

M&S

MODERN SLAVERY

STATEMENT

2025

CONTENTS

INTRODUCTION FROM OUR CEO
OUR BUSINESS AND SUPPLY CHAIN
GOVERNANCE
RISKS AND ACTIONS
TRAINING AND AWARENESS RAISING
PARTNERSHIPS AND ENGAGEMENT
FORWARD PRIORITIES

INTRODUCTION FROM OUR CEO



Our vision is to be the most trusted retailer, doing the right thing for our customers, with exceptional quality products at the heart of everything we do.

As an own-brand business this is only possible through the close relationships we have with our suppliers, built on a foundation of shared values and a commitment to ethical trading.

Together, we have an important role and responsibility to play in identifying, preventing, mitigating and remediating human rights risks. To do so, we acknowledge that we must act in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Identifying and mitigating human rights risks is incredibly complex and it's why we work in partnership with the wider industry where the risks are shared or where our influence is less direct.

This statement provides more detail on actions taken this year.



STUART MACHIN
Chief Executive Officer
Marks and Spencer Group plc

2/06/2025

This statement has been approved by the Board of Directors

OUR BUSINESS

This is M&S's tenth 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 29 March 2025, to monitor and prevent slavery and human trafficking from occurring in our own operations and supply chain.

M&S operates as a family of businesses across Food, Fashion, Home & Beauty, Retail and Property 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 over 1000 stores in over 30 markets globally. Across our stores, support centres, warehouses and supply chain, over 63,000 colleagues serve over approximately 32 million customers each year.

INTERNATIONAL

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

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.

SERVICES

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

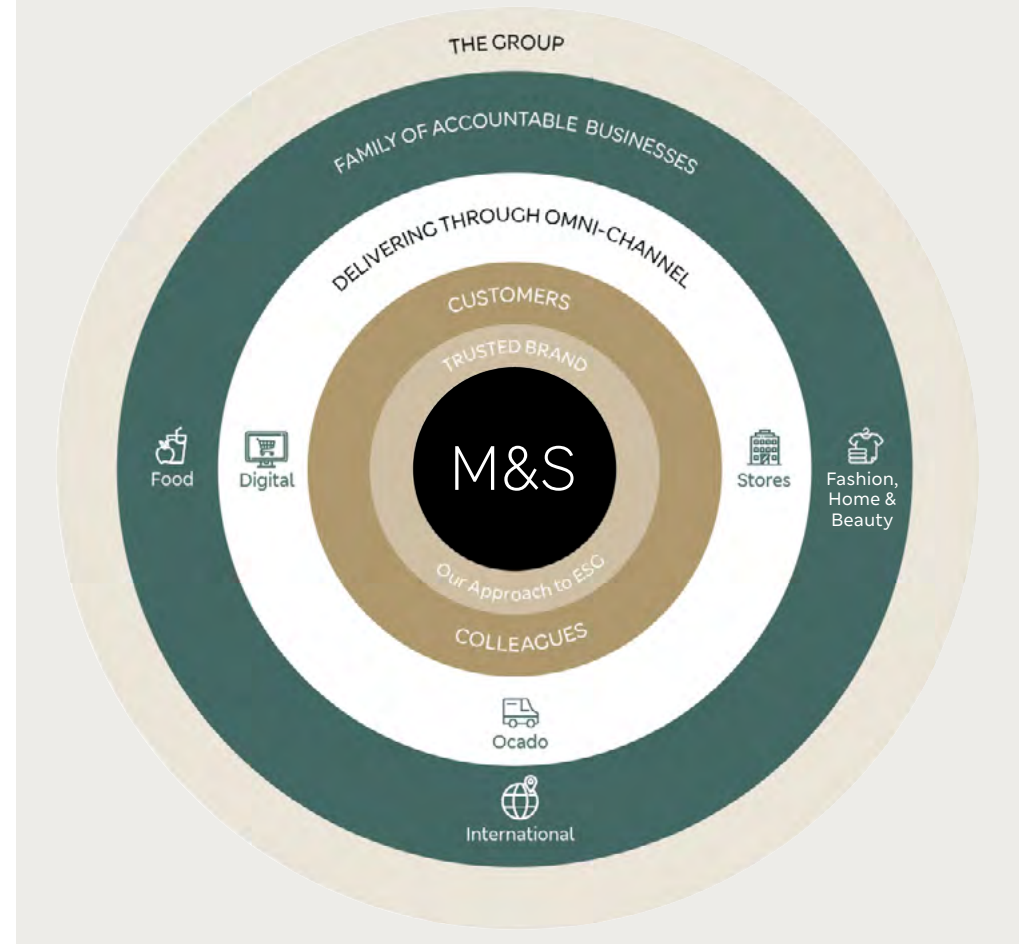
BRANDS

In March 2021, we formally launched "Brands at M&S". To date, we have launched over 140 brands under owned, wholesale, consignment or collaboration models.

GIST

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

BUSINESS MODEL



OUR OWN LABEL SUPPLY CHAIN

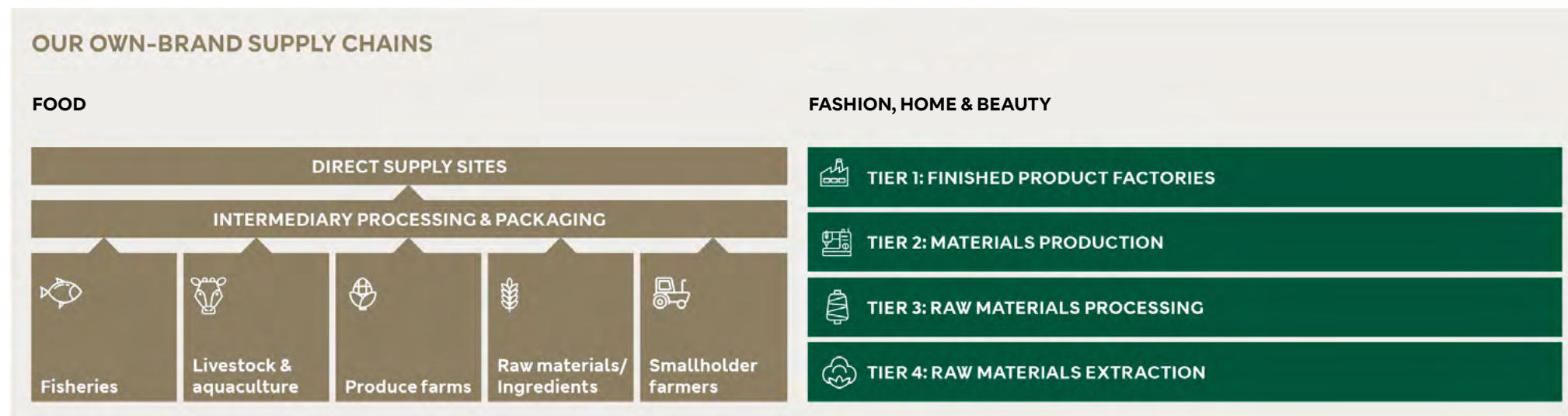
We predominantly sell own-brand products, manufactured and marketed exclusively under the M&S brand. Our relationships with our supplier partners are built on trust with shared aims.

We have three primary groups of suppliers: Food, Fashion, Home & Beauty 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 Fashion, Home & Beauty, using Open Supply Hub.

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 2,000 GNFR suppliers and 91% of the money we spend is with the top 250 suppliers.



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, we have an ESG Business Forum which 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](#).

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.

Our Code of Conduct	Sets benchmark minimum commitments for our business conduct. These 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 our overseas sourcing offices.
Our Human Rights Policy	States our commitment to respecting internationally recognised human rights in line with the principles and guidance contained in the UNGPs on Business and Human Rights.
Our 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. These Principles were last updated in January 2023.
Our 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.
Our Grievance Procedure for Fashion, Home, Beauty and Food Supply Chains	<p>Grievance mechanism to remedy adverse human rights impacts within the Food and Fashion, Home & Beauty supply chains. This policy sets out how to raise a grievance and our recommended process for investigating and understanding concerns should they occur.</p> <p>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 good practice. Whilst the review did not identify any immediate opportunities to improve our process, it did identify potential opportunities we can learn from to use the data we gather in a more effective way to help guide decision making across the business.</p>
Our 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 support our Foods supply chain. The guidance was open sourced in 2022 and remains the basis of our Human Rights Due Diligence Programme in Foods.

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.

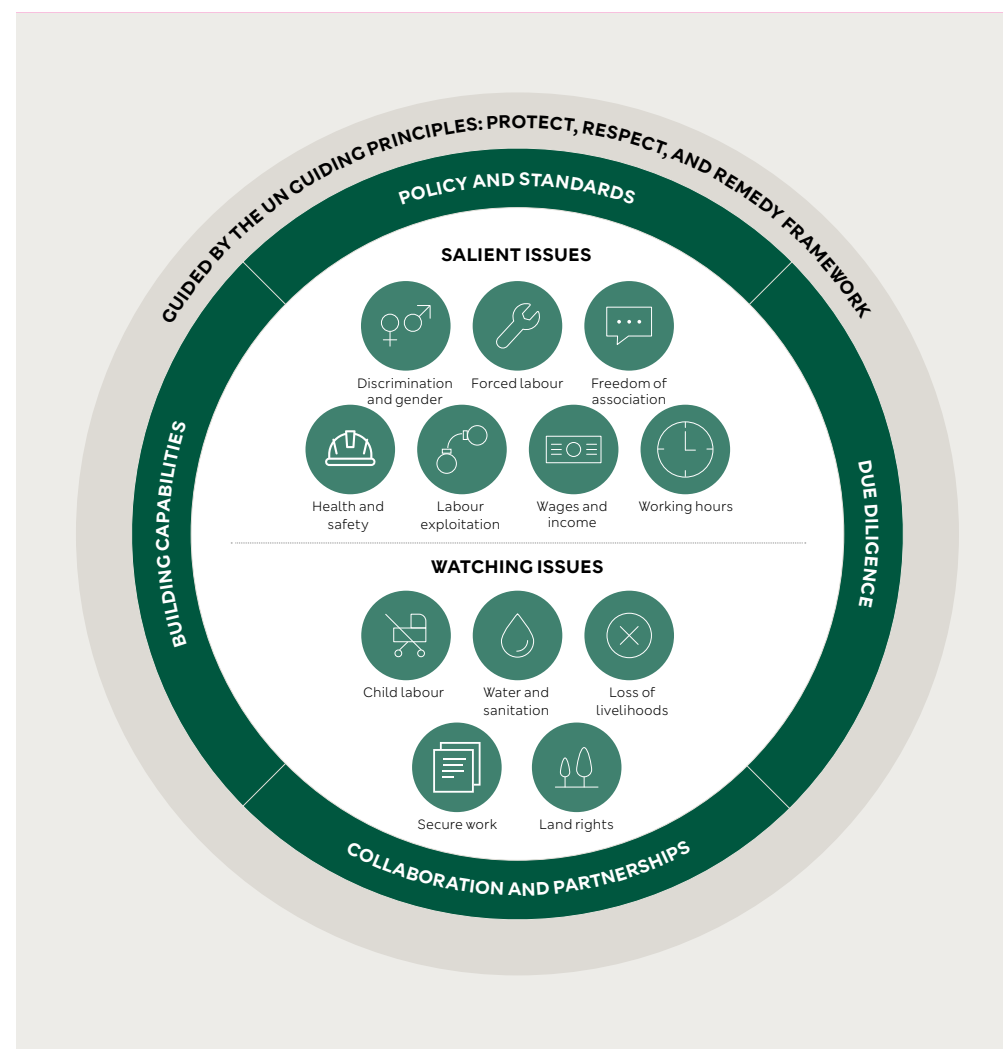
This risk assessment process occurs annually and covers the relevant business units in Food, Fashion, Home & Beauty, Retail & Property, International, and the support functions: Finance and Procurement, Digital and Technology, and HR. A director of each business area and support function is accountable 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 help us in prioritising actions to mitigate risk:

- detailed mapping of supply chains and operations;
- home sourcing teams in 10 sourcing offices to give us information and intelligence at a local level
- desk-based research including access to risk based data through portals such as SEDEX Radar;
- data from our audit programmes;
- supplier engagement and surveys;
- supply chain due diligence;
- discussions with expert stakeholders through multi-stakeholder initiatives such as the Ethical Trading Initiative (ETI) and the Food Network for Ethical Trade (FNET).

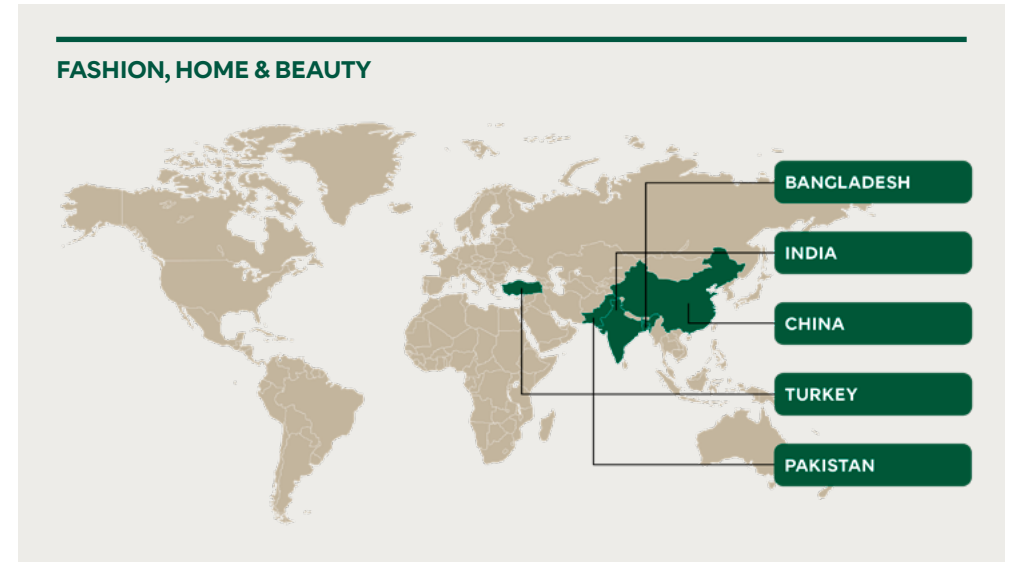
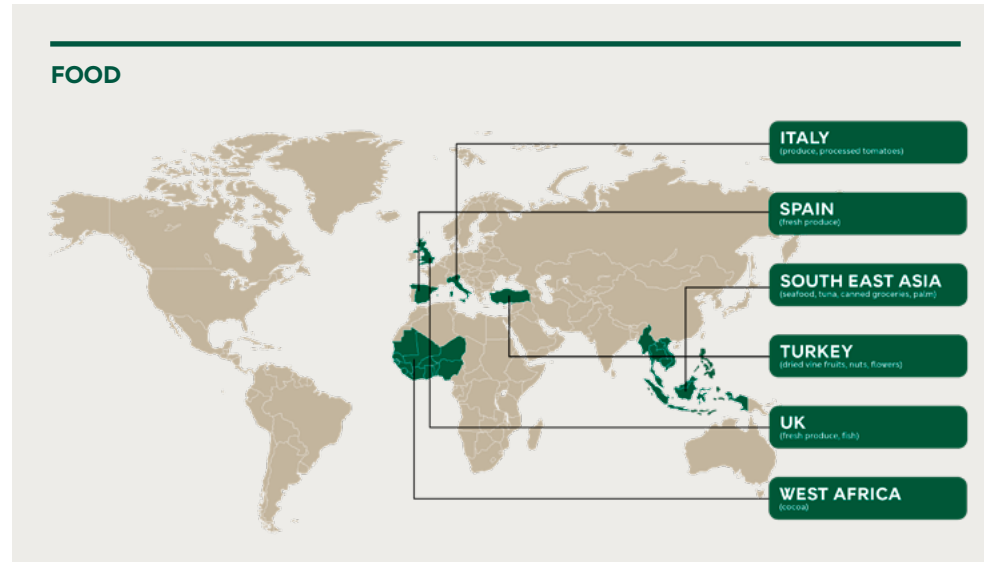
As a majority own-label business, our primary focus is on our Food and Fashion, Home & Beauty supply chains, where, working closely with our trusted supplier partners, we are able to make the greatest impact. As part of the risk assessment process, we map and regularly review countries and regions in 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 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 FY26/27.



RISKS AND ACTIONS CONT.

In 2024/25 the following countries were identified as high risk:



RISKS AND ACTIONS CONT.

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

While we are confident there continues to be a role for compliance and social audit programmes, we recognise their limitations in identifying instances of modern slavery. To address this, 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 Fashion, Home & Beauty, we have continued to strengthen our compliance programme including:

- Continued development of our Fashion, Home & Beauty compliance programme for Tier 2 sites;
- Introducing a mandatory requirement for all Tier 1 production sites to have effective worker voice mechanisms in place, and launching our Global Supply Chain Worker Voice Best Practice Guidelines to our supplier partners to support them to do so; and
- Carrying out a supply chain mapping exercise and supplier survey on key modern slavery issues to identify gaps, opportunities and due diligence.

Across our Fashion, Home & Beauty supply chain during 2024/25, 3 non-compliances (compared with 4 in 2023/24) were identified in SMETA audits, under “employment is freely chosen”, including findings relating to compulsory overtime and management systems.

Within Food, we have also continued to build on our compliance programme through the review of the first three years of our UK and ROI-wide worker voice programme for all Tier 1 sites and the onboarding of a new delivery partner for the next phase of the programme. We have worked closely with the new delivery partner to increase the number of indicators we include that will help identify potential situations of increased modern slavery risk. From June 2024 – June 2025, a first cohort of M&S supplier sites will roll out the programme, with a second cohort doing so the following year.

Another core pillar of our Food 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 Food

business. In 2024/25, we reviewed 48 nominated suppliers’ HRDD plans and processes in this way.

In Food, this year we rolled out a new Prohibited Sourcing and Enhanced Due Diligence Policy to our supply base, covering all product, ingredient and raw material sourcing in every tier of our supply chain. The policy details a subset of countries and regions where sourcing is either prohibited or deemed to be of particularly elevated risk and therefore requires robust enhanced due diligence and signposts suppliers to resources to support them in doing this. In some of our key highest risk supply chains, such as basic produce, fish and protein, we have also rolled out additional controls and requirements to protect workers.

UK food retailers together also launched a revised Serious Incident Protocol to enable an aligned approach to the escalation and investigation of critical issues, including any relating to modern slavery. The protocol can be found [here](#).

Across our Food supply chain, during 2024/25, 6 non-compliances (compared from 18 in 2023/24) relating to ‘employment is freely chosen’ were identified through audits of in scope suppliers. These related to the payment of fees, legal or otherwise, incurred during the recruitment process (3), incorrect notice periods (2) and payment of fees on termination of employment (1). There were also 5 ‘Collaborative Action Required’ findings raised, under the new SMETA 7 methodology. In total, these NCs and Collaborative Action Required findings accounted for 1.94% of non-compliances recorded across audits graded this year. All 6 non-compliances above have been closed out with corrective actions verified.



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, whistleblowers or any other parties are thoroughly investigated and remediated where required.

In Food, 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 2024/25. We fully investigate all allegations or reports we receive, following our internal Whistleblowing Standard Operating Procedure and the new UK Food Supply Chain Serious Incident Escalation and Management wherever relevant. Examples of risks identified and mitigation actions this year within Foods include:

RISK	INDUSTRY OR FACTORY LEVEL	SOURCE	MIGRATION / REMEDIATION ACTION
Non-UK protein supply chain: forced labour indicators including recruitment fees, document retention and excessive working hours	Country level	Collaboration	Increased due diligence with Tier 1 factories on specific risks, including annual survey.
UK produce	Sector level	Internal mechanisms + External stakeholders	Commissioned research with an independent ethical trade consultant on migration corridors and identified potential steps to strengthen our position around recruitment fees.



This year, in Fashion, Home & Beauty, we received some notifications regarding forced labour risks in our supply base, for example forced labour risk in China and recruitment fees risk in Taiwan. However, due to the majority of our supply chain workers being permanent and not seasonal, 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
China Forced Labour Risk	Country level	Collaboration	Increased due diligence with Tier 1 factories on specific risks, including annual survey.
Taiwan recruitment fees risk	Sector level	Internal mechanisms + External stakeholders	Commissioned research with an independent ethical trade consultant on migration corridors and identified potential steps to strengthen our position around recruitment fees.

RISKS AND ACTIONS CONT.

FOOD SUPPLY CHAIN

UK (PRODUCE)

Since its creation in 2022 in response to emerging risks to workers under the UK's new Seasonal Worker Visa Scheme ('SWS') following Brexit, M&S has been actively involved in the SWS Taskforce. The Taskforce's mission, as a multi-stakeholder initiative currently with more than 65 member organisations (up from 55 in 2023), 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.

Over 2024, the Taskforce continued to drive activity to reduce risk to workers within current Scheme design. These activities included:

- a series of in-person and online regional grower roadshows attended by 380 delegates;
- further development and rollout of the UK seasonal worker version of the Just Good Work worker information app;
- contracting and kicking off the Employer Pays Principle Feasibility Study within the Horticulture Value Chain (co-funded Taskforce and Defra);
- development of the Independent SWS survey as an ongoing, regular, independent survey of UK seasonal workers' experiences, to identify actions that can be taken in-season to address working, living and human rights challenges;

- wider roll-out of the responsible recruitment progress assessments (RRPAs) to Scheme Operators to help identify performance levels, management system gaps and improvement recommendations; and
- ongoing active engagement with Government departments and strategic policy development.

M&S has supported the Taskforce not only through funding but also as a retailer representative on the Governance Committee and through active involvement in workstreams. The plans for the coming year can be found on the Stronger Together website.

UK (FISHING)

In response to increasing risk of modern slavery and migrant labour exploitation in the UK fishing sector, we have taken specific action this year. Along with our suppliers; Associated Seafoods, Thistle and Youngs, and with match-funding from Seafood Ethics Action Alliance's (SEAA) 'Change on the Water', M&S have supported the Scottish White Fish Producers Association (SWFPA) Crew Services to develop and roll out a mobile app to help address welfare issues for both foreign and local crew. SWFPA Crew Services are the largest fishing crew recruiter in the UK and recruit for boats all over the country. The App has now been successfully rolled out to 200 crew members. It was designed to act as a central platform for fishers, offering key functionalities such as improving communication and information sharing between fishers, providing easy access for crew to essential documents

(reducing risk of loss/damage to paper copies) and establishing a grievance reporting mechanism. Crucially, the App was designed with direct input from fishers and a wide stakeholder group, making it an inclusive and tailored solution for the unique needs of this workforce. By placing the needs and experiences of workers at the centre of the App's design, the App not only provides immediate benefits but also sets a new standard for worker support and engagement in the seafood industry.

SWFPA Crew Services plan to continue refining the App based on user feedback and explore opportunities for wider roll out across UK fishing industry. The long-term vision is to develop a fully integrated Worker Voice Mechanism, linking the grievance process directly to independent auditors, further enhancing the accountability and support available to fishers.

SOUTHERN EUROPE (PROCESSED TOMATOES AND FRESH PRODUCE)

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 the following workstreams in Southern Europe over 2024/25 (and prior to this year):

ITALY (PROCESSED TOMATOES)

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. To date, the project has conducted in-depth research in selected regions of both countries to identify the critical challenges faced by migrant workers within agricultural supply chains. While grievance mechanisms exist in theory, practical obstacles such as language barriers, fear of retaliation, lack of awareness, and employer-controlled systems hinder their effective use.



RISKS AND ACTIONS CONT.

FOOD SUPPLY CHAIN CONT.

In Italy, workers often resort to exploitative arrangements like 'caporalato' (an illegal form of labour recruitment led by a gangmaster) whereas in Spain, restrictive contracts under the GECCO scheme create dependency and limit worker mobility. Both countries are also characterised by widespread undeclared work and exploitative conditions, exacerbating the precariousness of workers' situations.

In response to these findings, the ETI project adopted a bottom-up approach, actively engaging workers to gather their input on the effectiveness of existing grievance mechanisms at two growers supplying the UK market. This feedback has informed the development of an action plan aimed at improving existing reporting channels and designing new, more effective ones. The tools and insights generated by the project will be shared with industry stakeholders to enhance grievance mechanisms across supply chains.

Additionally, the project established a modern slavery prevention network, Digniwork, to connect local civil society organisations supporting migrants in Morocco, Tunisia, and Côte d'Ivoire with stakeholders in Italy and Spain. This network fosters knowledge exchange on ethical recruitment practices and workers' rights. The project is scheduled to conclude in March 2025.

SPAIN (FRESH PRODUCE)

In last year's statement, we reported on our work to commission and publish focussed due diligence of our Almerian fresh produce supply chains, in addition to our ongoing work with the ETI GMA programme (above) and with the Spanish Ethical Trade Forums.

A key workstream from the published action plan was our work to support the development of the App Foros, similar to the Just Good Work app successfully used in the UK and that gives workers access to information on their rights while working in Spanish agriculture. The App Foros was developed in the first half of 2024, supported by M&S financially and then trialled during the Spanish Forums' June 2024 international event. In the second half of the year, content was refined based on feedback from a consultation period which enhanced the app's format, and improved user accessibility. The app was officially launched in November 2024. Looking ahead, a key focus will be to expand the app's reach to key stakeholder groups. This includes promoting the App Foros across our supply chain and the agricultural workforce to maximize its impact within the sector by making it accessible to migrant workers from Latin America and Morocco pre-departure so that they are equipped with all relevant information as part of the recruitment process.

SOUTH EAST ASIA (SEAFOOD, CANNED GROCERIES, PALM)

In 2024, we launched a new, bespoke programme of enhanced due diligence in our key direct Thai sites that produce a range of ambient products for M&S, including sauces, tuna and tinned fruit. This programme, developed with our direct supplier, World Wide Foods, and Waitrose, targets the most salient risks for migrant workers in this supply chain whom we recognise as being more vulnerable to exploitation.

The programme has 3 key objectives:

- to ensure all workers are recruited in a fair and transparent manner that respects and protects their rights;
- to ensure workers access to rights and opportunities is not affected by gender and, in turn, establish gender-sensitive employers; and
- to amplify worker voice in order to identify and address workplace challenges.

In alignment with these objectives, over the past 12 months in partnership with World Wise Foods, our programme has:

- Conducted worker interviews with 82 migrant workers to further understand their experiences during the recruitment process and in the workplace
- Drafted, consulted and launched guidelines for effectively managing walk-in recruitment at sites in Thailand
- Conducted gender focus groups with 96 workers and subsequent gender equality training with 174 workers including a focus on the specific vulnerabilities of female migrant workers
- Conducted worker surveys with 655 workers in partnership with Labor Solutions

We will continue to support the development of this programme in 2025/6, ensuring it reflects evolving risks and is developed with input from workers and their representatives.

Over the last year, we have worked to deepen our risk assessment process down to raw material level and most recently combined this with our climate risk

assessment so we could better understand the linkages between human rights and climate. Palm oil from south east Asia was identified as an area of ongoing risk and so in 2024, we partnered with Pacos Trust, a non-profit organisation in Sabah, Malaysia, to build a training module and deliver workshops to support Palm Oil smallholders in their understanding of human rights and gender issues in their community.

WEST AFRICA (COCOA)

Our third-party risk assessment also flagged cocoa from West Africa (Cote d'Ivoire and Ghana) as particularly high risk from a forced and child labour perspective. Therefore, we have undertaken a wide-ranging review of our cocoa sourcing and in 2024 became the first UK retailer to co-fund the Fairtrade Child Labour Prevention and Remediation programme. Through this programme, cooperatives apply for funds to support projects which improve access to education, thereby reducing the risk of child labour. In 2024/25, nine cooperatives across Ghana and Cote d'Ivoire successfully applied for funding projects to support with construction of classrooms, school renovations, bicycle purchases.

RISKS AND ACTIONS CONT.

FOOD SUPPLY CHAIN CONT.

TURKEY (DRIED VINE FRUITS, NUTS, FLOWERS)

Turkey contributes 20-30% of global vine fruit production, positioning it as a crucial region for manufacturers across the world. However, Turkey faces significant human rights risks associated with the involvement of migrant workers in seasonal agricultural production, including the risk of child labour.

To help address these challenges, M&S Food and our Turkish sultana suppliers have been long-standing participants in the Fair Labour Association's (FLA) Harvesting the Future project. Launched in Manisa in 2019, Harvesting the Future is a capacity-building project whose main purpose is to improve workers' living and working conditions in seasonal agriculture through industry collaboration.

In the summer of 2024, FLA staff delivered face to face social compliance trainings in Manisa for 4 M&S sultana suppliers and a total of 124 farmers. Topics included employment relationships, grievance

mechanisms, internal monitoring systems, child labour and forced labour. Following the trainings, third-party experts performed field visits to provide feedback on the suppliers' internal monitoring system activities and FLA staff also performed field visits to deliver awareness raising sessions to farmers, workers and labour contractors on formal work and tripartite contracts.

In the first quarter of 2025, FLA and project partner suppliers met with Turkey's Ministry of Labor and Social Services to request support on certain areas such as increasing government audits, field level patrols and clarification of the field level implementation of ILO 182 (International Labour Organisation convention 182 which outlines the worst forms of child labour) by the authorities and light work definition for young workers.

M&S has also supported two phases of a programme in collaboration with ETI to address risk of child labour in UK retailers' Turkish flowers supply chains.



RISKS AND ACTIONS CONT.

FASHION, HOME & BEAUTY SUPPLY CHAIN

LOWER TIER SUPPLY CHAIN RISKS

In recent years, we have begun expanding our evaluation of ethical compliance further down the supply chain for Fashion, Home & Beauty products, through M&S ethical site visits and 3rd party audits. This provides us with greater transparency of our Fashion, Home & Beauty supply base, and a clearer assessment of human rights risks, social performance and labour conditions in our tier 2 facilities.

In Tier 2 and further down the supply chain, sites may have reduced maturity in, and awareness of, ethical compliance requirements. This presents labour standards risks, including those relating to forced labour and forced labour indicators.

During our Tier 2 site visits, we have identified issues including non-compliant emergency exits, excessive working hours and incomplete working hours records.

In 2024, we launched our Tier 2 ethical compliance policy, new onboarding requirements and escalation process for non-compliances. We also began collaborating with our Tier 1 suppliers on implementation of the policy in our shared supply chain and corresponding due diligence requirements. Finally, we carried out a supply chain mapping exercise to improve our visibility of sites in our supply chain that we don't engage with directly. We will continue to work with our Tier 1 suppliers to cascade ethical compliance requirements and due diligence through our supply chain.

OVERTIME

Excessive overtime can be a forced labour indicator, as defined by the International Labour Organisation (ILO). It's therefore important that any overtime is done voluntarily, and the amount of overtime completed is within the limits set by international standards and/or national law.

In times of supply chain disruption, such as the recent political unrest in Bangladesh, factories may increase overtime working to meet original production targets despite a loss of normal production time. There is additional complexity when workers want to increase their incomes through overtime. In this situation, compliance with overtime limits can be an issue. So, our approach is to:

- Verify through our compliance monitoring that all overtime is voluntary and within legal limits and ETI guidance;
- Continually review our production capacity and delivery timelines, in collaboration with our supplier partners, to a critical path to minimise the necessity for factories to have to operate with excessive overtime working;
- Become participants in Better Buying™ to help us understand how our buying practices impact our business partners through their survey feedback; and
- Implement ETI's Social Dialogue programme in Bangladesh in key factories affected by closures due to unrest.

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

In 2023 we completed targeted modern slavery due diligence with suppliers in the UK and ROI, including supplier partners of operational services (cleaning and waste management, security guarding, construction, warehousing and logistics). This year we continued the risk assessment approach, with a focus on security and guarding, facilities management, cleaning and waste management and globally sourced goods not for resale.

FOOD LOGISTICS

Since the acquisition of Gist, our principal Food logistics provider, we have been able to accelerate our plans to modernise our supply chain, support growth and take closer control of key decisions. We have continued a strong working relationship with Gist's team who have oversight of human rights with their human resources colleagues. All managers are required to

complete the 'People behind the product' training course and as part of continuous improvement, Gist have worked with Stronger Together and used the Stronger Together Progress Reporting tool to identify opportunities for improvement across the network. Gist operates via a network of 17 distribution centres across the UK and ROI, and their Modern Slavery Statement with further details is available on their website.

FASHION, HOME & BEAUTY LOGISTICS

We have continued our regular physical audit programme in all offshore Container Freight Station locations (CFS). The 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. Our teams are provided with refresher training twice a year which includes potential new breaches to be aware of.

INTERNATIONAL OPERATIONS

Our logistics hub in Croatia is managed by a third party, Maersk and a full risk assessment was completed during onboarding, with an ongoing annual risk assessment process established to ensure compliance. Maersk also publish their own Modern Slavery statement.

Our owned & joint venture businesses complete annual risk assessments to review business processes and analyse human rights and modern slavery risks in each market.

Our franchise partners conduct a self-assessment annually to ensure they have sufficient processes. This is presented back to M&S and reviewed quarterly.

THIRD PARTY BRANDS

M&S have worked with over 140 third party brand partners since the launch of the Brands at M&S programme in 2021 and have three different purchasing models:

1. Wholesale (stock fulfilled from our distribution centre);
2. Consignment (fulfilled by the brand); and
3. Dropship (fulfilled from the brand's distribution centre to the customer).

A risk assessment is completed at onboarding stage and continuous mapping of brands through desktop reviews, interviews and training webinars is completed by the dedicated Brands ESC Manager. Our minimum requirements prohibit our partners from sourcing cotton from Xinjiang, Turkmenistan and Uzbekistan. This year we have strengthened our processes by incorporating them into our Brands Hub platform. This includes an automated confirmation of brand Modern Slavery Statements, compliance transparency and includes tracking quarterly performance.



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 is completed by colleagues across our Food, Fashion, Home & Beauty, 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 completed by all colleagues on a bi-annual basis.

In our Fashion, Home & Beauty business, we also developed and launched a new e-learning module for product-facing teams about ethical trade and sustainability, which covered the impact of purchasing decisions on factories’ ability to comply with compliance requirements, and the corresponding impact to workers.

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. Sessions covered the launch of the second phase of our worker voice programme and risk and resilience.

For Fashion, Home & Beauty, in 2024/2025, we carried out 8 ethical compliance workshops for suppliers in our key sourcing regions, to share policies and gather feedback (India, Bangladesh, Sri Lanka, China, Cambodia, Vietnam, Pakistan), attended by a total of 434 supplier representatives.

We also created and distributed a supplier resource pack with updated policies and guidance to support all direct suppliers to comply with M&S standards.

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 of the Consumer Goods Programme, 2677 individuals have attended ‘Tackling Modern Slavery in Business - UK and ROI’ training, representing 1025 sites and 687 unique businesses that supply M&S Food. For 2024/25, this represents 390 individuals, 206 sites and 133 unique 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, 417 individuals have taken up at least one RRT benefit, representing 204 unique businesses that supply M&S Food. In 2024/25, this represented 100 individuals who have completed an RRT training course from 54 unique 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.

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 2024/25, MSIN has continued to grow its membership and work with data sharing partner, Stop the Traffik, to run the MSIN intelligence sharing platform,



and through this to gather data from our members which can be shared in order that they can then investigate incidents in their own supply chains or raise concerns in their own businesses as needed. Over the year, MSIN generated intelligence submissions for review and action by members if needed. It also shared “high priority” alerts with all members, for immediate action. MSIN has appointed a new CEO and has also reshaped its governance structure to focus on ‘Review and Learning days’ for members, which have been well received, giving members insight into issues such as fake job adverts and useful tips on how to spot issues in payrolls. 2024 saw a significant increase in membership of MSIN which is resulting in more data submissions coming through from both Stop the Traffik and MSIN’s members. Stronger links have also been forged with law enforcement and other key stakeholders in this space. In 2025/26, MSIN will continue to focus on growing membership and increasing the quality and quantity of insights and intelligence shared between members.

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.
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	Created in 2016 with support from M&S, FNET connects major UK food retailers, manufacturers, suppliers and a range of small, medium and large food companies to build more ethical trade by identifying and tackling human rights issues in food supply chains, 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 GAP 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".
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.
Better Buying™	Collect data directly from suppliers and provide actionable insights to improve purchasing practices and supplier relationships.



FORWARD PRIORITIES

ONGOING COMMITMENT

Every year we have a base level of activity that we have undertaken as outlined below. This is then supported by specific actions for each year relevant to issues identified and opportunities for improvement.

Train our colleagues to raise awareness of our corporate responsibility and train suppliers, similarly 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 2025/26

Colleague Training

Fashion, Home & Beauty: Purchasing Practices training for internal colleagues and continue roll-out of Ethical Trade and Sustainability e-learning

Food: Build on training delivered in previous two years, including for new colleagues.

International: Launch additional training materials to all international partners which includes best practice guidelines on mitigating risks.

Strengthening supply chain intelligence and capacity

Fashion, Home & Beauty: Participate in Better Buying supplier surveys to gather feedback from suppliers.

Continue supplier engagement through in-country workshops and supplier resource packs with policy updates and guidance.

Food: Embed the second phase of our worker voice programme, built to identify a broader range of possible modern slavery indicators

Continue to build our Human Rights Due Diligence programme with nominated suppliers and continue to equip direct supply base with tools to build their capacity

Continue our programme of Supplier Exchanges

Identifying risk with third party providers

Fashion, Home & Beauty: Continued expansion of third-party audits in Tier 2 sites to assess compliance risks including potential for forced labour and recruitment fees issues

International: Risk assessment for all franchise partners to be embedded in our franchise assurance process.

Industry collaborations

Fashion, Home & Beauty: Continue active support for ETI, RISE, Better Buying, The Coalition to End Forced Labour in the Uyghur Region, International Accord and ILO Better Work.

Food: Continue active support for, amongst others: Stronger Together, RRT, Unseen Business Portal, SWS Taskforce, FNET, SEA Alliance, Spanish Ethical Trade Forums