from CARE, Better Work, BSR's HERproject, and CAP Inc. P.A.C.E to deliver a unified approach to women's empowerment and gender equality in global supply chains. M&S has been a member since January 2023.
Institute for Human Rights and Business "Leadership Group for Responsible Recruitment"	Focussing on the Employer Pays Principle - Launched in May 2016, the Leadership Group for Responsible Recruitment is a collaboration between leading companies and expert organisations to drive positive change in the way that migrant workers are recruited. As part of this group, we are committed to the "Employer Pays Principle".
Issara Institute	Promotes a different model of issue detection based on an "empowered worker voice".
Modern Slavery Intelligence Network (MSIN)	M&S is a founding member of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.
Responsible Recruitment Toolkit	The Responsible Recruitment Toolkit (RRT) is an unparalleled online capacity building tool to help business understand, achieve and demonstrate responsible recruitment. RRT is an initiative of not-for profit Stronger Together.
Seafood Ethics Action (SEA) Alliance	The Seafood Ethics Action (SEA) Alliance is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights. Members include many of the UK's major retailers and seafood businesses, alongside retail and industry trade bodies.
SEDEX	Sharing data significantly increases efficiencies for M&S. The platform creates consistency across supply chains, making it much easier for suppliers to take action.
Spanish Ethical Trade Forums	Collaborative initiative delivering dialogue & engagement between the fresh food industry supply chain and its stakeholders, while obtaining relevant impacts, raising awareness, developing solutions and improving workers' lives.
Stronger Together	Multi-stakeholder business-led initiative aiming to reduce modern slavery by providing guidance, training and resources in the UK, Spain and South Africa.
Unseen Modern Slavery and Exploitation Helpline and Business Portal	Sponsorship of the Modern Slavery and Exploitation helpline and intelligence from the portal helps us to investigate live issues within our supply chains.



OUR PRIORITIES FOR THE YEAR AHEAD

ONGOING COMMITMENT

Train our colleagues to raise awareness of our corporate responsibility and train suppliers and assess their ability to detect and mitigate modern slavery risks.

Strengthen our network of supply chain intelligence to build supplier partner capacity, and work with leading forced labour experts on bespoke due diligence audits.

Identify risks regarding recruitment practices of third-party labour providers in M&S operations and supply chains.

Identify and use opportunities for collaboration to verify and help resolve risk issues.

PLANNED ACTION FOR 2024/25

Colleague Training

C&H: Expand Everyone's Business App in all Sourcing Offices, a human rights toolkit to allow M&S colleagues to raise any issue of concern internally when visiting our supply chain.

Foods: Build on training delivered in 2023/24 to technical colleagues by rolling out e-learning tool.

International: Ensure that all new Directors of owned or JV boards are trained in their role and responsibilities regarding health, safety, risk management, third parties and employees

Strengthening supply chain intelligence and capacity

C&H: Review worker accommodation where provided and re-publish Responsible Hostel Guidelines.

Foods: Build on combined human rights / environmental risk assessment of top 50 raw materials by prioritising key areas for e.g. policy review, further programming etc.

Identifying risk with third party providers

C&H and Foods: Investigate new horizon scanning and risk tools to identify global issues & increase collaboration to resolve key concerns.

International: Risk-assess 3rd party contractors i.e. cleaners/security guards (Czech, Greece & India) and tailors (in Czech & India only)

All Franchise partners will complete the International Franchise Modern Slavery Risk Assessment annually as currently Franchise partners are not required to demonstrate proof to M&S that they have their own due diligence processes in place

Industry collaborations

C&H: Re-assess existing Social Dialogue Programmes and Grievance Mechanisms in key sourcing locations.

Foods: Continue active support for, amongst others: Stronger Together, RRT, Unseen's Modern Slavery Helpline Business Portal, MSIN, the UK SWS Taskforce, Spanish Ethical Forums and the ETI Grievance Mechanisms in Agriculture programme.