

Loblaw Companies Ltd.

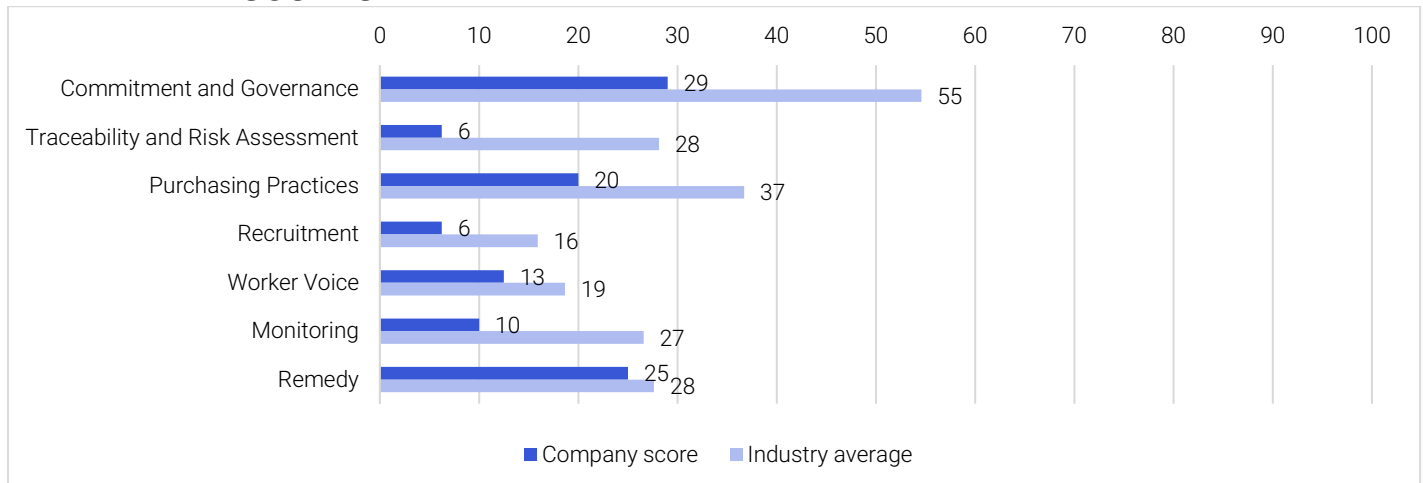
TICKER
 TSX:L

MARKET CAPITALIZATION
 US\$21 billion

HEADQUARTERS
 Canada

COMPLIANCE
UK Modern Slavery Act: [Not applicable](#)
California Transparency in Supply Chains Act: [Not applicable](#)
COMMITMENTS
[None](#)
OVERALL RANKING
29 out of 38
OVERALL SCORE
16 out of 100
SUMMARY

Loblaw Companies Ltd. (Loblaw), a retailer and one of the largest supermarkets chains in Canada, ranks 29th out of 38 companies, disclosing less information on its forced labor policies and practices than other companies on all themes. The company discloses some information on all themes, scoring highest on the themes of commitment and governance, and remedy, and lowest on the themes of traceability and risk assessment and recruitment. It has an opportunity to improve its performance and disclosure on the themes of commitment and governance, traceability and risk assessment, and recruitment.

THEME LEVEL SCORES


LEADING PRACTICES

None.

NOTABLE FINDINGS

Supplier Code of Conduct: Loblaw's supplier code of conduct includes the four fundamental freedoms (as articulated in the ILO Declaration on Fundamental Principles and Rights at Work) and is easily accessible from the company's website. The company states that suppliers have to sign this code.

Monitoring: Loblaw states that it may verify the compliance of all suppliers, either by means of self-evaluations or audits. It further explains in its supplier code of conduct that a key component of its on-site audits is effective interviews with workers and that it requires suppliers to facilitate such interviews and refrain from discriminating or retaliating against those any workers who participate.

Purchasing Practices: Loblaw states that it uses certifications that include forced labor provisions for some of its raw materials, such as palm oil, cocoa, and seafood. The company further discloses that its supplier contracts include the prohibition of forced labor.

OPPORTUNITIES FOR IMPROVEMENT

Commitment and Governance: The company may consider establishing training programs to ensure that 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. Further, it is 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 relevant multi-stakeholder or industry initiatives.

Traceability and Risk Assessment: While the company discloses efforts to trace its commodities, to demonstrate a strong understanding of its supply chains, it may consider disclosing the names and addresses of first-tier suppliers, the countries of below-first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor, and information on its suppliers' workforce. The company is further encouraged to assess forced labor risks across its supply chains and disclose the risks identified.

Recruitment: While the company's supplier code of conduct prohibits requiring workers to deposit funds or personal documents as a condition of their employment, to take further steps to address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company may consider requiring recruitment agencies used by its suppliers to uphold workers' rights and ensuring that workers in its supply chains are not charged fees during any recruitment-related process. The company is also encouraged to ensure recruitment agencies used by its suppliers are audited, and to work with its suppliers to guarantee migrant workers' rights are respected.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes.](#)