

# PwC UK Modern Slavery Statement

December 2023



**pwc**

[www.pwc.co.uk/humanrights](https://www.pwc.co.uk/humanrights)



# Executive summary

PwC UK<sup>1</sup> is committed to addressing modern slavery<sup>2</sup> risks in its business and supply chain, aligning with the firm’s Purpose to build trust in society and solve important problems. This statement outlines the actions taken by PwC UK to address these risks during the financial year from 1st July 2022 to 30th June 2023.

This year, we have maintained our focus on identifying and managing modern slavery risks relating to our business against a backdrop of the cost of living crisis, growing geo-political uncertainty and the ever increasing effects of climate change.

**This, our eighth modern slavery statement, sets out how we have:**

- increased the robustness of our measurement and reporting by transitioning to a third party sustainability assessment platform;
- embedded human rights considerations into UK supplier contracting arrangements; and
- reviewed our supply chain hotspots and performed due diligence over these areas.

**No infringements or violations have been identified this year in our operations or supply chain. We will continue to develop and strengthen our due diligence approach in the coming year and are committing to:**

- provide a selection of our suppliers with human rights upskilling and guidance; and
- conduct training for all members of our procurement team and other relevant internal stakeholders.

See ‘Our commitments’ section for full details of our progress and commitments.

We continue to be committed to respecting and upholding the human rights of our people and other individuals with whom we interact, in line with the [UN Global Compact](#) (of which we are a long-standing member), the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines on Multinational Enterprises](#).



Policies and Procedures



of our key suppliers<sup>3</sup> have a human rights policy.<sup>4, 5</sup>



of our key suppliers have a whistleblowing procedure in place.<sup>4, 6</sup>



Actions and Processes



of our key suppliers who operate in high risk sectors have taken actions to prevent child labour, forced labour & human trafficking.<sup>4, 7</sup>



of our key suppliers have structured mechanisms to deal with policy violations.<sup>4, 8</sup>



Engagement and Training



of suppliers representing UK procurement spend have had their sustainability performance evaluated through our third party sustainability assessment platform.<sup>4</sup>



of PwC UK staff have completed modern slavery training.<sup>9</sup>

# 1. Business overview

### What we mean by ‘our business’ and ‘our operations’

PwC UK is a leading professional services firm, delivering audit, risk, consulting, deals and tax services to clients in the public, private and not-for-profit sectors, as one of the entities in the wider PwC network<sup>10</sup>.

This statement outlines the actions taken by PwC UK to address modern slavery risks in its business and supply chain. In this context, PwC UK refers to PricewaterhouseCoopers LLP (a limited liability partnership incorporated in England) and its related entities that carry on their business in the UK. In the 2023 financial year PwC UK employed

around 24,000<sup>11</sup> people, operating out of 19 offices throughout the UK.

### What we mean by ‘our supply chain’

We are a member firm of the global PwC network. For the purposes of the statement the other members of the PwC network (“PwC member firms”), including our non-UK related entities, may be part of our supply chain, as there are some services they supply for PwC UK’s own benefit, in addition to supplying services for specific PwC UK client engagements.

Our relationship with PwC member firms is different to that with external third party

suppliers. PwC member firms are accountable to uphold many global policies, including our global [Human Rights Statement](#). All PwC member firms must declare annually that they comply with the global policies and processes.

As a professional services firm, we also procure goods and services from third parties other than PwC member firms (“suppliers”) for the benefit of the firm including offshore vendors, contingent workers and managed services providers, facilities management and hospitality service providers, subcontractors for specific client engagements and through global PwC network agreements.



Our business and supply chain

3,241

suppliers used by PwC UK in FY23.  
FY22 - 2,962

£737m

our total UK supply chain spend for FY23.  
FY22 - £632m<sup>12</sup>

24,000

staff employed by PwC UK in FY23.  
FY22 - 22,000



## 2. Policies and governance

---

### 2.1 Operations

---

Our [Human Rights and Modern Slavery Policy](#) sets out our position in line with internationally recognised human rights principles. It is displayed on every floor across all our offices, hosted on our website and is circulated annually via digital communications. All our staff are required to confirm annually that they are familiar and comply with the Human Rights and Modern Slavery Policy, as part of their mandatory General Annual Confirmation.

The Human Rights and Modern Slavery Policy is embedded in our culture through our [Global Code of Conduct](#) and sets the tone from the top. Living the code is fundamental to who we are as PwC professionals.

Accountability for human rights and modern slavery relating to our business resides with the Chief Operating Officer. Responsibility for day-to-day management of the programme is led by the Director of Corporate Sustainability. An annual review of its effectiveness is conducted in conjunction with other stakeholders in the firm that include risk management, procurement, service owners and the Office of General Counsel.

This statement is reviewed by the Executive Board and ultimately approved on behalf of the Partners by the Supervisory Board.

Our Internal Audit team has reviewed the information in this Modern Slavery Statement and the conclusion of their work was that the disclosures made were in line with the supporting evidence provided.

### 2.2 Suppliers

---

Our approved PwC UK supplier template agreements create a contractual obligation on the supplier to comply with the [Global Third Party Code of Conduct](#) (GTPCoC) and all applicable laws.

In some instances we may contract on suppliers' templated agreements, adjusted to place equivalent contractual obligations on the supplier. Such contracts should also (with some limited exceptions) contain similar concepts. We acknowledge, however, that: i) no code can address every situation that a third party supplier may encounter; and ii) contractual obligations do not guarantee compliance. Accordingly, we recognise that the GTPCoC and our supplier contracts are not a substitute for a supplier's own accountability and responsibility to exercise good judgement and proper business conduct.

As set out in our Human Rights and Modern Slavery Policy, where a violation of one or more internationally-recognised human rights is identified, we work with relevant parties to seek to ensure victims have access to remedy, compensation and justice. We also investigate the root cause and take appropriate steps with the supplier to prevent recurrence. Ultimately, if we feel that a supplier's response is unsatisfactory, we will terminate the contract.

## 3. Due Diligence

---

We communicate our expectations to our employees and suppliers with regards to human rights and modern slavery, and use a range of mechanisms to ensure that we can monitor standards and identify instances of modern slavery in both our operations and supply chain, outlined in sections 3.1 and 3.2 below.

### 3.1 Operations

---

Our people are our most valued asset and therefore creating a safe, fair and inclusive working environment is critical. We have processes in place to achieve this, examples of which are detailed below.

All employees are asked on an annual basis to declare formally that they have read and understood our Global Code of Conduct, which sets out the expected behaviours of our people.

Our [Speak Up helpline](#) (+44 (0)800 069 8056) is available to any partner, employee or third party (including suppliers and contractors) who comes across bad business conduct or unethical behaviour, including suspected instances of modern slavery. Stakeholders are made aware of the helpline by way of a number of channels, including our website and posters in our service hubs. All reports are investigated by our Ethics team.

Building on the work done in FY22, this year we have continued to deliver upskilling sessions to our risk management teams across the business, in addition to developing further training. Furthermore, all new joiners completed the mandatory firmwide modern slavery e-learn as part of their induction.

### 3.2 Supply Chain

---

In FY23 we continued to work closely and build strong relationships with our suppliers of products and services, including support staff such as cleaners, caterers and mailroom personnel.

Upholding human rights (including addressing the challenges of modern slavery), is an integral part of our Corporate Sustainability strategy and sits within one of our three strategic pillars - the pillar to accelerate a just transition<sup>13</sup>. We have shared our refreshed strategy and objectives with key suppliers at our annual sustainability supplier forum.

Consideration of modern slavery risk is embedded at each stage of the PwC UK procurement cycle, from supplier evaluation to contract management. As described in section 2.2, our UK contract templates include terms requiring our suppliers to comply with our GTPCoC and applicable laws (including relating to modern slavery).

For the purpose of engagement and due diligence, we focus on a group of 86 key suppliers, selected on the basis of spend, sustainability impact, and modern slavery risk. For FY23, our key supplier population represented 63% of our overall UK procurement spend. We have an active programme of engagement for our key supplier population in order to manage human rights impacts linked to the goods and services we procure.

For our supply chain hotspots, outlined in section 4, we conduct a range of due diligence and desk-based research. This consists of reviewing and evaluating supplier controls, reporting, staff training, third party audits and engaging suppliers directly. Our approach is to first focus on oversight of our direct suppliers, then to increase visibility of working practices in indirect suppliers.

## 4. Risk assessment and management

Professional services firms are typically considered a relatively low risk sector for modern slavery. Nonetheless, we believe it is essential that we have strong risk identification and mitigation processes in place for both reputational and regulatory risks and for humanitarian reasons.

We have conducted analysis of publicly available specialist reports and performed desk based research in order to identify potential modern slavery risk areas in our supply chain.

In FY23 we continued to focus our efforts on increasing transparency and assurance for the supply chain hotspots identified. These are: information technology hardware, food, promotional merchandise, supplier personnel uniforms, hotels, global information technology procurement and waste and recycling. Our supply chain hotspots from UK procurement total 6.62% of our overall direct UK procurement this year. An additional hotspot, global information technology services<sup>14</sup>, are procured through our global network and are therefore not included in the UK spend calculation.

We further developed our approach to modern slavery risks arising from client services in FY23, and have continued to engage with risk teams across the business to raise awareness of the indicators of modern slavery. See section 4.3 and 5 for more details on awareness training and upskilling.

### 4.1 Suppliers providing services

For supplier personnel<sup>15</sup> working in our UK offices, the risks are relatively low, given the national legislative context and the robust policies and processes we have in place throughout our business. Nevertheless, we recognise that certain supplier personnel—such as cleaners and catering personnel—may be vulnerable groups. We have procedures in place with our key suppliers to ensure that they adhere to our required standards. Following a review of our suppliers' standards, we have embedded information on modern slavery and employment rights into supplier personnel on-boarding materials this year. Further details on upskilling are available in section 5.

#### *Hotels*

As part of our due diligence over this hotspot area, we assessed the modern slavery statements of our key suppliers, reviewing their approach and mitigation actions over sector risks such as ensuring adequate staff training to spot potential victims, robust recruitment processes and the existence of supply chain risk assessments. This analysis took into account the level of detail and transparency in these disclosures, in addition to performing an adverse media check and following up with suppliers where appropriate to discuss any actions needed.

Drawing on our findings from this due diligence, we will continue to seek opportunities to improve the actions taken by our suppliers in this area, through engagements on our enhanced supply chain standards and gaps identified by the third party assessment platform.

#### *Waste and recycling*

Having refined and improved our due diligence approach to this area in FY22, this year we continued to extend our review coverage of the companies used to carry our waste streams. Our approach consisted of analysing our waste stream data by the quantity of waste treated at tier<sup>16</sup> three or four waste destination carriers (where waste was sorted or processed). The due diligence performed consisted of reviewing the carriers' modern slavery statements and any associated adverse media.

This process was undertaken for waste carriers representing 94% of our total UK waste mass for FY22<sup>17</sup>, an increase from 84% last year. We were able to increase coverage by expanding the number of carriers subject to review, and by performing due diligence over the carriers responsible for IT Equipment waste. The carriers subject to due diligence treated at least one waste stream, such as food waste or cardboard, from each of our 19 offices.

The due diligence did not identify any reports of instances of modern slavery at tier three or four recycling centres that were engaged by our offices to treat our waste streams.

#### *Global information technology procurement*

This year we have continued to review our approach to the management of sustainability issues with our global suppliers. In FY23, all new suppliers engaged for global procurement services with an estimated spend of \$1m and above were issued with a supplier due diligence questionnaire, which included questions around the actions they have taken to address modern slavery. The responses are reviewed as part of the overall global risk management process. In the coming year, we will use the third party assessment platform to review our global suppliers.

### 4.2 Suppliers providing goods

The key risks associated with our procurement of goods from suppliers are indirect and relate to manufacturing or sourcing of certain commodities or raw materials.

#### *Food*

Six of our offices offer supplier managed in-house staff restaurants. We work closely with our catering supplier to understand and manage our risks in this area.

Full-time catering staff that work in our offices are directly recruited by our catering supplier. To cover shortages, temporary staff agencies are used as and when the need arises. This year, we conducted our own internal audit of our catering supplier. This allowed us to review the effectiveness of controls over their use of staffing agencies and temporary workers. The audit identified opportunities to further strengthen their processes in this respect, including the due diligence and monitoring being performed. As a result of the audit, we worked with the supplier, who promptly took the steps needed to make all the improvements proposed.

Our catering supplier continues to be a member of the Sedex platform, an ethical trade body to assess and manage modern slavery risks in its supply chain. This is achieved through conducting social audits of its supplier sites in line with the SMETA (Sedex Members Ethical Trade Audit) methodology, which assesses standards of labour, health and safety, environment and business ethics. Instances of non-compliance that are identified as part of the audit process are reported to our supplier through the Sedex platform, with corrective actions tracked to completion.

In FY23, 34% of the 114 suppliers selected by our caterer to supply our offices had been fully onboarded to Sedex or have an active membership, an increase from 25% in FY22. This increase has been driven by our catering supplier actively encouraging their suppliers onto the Sedex platform. Onboarded suppliers include high risk supply categories such as fresh meat and dairy, seafood and beverages. Our caterer has committed to increase Sedex membership throughout their supplier base, and this will be monitored in FY24. Suppliers to our caterer also complete an annual online self-assessment and provide copies of their modern slavery and other relevant policies.

#### Information technology hardware

In FY23, our laptops were procured from two key suppliers. Due diligence has been performed over the sites of manufacture.

90% of our laptops were manufactured at our supplier's facility in Chongqing, China. Our supplier is a member of the [Responsible Business Alliance \(RBA\)](#) which requires members to adhere to their [Code of Conduct](#). Their manufacturing sites are subject to a combination of third party and in-house audits. Its most recent audit in May 2023 received [Silver recognition status](#).

Our other supplier provides 10% of our laptops which are manufactured by our supplier's subsidiary at a facility in Hefei, China. The supplier and its subsidiary are both members of the [Responsible Business Alliance \(RBA\)](#). The manufacturing site where our laptops are manufactured is externally audited biennially under the RBA Validated Assessment Program; its most recent audit in June 2023 received [Silver recognition status](#), with a declined score compared to their Gold status from the previous year. We have reviewed this slight reduction in the score with the supplier, and are satisfied with the preventive measures and planned actions put in place by their manufacturer, to mitigate this issue moving forward.

We continue to work with our suppliers to encourage and support them in seeking to continually improve their standards.

#### Promotional merchandise

We procure promotional items which are used at client events and for other marketing purposes. These products are manufactured by labour that may be more at risk of exploitation, such as migrants and workers in manual, low-paid roles. We are, therefore, continuing to work with our principal supplier, to develop an approach to monitor the number of manufacturing sites subject to third party audits. Our due diligence approach consisted of reviewing the most popular products on the basis of the number of units procured, and determining at which sites these were manufactured and whether the site was subject to audit (although we recognise that audits can only provide a certain level of comfort).

For FY23, we've identified the relevant manufacturer and their geography for all of our most popular promotional items, which covers 28% of the total merchandise we procured this year. This was calculated following analysis of the top selling products, and is a 3% increase on the equivalent figure for FY22.

We have also confirmed that third-party audits of those manufacturing sites have taken place within the last three years, such as the Sedex Members Ethical Trade Audit (SMETA) or amfori BSCI (Business Social Compliance Initiative).

During FY23, we have used our third party sustainability assessment to help us identify the improvement areas for the corporate merchandise supplier, and we will monitor and track its progress going forward.

#### Supplier Personnel Uniforms

This year our suppliers have issued just under 8,000 garment items to our supplier personnel working in hospitality, welcome team, security and maintenance. Clothing and textile production is a high risk area and therefore consideration around modern slavery and labour exploitation features prominently in our selection criteria for the suppliers in this industry.

The due diligence performed this year consisted of reviewing their modern slavery statements if they had published one, and ascertaining whether companies conducted third party audits of their manufacturing sites (Sedex, Fair Wear Foundation, Business Social Compliance Initiative and Worldwide Responsible Accredited Production). As a result of the due diligence performed, no further investigations were required. We will work with our suppliers over the next year to explore opportunities to further enhance our assurance in this area.

### 4.3 Client Services

In FY23, human rights considerations continued to form part of our client risk and acceptance processes. We engaged with risk management teams to educate them around the risks of modern slavery and how these can present in our client work. In addition, we developed industry specific guidance for engagement teams to provide further information as to what constitutes a modern slavery risk in different sectors. Further details on upskilling are available in section 5.

## Our transition to a third party sustainability assessment platform

In FY23 we transitioned from our bespoke annual supplier sustainability survey, as a way of measuring the performance of our supply chain, to a third party sustainability assessment platform. This has provided us with independent verification of our suppliers' performance and the areas requiring improvement. It has strengthened our review process and made it more efficient.

Following completion of the assessment, our suppliers receive a sustainability scorecard that includes detailed insights into their strengths, along with areas for improvement, which helps us and the suppliers to record their progress and achievements more efficiently. In addition, standardising our approach has enabled us to benchmark our suppliers' performance against others more easily.

## 5. Training

In order to deliver our modern slavery and human rights programme effectively, key personnel in our business need to have sufficient understanding of this topic and our approach to due diligence, risk identification and management. There is also a requirement for our people to understand the associated legislative requirements applicable to the firm.

Since we rolled out the mandatory firmwide training module to all our people, we have continued to ensure that all new joiners complete it. The module outlines the scale of exploitation occurring globally, the impacts these crimes have on victims, and the role businesses play in tackling it. This includes modern slavery considerations with respect to our supply chain and operations in addition to modern slavery risks arising from the client services we deliver.

This year we have also developed industry specific guidance documents for high risk sectors. These guidance documents were launched on our internal microsite and are available to all staff and Partners. The guidance outlines real world examples of how indicators of modern slavery can present in different industries and sectors. This site also contains a guide to human rights considerations in client acceptance and links to the training module.

We have included modern slavery and employment rights information within our supplier personnel on-boarding materials to ensure all supplier staff working in our offices are aware of their employment rights and provided with information as to where they can seek further advice should they need it.



## 6. Effectiveness of programmes

This year, following the transition to a third party sustainability assessment platform, we have refreshed the supply chain specific metrics that we use to measure the effectiveness of our human rights and modern slavery programme. This has allowed us to improve the granularity, coverage and consistency of the metrics and ensure that the metrics we measure and report on are adding value to the programme.

As these metrics are new and have not previously been reported, there are limited direct comparative figures available for previous years. We were encouraged to see that 97% of key suppliers have a human rights policy, reflecting a commitment by the businesses to address this issue.

Across the other metrics there was also a strong

| Key Performance Indicators  | FY23 |
|---|------|
| Spend with suppliers assessed through our third party sustainability assessment platform <sup>4</sup>   | 61%  |
| Assessed key suppliers <sup>3</sup> with a Human Rights policy <sup>4, 5</sup>  | 97%  |
| Assessed key suppliers with a whistleblowing procedure in place <sup>4, 6</sup>   | 79%  |
| Assessed key suppliers who operate in high risk sectors have taken actions to prevent child labour, forced labour and human trafficking <sup>4, 7</sup> | 83%  |
| Assessed key suppliers with structured mechanisms to deal with policy violations <sup>4, 8</sup>  | 93%  |

performance, with high positive responses showing that our suppliers are not only aware of the human rights risks associated with their operations, but that they are taking action to implement processes and procedures to address these. Recognising, however, that there is always more to do as we move into FY24, we will continue to engage with our suppliers on this topic to drive improvements across the board.

In our operations, we use a broad set of metrics to monitor our human rights and modern slavery performance. For example, an extensive set of measures relating to the wellbeing, diversity and inclusion of our people allows us to actively manage these aspects of our business throughout the year. We also report on our performance publicly in our [Annual Report](#).

## Our commitments<sup>18</sup>

This year we have continued to progress our modern slavery programme. We have continued to make progress towards our new commitments set out at the beginning of the year and have made strong progress on all commitments. Below is a summary of our actions to date and new commitments we are making for the coming year, to help us continue to make headway on this important topic.

|                             | Date set | End date | Commitment   | Status   | Comment   |
|-----------------------------|----------|----------|--|----------|---|
| Supply chain                | 2020     | Ongoing  | Continue to extend transparency and due diligence over our supply chain hotspot areas <sup>19</sup>                              | Ongoing  | Extensive due diligence has been conducted and is ongoing in our hotspots   |
|                             | 2021     | 2023     | Review and update where appropriate how modern slavery risk is embedded in our end to end third party risk management process    | Complete | We have updated our third party risk management approach to modern slavery risk and this has been embedded in firm processes  |
|                             | 2022     | 2023     | Review our on-site support staff recruitment process with suppliers for improvement opportunities                                | Complete | This has allowed us to further strengthen standards around our support staff  |
|                             | 2022     | Ongoing  | Extend our human rights review to existing global suppliers using a third party sustainability assessment platform <sup>20</sup> | Ongoing  | This enables us to maintain the consistency of our human rights review across our existing global suppliers   |
| Effectiveness of programmes | 2021     | 2023     | Track and report a broader set of key supplier human rights metrics  | Complete | Our transition to a third party sustainability assessment platform has allowed for a better understanding of our suppliers' performance and of the overall effectiveness of the programme |
| Training                    | 2022     | 2024     | Maintain our people's awareness of modern slavery risks  | Ongoing  | Requiring our people to refresh their knowledge of modern slavery every year will ensure that these risks remain front of mind  |
|                             | 2023     | 2025     | Provide a selection of our suppliers with human rights upskilling and guidance   | New      | Upskilling our suppliers on the human rights and modern slavery risks that relate to their operations and supply chains   |
|                             | 2023     | 2025     | Roll out training to procurement team members and other relevant internal stakeholders   | New      | Providing tailored training to teams in our business that are more likely to manage modern slavery risks  |



This statement was approved by the Supervisory Board of PwC LLP on behalf of its members, and is signed by:

Kevin Ellis  
UK Senior Partner  
December 2023



- 1 In this document, PwC UK refers to PricewaterhouseCoopers LLP (a limited liability partnership incorporated in England) and its related entities that carry on their business in the UK.
- 2 Modern Slavery is a term used to encapsulate the following offences stated in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in full in [section 1](#) and [section 2](#) of the Act.
- 3 Key suppliers are our top 86 suppliers, who are contracted to provide goods and services directly to PwC UK, selected on spend, sustainability impact and modern slavery risk; and who represent 63% of PwC UK procurement spend annually.
- 4 Following our transition to a third party sustainability assessment platform, this metric is new and has not previously been reported so there is no direct comparative figure available for previous years.
- 5 Metric has been obtained from the third party sustainability assessment platform based on the responses to the question 'Does your company have a policy regarding labour practices or human rights issues?'
- 6 Metric has been obtained from the third party sustainability assessment platform based on the responses to the question 'key suppliers with an active whistleblowing procedure in place'
- 7 Metric has been calculated based on the responses to the third party assessment question 'What actions are in place to address child labour, slavery and/or human trafficking?' Only suppliers identified as being in a high risk sector by our third party platform have been assessed for this KPI.
- 8 Metric has been obtained from the third party sustainability assessment platform based on the responses to the question 'key suppliers with structured mechanisms to deal with policy violations'
- 9 The population we require to complete the training includes all grades, all lines of service and internal staff. This excludes contractors, supplier personnel in support roles, and staff on extended leave or secondment during this period.
- 10 The PwC network is made up of individual member firms, each of which is a separate legal entity. Please see [www.pwc.com/structure](http://www.pwc.com/structure) for further details.
- 11 Figure does not include supplier personnel in support roles or contractors.
- 12 Restated in FY23 to reflect our procurement supply chain spend, which now covers our AP and travel related expenses, and excludes other non-travel related expenses.
- 13 For our Corporate Sustainability strategy please go to [www.pwc.co.uk/who-we-are/our-purpose/our-corporate-sustainability-strategy.html](http://www.pwc.co.uk/who-we-are/our-purpose/our-corporate-sustainability-strategy.html)
- 14 Global information technology procurement refers to multinational IT services or goods providers procured or licensed globally for the benefit of the PwC network.
- 15 "Personnel" shall include the relevant party's partners, members, employees, officers and agents, self-employed contractors and those of its sub-contractors, and includes that party's 'associated persons' as defined in the Bribery Act 2010.
- 16 'Tiers' refer to how close a supplier of goods or services sits relative to PwC in our supply chain, where tier one is a direct supplier and tier four, for example, has three intermediary suppliers.
- 17 Calculated using FY22 waste stream data from our offices as this was the most recent complete data set available.
- 18 Commitments outlined represent only those begun, ongoing or completed for FY23. For previous years' commitments please go to [www.pwc.co.uk/who-we-are/our-purpose/downloads.html](http://www.pwc.co.uk/who-we-are/our-purpose/downloads.html)
- 19 Commitment incorporates ongoing commitment reported in previous years to "Review risks in our corporate merchandise supply chain", one of our seven supply chain hotspots.
- 20 Commitment updated to reflect our transition to a new third party sustainability assessment platform.