

Marks and Spencer Group plc

TICKER
LON:MKS

MARKET CAPITALIZATION
US\$6 billion

HEADQUARTERS
United Kingdom

DISCLOSURES

UK Modern Slavery Act: Yes

California Transparency in Supply Chains Act: Not applicable

TARGETS
Yes

Marks and Spencer Group plc (Marks and Spencer), one of the UK's largest retail groups,¹ has taken intermediate steps to address forced labor risks in its supply chains. It discloses more information than the global sector average. Primark, another UK apparel retailer, discloses taking stronger steps. Marks and Spencer formally endorsed the Coalition to End Forced Labor's call to action in the Uyghur Region, and it notes that it conducts additional supplier assessments to identify whether they employ Uyghur workers. However, it does not disclose how it is addressing the risks of alleged forced Uyghur labor across its supply chain tiers, including at the raw material level. KnowTheChain identified one additional allegation of indicators of forced labor in Marks and Spencer's supply chains. The company neither discloses engagement with affected stakeholders nor remedy outcomes for workers.

STEPS TAKEN TO ADDRESS FORCED LABOR RISKS IN SUPPLY CHAINS



SUPPLY CHAIN TRANSPARENCY

Supplier List Yes
 Information on Supply Chain Workers Yes

HIGH-RISK RAW MATERIALS²

🇷🇺 Cashmere, cotton, viscose, and others

HIGH-RISK SOURCING COUNTRIES

🇨🇳 China, India, Thailand, and others

¹ Statista (2 September 2020), "Number of Marks & Spencer stores from 2010 to 2020, by region." Accessed 1 February 2021.

² For further details on high-risk raw materials and sourcing countries, see KnowTheChain's [2021 Apparel and Footwear Benchmark Report](#).

SUBSET OF INDICATORS

	 NOT MET	 PARTIALLY MET	 MET	Policy / Process	Outcomes
Supplier Code of Conduct and Integration into Supplier Contracts					
Management and Accountability					Not Applicable
Internal Management					
Board Oversight					
Stakeholder Engagement					Not Applicable
Local Stakeholders					
Peers					
Risk Assessment					
Purchasing Practices					
Recruitment Fees					
Freedom of Association					Not Applicable
Working with Unions					
Examples of Improvements					
Grievance Mechanism					
Remedy Programs / Remedy Outcomes and Response to Allegations					

Marks and Spencer discloses engaging with unions to calculate living wages for workers. It reports that its cost price model sets a non-negotiable sum for the labor cost to produce a garment. Further, it discloses that supply chain workers and supervisors are trained on labor rights and that this generated wage increases for workers of between 12-54%. The company does not disclose how it addresses forced labor risks in relation to third-party retailing.

Additional steps Marks and Spencer could take include

- disclosing evidence of implementation of its responsible purchasing policies and practices (such as its costing model, which ringfences labor costs and intends to allow suppliers to pay living wages), and its adherence to the Prompt Payment code;
- incorporating the [Employer Pays Principle](#) into a formal supply chain policy and, where relevant, providing evidence of reimbursement of recruitment-related fees to workers and/or evidence that such fees are paid by suppliers;³ and
- disclosing data about the practical operation of any grievance mechanism available to workers in its supply chains (e.g., the number and types of grievances received).

COMPANY ENGAGED WITH KNOWTHECHAIN⁴

Informal (i.e., engaged outside the formal three-month engagement period).

³ It has joined the Leadership Group for Responsible Recruitment but does not yet seem to have integrated the Employer Pays Principle into its supplier code.

⁴ Research conducted through November 2020 or through February 2021, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the [Business & Human Rights Resource Centre website](#).