

# LPP Spolka Akcyjna

**TICKER**  
WSE:LPP

**MARKET CAPITALIZATION**  
US\$5 billion

**HEADQUARTERS**  
Poland

**COMPLIANCE**

UK Modern Slavery Act: [Disclosure available, but not compliant](#)

California Transparency in Supply Chains Act: [Not applicable](#)

**COMMITMENTS**

[Yes](#)

**OVERALL RANKING**

26 out of 43

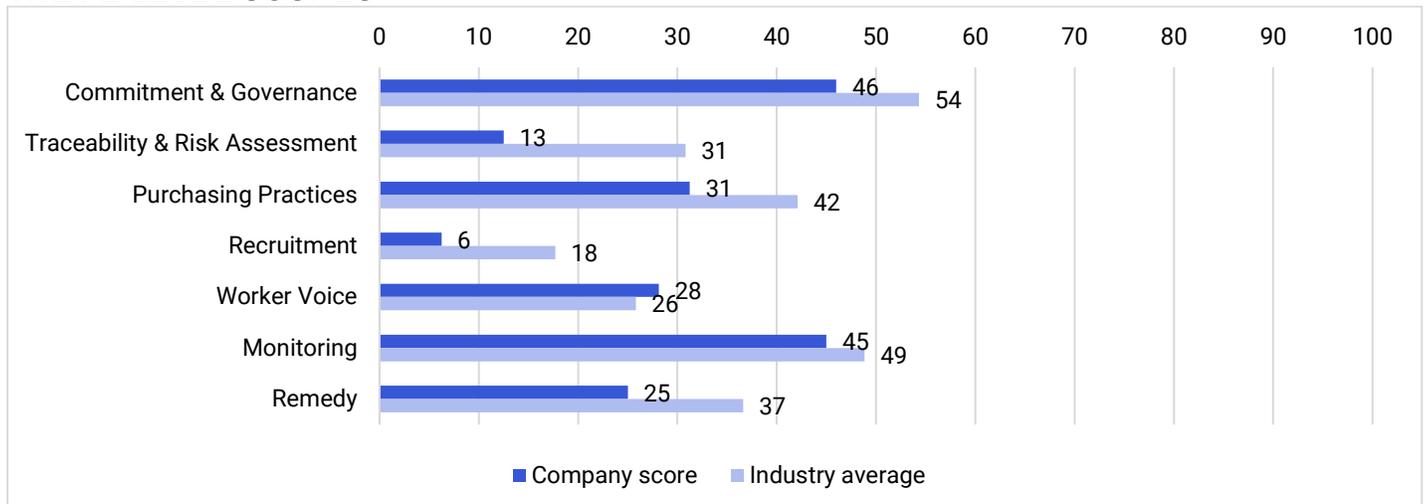
**OVERALL SCORE**

28 out of 100

**SUMMARY**

LPP Spolka Akcyjna (LPP), a Polish footwear and clothing retailer, ranks 26th out of 43 companies and discloses less information on its forced labor policies and practices than its peers across all themes. The company's score is based on its performance on the themes of Commitment & Governance and Monitoring. LPP committed to training audit staff and its employees in Bangladesh to "counteract forced labor" in 2018. The company is encouraged to improve its performance and disclosure on the themes of Commitment & Governance, Recruitment, and Worker Voice.

**THEME-LEVEL SCORES**



Research conducted through June 2018, or through August 2018 where companies provided additional disclosure or links. For more information, see the full dataset [here](#).

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## LEADING PRACTICES

None.

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## NOTABLE FINDINGS

**Commitment & Governance:** LPP gives an overview of internal accountability for its supply chain policies on forced labor. It states that its Purchasing Director is responsible for managing social issues with its suppliers and for its supplier selection. The company states further that 120 staff at its Asian office are responsible for verifying its suppliers' compliance with its standards, which include forced labor. It further notes that its audit department, and its communications and sustainable development department, are engaged in the control of working conditions in its suppliers' factories.

**Purchasing Practices:** LPP's supplier code of conduct requires suppliers to communicate the policy to all subcontractors in its supply chains.

**Monitoring:** LPP discloses that it regularly conducts unannounced audits on its suppliers to monitor compliance with its supplier code of conduct addressing forced labor, including a review of documentation, off-site interviews with workers, and an inspection of production facilities.

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## OPPORTUNITIES FOR IMPROVEMENT

**Commitment & Governance:** The company may consider establishing training programs to ensure that the relevant decision-makers within the company and its supply chains are aware of the risks related to human trafficking and forced labor and are effectively implementing the company's policies and standards. The company is further encouraged to engage with relevant stakeholders on human trafficking and forced labor. This includes engagement with policy makers, worker rights organizations, or local NGOs in countries in which its suppliers operate, as well as active participation in one or more pertinent multi-stakeholder or industry initiatives.

**Recruitment:** To avoid exploitation of migrant workers in its supply chains, the company may consider requiring that workers in its supply chains are not charged fees during any recruitment-related process. The company is encouraged to require that such fees be paid by the employer (Employer Pays Principle) and, where such fees have been paid by its suppliers' workers, to ensure that the fees are reimbursed to the workers.

**Worker Voice:** The company is encouraged to ensure that a formal mechanism to report grievances to an impartial entity regarding labor conditions in the company's supply chains is available and communicated to its suppliers' workers and relevant stakeholders, such as worker organizations or labor NGOs. The company may further consider ensuring that its suppliers' workers trust the mechanism by involving workers or an independent third party in the design or performance of the mechanism.

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## COMPANY PROVIDED ADDITIONAL DISCLOSURE

[No.](#)