

M&S Grievance Procedure for Supply Chains

Summary

When human rights are adversely impacted, workers need access to remedy, as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Workers must have the ability to raise a grievance where they feel that their rights have not been respected by an employer. Grievance channels available to workers must meet the criteria laid out in Principle 31 of the UNGPs. There must be an effective mechanism for workers to raise a grievance, clear process for investigation and appropriate access to remedy if the grievance is found to be valid.

Investigations should be independent and fair. This requirement is set out in our Global Sourcing Principles and forms part of the contractual obligations for all suppliers.

We are committed to ensuring that all workers in our supply chain can raise concerns safely and without fear, with their confidentiality protected wherever possible, and that they are safeguarded from retaliation, intimidation, or any adverse consequences as a result of speaking up.

Purpose

To ensure timely, transparent, and responsible action when human rights concerns are raised.

Scope

This policy applies to workers in our supply chain. All our supplier partners, including Goods not for Resale (GNFR), are contractually obliged to comply to our [Global Sourcing Principles \(GSP\)](#) which require them to have their own effective grievance mechanisms in place. All M&S employees are covered by our own internal grievance channels.

What would constitute a complaint under the process?

A complaint is a report of a violation against our Global Sourcing Principles, Code of Conduct, Human Rights Policy or Groceries Supply Code of Practice (GSCOP) that has occurred in our supply chain and has a direct adverse human rights impact. The complaint should be evidence-based. This means that the complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

How can a complaint be made?

A complaint can be made through a number of channels: Safecall, an independent organisation, directly to our UK or in-country colleagues, business unit-specific channels, and through our membership of multi-stakeholder initiatives such as [Unseen](#).

Our approach

A member of the ESG team or a colleague with responsibility for human rights in their business unit will follow these steps, ensuring that the complainant is protected from retaliation throughout:

1. **Initial assessment of the complaint:** Gather information from all parties in a timely manner with complete information, based on a thorough enquiry into the issues. Sample of questions to establish the legitimacy and scale of the alleged problem:
 - *Has the complaint occurred in our current supply chain or operations?*
 - *What is the size of our operation where the complaint has occurred?*
 - *How many employees, workers, products or services are involved?*
 - *How has the community been impacted?*
 - *Is there immediate physical danger?*
 - *How serious is the breach?*
 - *Is the grievance being pursued by other means?*
 - *Is there supporting information or details of where corroborating information can be found?*
 - *Has a formal grievance with the employer been lodged, or a court case been filed?*
 - *Has the issue been raised before?*
 - *What is the preferred solution: what do the complainants want to happen to remedy the situation?*
 - *Are there other organisations that might have useful information directly relevant to the complaint together with their contact details?*
 - *Are there local complexities that will have a bearing on the alleged violation and how it can be investigated?*
2. **Internal investigation** which may involve an independent third party:
 - Assess evidence that confirms that the complaints are founded.
 - Interview relevant parties.
 - Identify if the issues were still current or if effective corrective actions had occurred.
 - Check if the governance and due diligence processes are effective at identifying these issues.
 - Assess effectiveness of all local and site-based remediation and grievance mechanisms.
3. **Consultation and mediation:** Following receipt of information from all parties and where appropriate, M&S will seek to promote discussion and dialogue between the relevant parties, using the criteria below:
 - Ideally all appropriate parties should meet in person or virtually to talk about the issues to ensure a more successful outcome. This should be conducted as near as possible to the location of the complainant.
 - All relevant information should be shared, including the prioritisation of the issues, with all parties prior to mediation so all sides are fully briefed.
 - Rules about confidentiality of information should be agreed at the start of the mediation process.

- Encourage all parties to be open-minded and flexible on what constitutes an acceptable outcome to a complaint.
- During mediation, we will focus the discussion only on the issues where there is disagreement.
- Once communication has begun and a degree of trust established, some issues are best addressed through bilateral dialogue between parties, rather than requiring M&S's involvement.
- All parties should be encouraged to put forward practical solutions rather than simply registering complaints or stating their position.
- A monitoring plan with timings must be assigned to all corrective actions and other outcomes, including responsibility for monitoring.
- In some cases, a third party can be used for support with monitoring the implementation of corrective action plans.

4. **If no agreement is forthcoming** within a reasonable time period and the investigation has been thorough and all available options have been exhausted, M&S reserves the right to decide on its actions in relation to the complaint. We will do this in consultation with the ESG Team and colleagues responsible for human rights in business units.

In certain issues, which may be outside our influence we may seek to achieve the following:

- Look to engage through advocacy or on a legislative level.
- Support greater transparency of the wider systemic cultural issue through relevant stakeholders and reporting.
- Where appropriate identify other customers that have similar standards and share information with them insofar as commercial sensitivity and confidentiality allows, to build broader leverage and communicate a shared set of expectations.

5. **If a party is unhappy with the outcome**, they would be invited to raise the issue with the ESG team who will review the case with the Internal Audit and Risk team for a final decision. If the party is still dissatisfied with the outcome and the actions taken by M&S then they can refer the issue or complaint to the relevant [National Contact Point](#).

Response timescales: Human rights issues can be complex and may require time to investigate, requiring wider industry engagement in some instances. Our goal is to assess and investigate all legitimate complaints and promote resolution as quickly as possible, with a complaint considered resolved when all parties agree on a remedial action plan. Timelines may vary by scale, complexity, and geography. We will always strive to keep all parties regularly informed about steps taken and outcomes.

Anti-retaliation: Within our grievance framework, safeguarding the rights and wellbeing of anyone raising a concern is our priority. M&S enforces a strict anti-retaliation policy and will investigate all reports. If retaliation is confirmed, we will take appropriate remedial action which may include issuing warnings to business

partners or engaging legal and governmental remedies. Each case will be addressed individually to ensure the most relevant solution.

FURTHER INFORMATION

Policy Owner: Thinus Keeve

Compliance Lead: Karina O’Gorman

Published: May 2026

Review frequency: Annually
