



# MODERN SLAVERY STATEMENT

2018/2019

# INTRODUCTION



**From the boardroom to all our stores and support functions we fully support the [Modern Slavery Act 2015](#) (the 'Act') requirements on organisations to manage risk and prevent modern slavery in their business and supply chain**

The fact that modern slavery and human trafficking still exist today is abhorrent; eradication of these crimes requires collaboration and transparency which we welcome. We always aim to leverage our size and unique capabilities to do good; as a large business trading in several countries, with a wide-reaching supply chain, we know we have the opportunity to make a difference by taking positive action.

**OUR APPROACH:** We have worked to identify areas where there is potential for modern slavery and assign resources where they are most needed. There is huge value in partnering and collaborating with others, sharing experience and best practice in the common goal of preventing modern slavery. Given the scale and complexity of our supply chain, our initial focus has been on our first-tier suppliers (those suppliers that provide goods or services directly to our business), where we have the most influence and can make more immediate contact. Responsible Sourcing and ethical business are embedded in our company values 'We help everyone enjoy amazing technology'. We recognise our size and influence as a tool for good and aim to work with our suppliers to give customers peace of mind that their purchases are free from forced labour and exploitation.

“ For customers to enjoy our amazing technology, they need peace of mind that we’re sourcing it responsibly. As a leader, how seriously we take this can make a big difference to many people. And we do take it seriously. I’m determined that we make sure that forced labour and exploitation have no place here: that no-one who supplies us has any tolerance for them. That we can look ourselves in the mirror, and our customers can be sure that, in giving us their money, they’re supporting a force for good in the world. ”

Alex Baldock (Group Chief Executive)

This is our fourth statement on modern slavery and human trafficking and is made pursuant to section 54(6) of The Act. The statement covers our financial year ending 27 April 2019 and is endorsed, approved and adopted by the following operating subsidiaries: Carphone Warehouse Limited, DSG Retail Limited, Simplify Digital Limited & CPW Technology Services Limited. The named subsidiaries are those with an annual turnover greater than £36m in 2018/19, however the statement applies to all subsidiaries regardless of size.

This statement was approved by the board of Dixons Carphone plc

**Alex Baldock**  
Group Chief Executive 24 July 2019



# GOVERNANCE AND COMMITMENT



**Modern Slavery has been a biannual agenda item, for both our Executive Committee, chaired by our CEO, and for our Board, presenting progress on our actions, strategy and 3-year plan**

Our Group Chief Executive has overall responsibility for the Modern Slavery agenda and actions. Additionally, our Ethical Social and Governance (ESG) Committee, chaired by our General Counsel and Company Secretary with members of our Executive Committee and Board in attendance, meet quarterly and modern slavery/responsible sourcing regularly feature in discussions. We have also recently

formed our Group Ethics Supply Chain Compliance Committee, to meet quarterly and review alerts raised during supplier background checks and review any new vendor applications that have been flagged as a potential risk.

This year we are expanding our efforts in responsible sourcing and tackling modern slavery, collating existing actions and working on new initiatives across our business that incorporate what ‘responsible sourcing’ means to us (further information can be found in the policies section of this Statement). Responsible Sourcing goes beyond Modern Slavery and Human Trafficking to include workers’ rights, plastics reduction, supplier capacity building, ‘environment, anti-corruption and social impact. We became members of the [Ethical Trade Initiative](#) (ETI) in October 2018 and this will also help us drive continuous improvement and enable us to share trends, concerns and best practice with other members.

“ I have been proud to work on the topic of Modern Slavery for Dixons Carphone since before the Act gained Royal assent. During that time, I have seen the work that we do increase year on year and the awareness from our board, senior management and other colleagues improve significantly. Whilst we as a society still have some way to go to eliminate Modern Slavery, I am confident that Dixons Carphone is a business that takes its obligations seriously and we will use our scale to influence our suppliers as well as collaborate with our peers and NGO’s to make a wider impact. ”

Simon Murray (Group Responsible Sourcing and OEM Standards Manager)

## KEY ACHIEVEMENTS in 2018/2019

Sent our workers’ rights questionnaire to all OEM (Original Equipment Manufacturer), Greek and Nordic suppliers. This was in addition to sending to all UK & Ireland suppliers in 2017/18 and completed this process for our Group. Currently engaging with responders that are flagged as potentially high risk, to clarify their answers and, if appropriate, work with them to mitigate risk

Made significant progress on building supplier database to collate Group data and systematise the supplier risk assessment process

Offered a victim of Modern Slavery a 4-week paid work placement through [Project Bright Future](#), led by the charity [City Hearts](#) and giving victims of slavery a route into paid employment

2 additional colleagues successfully completed the [SA8000](#) Social Systems Lead Auditor Course

Commenced roll-out of driver face to face ‘spot the signs’ training

Created Dixons Carphone’s Responsible Sourcing Standards setting out the high values we expect from our suppliers/partners and their supply chains regarding human rights, labour, environment, anti-corruption and social impact

Issued our Modern Slavery Policy to all OEM (Original Equipment Manufacturer), Greek and Nordic suppliers. This was in addition to sending to all UK & Ireland suppliers in 2017/18 and completed this process for our Group.

Created and communicated our Responsible Sourcing Policy internally; aimed particularly at colleagues involved in procurement to hold our suppliers to the Responsible Sourcing Standards

Added two new members to our UK based Responsible Sourcing team

Joined the Ethical Trade Initiative

Written training delivered to front line managers in our national distribution centre

# STRUCTURE OF BUSINESS AND SUPPLY CHAIN



## We are Europe's leading specialist electrical and telecommunications retailer and services company

We provide a complete solution for customers across the value chain offering a comprehensive range of electronic and mobile products, connectivity and expert after-sales services.

We are the market leader in every market that we operate in. Our brands, which include Currys PC World, Carphone Warehouse and ID Mobile in the UK & Ireland, Elkjøp and Elgiganten in the Nordic countries and Kotsovolos in Greece all provide nationwide presence. We also operate under the Dixons Travel brand within UK airports as well as in Dublin and Oslo. Our service brand is Team Knowhow in the UK, Ireland and the Nordics.

The organisation is divided into a number of subsidiaries, full details of which can be found on our [corporate website](#).

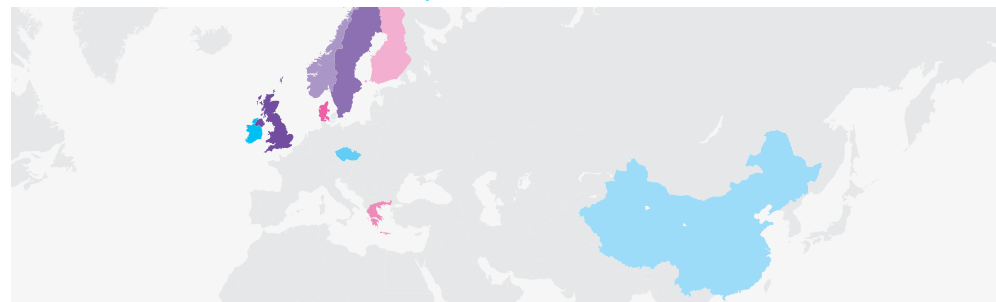
The company has two main divisions: Group (including UK & Ireland) and International (including Nordics and Greece). Our business in UK & Ireland, the Nordics and Greece are each supported by their own support centres (head offices) and distribution network, with each procuring goods for resale (i.e. products to be sold in our stores) and goods not for resale (i.e. service providers such as catering and cleaning, construction services, IT partners, etc.).

### OEM

Our OEM (Original Equipment Manufacturer) operation, based in Hong Kong, sources many product types that are sold in our stores under our own or licenced brand names. We currently work with 123 suppliers across Asia and Europe. Auditing and risk assessment are integral to our supplier selection process and their ongoing relationship with us, and we have been carrying out this work for many years. We have taken advantage of this wealth of experience to understand our wider business and supply chain, and when creating our support functions, including the Responsible Sourcing team based in London.

## OUR BUSINESS

Headline Revenue **£10,433 million**



42,000 staff in total

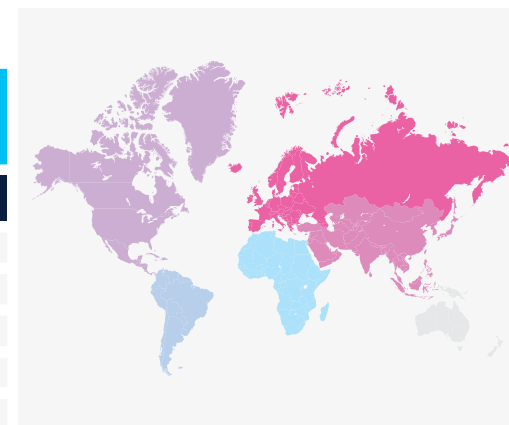
66.2%	United Kingdom	6.2%	Denmark	2.7%	Republic of Ireland
7.8%	Sweden	5.8%	Greece	1.6%	Czech Republic
6.6%	Norway	2.9%	Finland	0.2%	China (Inc. Hong Kong)

## SUPPLY CHAIN

We source from **12,000** first-tier suppliers

We source from 39 countries

69%	Europe
21%	Asia
5%	North America
3%	South America
3%	Africa



Number of stores

UK & Ireland **991**

250	Nordics	70	Greece
161	Franchise	25	Franchise
411	TOTAL	95	TOTAL

# POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING



## In 2018/19 we have focussed on issuing our Modern Slavery policy, created last year, both internally and externally.

It has been communicated to all our 12,000 Group suppliers both branded and Own Brand (OEM) alongside our Workers' Rights Questionnaire. As well as completing the questionnaire, we ask suppliers to confirm they have read and will adhere to our [Modern Slavery Policy](#). The questionnaire and policy are also part of our onboarding process for new suppliers in the UK and Ireland and we are working with our colleagues to make this part of our process for the Nordics and Greece.

The process of ensuring supplier conformance with this policy has been challenging, given somewhat disappointing response rates to our Questionnaire. We continue to encourage our suppliers to engage with us as we work on reducing risks of modern slavery in both our business and supply chain. To achieve this, we are evolving our due diligence process to be more risk based, requesting questionnaire completion from only those suppliers that operate in countries or sectors that have been identified as higher risk.

We have advanced beyond our [Modern Slavery Policy](#) by writing our Responsible Sourcing Policy and [Standards for Responsible Sourcing](#), which go beyond Modern Slavery and Human Trafficking issues to also include our minimum requirements in human rights, labour, environment, anti-corruption and social impact. The Standards also reference the [ETI base code](#), in conjunction with our foundation membership to their organisation this year. The goal of the Standards is for continuous improvement, working with suppliers to improve their position rather than excluding them.

“ We require our OEM suppliers to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place and will look to expand that to other areas of our supply chain in the coming year. ”

However, if necessary, we may need to delist a supplier or terminate a contract in response to a related non-compliance. At the time of writing the Statement, we are in the process of issuing the Standards to all our Group suppliers and these will also be included in all new supplier contracts for UK & Ireland, as well as starting the process of embedding them in all other territories.

We worked in conjunction with the [British Retail Consortium](#) (BRC), [Gangmasters and Labour Abuse Authority](#) (GLAA) and [Stronger Together](#) to draft and collectively approve a [Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain](#). We have adopted the principles of the protocol as guidelines for action if a case of Modern Slavery is found here in the UK.

We have also reviewed our other company policies and, where appropriate, have/will include reference to the Modern Slavery Policy when they become due for review and updating.

## 2019/2020

- Highlight supplier best practice regarding our Responsible Sourcing Standards
- Issue Responsible Sourcing Standards to all suppliers
- Communicate Protocol for Handling Modern Slavery cases to our UK suppliers

# DUE DILIGENCE PROCESS



## Key activities during 2018-2019

### WORKERS RIGHTS QUESTIONNAIRE:

We have issued our questionnaire to all first-tier suppliers. The questions are designed to risk assess our suppliers for modern slavery occurring in their business and supply chain and request adherence to our modern slavery policy. We review responses from suppliers and engage on potentially high-risk answers to clarify our understanding and mitigate any concerns. In reviewing the responses many of the 'high risk' answers were misunderstandings, particularly when asking if the supplier keeps 'copies of' or 'original' passports. Of the responses received 9% required additional follow-up given the potential high-risk answers provided. Following this additional engagement less than 2% of the suppliers who responded remain categorised as 'high-risk' as we engage further to mitigate our concerns.

### ETHICAL AUDITS FOR OEM SUPPLIERS:

Our OEM suppliers are audited prior to selection against our own strict audit criteria and operating procedures. This year we have completed 93 ethical audits across our OEM operation. We work closely with suppliers to monitor non-conformances and ensure issues are resolved to our satisfaction. (Detailed further in monitoring section below).

### IDENTIFYING TRENDS/RECURRENCES:

Like many other companies with global supply chains, our most commonly occurring discovery from ethical audits is the occurrence of excessive working hours in countries such as China. We have been working to address this and have set suppliers a target for continuous improvement. We are also working with likeminded companies through our ETI membership to share learnings and identify areas for collaboration.

“ Our OEM suppliers are audited prior to selection against our own strict audit criteria and operating procedures. This year we have completed 93 supplier ethical audits across our OEM operation. We work closely with suppliers to monitor non-conformances and ensure issues are resolved to our satisfaction. ”

### ENHANCING COMPLIANCE CHECKS:

Recognising the scale and complexity of our first-tier supply chain, we know audits are key but not standalone, but form one part of the due diligence solution. This year we have started to enhance our existing compliance checks to include ethical and modern slavery risks for UK & Ireland suppliers in addition to sending our workers' rights questionnaire. We have also created our Responsible Sourcing Policy and Standards detailing our requirements of suppliers in human rights, labour, environment, anti-corruption and social impact.

### CREATING OUR GROUP SUPPLIER DATABASE:

We are finalising the creation of our group supplier database, combining compliance and finance data from all areas of our business and from several different systems, refining the data from a complex supply chain. We appreciate the effort such questionnaires take on the part of our suppliers, so this database will allow us to only contact recently active suppliers for this information as we recognise these are the suppliers we can effectively engage with. Analysing the data with this improved methodology will enable us to report more accurately on supplier engagement and risk.

### MODERN SLAVERY THREAT ASSESSMENT:

As part of our membership of the [Slave Free Alliance](#) (a best practice scheme and part of [Hope for Justice](#), a leading global modern slavery charity) we benefited from a two-day modern slavery assessment at our National Distribution Centre, which evaluated our policies and procedures for exposure to risk. (Detailed further in Case Study below).

## 2019/2020

- Realign our resources towards the higher risk suppliers, assigning targeted questionnaires based on a suppliers' country of registration and type of business
- Start process of extended enhanced supplier compliance checks to include ethical and modern slavery risks beyond our UK & Ireland business

# RISK ASSESSMENT



## Exposure to risk is dynamic and so our assessment changes to accommodate these fluctuations.

With our industry collaborations including the BRC, ETI and Slave Free Alliance, we keep ourselves aware of changing and emerging issues within our supply chain. We combine this awareness of modern slavery, internal expertise and ethical audits with the [Global Slavery Index](#), which we also use to assess country risk.

Given the size of our supply chain we have evolved our risk assessment process from focusing on key areas of potential risk within our business and with our distribution partners in the UK in 16/17 to contacting all suppliers by the end of 18/19 to now moving to a more targeted and risk focussed approach in order to use resources more impactfully in 19/20 and beyond. Our initial assessment involved focussing on high risk industries and getting to know those suppliers with potentially higher levels of risk. We then evolved the process to contact

all 12,000 suppliers with a workers' rights questionnaire asking questions about age of workers, confirming worker ID, freedom of movement etc. Contacting 12,000 suppliers with a questionnaire has been challenging and hence our third phase of the evolution of this risk assessment will be to assess all suppliers on country of registration (using the Global Slavery Index risk rating) and type of business (SIC code) beforehand and then ask more targeted, relevant questions to particular sets of suppliers according to their risk rating. This will ensure resources are focussed on the countries, products/materials and industries where modern slavery is more prevalent.

With recognition that some suppliers' manufacturing location and type of industry varies, our risk assessment is an ongoing process. Below we have identified some areas we consider to be of higher risk.

### AREAS OF RISK

**Distribution:** We consider distribution an area of higher risk in our business as there are typically higher levels of migrant and manual labour within this sector. By way of mitigation, we asked Slave Free Alliance to carry out their Threat Assessment at our national distribution centre (case study below)

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and we will carry learnings from this to the rest of our distribution network. This adds to our work last year on assessing our external distribution network of 3rd party couriers.

**Natural Stone:** Sourcing of natural stone for our kitchen operation in the Nordics was considered as an area that could carry higher risk, given the difficulties in supply chain transparency and the potential to source from high risk countries. Our Responsible Sourcing team visited our warehouse in the Czech Republic to better understand their operation and supply chain. We also engaged with a major UK supplier of natural stone to help us gain a better understanding of this material.

**Raw Materials:** Given the complexity of our supply chain and the number of tiers between us and raw material suppliers we are working with the ETI to help identify high risk materials and/or components to identify areas where we will need to focus efforts to get back to source.

**Recycling partners:** Given the manual labour involved in waste and recycling, we recognise this is as an area we wish to explore further. Next year we will work with our waste and recycling partners to review, audit and look at ways to mitigate risk in this area.

**Countries of higher risk:** As a global business with a wide-reaching supply chain, working with suppliers in particular countries remains an area of risk. We keep abreast of emerging issues through collaboration with the ETI, BRC, SEDEX and other organisations and take targeted supplier engagement actions to mitigate concerns such as excessive working hours and natural stone.

## 2019/2020

- Review our waste and recycling partners for risk of modern slavery/ workers' rights
- Work closely with all labour providers across our network to ensure we fully understand their recruitment practices

# EXPERT ADVICE AND COLLABORATION



**We recognise that the issues of modern slavery and human trafficking require collaboration across private and public sectors organisations, states and civil society.**

We welcome collaboration on the topic, learning from others and sharing our own experiences and best practice.

## KEY EXAMPLES OF COLLABORATIONS:

**BRC - (Ethical Labour Working Group + Better retail better world)**



We worked in conjunction with the British Retail Consortium (BRC), Gangmasters and Labour Abuse Authority (GLAA) and Stronger Together to draft and collectively approve a Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain.

## SEDEX



Networking and sharing opportunities at events on the topic as well as shared audits

## Slave Free Alliance



This membership organisation gives us access to expertise around modern slavery in the form of in-house investigations, crisis response, due diligence review and training.

“ Whilst the placement created a few challenges, we worked closely with the candidate and charity partners to overcome those issues. Despite it not leading to a permanent appointment, we learnt from the experience and found it to be very positive overall. We look forward to offering the opportunity to another victim of slavery in the near future. ”

Dixons Carphone colleague involved in Project Bright Future

## ETI



Membership gives us access to expertise and other members experience as well as specific modern slavery updates in the modern slavery working group. We are required to report on actions and progress annually which will help us drive year on year improvement.

## Bright Future

### Bright Future

We are proud to be part of this scheme offering victims of modern slavery a pathway to paid employment. This year we hosted our first victim of modern slavery for a four-week paid placement, unfortunately they were unable to complete the placement due to personal reasons. This only serves to highlight the complex needs of victims and that offering paid employment is only part of their journey to moving beyond the traumatic experiences of slavery. We have taken our learnings from this process back to Project Bright Future so that other companies involved in the scheme can benefit.

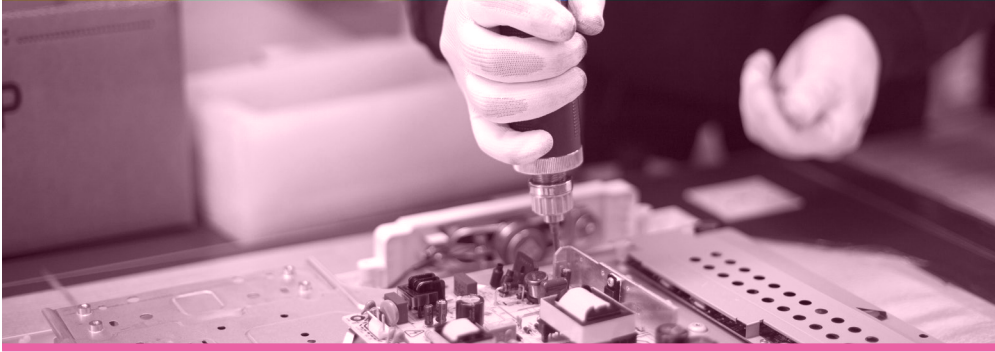
## Other

We sought and received feedback from NGOs on the quality of our statement. We have taken comments on board and made the relevant amends where possible with a view to further improvements year on year.

We believe collaboration is key to building and maintaining strong, long-term relationships with our suppliers. We have traded with approximately 20% of our current Own Brand (OEM) suppliers for 10 years or more and nearly 50% for 5 years or more, allowing us to mutually benefit from the partnerships. We welcome greater collaboration with our suppliers, and this is an area we aim to build on as we collect better data on our suppliers and improve our ways of communicating with them to be more open so that any supplier concerns regarding risks of modern slavery can be shared and remediated immediately.



# MONITORING AND IMPACT



## Our ways of monitoring action and impact are constantly evolving.

Currently we have the following in place:

### Monitoring of our global whistleblowing hotline:

Monitoring of our whistleblowing hotline: this year we have received 460 calls to the confidential line. The majority of these were related to colleagues but none referred to modern slavery or human rights concerns. The audit committee review all the calls received biannually to ensure they have been appropriately dealt with. We appreciate the lack of associated calls to the line and have increased awareness of modern slavery through training and adding modern slavery to our whistleblowing posters this year.

### Monitoring non-conformities in relation to our OEM supplier factory audits:

Monitoring non-conformities in relation to our OEM supplier factory audits: Our audits include several topics including child/young labour, working hours, wages and deductions, overtime, working conditions and safety, freedom of movement and association, discrimination and disciplinary practices. Factories are audited prior to selection and once approved they remain subject to regular audits throughout our trading relationship. We work with suppliers to assist them in improving conditions for workers. Where issues have been found, we believe working with the supplier to make improvements is better for workers than immediate withdrawal, however, if improvement is not possible, they will not be approved as a supplier or delisted as appropriate.

“ Our audits include several topics including child/young labour, working hours, wages and deductions, overtime, working conditions and safety, freedom of movement and association, discrimination and disciplinary practices. ”

An audit gives a red result if a supplier fails to meet satisfactory levels in relation to social and ethical standards. In all cases we request a corrective action plan and work closely with the supplier to ensure non-conformances are remedied.



NUMBER OF ETHICAL AUDITS COMPLETED
NUMBER OF RED AUDITS
NUMBER SUPPLIERS REJECTED AT AUDIT/DELISTED

### Monitoring of OEM audit analysis:

Alongside the audits and corrective action plans (CAPs) at individual factory level, we monitor trends in findings to drive impact. This year we have engaged with suppliers on the issue of working hours and will continue to monitor progress following this intervention to assess impact.

### Monitoring of supplier workers' rights questionnaire responses:

Our questionnaire and modern slavery policy have been sent to all first-tier suppliers. Responses (or lack of) contribute to our supplier risk assessment leading to follow-up engagement, if deemed necessary.

## 2019/2020

- Review our whistleblowing procedure to assess ways to raise awareness of the facility with regards to modern slavery
- Continue monitoring suppliers through our improved, risk-based approach to due diligence

# TRAINING AND AWARENESS



## Our strategy for modern slavery training involves raising awareness across our business, giving confidence to our colleagues to flag any concerns.

We know modern slavery thrives when it is hidden and so empowering colleagues to understand the crime and know how to report concerns internally and in their communities is essential. Given the scale and complexity of our supply chain, we see the best way of impacting change on the topic is challenging first-tier suppliers to make changes in their own business and filtering those learnings down their supply chain, making suppliers realise how these changes could benefit their own business. We plan to roll-out targeted supplier training as well as utilise training from 3rd parties such as the ETI in the coming year to assist them in their journey.

We also consider this training essential for our colleagues, in order to embed our Modern Slavery and Responsible Sourcing policies

as well as the external facing Responsible Sourcing Standards. We understand this training also helps to embed our approach to the topic when engaging with suppliers, and its impact goes beyond just impacting us as a business and hope to continue this benefit in the communities in which we serve.

Our efforts to increase knowledge and understanding of modern slavery issues is not just for high risk areas of the business. We have regular posts on our Modern Slavery Awareness Group on our internal online communication platform. We updated our whistleblowing posters to include reference to modern slavery and encourage concerned colleagues to phone the confidential line. With the help of Slave Free Alliance, we spoke with a number of colleagues at our National Distribution site in Newark across the 2-day site assessment. We believe that our approach to modern slavery is proportional for our business risk and we endeavour to continue raising awareness of the issue and striving to make further improvements year on year.

Alongside wider awareness raising, our key area of training this year was providing written training to all management, HR and recruitment colleagues across our distribution network. We hoped to have rolled out a new

“ I was made aware of modern slavery through work- I wasn't really aware it was such an issue in the UK! From talking to colleagues, I knew how to spot the signs, so when I noticed something concerning locally, I phoned the modern slavery helpline to make a report. I hope my report proves to be a false alarm however if I am proved right, I'll be glad I took action. ”

Dixons Carphone colleague April 2019

online training module for all UK & Ireland colleagues for onboarding and refresher training this year, however due to changes with our company values, this has been delayed and will be completed in 2019-2020.

We have piloted face-to-face modern slavery training to a group of 50 of our delivery drivers. Whilst not identified as a high-risk group of colleagues in themselves, they visit homes in the communities in which we work, carrying out 5 million deliveries and installations a year. By being made aware of the signs of modern slavery, we hope they will feel empowered to raise any concerns they come across when delivering or installing our products.

This year two Responsible Sourcing colleagues completed the SA8000 Social Systems Lead Auditor Course, giving us additional capacity when conducting supplier or own operation visits enabling us to maintain an ethical focus.

## 2019/2020

- Roll-out modern slavery training to all our delivery drivers in the UK and Ireland
- Launch a new online training module which will include awareness raising of modern slavery, this will be included in new starter onboarding training and mandatory training for all UK & Ireland employees on an annual basis
- Conduct targeted Supplier training and/or capacity building

# CASE STUDY

## NATIONAL DISTRIBUTION CENTRE: THREAT ASSESSMENT



### A modern slavery threat assessment was carried out at our UK National Distribution Centre in Newark, as part of our membership of Slave Free Alliance.

This site was selected due to the perceived high risks in distribution and warehousing in the UK, as well as the number of migrant and agency colleagues working there during our peak seasons; all of which are potential contributors to the risk of modern slavery. It was felt that this would be far more productive than a mostly paper-based exercise at our office in London.

The 2-day assessment involved a review of our policies and procedures in relation to modern slavery and recruitment, a review of worker records, as well as interviews with workers, management and labour providers. The findings were mostly positive and have reassured us in the effectiveness of our long-standing welfare practices. Senior management commitment to the topic was

also evident and strong mitigating influences for risk such as: high calibre of staff, relatively high levels of spoken English (functional skills workshops including English lessons available), strong recruitment and HR processes, ID cards across the site, excellent communication forums, and a culture where workers feel able to share concerns or grievances.

“ We are pleased to see that Dixons Carphone is adopting an industry leading stance on the issue of modern slavery. Their staff have been working proactively with Slave-Free Alliance to identify and mitigate Modern Slavery risks on their sites and within their supply chains. ”

Ben Cooley, Chief Executive Officer  
Hope for Justice

The recommendations from the report highlighted areas where we could further improve in our processes. Taking onboard these recommendations, raising overall staff awareness and working closely with our recruitment providers both at Newark and our regional distribution centres form part of our actions for 2019-2020.

## FUTURE STEPS FOR 2019-2020

Take learnings from Slave Free Alliance Threat Assessment to our other distribution centres

Look to take on more Bright Future candidates

Work closely with labour providers to ensure stringent recruitment processes and modern slavery awareness

Embed modern slavery content for a new online company training module

Continue to welcome opportunities for collaboration where there is a plethora of problems that we cannot tackle alone

Continue roll-out of driver modern slavery training

Targeted supplier training and capacity building

Work closely with our waste and recycling partners for modern slavery/ workers' rights mitigation

Improve guidance for colleagues if modern slavery is found in our business or supply chain