

Our policy on:

Human Rights

Policy Owner: Chief People Officer

Last Updated: April 2024

Version: 3.0

This policy applies to...

All divisions, operations and supply chains

In a nutshell

Our customers want to be confident that the people who are part of the complex supply chain that makes sure that products are on our shelves are not being exploited or exposed to infringements on their human rights. Although the primary duty to protect human rights sits with national governments, we fully recognise our responsibility as a company to respect human rights throughout all our operations, including our own business and our supply chains.

Our principles

We adhere to the following key principles in order to meet our obligations in respecting human rights:

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| Our vision | To be a truly inclusive place to work and shop, which includes treating people fairly wherever they are in our business and supply chains. |
| Our duty | We understand our duty to respect human rights and this policy is developed in line with the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, acknowledging that our business has a greater impact on particular human rights. |
| Zero tolerance | We do not tolerate any form of human rights abuse within our company or supply chains. We have policies and processes in place to avoid causing or contributing to adverse human rights impacts through our activities and are committed to addressing such impacts if they occur. |
| Continuous review | Our key policies and priority areas relating to human rights are outlined below and we reserve the right to amend and update these as our understanding of the human rights impacts of our business operations changes and grows. |

Due diligence

Through our due diligence processes, we seek to identify, prevent or mitigate adverse human rights risks that are linked to our operations, products or services and where possible, remediate any adverse impacts caused.

Our commitments

As well as our key principles, we also have a number of commitments to support us in achieving our vision. Respect for human rights, decent work and diversity in our operations and supply chains is important to us. We are committed to uphold and respect the:

- United Nations (UN) declaration of Human Rights
- UN Guiding Principles on Business and Human Rights ILO Core Conventions

As part of our vision to be the most inclusive retailer and our commitment to diversity, we have signed up to the UN Women's Empowerment Principles that promote gender equality and women's empowerment as well as Stonewall and the Women in Finance Charter.

We encourage our suppliers to sign up to these commitments for their operations and supply base. We encourage all our suppliers to go beyond compliance and make commitments to uphold and respect human rights, decent work and diversity and implement and promote these within their operations and supply chains. We work with suppliers to carry out human rights impact assessments, and publish key findings and action plans. We want to make sure that workers' complaints and disputes are resolved and human rights violations are remediated through a transparent, accountable and agreeable dispute resolution process.

For our own operations, we publish annual key gender pay gap data. We also voluntarily report on our ethnically diverse and black pay gaps.

Our commitments to colleagues, customers and suppliers:

Colleagues

Being an inclusive business with diverse representation at all levels is important to us. We are committed to be a truly inclusive retailer where every single one of our colleagues is treated fairly, with respect and can fulfil their potential. We make public commitments on wellbeing, achieving diverse representation in leadership and inclusion and report on our progress regularly.

We have a zero-tolerance policy on discrimination, bullying, harassment, sexual harassment, victimisation or any other treatment towards individuals or groups which has a negative impact on the way they feel at work. We have guidance for all colleagues and managers on what we mean by these behaviours and the protected characteristics under the Equality Act 2010.

We strive to create an environment where colleagues can talk openly and reach out for help if they need to and know that they are listened to without judgement. We encourage all colleagues who are experiencing or are aware of any form of

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| | <p>discrimination, bullying, harassment or victimisation to raise it to their manager (or another manager or our ER team if they feel unable to raise it with their direct line manager). Any allegations deemed to be of this nature are formally investigated and heard in line with our Fair Treatment policy. Outcomes may include disciplinary action up to and including dismissal.</p> <p>We recognise that experiencing discrimination, bullying, harassment or victimisation of any kind may have an impact on an individual's mental health. We offer sources of support to any colleagues who are affected by these issues, such as our independent and confidential Employee Assistance Programme.</p> <p>Our Fair Treatment policy is also in place for other types of complaints whereby there may be informal actions we can take to support colleagues to reach a resolution (e.g., conciliation or mediation) or the formal investigation and hearing process can be followed where appropriate.</p> <p>Additionally, we have a range of people policies which protect our colleagues' human rights, including, but not limited to: inclusion, holidays, working time, pensions and health and safety. Many of our policies go beyond the minimum provisions outlined in law such as our carers, family leave and colleague recognition policies.</p> |
| <p>Customers</p> | <p>Our commitment extends to our customers as we develop new products and services that meet diverse needs and create a shopping environment where people with different needs feel valued and respected, whether they are families with children, people with disabilities or carers regardless of their age, first language, religious beliefs, gender, sexuality or other circumstances. We want all our customers to feel welcome when they shop with us.</p> |
| <p>Suppliers</p> | <p>Sainsbury's and Argos suppliers to meet our Code of Conduct for Ethical Sourcing which is based on the ETI Base Code. This Code of Conduct outlines respect for the human rights of workers in our supply chains including, but not limited to, protections around working hours, health and safety, discrimination, forced labour, child labour and wages. This Code of Conduct should be adopted as a minimum standard and we expect to see suppliers' performance continuously improving.</p> |

Our modern slavery and whistleblowing commitments:

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| <p>Modern Slavery & Human Trafficking</p> | <p>We are committed to identifying vulnerable workers and will not tolerate any form of slavery or servitude within our business or supply chains. Recognising that excessive levels of worker indebtedness, caused by high recruitment fees, is one of the most common forms of modern slavery within our company's sphere of influence, we have committed to the Consumer Goods Forum's (CGF) Forced Labour Priority Industry</p> |
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| | <p>Principles which include: every worker should have freedom of movement, no worker should pay for a job and no worker should be indebted or coerced to work.</p> <p>Suppliers are required to demonstrate compliance with the UK Modern Slavery Act 2015 through our contractual terms and provide Sainsbury's with information on their actions, including risk assessment, mitigation and training.</p> <p>We report annually on our work to combat modern slavery and human trafficking through our modern slavery statement, which can be found here: https://www.about.sainsburys.co.uk/sustainability/plan-for-better/reports-policies-and-standards</p> |
| <p>Whistleblowing and grievance mechanisms</p> | <p>We believe that all colleagues, contractors and workers in our supply chains should be encouraged to raise any wrongdoing concerns in good faith without victimisation. Concerns that have happened, are happening or that are believed to happen in future can be reported in confidence to our independent reporting service, Rightline. All of our first-tier suppliers must have abide by Sainsbury's Policy on Supplier Whistleblowing.</p> <p>Additionally, we have committed to ensuring access to effective and trusted grievance mechanisms across all tier 1 suppliers. This means there will be clearly established procedures in place for affected people to raise and escalate concerns so that these can be resolved and remediated and future abuses prevented.</p> |

Supply chain collaboration and additional information

We recognise we cannot tackle severe human rights abuse in our supply chains alone, which is why we work with a wide range of stakeholders to achieve a positive impact for workers. More information on these initiatives, our Modern Slavery statement, pay gap reports, our approach to Human Rights, Plan for Better commitments and Code of Conduct for Ethical Sourcing can be found on www.about.sainsburys.co.uk/sustainability/plan-for-better.