

# Transparency and Supply Chain Monitoring Policy

How we gather and use the data we require to understand labour and human rights risk and implement supply chain due diligence.

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#### Introduction

Supplier transparency provides the foundation of Asda's Responsible Sourcing and Human Rights programmes. Transparency is the process by which suppliers provide Asda visibility to their in-scope operations and supply chains and the associated information required to inform risk. Our Transparency and Supply Chain Monitoring Policy allows us to assess supply chain risk, deploy resources to assist continuous improvement and monitor compliance to our <u>Standards for Suppliers</u> within our global supply chain.

This policy represents the minimum transparency and due diligence standards that Asda expects for inscope suppliers and sites. All suppliers must read this policy and identify which elements of their own operations and supply chains fall in-scope of the policy requirements <u>prior</u> to providing any products or services to Asda. Asda is committed to using the data disclosed through this Transparency and Supply Chain Monitoring Policy to better understand risk, collaborate with suppliers and identify areas where improvements can be made for the benefit of workers.

All in-scope suppliers and sites are subject to due diligence requirements that are determined by completion of an ongoing risk assessment. Asda's risk assessment is informed by the SEDEX Self-Assessment Questionnaire (SAQ) and Radar tool, open-source country and sector data, reported labour and human rights incidents and academic research. Our due diligence requirements may include but are not limited to, social audits, strategy reviews, additional transparency and self-assessment questionnaire requirements for lower tiers of the supply chain, implementation of worker voice technology and submission of evidence of supplier-led human rights due diligence. Whilst social audits still have a place within our Responsible Sourcing and Human Rights programmes, we recognise the need to go beyond audit to identify root cause.

Asda reserves the right to increase transparency and supply chain due diligence requirements for business areas, commodities or geographies subject to ongoing risk assessment and saliency work conducted inline with our Human Rights Policy.

This Transparency and Supply Chain Monitoring Policy is operated by Asda Stores Limited, including where relevant Asda's trading brands and subsidiaries ("Asda"). The requirements within it are the minimum requirements for Asda Responsible Sourcing and Human Rights compliance. Other Asda business areas may have additional requirements.

Further information can be found on our <u>salient labour and human rights risks</u> and associated policies located on the <u>Asda Corporate</u>, <u>George</u> and <u>IPL</u> websites.

Additional Responsible Sourcing & Human Rights policies:

- Human Rights Policy
- Modern Slavery Policy
- Standards for Suppliers

This document represents the requirements for Responsible Sourcing and Human rights. Additional steps may also apply to suppliers working with George, IPL, Forza or Kober.



### **Synopsis**

- Suppliers are accountable for identifying which elements of their own operations and supply chains fall in-scope of the policy requirements prior to signing a supplier agreement, accepting a purchase order, and/or commencing/providing products to Asda or commencing a service which constitutes acceptance of our Transparency and Supply Chain Monitoring Policy.
- Asda expects in-scope suppliers and sites to adhere to our Transparency and Supply Chain Monitoring Policy and may impose <u>consequences</u> up to and including termination of business for failure to comply.
- Asda reserves the right to audit or inspect Suppliers' books, records, and any site they use at any time.

### Who is in-scope of this policy?

This policy applies to all suppliers and sites where one of the following points is true:

- An Asda Stores Limited (including a subsidiary of Asda and/or trading name) brand identifier is present e.g. an Asda branded product or an Asda company identifier is within a site,
- · Products are deemed exclusive to Asda in production or supply, or
- They provide specified Goods-not-for-resale (GNFR) products or services to Asda (see page 6).

We would deem the following out of scope for our Transparency and Supply Chain Monitoring Policy:

- Large established brands with significant UK market presence that supply an exclusive variety to Asda for a short, limited period e.g. 12 weeks, before it is sold to the wider market and no part of the production is unique or specific to Asda.
- Charity partnerships where an established supplier branded product is supplied featuring exclusive packaging e.g. 'Tickled Pink' and the product is available in other retailers without the exclusive packaging and no part of the production is unique or specific to Asda.
- Unbranded raw materials these may be subject to heightened due diligence requirements based on the commodity risk. It is expected that suppliers undertake sufficient due diligence to meet the expectations outlined within our Standards for Suppliers as they apply to all tiers of our supply chains.

Asda has the option to exempt certain facilities from our Transparency requirements where stock buys are possible.

#### Stock Buys must:

- Be a one-time purchase of a fixed quantity of merchandise that has already been produced and where no future orders of the same goods are anticipated
- Have no Asda branding present
- Only be purchased on a landed basis
- Not meet specific exclusivity requirements



#### **Definitions**

Asda	Asda Stores Limited, including Asda's trading brands and subsidiaries.
Brand Identifier	A brand identifier is anything that identifies the Asda business such as a logo or trading name/brand, designs by/for Asda, address or product codes. This is a non-exhaustive list of examples.
Exclusive	If the following conditions are met, the relationship is considered exclusive:
	<ul> <li>Provides product(s) or services to Asda and does not supply any other established UK retailer</li> </ul>
	<ul> <li>Produces exclusive product(s) or services only for Asda and no other established UK retailer. *</li> </ul>
	If you have any queries as to the exclusivity or otherwise of a product or service, please contact responsiblesourcingqueries@asda.uk
	*A formal agreement is not required to deem a product exclusive.
	Note: It is a supplier's responsibility to inform Asda Responsible Sourcing and Human Rights team if a product is no longer deemed exclusive to Asda e.g., sold in other established UK retailers.
Established UK Retailer	A recognised retail company with a significant market presence, including physical store locations, a strong brand identity, and a history of successful operations within the United Kingdom.
Established brand or product	A brand or products with a significant market presence and equity.  Available in multiple established UK Retailers.
Tier-one site	The last point of manufacture that results in a final product, ready to be provided to Asda.
Tier-two site	A site/location in the supply chain that directly precedes the last point of manufacture e.g., a factory or farm providing a component product to another site that produces the final product for Asda; e.g. a facility providing an embroidered component to another site that produces the final garment to be provided to Asda.
Unapproved production, unauthorised production and sub-contracting	Any in-scope site failing to meet the requirements of this policy. See page 14.

If you require further support to identify if the sites used are in-scope of this policy, or have any queries  $regarding \ the \ definitions \ provided \ above, \ please \ contact \ \underline{responsible sourcing queries@asda.uk}.$ 

#### George

Additional due diligence checks are required for our George clothing business; as a result, we have expanded our transparency requirements for George clothing suppliers.

The following sites must be disclosed in addition to those listed above:

- All second-tier facilities such as printing, embroidery, laundry and tanneries;
- Any subcontracted sites where garment transformation is taking place if not housed in the main production site such as linking, cutting and footwear upper stitching;
- Any nominated trims and accessories such as zips and hangers, packaging, fabric mills; and
- Any facilities and processes which involve Direct to Retail or Disney license.



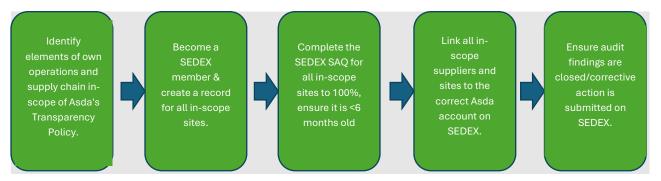
# Goods-not-for-resale (GNFR) products or services

The following Goods-Not-for-Resale (GNFR) suppliers are within the scope of this policy:

GNFR Category	Business Areas	In Scope (including but not limited to)
Construction, Facilities	Construction Services & Labour,	Trollies & Baskets
Management &	Fixtures & Equipment, Maintenance	Metal Fixtures
Equipment	& Repair, Utilities, Waste Removal	Construction Materials
	and Recycling	Signage
		General Maintenance
		Depot Trays & Totes
		Security
		Cleaning Services
Operations	Hygiene, Cleaning & Chemical	Print
Consumables	Supplies, Office Supplies, Safety &	Packaging
	Security Equipment and Supplies,	POS
	Printing and Packing Supplies,	Uniforms
	Labels, Signage & Accessories,	Labels
	Merchandise Packaging,	Display Equipment
	Merchandise Related Supplies,	Clothes Hangers
	Photo Supplies, Plastic and Paper	Packing Tape
	Bags and Uniforms	
Marketing	Print Management, Publications,	As per operations consumables
	Point of Sale, Paper, Packaging and	
	Promotional Merchandise	
Corporate Services	Temporary Labour, Outsourced	Labour Providers
	Business Services, Safety & Security	In-Store Cafes
	and Cash-in-transit Services	
Information Technology	Telephony, Hardware, Software,	Telephony call centres
	Maintenance, Support Services	
Logistics	Third Party logistics Warehouse and	Couriers
-	Distribution Centre Management,	Road Haulage
	Mail & Delivery Services, Pallets,	Retail Distribution
	Road Cargo Transport & Storage,	Warehouse
	Trucking, Ocean, Air and Rail Freight	
	and Fleet Maintenance	
Other (Not Assigned A	Tenants, Concessions	Food Concessions
GNFR Category)		Food and Non-Food Tenants (concession -
		excluding vestibule services)
		Car Washes



### Step 1 - Transparency via <u>SEDEX</u>



#### All in-scope suppliers and sites must:

- 1. Become a member of SEDEX and establish a record for all in-scope sites. The address of each site must match the record submitted on Asda systems during onboarding.
- 2. Ensure that the site SEDEX Self-Assessment Questionnaire (SAQ) is 100% completed and updated / completed within the last 6 months.
- 3. Link all in-scope sites to the correct Asda business area account on SEDEX, ensuring the business relationship is accurately reflected through 'direct' or 'indirect' links.
- 4. Grant the relevant Asda business area account full visibility of all in-scope sites: contact information, SAQ, and all audit records. Sites that have not undertaken an audit within the last 5 years will be required to undertake one as part of this policy, see <a href="Due Diligence">Due Diligence</a> section. This requirement may delay on-boarding, as this will be reviewed and communicated by the Responsible Sourcing and Human Rights team.
- 5. Ensure all audit findings (non-conformances and non-compliances) have either been verified within the timescales set by the auditor or where findings are not overdue, corrective action evidence has been submitted on SEDEX irrespective of this audit being requested by Asda. All 'open' NCs must (either) be pending auditor review and have an audit booked and paid for or if there is a dispute in progress, this must be reflected within the Sedex platform. Progression of on-boarding for 'open' NCs is subject to review and confirmation from the Responsible Sourcing and Human Rights Team.

It is your responsibility to maintain your membership with SEDEX and ensure all in-scope sites accept the relationship with Asda and always provide full transparency. Failure to comply with this process will result in a breach of this policy, our <u>Standards for Suppliers</u> and ultimately the Conditions of Purchase you have with Asda.

### Linking on SEDEX

**Direct links** should be used by suppliers who **own or are legally accountable for** the sites that are being utilised for the production/provision of the product/services. Link *directly* to the Asda business area ZC account for the product area you supply and provide visibility of all <u>owned</u> in-scope sites that you utilised for production/provision of products/services.

**Indirect links** should be used by suppliers who **do not own or are not legally accountable for** the sites that are being utilised for the production/provision of the product/services **and/or** are providing a product/service on behalf of another supplier (e.g., acting as an Agent). The in-scope sites should be *indirectly* linked to the correct Asda business area ZC account and to you *directly*, as the supplier.

You, as our supplier, are responsible for these steps being correctly executed.



Training and guidance are available on the SEDEX website via their <u>E-learning platform</u>. For further questions or support, please contact the SEDEX helpdesk and/or your SEDEX account manager.

#### Asda SEDEX ZC Codes

Asda Grocery - ZC1069018	For suppliers and sites providing food or grocery products
<b>Asda GNFR -</b> ZC4175399	For all goods-not-for-resale products and services such as packaging and labour providers
Asda General Merchandise - ZC414283949	For suppliers and sites providing General Merchandise products, including George Home
<b>George</b> - ZC1086103	For suppliers and sites providing apparel, footwear and accessories
International Procurement Logistics - ZC4175422	For suppliers and sites providing products via our subsidiary International Procurement Logistics (IPL), including Forza Foods Limited and Kober Limited

### Step 2 - Transparency via Open Supply Hub

All in-scope sites, as defined by this policy, must be disclosed and claimed by suppliers at the time of onboarding to Open Supply Hub.

Open Supply Hub aims to create the world's most complete, open and accessible global supply chain map and drive transparency within complex networks of sites and suppliers. Asda is committed to providing up to date data on our operations and suppliers and the following steps will ensure this transparency is owned by the correct parties and managed accordingly.

#### Disclosing sites and Obtaining OS IDs

To disclose in-scope sites and obtain OS IDs for them, suppliers have two options:

- 1. Add a single location: Follow the direction on this page to add one or few locations to Open Supply Hub. This option is preferred as it links directly to the claims process below.
- 2. **Bulk upload:** Follow the instructions on this page to upload multiple locations in bulk. Use this option if you want to disclose more than 10 sites at the same time.

The sites disclosed can be any suppliers / sites that you work with, owned facilities, suppliers, subcontractors, etc. This will list these sites on Open Supply Hub and show that you are connected to them.

#### **Claiming sites**

An owner or Sr. manager of the production location can claim the site. This gives them access to a complete, credible, and confirmed profile, marked with a green banner and a "Claimed" badge, as well as control over the information displayed for their site.

Please refer to the <u>directions for claiming a production location on this page</u>. You will be required to submit documents/links to confirm company name and address, as well as the person who submitted the claim request. You can also ask any suppliers you list but do not own to claim their profiles, <u>using this template</u>. Translated resources are also available in <u>Turkish</u>, <u>Portuguese</u> and <u>Bangla</u>. If you have any functional issues with the Open Supply Hub website, portal or upload process please contact their helpdesk - <u>support@opensupplyhub.org</u>.



To ensure prompt approval of the claim: suppliers must submit the required documentation to confirm the:

- identity and affiliation to the company of the person submitting the claim and
- the <u>name and address of the production location</u>

#### Eligibility to submit a claim

Only individuals (claimants) with sufficient authority to represent a production location and manage its information on Open Supply Hub may claim a profile. This is typically an **Owner** or **Senior Manager**, but others may also be eligible if they meet one of the following criteria:

- The claimant's account is registered with a **generic company email address** (e.g. info@companyname.com, compliance@companyname.com);
- The claimant holds at least a **Manager-level title** and can provide proof of their role and affiliation with the company (e.g. an employment confirmation letter).
- The claimant submits **written approval** (including name, title, and contact email) from a senior manager or owner authorizing them to claim and manage the profile.

In order to comply with our on-boarding process and demonstrate compliance, the Open Supply Hub ID or OS ID should be shared within correspondence and on-boarding records within the Asda system. Asda Responsible Sourcing & Human Rights Team will then validate that the in-scope site has been claimed by an owner or manager as part of the compliance checks.

### Due diligence (Goods-for-resale)

**All in-scope suppliers and sites will be continuously risk assessed by the Asda Responsible Sourcing & Human Rights team.** Asda's risk assessment is informed by the SEDEX Self-Assessment Questionnaire (SAQ) and Radar tool, open-source country and sector data, reported labour and human rights incidents and NGO/academic research. **To inform our risk assessment, sites must provide audit history visibility within the Sedex platform.** Suppliers will be informed of each site's risk category at onboarding and/or re-activation and advised of any changes if they occur during active supply.

#### Suppliers and sites will fall into one of three risk categories:

Risk category	Due Diligence Requirements
Low Risk	An SAQ must be updated every twelve months and shared with Asda via the SEDEX platform
	<ul> <li>Suppliers must evidence continuous improvement and manage risks to reduce their risk category. See appendix for tools and resources available to support this activity.</li> </ul>
	<ul> <li>Site(s) must be audited by a third-party social auditor every five years as a minimum.</li> </ul>
	<ul> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales specified by the auditor, irrespective of this audit being requested by Asda.</li> </ul>



Risk category	Due Diligence Requirements
Medium Risk	<ul> <li>An SAQ must be updated every six months and shared with Asda via the SEDEX platform</li> <li>Suppliers must evidence continuous improvement and manage risks to reduce their risk category. See appendix for tools and resources available to support this activity.</li> </ul>
	<ul> <li>Site(s) must be audited by a third-party social auditor every five years as a minimum.</li> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales provided by the audit body, irrespective of this audit being requested by Asda.</li> </ul>
High Risk	<ul> <li>An SAQ must be provided every six months and shared with Asda via the SEDEX platform.</li> <li>Suppliers must evidence continuous improvement and manage risks. See appendix for tools and resources available to support this activity.</li> <li>Site(s) must be audited by a third-party social auditor every 12 months.</li> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales provided by the audit body, irrespective of this audit being requested by Asda.</li> </ul>

It is the supplier's responsibility to ensure you, and all in-scope sites meet the due diligence requirements outlined above. Asda will monitor compliance. Failure to remediate non-compliances / non-conformances may result in delays to on-boarding as we require evidence to be uploaded to SEDEX and reviewed by the auditor prior to any 'activation'. Failure to adhere to this process will result in a breach of our <u>Standards for Suppliers</u> and ultimately the Conditions of Purchase you have with Asda.

### Audit requirements

Social audits must be:

- Undertaken by an APSCA approved auditor and firm
- Conducted on either an unannounced or semi-announced basis, except for follow-up audits
- 2 or 4 pillar audits (if SMETA)
- Uploaded to the SEDEX platform with all audit findings mapped to SMETA issue titles by the audit firm

Asda will accept <u>SMETA</u> methodology audits. In certain instances, we will also accept the following audit methodologies:

- Amfori BSCI
- Siza
- SA8000
- Ethical Supply Chain Program (ESCP), previously known as IETP Ethical Toy Program

If you would like to utilise a different methodology to those listed above, please contact <a href="mailto:responsiblesourcingqueries@asda.uk">responsiblesourcingqueries@asda.uk</a> to obtain approval.

If a non-SMETA audit is undertaken, it is still required to be uploaded for review to SEDEX. All audit findings must be mapped to a corresponding SMETA issue title within the platform and evidence provided as to how the findings have closed in-line with Asda's programme requirements, unless you are provided a derogation to this by the Responsible Sourcing and Human Rights team.



Asda provides flexibility in selected scenarios where country context, or applications of audits may vary e.g. the Sustainability Initiative of South Africa - SIZA. In these instances, our approach may vary in terms of the consolidation of sites and submission of information to Asda. Should you have any questions relating to this, or a variation to our standard Transparency and Supply Chain Monitoring Policy please contact responsiblesourcingqueries@asda.uk.

#### Disney audit requirements

All facilities that produce Disney products for Asda must also submit an ILO Better Work programme social audit in order to comply with Disney's FAMA requirements. This is in addition to Asda's own Responsible Sourcing and human rights audit requirements.

For further information on how to submit the ILO Better Work audit:

- George Apparel suppliers please contact Indira Chauhan Indira. Chauhan@asda.co.uk
- General Merchandise suppliers please contact gm-disneyfama@asda.uk

For any other queries regarding Disney requirements please contact your lead sourcing or commercial colleague.

### Audit finding derogations

Audits in certain situations and markets present nuances which can be hard to address via a formal close-out process. These will be reviewed and managed by the Responsible Sourcing and Human Rights team via a derogations process. To request a derogation for an audit finding please contact responsiblesourcingqueries@asda.uk.

We will review each derogation request on a case-by-case basis. We will set minimum standards, and in some instances provide guidance, that suppliers must meet via evidence uploaded to SEDEX. In some instances, these may not close the audit findings but will be considered sufficient corrective action by Asda.

Asda reserves the right to refuse a derogation request if proposed corrective action does not provide adequate protection for workers or cannot be evidenced.

# Due diligence (Goods-not-for-resale)

Asda is committed to ensuring that all suppliers providing both Goods-Not-for-Resale (GNFR) products or services adhere to our Responsible Sourcing and Human Rights standards. The following due diligence processes will be implemented during the onboarding of GNFR suppliers, ensuring alignment with our overall transparency and ethical sourcing objectives.

All in-scope suppliers and sites will be continuously risk assessed by the Asda Responsible Sourcing & Human Rights team.

Asda's risk assessment is informed by the SEDEX Self-Assessment Questionnaire (SAQ) and Radar tool, open-source country and sector data, reported labour and human rights incidents and NGO/academic research. To inform our risk assessment, sites must provide audit history visibility within the Sedex platform. Suppliers will be informed of each site's risk category at onboarding and/or re-activation and advised of any changes if they occur during active supply.



#### Suppliers and sites will fall into one of three risk categories:

Risk category	Due Diligence Requirements
Low Risk	<ul> <li>An SAQ must be updated every twelve months and shared with Asda via the SEDEX platform</li> <li>Suppliers must evidence continuous improvement and manage risks to reduce their risk category. See appendix for tools and resources available to support this activity.</li> <li>Site(s) must be audited by a third-party social auditor every five years as a minimum.</li> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales specified by the auditor, irrespective of this audit being requested by Asda</li> </ul>
Medium Risk	<ul> <li>An SAQ must be updated every six months and shared with Asda via the SEDEX platform</li> <li>Suppliers must evidence continuous improvement and manage risks to reduce their risk category. See appendix for tools and resources available to support this activity.</li> <li>Site(s) must be audited by a third-party social auditor every five years as a minimum.</li> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales provided by the audit body, irrespective of this audit being requested by Asda</li> </ul>
High Risk	<ul> <li>An SAQ must be provided every six months and shared with Asda via the SEDEX platform.</li> <li>Suppliers must evidence continuous improvement and manage risks. See appendix for tools and resources available to support this activity.</li> <li>Site(s) must be audited by a third-party social auditor every 12 months.</li> <li>All non-conformances/non-compliances identified in any social audits must be remediated within the timescales provided by the audit body, irrespective of this audit being requested by Asda</li> </ul>

We recognise that our GNFR (Goods-Not-for-Resale) suppliers are diverse, spanning both products, such as signage and uniform, and services, including logistics and facilities management. Given this variety, a standardised approach to ethical audits may not always be the most effective solution. We want to be clear about what's expected and where there is flexibility:

#### **GNFR Goods Suppliers –** If you supply tangible goods:

A social audit will usually be required. This should be:

- Undertaken by an <u>APSCA</u> approved auditor and firm
- Conducted on either an unannounced or semi-announced basis, except for follow-up audits
- 2 or 4 pillar audits (if SMETA)
- Uploaded to the SEDEX platform with all audit findings mapped to SMETA issue titles by the audit firm

We accept SMETA audits as standard, but also recognise other reputable approaches, including:

- Amfori BSCI
- Siza
- SA8000
- Ethical Supply Chain Program (ESCP), previously known as IETP Ethical Toy Program

**GNFR Service Suppliers** – If you deliver services with no physical product. A traditional factory-based audit may not be appropriate. In some cases, a SMETA



Service Provider audit might be suitable. More often, you'll be asked to complete a tailored due diligence route, agreed with us, that reflects the nature of your service and the associated risk.

We'll always aim to take a proportionate, risk-based approach—what's right for one supplier may not be right for another. If you think an alternative approach would be more appropriate for your business, please get in touch with us first at: responsiblesourcingqueries@asda.uk.

It is your responsibility to ensure you, and all in-scope sites meet the due diligence requirements outlined above. Asda will monitor compliance. Failure to remediate non-compliances / non-conformances may result in delays to on-boarding as we require evidence to be uploaded to SEDEX and reviewed by the auditor prior to any 'activation'. Failure to adhere to this process will result in a breach of our Standards for Suppliers and ultimately the Conditions of Purchase you have with Asda.

In addition to the above, in-scope GNFR suppliers will also undergo a comprehensive risk assessment process, which includes, but not limited to, site / Head Office Visits and Audits. Depending on the risk category assigned, suppliers may be subject to site visits and audits to verify compliance with Asda's Standards for Suppliers.

Asda will provide training and resources to GNFR suppliers to help them understand and comply with our responsible sourcing standards. This includes:

- Workshops and Webinars: Regular training sessions will be conducted to educate suppliers on best practices in labour rights and ethical sourcing.
- Guidance Documents: Suppliers will have access to guidance documents outlining Asda's expectations and requirements.

### GNFR Strategic Partners, Agents & Neutral Vendors

Partners providing GNFR services to Asda – in the capacity of an agents, strategic partner or Neutral Vendors will establish direct links to the Asda business area ZC account for the product area you supply and provide visibility of all owned in-scope sites that you utilised for production/provision of products/services. These same partners are also expected to support their suppliers (who supply into Asda group) in establishing indirect links to the correct Asda business area ZC account and to you directly, as the supplier. You, as our supplier, are responsible for these steps being correctly executed.

Training and guidance are available on the SEDEX website via their E-learning platform. For further questions or support, please contact the SEDEX helpdesk and/or your SEDEX account manager.

Members of Asda's Responsible Sourcing and Human Rights Team will engage agents, strategic partners and neutral vendors directly to establish quarterly reporting processes to assess transparency into tier 2 indirect suppliers and agree reporting metrics and methodology as appropriate.

By implementing these due diligence processes, Asda aims to ensure that all GNFR suppliers operate in a manner that respects human rights and adheres to our commitment to ethical sourcing. For further inquiries or support regarding the GNFR onboarding process, please contact responsiblesourcingqueries@asda.uk.

# Enhanced due diligence (applicable to GFR & GNFR)

As part of our Responsible Sourcing and Human Rights programme, we consider how factors such as government effectiveness, conflict / civil unrest, proximity to conflict, rule of law, natural disasters, population displacement, control of corruption and government stability affect the risk of noncompliance with our Standard for Suppliers. We also perform regular ASDA risk assessment to identify the salient risks and associated supply chains pertinent to our business, which require additional attention from Asda, our suppliers, and colleagues to address root cause. Further information on our salient labour and human rights risks can be found <a href="https://example.com/here.com/h

In these instances, suppliers are expected to operate in-line with the United Nations Guiding Principles on Business and Human Rights and will be subject to enhanced due diligence requirements. Requirements will vary for each country, region, or supply chain category identified below.

### Countries/regions/supply chains where additional due diligence is required

Apparel & textiles United Kingdom	Fast Forward is a due diligence program supporting UK facilities.  Currently all Apparel sites are engaged in training and due diligence required to improve Human rights practices. This also involves a forensic audit which encourages factory management to comply with UK legislations
Apparel, GNFR & General Merchandise Bangladesh	Nirapon building safety programme  All suppliers and facilities in Bangladesh must participate in the Nirapon Bangladesh safety monitoring programme.  For more information, George Apparel suppliers please contact Indira Chauhan - Indira.Chauhan@asda.uk. GNFR and General Merchandise suppliers please contact responsiblesourcingqueries@asda.uk.
Apparel, GNFR & General Merchandise Pakistan	Accord building safety programme All suppliers and facilities in Pakistan must participate in the Accord Building Safety monitoring programme. For more information, George Apparel suppliers please contact Indira Chauhan - Indira.Chauhan@asda.uk. GNFR and General Merchandise suppliers please contact responsiblesourcingqueries@asda.uk

### Investigations and site visits

Asda, or its designated representatives, reserves the right to investigate or visit any site used by our suppliers across our supply chains without notice.

In addition, we may choose to investigate allegations that a supplier and/or site have engaged in conduct that may breach our <u>Standards for Suppliers</u>. Allegations may be received through several sources, including but not limited to audit information, Asda Ethics hotline, anonymous tips, media, academic or NGO reports.

Substantiated findings may result in consequences for suppliers and/or sites, up to and including termination of business with Asda and its subsidiaries. Suppliers must cooperate and make sites available, in accordance with the requirements set out in an applicable supplier agreement and/or Asda's Standards for Suppliers. The supplier is responsible for the remediation and close out of any findings identified in an investigation or site visit and is required to define the process for any remedy, as per our <u>Standards for Suppliers</u>.



### Prohibited sourcing regions

Asda acknowledges that there are certain sourcing regions or countries that pose severe human rights risks that unfortunately cannot be addressed through existing models for due diligence.

Expressly prohibited sourcing countries / regions (as determined by the Asda Responsible Sourcing and Human Rights team):

- Xinjiang Uyghur Autonomous Region (XUAR)
- Russian Federation
- Occupied Palestinian Territories
- Occupied Ukraine
- Myanmar

Other Asda business areas may have additional restrictions or prohibitions on certain sourcing countries and regions. Please consult with relevant Asda colleagues for further information. For example, if you are looking to source from a country that may be impacted by Trade Sanctions, please contact TradeCompliance@asda.uk.

### Unauthorised production

Production at a facility that is not transparent, as set out within this policy, and has not been exempted by the Asda Responsible Sourcing and Human Rights team will be considered unauthorised. A supplier's failure to disclose a site and/or the production of a product in an undisclosed site is considered to be unauthorised production and can lead to consequences for the supplier, site or both.

# Consequences of non-compliance

Where an issue is identified in the supply chain, we are committed to working with suppliers and third parties to understand the root cause and provide relevant guidance, resources and support to enable robust investigation, delivery of corrective action and where required, remediation for impacted workers. We encourage suppliers to contact us at the earliest opportunity when an issue is identified so that we can apply the above approach.

The following escalation process may be utilised for breaches of Asda's Responsible Sourcing and Human Rights policies or Standards for Suppliers and will be administered by the Responsible Sourcing and Human Rights team in collaboration with other areas of the Asda business.

Stage 1 - Notification	A notification communication will be sent informing the supplier and site of the	
	issue and required corrective action(s)	
Stage 2 - Caution	A caution communication will be sent informing the supplier, site and relevant	
	Asda stakeholders of the unsatisfactory resolution of the previous notification	
Stage 3 - Sanction	If following the above stages there is still no satisfactory resolution of the	
	issue/breach, one of the following sanctions may be applied:	
	Reduction of business or suspension	
	Termination of supply for Asda	

These consequences will be recorded against the supplier and/ or site for two years. Asda may issue multiple consequences at one time for multiple infringements, or the severity of the issue involved.

Reactivation



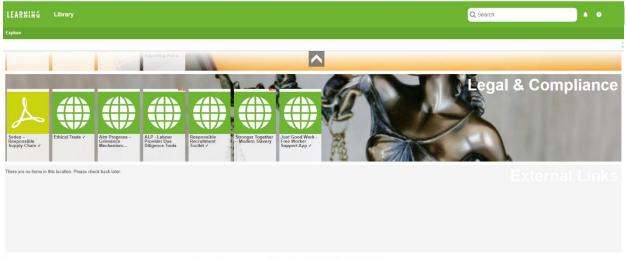
If a supplier or site has been previously inactivated as a result of breaching Asda's Responsible Sourcing and Human Rights policies, to be re-considered for supply to Asda, they must:

- Demonstrate to the Asda Responsible Sourcing and Human Rights team that corrective action has been taken to resolve the issue that led to the inactivation.
- Meet the requirements of Asda's Transparency and Supply Chain Monitoring Policy.

Asda reserves the right to evolve its approach to reactivation of a supplier and site and may require additional action beyond the minimum requirements of this policy to provide assurance and validation of corrective action.

# Appendix: Supporting tools & resources

Our <u>training</u> page contains links to tools and guidance that aim to help suppliers meet our programme requirements and reduce risks within their supply chains



If you experience any issues accessing content, or if any of the content does not work as intended, please contact us via email on <a href="mailto:futurelearning@asda.co.u">futurelearning@asda.co.u</a>