# MODERN SLAVERY STATEMENT 2020/21





As a responsible business we're committed to using our scale and expertise to be a force for good in the world. There is no place for forced labour and exploitation in any of our operations and we will continue to do right by our colleagues, customers and shareholders by working tirelessly to eradicate exploitation altogether.

























## INTRODUCTION

This is our sixth statement on modern slavery and human trafficking and is made pursuant to section 54(6) of The Act. We strive to make continuous improvements to not only understanding of risk but also to our actions to prevent the infiltration of modern slavery into our business. The statement was approved by the board of Dixons Carphone plc and covers our financial year ending 1 May 2021. It is endorsed, approved and adopted by the following operating subsidiaries: Carphone Warehouse Limited, DSG Retail Limited, Carphone Warehouse Europe Limited, DSG Ireland Limited, Dixons Retail Group Limited, DSG International Holdings Limited, ID Mobile Limited, DSG European Investments Limited and DSG Overseas Investments Limited. The named subsidiaries are those with an annual turnover greater than £36m in 2020/2021, however the statement applies to all subsidiaries regardless of size.

Since the inception of the Modern Slavery Act 2015 ('The Act') we have been fully supportive of the objective of preventing modern slavery in businesses and supply chains around the world. We continue to believe that eradication requires raised awareness of modern slavery among both our colleagues and our communities and through collaboration we can drive good practice and transparency. Our business is committed to acting with integrity and leveraging our size and unique capabilities to do good. As a business trading across the United Kingdom & Ireland, the Nordics, Greece and Cyprus, with colleagues also in Hong Kong, the Czech Republic, Netherlands and Portugal, combined with a wide-reaching supply chain, we know we can make a difference by taking positive action.

This year, with the continuation of Covid-19 measures radically changing daily life both at home and work, enhancing health and safety and prioritising colleague wellbeing has naturally been a business priority for both our own business and our suppliers. Face-to-face opportunities were limited and pressing Covid-19 preparations altered some plans we had for modern slavery work. Nevertheless, we have still made good progress throughout the year and we have not altered our overarching approach. Amidst the global pandemic, we strived to ensure that workers' rights remained front and centre of our business and supply chain and we have collaborated this year on ways to recognise and reduce the disproportionately negative effect of the pandemic on vulnerable workers.

## **OUR APPROACH:**

We continue to risk assess our business and supply chain, recognising the dynamic nature of risk and identifying areas where there is potential for modern slavery, assigning resources and mitigating where necessary. We have always advocated the value in collaboration, sharing best practice and experience with those with a common goal of preventing modern slavery. Our focus continues to be on tier 1 suppliers (our direct supply base) where we have the most influence and can achieve more immediate impact. However, continuing our work from last year, this year we also targeted some of our tier 2 suppliers that we identified as higher risk. Once again collaborating with suppliers to utilise their own supplier relationships to target risk further down our supply chain. Social purpose is embedded in our company values and we will work with suppliers to give our customers peace of mind that their purchases are free from forced labour and exploitation.



## **GOVERNANCE AND COMMITMENT**

Responsible sourcing, which encompasses our work to prevent modern slavery, is a regular agenda item, for both our Executive Committee, chaired by our Group Chief Executive, and our Board, where our progress on our actions, strategy and 3-year plan are regularly presented. Our Group Chief Executive has overall responsibility for the responsible sourcing agenda and actions. Additionally, to maintain engagement with senior leadership throughout the year, responsible sourcing features in discussions with our Environmental Social and Governance (ESG) Committee, chaired by our General Counsel & Company Secretary, with members of our Executive Committee and Board in attendance, which meets quarterly. Alerts raised during supplier background checks and the review of any new vendor applications that have been flagged as a potential risk falls under our Group Ethics Supply Chain Compliance Committee. Any further ad hoc vendor concerns are raised through our Risk Committee.

#### **KEY ACHIEVEMENTS in 2020/2021**

- ★ Expanded our partnership with EcoVadis from our Nordic business to our Group and began the process of inviting UK&I and Greek suppliers to join
- **★** Rolled out Modern Slavery training to over 3000 Supply Chain and Service Operations colleagues

Responsible sourcing goes beyond modern slavery and human trafficking to include workers' rights, the environment (which includes topics such as the reduction of plastic packaging and energy consumption), supplier capacity building, anti-corruption and social impact. Assessing against these broad issues is an area that we felt that we could build capacity via external support and following a successful pilot in our Nordic business (Elkjøp) we expanded our partnership with EcoVadis, one of the leading providers of business sustainability ratings. Their platform and metrics give us a simple yet practical way to measure and work with suppliers to improve their performance in this field and have begun the process of inviting UK&I and Greek suppliers to the platform. We continue to benefit from our full membership of the Ethical Trade Initiative (ETI), collaborating and learning from ETI expertise and other members as well as validating our existing efforts in the ethical space.

"Elkjøp wants to make it easier for consumers to choose sustainable. EcoVadis is a great tool for that. We also wish to use the EcoVadis certification as a motivation for our suppliers to continuously improve, within the holistic approach on sustainability – including human and labour rights."

Camilla Skielsbæk Gramstad, Head of Sustainability, Elkigo



## STRUCTURE OF BUSINESS AND SUPPLY CHAIN

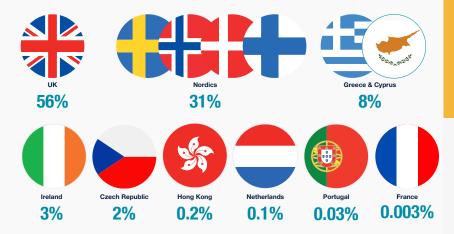
**Our Business** 

#### **Headline Revenue:**

£10,344 million

NUMBER OF STORES				
UK & Ireland	Nordics			
<b>314</b>	Franchise	190	Franchise	
	Total:	515	Total:	

#### 35,000 employees based in 7 countries



#### **Supply Chain**

We source from nearly 10,000 tier 1 suppliers in 45 countries with 96% of them in the 10 listed below:

13% of suppliers are for products or services that are sold to our customers (goods for resale).

of suppliers are of goods or services not intended for consumers (goods not for resale)



We are one of Europe's leading specialist electrical and telecommunications retailer and services companies. We provide a complete solution for customers offering a comprehensive range of electronic and mobile products, connectivity and expert after-sales services.

We are the market leader in every country in which we operate. Our brands, which include Currys PC World, Carphone Warehouse and iD Mobile in the UK & Ireland, Elkjøp and Elgiganten in the Nordics and Kotsovolos in Greece all provide a 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 businesses 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.).

## Own label and licensed brand suppliers.

Our own label and licensed brand operation, based in Hong Kong, sources products across many categories. We currently work with 101 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 the UK.



## POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING



## Our key areas of focus for 2021/2022 include:

- » Continue to highlight supplier best practice and to champion and reward supplier ethical behaviour
- » Approve and publish completed Conflict Mineral & Child Labour Remediation policies

Our Standards for Responsible Sourcing continue to be the cornerstone of our work to set minimum requirements in the areas of modern slavery, human trafficking, human rights, labour, environment, anticorruption and social impact. They make explicit reference to the <a href="ETI">ETI base code</a> and require our suppliers to work towards full compliance.

The goal of the Standards is for continuous improvement, working with suppliers to improve their position rather than excluding them. However, if necessary, we may need to delist a supplier or terminate a contract in response to a related non-compliance. Last year we communicated our Standards for Responsible Sourcing to all UK & Ireland and Greek suppliers and included reference to them alongside our Modern Slavery policy in new supplier contracts.

We recognise the impact of standards and policies is through compliance as well as colleague and supplier awareness. This year, our partnership with EcoVadis adds to our existing audit programme, compliance checks and workers' rights questionnaire. Through engaging third-party support such as EcoVadis, we will continue highlighting top performing suppliers in the area of ethics and modern slavery. Through the EcoVadis supplier assessments, supplier policies will also be externally verified rather than relying on self-assessment. We will continue to keep suppliers under review and add further measures to monitor compliance as required.

This year we reviewed our Modern Slavery Policy as well as drafting new, separate Conflict Mineral and Child Labour Remediation policies.

#### Progress against 2020-2021 areas of focus:

2020-21 Area of Focus	Status	What steps we've taken this year
Highlight supplier best practice	Ongoing	The introduction of the EcoVadis platform gives us a tool to measure suppliers against set criteria and understand what best practice might look like within the business areas we operate.
Modern Slavery policy	Completed	Reviewed and updated our modern slavery policy.

"Retailers recognise it's not always easy for supplier businesses to announce they've discovered a possible case of modern slavery, and so to support suppliers they have developed a new Retailer Protocol to give confidence that if a suspicion of modern slavery is discovered and alerted to the authorities, retailer customers will seek to support that supplier along the way, as long as they are not culpable to the crime."

Peter Andrews, Head of Sustainability Policy

at the British Retail Consortium

## **DUE DILIGENCE PROCESS**



### **Key activities during 2020-2020:**

### Review of Audits for Own Label and Licensed Brand Suppliers

In order to ensure our own ethical audits remain relevant and maintain focus on the appropriate areas of risk, we carried out a full review of our criteria. We benchmarked it against the ETI base code, SMETA and SA8000 criteria, as well as using our learnings from the BRC, Slave Free Alliance, the ETI and other relevant industry guidance; revising and adding to our criteria where beneficial. Own label and licensed brand suppliers are audited prior to selection and then on an ongoing basis, with the frequency of audits set dependant on previous performance and other relevant criteria. This year we completed 87 ethical audits and we then work closely with suppliers to monitor non-conformances and ensure issues are resolved to our satisfaction (detailed further in monitoring section below).

## Modern Slavery threat assessment of waste & recycling partners:

As part of our membership of the <u>Slave Free Alliance</u> (a best practice scheme that is run by <u>Hope for Justice</u>, a leading global modern slavery charity) we scheduled a threat assessment of tier 2 waste

and recycling sites in conjunction with our tier 1 supplier. We are aware of the recent 'Operation Fort' (the UK's largest modern slavery prosecution) involving workers forced to work long hours in farms, factories and waste and recycling plants and as such we considered it important to direct our annual threat assessment to our tier 2 waste and recycling partners and arranged this in collaboration with our tier 1 supplier. Last year we completed desk-based assessments but, due to Covid restrictions we were unable to conduct the follow up site visits in 20/21. We remained in contact with all parties to ensure they were scheduled as soon as was practical and they have been arranged for early 21/22.

## Continue to roll out EcoVadis to Group suppliers:

To go beyond our own supplier database and risk assessment, we have now launched EcoVadis's sustainability ratings platform to our Group to measure and improve supplier social, environmental, and economic performance. The platform goes beyond ethics and gives us a thorough view of our suppliers, enabling us to assess supplier compliance against our Standards. Enhanced data will empower us to target resources towards areas of higher risk, and to drive

continuous improvement and sustainability impact. Whilst numbers invited remain relatively small, in regards to our overall number of tier 1 suppliers, we have focused on key suppliers that are the largest percentage of our overall spend and will continue to add suppliers regularly.

#### Roll-out of improved audit programme for Own Label and Licensed Brand Suppliers:

Last year, in order to ensure our own ethical audits remain relevant we carried out a full review of our criteria. We benchmarked it against the ETI base code, SMETA and SA8000, as well as using our learnings from the BRC, Slave Free Alliance, the ETI and other relevant industry guidance, revising and adding to our criteria where beneficial. This has included asking suppliers for a breakdown of male and female workers by age and by level (production/management) so that with enhanced data we can identify potential improvements to be made through future supplier collaboration and capacity building. This year we have trialled this improved audit criteria and revised questions based on auditor feedback. We have now rolled out this enhanced programme to our own label and licenced brand suppliers based in China and the Far East and will

## Our key areas of focus for 2021/2022 include:

- » Continue inviting suppliers join us on the EcoVadis platform
- » Monitor results/auditor feedback on new audit process and make adjustments/improvements if/when necessary

2020-21 Area of Focus	Status	What steps we've taken this year
Continue rollout of EcoVadis sustainability assessments to Nordic suppliers and start the rollout to the rest of our Group	Ongoing	Onboarded a number of key suppliers across the Nordics and UK&I with more planned (including Greek suppliers)
New Ethical Audit criteria for own label and licensed brand suppliers	Completed	Finalised the review of our audit criteria, piloted, amended accordingly and rolled out our new audit

look to implementing this with our European suppliers in the future. These suppliers are audited prior to selection and then on an ongoing basis, with the frequency of audits set dependant on previous performance. This year we completed 78 ethical audits and we then 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

As we have reported previously, like many other companies with global supply chains, the issue we most commonly find remains 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, reviewing corrective action plans and re-auditing as necessary. Whilst this remains an area with more work to be done, we're pleased with the improvements made in this challenging year.

## **RISK ASSESSMENT**

Risk exposure is ever evolving and our business and supply chain assessment adapt accordingly. We gather intelligence about emerging risks through our industry collaborations including the BRC, ETI and Slave Free Alliance and target our efforts where they can make the most impact.

We have evolved our risk assessment process; in 2016/17 we focused on internal risks and distribution partners as they were identified as a sector that potentially had a high risk. That was followed up with contacting all our suppliers with a workers' rights questionnaire asking questions about age of workers, confirming worker ID, freedom of movement etc. We learnt that the time taken to contact over 12,000 suppliers and to chase responses was not an effective use of our efforts so we have progressed to assessing all suppliers on country of registration (using the Global Slavery Index risk rating) and type of business and then asking targeted questions to the suppliers identified as higher risk. This ensures our resources are focussed on the countries, products/materials and industries where slavery is more prevalent. This year we have furthered developed our risk assessment strategy by introducing the EcoVadis sustainability ratings platform to our Group, working to assess key suppliers in areas of social, environmental and economic performance to drive improvement and impact.

During the pandemic, we have also seen some necessary changes to accommodate social distancing and reduced site visits. We have worked together with suppliers accommodating new safe changes to working practices and the need to prevent face to face contact where possible to keep both our own and our supplier's colleagues safe.

Below we have identified some areas we consider to be of higher risk.

#### **Areas of Risk**

#### **Human rights concerns:**

The ongoing risk to workers' conditions is an area of concern and ongoing monitoring for our business. We have engaged with the ETI and BRC on the topic to gain expertise and discuss experiences with other members as this continues to be challenging for many businesses. When applicable sanction lists are released or updated we contact our relevant suppliers for confirmation that they aren't providing Dixons Carphone with goods or parts that come from any entities named. All suppliers are risk assessed and our own label and licenced brands are audited before being contracted and then throughout the trading relationship by both our inhouse and specialist independent auditors. Where possible we will work with a supplier to help them improve their working practices but if the concern can't be resolved we will cease to work with the supplier.

#### **Raw Materials:**

Given the complexity of our supply chain due to the number of tiers between us and raw material suppliers we are working with the ETI and fellow members to collaborate in this space and help identify high risk materials and/or components where we will need to focus efforts to get back to source.

#### **Waste and Recycling partners:**

Given the manual labour involved in waste and recycling, we continue to recognise this is an area we wish to explore further. This year we continued our work with Slave Free Alliance to conduct a Threat Assessment of tier 2 waste and recycling sites in conjunction with our tier 1 supplier. Last year we completed the desk-based exercise to select which sites to review in person and on-site assessments were planned for 20/21. Unfortunately, due to Covid restrictions we were unable to conduct these assessments so we remained in contact with all parties to ensure they were scheduled as soon as was practical and they have been arranged for early 21/22.

#### **High working hours in China:**

High working hours continues to be an area of risk for our supply chain. We have made ongoing efforts to improve our audit questioning to advance data sources and we have also contacted Chinese suppliers to stress our concern and focus over reducing excessive working hours. We set suppliers' targets for continuous improvement, reviewed corrective action plans and re-audited as needed.

#### **Recruitment Providers:**

We reviewed our recruitment provider contracts to be assured that no subcontracting was taking place. Temporary labour contracts already prohibited the use of subcontracting but this year we also contacted our recruitment providers to ask directly and to dig deeper. We issued these suppliers with our Standards for Responsible Sourcing and respecified our expectations. After discussions, one supplier of temporary labour was unable to provide satisfactory assurances and we chose not to renew our contract with them. We have also commenced a project to consolidate temporary labour provision to ensure we have a thorough understanding of our suppliers in this higher risk field. This follows on to work we've previously done on prohibiting zero hours contracts.

#### **Countries of higher risk:**

As a multinational business with a global supply chain, working with suppliers in areas of risk we keep abreast of emerging issues through collaboration with the ETI, BRC and other organisations as well as identifying countries, companies and individuals flagged by the Global Slavery Index and/or international sanctions. This allows us to take targeted supplier engagement actions to mitigate concerns.

## Our key areas of focus for 2021/2022 include:

» Conduct Gap Analysis in partnership with Slave Free Alliance to identify key activities for the next 3 years

2020-21 Area of Focus	Status	What steps we've taken this year
Review of waste and recycling partners	Planned in 21/22	Due to the restrictions caused by Covid for on-site reviews, we kept in dialogue with all parties and re-scheduled the review for as soon as it was appropriate
Slave Free Alliance Threat Assessment in our Nordics business	On-hold	Due to the restrictions caused by Covid for foreign travel and on-site reviews, we kept in dialogue with all parties and will consider this action as part of our Gap Analysis with Slave Free Alliance.
Understanding of high-risk components/materials	Ongoing	Discussions with ETI and fellow members to keep abreast of high-risk materials.
Review current risk assessment processes	Completed	Overlaying EcoVadis with our current risk assessment to get a more holistic picture of supplier performance.

## **EXPERT ADVICE AND COLLABORATION**



"I work for Dixons Carphone in the warehouse loading vans. I love my job; I am very happy here. I can see a very beautiful future here...thank you very much Bright Future!"

Survivor of Modern Slavery working for Dixons Carphone

We recognise that the issue of modern slavery and human trafficking requires collaboration across private and public sector organisations, countries and civil society. We welcome collaboration on the topic, learning from others as well as actively sharing our own experiences and best practice.

#### S | SLAVE-FREE ALLIANCE

Membership gives us access to expertise around modern slavery in the form of in-house investigations, crisis response, due diligence review and training. Adding to our donation last year, this year, we also helped support Hope for Justice by providing a number of mobile phones and tablets, that were issued to survivors of modern slavery, giving individuals more freedom and helping combat isolation. Following modern slavery training conducted by Hope for Justice, our people coordinator teams were also inspired to start their own fundraiser to support the charity and survivors (Detailed further in training section below).



This year we completed an enhanced expectations report detailing how we had kept workers in our supply chain front of mind in our response to Covid-19. Membership gives us access to expertise and experience as well as topic specific updates in the modern slavery working group. We are required to report on actions and progress biennially, which will help us to drive year on year improvements. We are working with the ETI to collaborate with members working on similar areas of risk.

#### Bright Future

We are proud to be part of this scheme offering survivors of modern slavery a pathway to paid employment. We have several survivors of modern slavery working within our business and have also been part of the committee turning Project Bright Future into Bright Future (Cooperative) Limited, with our own Group Responsible Sourcing Manager representing Dixons Carphone on the board of directors. The pandemic has made it more challenging for businesses, including ours, to place candidates this year. We continue to be committed to placing more candidates when possible. Along with Hope for Justice, we are also working with our colleagues in our Nordics business to look at the possibility of piloting a 'Bright Future' type scheme in Oslo. Plans to pilot this have been delayed this year due to travel restrictions but we look forward continuing with the project as soon as it practical.



(CSR Community, Ethical Labour Working Group & Better Retail Better World)

 Discussions on the human rights concerns related to the treatment of migrant workers/ethnic minorities

We believe collaboration is key to building and maintaining strong, longterm relationships with our suppliers. We have traded with approximately 20% of our current own label and licensed brand 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:

### Dixons Carphone whistleblowing hotline:

This year none of the calls to our confidential line referred to modern slavery or human rights concerns.

## Distribution franchise whistleblowing hotline:

This year no calls were made in relation to modern slaverv.

## High-risk supplier workers' rights questionnaire responses:

As part of our onboarding process, our questionnaire is sent to higher risk suppliers. Responses must be received and followed up (if required) before onboarding can be completed and orders placed.

### Own label and licenced brand audits:

We audit suppliers prior to selection and then on an ongoing basis with the frequency of audits set dependent on previous performance. Our audit criteria include assessments for child/young labour, working hours, wages and deductions, overtime, working conditions and safety, freedom of movement and association, discrimination and disciplinary practices.

 Non-conformities in relation to our own label and licensed brand supplier factory audits:
 We engage directly with suppliers on nonconformities, ensuring issues are resolved to our satisfaction. In all cases we request a corrective action plan and work closely with the supplier to ensure non-conformances are remedied within an agreed timeframe.

- Red Result/Corrective Action Plan (CAP): An audit gives a red result if a supplier fails to meet satisfactory levels in relation to social and ethical standards. After engaging with the supplier on remedial action, if it is impossible for the Supplier to improve their performance or we do not see positive results, they will not be approved, or they will be delisted.
- Working Hours: alongside the audits and corrective action plans (CAPs) at individual factory level, we monitor trends in findings to drive impact. Last year we engaged suppliers on the issue of working hours; auditing and then reviewing CAPs and stressing our focus in this area. Follow-up audits this year for suppliers we previously engaged on this topic reported an average of 5% reduction in maximum working hours.

Ethical audits completed ••

Red audits 00

Suppliers rejected at audit/delisted



## Our key areas of focus for 2020/2021 include:

» Continue monitoring suppliers through our improved, risk-based approach to due diligence

2020-21 Area of Focus	Status	What steps we've taken this year
Continue to communicate and help colleagues understand that Modern Slavery concerns can be raised through our existing whistleblowing procedure.	Ongoing	Modern slavery training for over 3000 distribution colleagues included reference to whistleblowing line.
Enhanced risk-based approach to supplier monitoring.	Completed	With the development of our relationship with EcoVadis we'll have a better understanding of the risk makeup of our supply chain and can invest resource appropriately.

## TRAINING AND AWARENESS



## Our key areas of focus for 2020/2021 include:

» Roll-out of commercial training module

#### **Supplier Training:**

Given the scale and complexity of our supply chain, we see the best way of impacting change on modern slavery is challenging tier 1 suppliers to make changes in their own business and filtering those learnings down their own supply chains, making suppliers realise how these changes could benefit their own business.

We have identified our distribution franchise operations as a particular area that would benefit from modern slavery training. We worked closely with the HR partners that support the distribution franchise owners and their workers, building modern slavery training into their onboarding process, sharing our training materials and ensuring all new starters gain awareness of the risks, minimum standards, contact details for the franchise whistleblowing line and how to spot the signs. Alongside the training we have advised on which questions should be added to their onboarding questionnaire and this year, all new franchisees have now received this enhanced questionnaire.

#### **Colleague Training:**

Our strategy for modern slavery training involves raising awareness across all of our business operations and colleagues, giving confidence to our colleagues to flag any concerns, whether these be at work or in their communities. We know modern slavery thrives when it is hidden and so empowering colleagues to understand the crime and ensuring they know how to report concerns is essential.

This year we have focussed on raising awareness of modern slavery among our supply chain and service operations colleagues by training colleagues how to spot the signs of slavery and raise concerns both within the business and their communities. This training has since been modified allowing us to share with our Supply Chain and Service Operations managers, who have since delivered training to over 3000 of our colleagues. In addition, we ran a targeted workshop for our colleagues involved in recruitment, in conjunction with Hope for Justice. This session resulted in participating colleagues going on to raise funds for the charity as part of a monthlong event.

We will continue to deliver targeted modern slavery training to colleagues where there is a higher risk of modern slavery occurring. To complement our distribution colleague training we are working

on training for our colleagues in commercial roles, improving their awareness of modern slavery and broader issues surrounding responsible sourcing to ensure this is considered in their purchasing decisions.

Whilst we believe that our approach to modern slavery is proportional for our business risk we endeavour to continue raising awareness of the issue and strive to make further improvements year on year.

"The workshop supported by Hope for Justice really highlighted what the concerns were and what our role in spotting and prevent modern slavery is. It was also really inspiring to hear what Hope for Justice has achieved, not just in terms of their fundraising but also their ongoing programmes to drive societal reform. It was then we realised we could do more!"

Laura Smith, People Coordinator

2020-21 Area of Focus	Status	What steps we've taken this year
Targeted training for commercial colleagues	Planned in 21/22	Worked with our learning and development teams to create a draft version of the module to be launched in 21/22
Targeted Supplier training	Ongoing	We identified our distribution franchisee operation for training and worked with our HR partners to support building modern slavery awareness into onboarding
Modern slavery training for distribution colleagues	Completed	We shared modern slavery training with all supply chain managers to deliver to their teams

## **CASE STUDY - TIER 2 SUPPLIER**



Waste and recycling partner – threat assessment

Following the prosecution of a number of Gangmasters here in the UK as part of the multi-agency 'Operation Fort' we felt it appropriate to direct our attention to the waste and recycling sector. Having worked with Slave Free Alliance last year to conduct a threat assessment on our national distribution centre we asked if they could support us this year by working with us and our tier 1 supplier to look at their supply chain.

The process started with a desk-based exercise issuing and reviewing questionnaires that our supplier sent to their waste and recycling partners which allowed Slave Free

Alliance to review and identify sites where it was felt that a follow up visit would be beneficial.

The onsite assessments were planned for March and April 2020 but were delayed due to Covid-19 restrictions and our desire to ensure all parties remain safe. We will complete this work later in the year and it will involve a review of policies and procedures in relation to modern slavery and recruitment, a review of worker records, a training needs assessment, as well as interviews with workers, management and labour providers.

## Our key areas of focus for 2020/2021 include:

- » Complete on-site assessment of waste and recycling partners
- » Work with Slave Free Alliance to share learnings to other members and sector wide

"Slave-Free Alliance is delighted to continue its partnership with Dixons Carphone. Together we have successfully engaged with one of their Tier 1 suppliers to look even further into the supply chain network. It is great to see lessons learned being shared and put into effective practice."

Susan Banister, Head of Business Development Slave Free Alliance

## **KEY FUTURE STEPS FOR 2020-2021**

(We will continue to monitor what is possible and safe regarding Covid-19 so actions will remain under review)

Complete on-site assessment of waste and recycling partners

Conduct Slave Free Alliance Threat Assessment in our Nordics business Work with our Nordics business to look at the possibility of piloting a Bright Future type scheme in Oslo Conduct targeted
Supplier training and/
or capacity building

Introduce targeted training for commercial colleagues

Increase company understanding of high-risk components/ materials through collaboration with ETI

Launch the EcoVadis platform to the rest of our Group



