ETI Impact report
2021–23
From April 2021 to March 2023, we continued our work to influence change in business practices through three essential pathways as set out in our Theory of Change:

- Driving progression and accountability
- Collaborating for impact
- Facilitating an enabling environment

This work was guided by the aims and goals we set out in the ETI Strategy 2026.

Our vision is a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.

Our mission is to advocate for the most vulnerable workers, by harnessing the power of a diverse and growing membership. Through collaboration and innovation, we work to drive engagement, challenge barriers to change and ensure respect for human rights at work.
Member overview

New companies joined ETI

<table>
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<th>2021 - 22</th>
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<tr>
<td>11</td>
<td>7</td>
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Companies left ETI

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<th>2021 - 22</th>
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Net change in company membership

| +7        | -1        |

In 2022-23, 7 new members joined, including two large companies, Woolworths and Lidl.

The impact of Covid on the economy also began to show, with 3 companies resigning and 5 entering administration.

Trade union members (4) and NGO members (21) remained unchanged.


Resigned company members – Clarks, Burberry Group plc, EFL Headquarters (Pvt) Ltd, Tibard, Naissance, Dixons Carphone.

Terminated company members – Mackays, Made.com, East Midlands Railway, Promointernational, Missguided Ltd.

See a list of all our members.

“ETI provides a safe platform for discussion & access to resources & expertise.”

Graham Clewer – Group Head of Human Rights, Primark

ETI members 2023

Company members by size

<table>
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<th>Small companies (£100m)</th>
<th>Medium companies (£100m - £1bn)</th>
<th>Large companies (&gt;£1bn)</th>
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<td>45</td>
<td>31</td>
<td>20</td>
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Company members by sector

- Apparel & textiles 58%
- General merchandise 24%
- Food, farming & fisheries 18%

Trade union and NGO members

- 4 Trade union members
- 21 NGO members
Driving responsible business and accountability

Progression

In 2021, we introduced a more dynamic approach to supporting individual company member progression, through individually focussed meetings.

What is a progression meeting?

Member progression meetings are an opportunity for a company to share with ETI the progress and challenges faced within their supply chain. We act as a ‘critical friend’ for companies, offering feedback and next steps to drive company progress on human rights in supply chains. We use the ETI Progression Framework to guide our feedback to members which is based on a Human Rights Due Diligence approach founded on the United Nations Guiding Principles. We also introduced the new Member Charter and the Corporate Transparency Framework (CTF) as part of individual member accountability.

What is the ETI Member Charter?

Our Member Charter sets out the expectations of all ETI members: companies, trade unions and NGOs, and of the ETI Secretariat itself. It outlines the actions, behaviours, and ways of working essential to achieving our vision and mission.

What is the ETI Corporate Transparency Framework?

Our Corporate Transparency Framework (CTF) details the public reporting requirements set out for all ETI company members. Company members commit to meeting these requirements and to move towards better practices.

14 members graduated to full membership between 2021 and 2023.
CasE sTudy

ETI ImpacT rEpOrT 2021-23

GRADUATING TO FULL MEMBERSHIP

Liberty was one of 14 company members to graduate to full membership between 2021 and 2023.

As a fabric designer, wholesaler and luxury brand, Liberty faced its own set of unique challenges in its efforts to map tier one of their supply chains; for Liberty the diversity of business and its internal approach to defining tiers made establishing visibility particularly hard. Fortunately, through their ETI membership Liberty has been able to seek support from other organisations working to overcome this issue. During foundation membership Liberty was also able to utilise ETI guidance to assess the impact of Covid-19 on its supply base and develop their approach to risk assessment more broadly.

DRIVING CORPORATE TRANSPARENCY

The development of ETI’s Corporate Transparency Framework included a full board-level and member consultation; including ETI trade union, NGO and company members.

CTF consultation faced various challenges, with some company members raising concerns around their ability to meet all minimum requirements due to commercial risk. Overcoming these concerns and implementing requirements has required individual company action. CED Stone is a great example of the CTF’s positive impact on company member transparency. Operating in a heavily competitive industry like stone, CED Stone had major concerns around disclosing their suppliers. With ETI’s support they navigated these concerns to prioritise transparency and push ahead on their continuous improvement journey.

“Being a member of ETI gives us plenty of opportunities to deepen our understanding of the risks in our supply chain, in particular within Liberty Fabrics.” Kasia Myatt – CSR Manager

Accountability and transparency

Find out more about ETI’s Corp. Transparency Framework

Our practical experience has been garnered over 25 years
convening for change, influencing business and promoting human rights at work.
ETI member Day 2023 brought together 150 trade union, NGO and company members and partners in-person. Keynote speakers included Preet Kaur Gill, MP and Shadow Cabinet Minister for International Development and ETI Board Chair, Mary Creagh CBE. Read a summary, explore the agenda.

ETI training

COVID impacted our ability to offer in-person training from 2020. This pause afforded us time to reflect on training content and work with external training partners to update materials. In November 2022, we piloted the revised ETI’s Human rights essentials training course in partnership with Inherently Human. This training series will run twice throughout 2023.

“As an ETI member we benefit from the connection and exchange with other ETI members. It gives us more leverage on systemic and sectoral issues, and we can start projects more easily. Being an ETI member helps to find a shared understanding on human rights issues.”

Stephan Jermendy – Corporate Responsibility International Manager, Aldi

“I attended all four ETI training modules and could not recommend them enough. It was a great opportunity to meet like-minded people while providing practical guidance.”

Ella Wiseman – Corporate Social Responsibility Coordinator, Mint Velvet

Company member annual survey 2022

72% of members feel that their recent progression meeting was useful.

76% rated the website as good or very good.

76% rated the new community site as good or very good.

73% of members rated their experience as an ETI company member as good or excellent.

“I attended all four ETI training modules and could not recommend them enough. It was a great opportunity to meet like-minded people while providing practical guidance.”

Ella Wiseman – Corporate Social Responsibility Coordinator, Mint Velvet
Collaborating for impact

ETI’s members acted collectively in response to a range of issues.

This collective action aligned with our Strategy 2026 by focusing on three thematic priorities:
1. Business practices,
2. Just transitions and
3. Gender.

Across our three company member sectors:
- Apparel and textiles,
- Food, farming and fisheries, and
- General merchandise.

1 Informing business practices

Business practices can often be misaligned with a company’s human rights and environmental commitments and have adverse impacts on workers, including excessive hours or low wages.

Research shows that company purchasing practices have the most known impacts on working time, contracts, and wages, with evidence of impacts on occupation health and safety, child and forced labour, freedom of associational and discrimination. ETI collaborated with industry stakeholders to inform and influence businesses purchasing practices.

Alongside STITCH consortium members, we facilitated the consultation and publication of the Common Framework on Responsible Purchasing Practices (CFRPP), a reference point for companies and multi-stakeholder initiatives (MSIs) implementing improvements in purchasing that create better working conditions in supply chains. The framework is complemented by a range of resources, including training summary, procurement mapping exercise, risk assessment tool and briefing to support company engagement with suppliers. ETI has joined other MSIs in the creation of the Learning and Implementation Community (LIC), which offers a safe peer-learning environment for clothing brands and retailers to improve their purchasing practices over the span of two years. Nine ETI company members have already joined, committing to review their purchasing practices through in-depth risk analyses and supplier feedback. Action plans to address the root causes of human rights abuses that may occur because of their purchasing practices will then be made and implemented.
“A ‘just transition’ means moving to a more sustainable economy in a way that’s fair to everyone, creating a more equal society. This means redressing past injustices, building good relationships with each other and our shared planet, and more equitable and inclusive decision-making.”

The Body Shop

2 Supporting a just transition

Studies by the International Labour Organisation (ILO) show that implementing the Paris agreement on Climate Change could create 24 million jobs and end six million jobs, meriting complementary policies to protect workers and ensure a just transition.

ETI’s Strategy 2026 acknowledges the key role we can play in working with companies, trade unions and NGOs to develop solutions to manage and mitigate the impact of climate change on workers and business. The ILO’s Guidelines for a just transition present a policy framework and a practical tool embedded in core labour standards, to help manage the transition to a low-carbon economy. It promotes the consultation and dialogue between worker representatives and employers and places workers and communities at the heart of devising solutions to future problems.

ETI shared with members our plans to support a just transition, developed through bespoke primary research, extensive consultation with members and stakeholders, and the work of a tripartite member working group. We are heartened to see some members already adopting relevant language and commissioning supply chain research on this issue. In Bangladesh, work also began on our Green Social Dialogue Initiative, in partnership with ETI Norway and NORAD, which aims to drive worker-led climate action by mainstreaming environmental issues in the existing social dialogue between employers, workers, and their representatives.
3 Understanding gender

The imperative to drive gender equality in global supply chains is embedded in ETI’s Strategy 2026. We continue to support our members and other stakeholders to ensure the rights of both women and men are protected and respected at work, with equal access to opportunities and remedy when their rights are violated.

Gendered risks to migrant workers

There are around 169 million migrant workers globally: 40% are women, who are over-represented in low-paid, low-skilled jobs and face heightened vulnerabilities. Recognising this, ETI worked to put an explicit gender lens on our Access to Remedy Principles for migrant workers in 2021. This work aims to support businesses and other stakeholders to understand the need to tailor responses and access to remedy to account for specific gender risks and vulnerabilities, alongside practical steps on how to do so.

From January to February 2022, ETI worked with NGO members Women Working Worldwide, Banana Link and Homeworkers Worldwide to share key highlights and learnings from their programme ‘Gender equity across supply chains; a comparative analysis’. These were shared via an eight-part blog series featuring examples of good practice to inform further work by companies, NGOs and trade unions on improving the rights of women workers and producers.

“We hope that our stories will encourage you to think about how you too can take those small steps - or even giant leaps - and knit them together to help build a gender equal world, even in the face of global crises.”

Caroline Downey, Women Working Worldwide.
Gender data initiative

For businesses, data is essential to assess risks and adverse impacts on workers impacted by their operations, justify action and drive approaches that positively improve the lives of all workers. However, supply chain data often fails to consider gender, treating all workers as equal. This limits possibilities to understand certain risks and inequities that may be gender sensitive and present and hinders our ability to assess whether programmes and initiatives are having equal outcomes for all.

ETI’s gender data initiative (GDI) aims to support members to collect and utilise better gender-disaggregated supply chain data to inform their human rights due diligence (HRDD). We developed joint guidance with other MSIs building on the BSR Gender Data and Impact Framework – FWF, the German Partnership for Sustainable Textiles (PST), Business for Social Responsibility (BSR), Dutch Agreement for Sustainable Textiles and Sedex. This coordination resulted in guidance that is aligned across different MSIs, reducing confusing multiplication of standards and expectations.

ONE + ALL

Speaking at the February 2023 OECD Forum, One + All highlighted how ETI’s gender data guidance has helped them enhance their HRDD with a stronger gender lens.

Until joining the GDI in April 2022, One + All had no experience of collecting this data. They now have a more in-depth understanding of their supply chain’s gender dimensions. For example, data revealed they had no female managers at their biggest suppliers; and that while absenteeism is generally similar between men and women, in Bangladesh it was double for women over men. Although further research is expected, the company is already moving to use these insights to reduce gender-based inequalities in their supply chains.
Cross-sector action

ETI’s membership is broadly grouped into three sectoral groups through which we convene members and through a range of reactive and proactive work, respond to the human rights issues impacting workers worldwide.

Apparel & textiles

Responsible business in Myanmar

The immediate crackdown following the Myanmar military coup in February 2021 made it impossible for the garment industry to function. Normal life ceased as streets were occupied by an aggressive military and brave citizens demonstrated for a return to democracy. Ports could neither import materials nor export finished goods. While things stabilised and production recommenced, military rule took hold and the situation remained very challenging for rights defenders. Many trade unionists were persecuted or forced to flee, raising significant questions for responsible business as to what to do.

Working with ETI company members sourcing from Myanmar, as well as Shift and Impactt, ETI commissioned Due Diligence Design to conduct an independent, evidence-based sectoral assessment of human rights and responsible business conduct in Myanmar. This report and its recommendations continue to inform our expectations of ETI company members, whether they have chosen to exit responsibly, or to remain and undertake enhanced measures to protect workers’ rights in a challenging and dynamic environment. The assessment has been cited in more than 25 articles and continues to foster debate on working in high-risk areas, including in high-level forums including the OECD. Four members have chosen to exit Myanmar following responsible exit principles. Six members continue to source and are implementing enhanced due diligence measures in Myanmar. ETI continues to engage with all members, as well as with external stakeholders, to address the concerns posed by working in this volatile and high-risk context.

“This significant report, which reflects extensive research and well-founded analysis, provides brands – and the broader business and human rights field – with a unique and valuable resource that should shape their understanding and decision-making with regard to doing business in Myanmar.”

Caroline Rees – President and Co-Founder, Shift
Exploitation in Italian agricultural supply chains has been well documented in studies and investigative journalism for over a decade. From low wages, excessive hours, unsafe housing and conditions at work, gender-based discrimination and harassment, and a lack of access to freedom of association and remedy, risks are high and wide-ranging.

In response to ongoing concerns among company members, ETI established a working group to improve the human rights impact of their Italian supply chains by strengthening their due diligence, engaging with local suppliers, establishing new mechanisms for worker voice, and supporting local growers to adopt more robust labour practices.

Eight major food, farming, and fisheries members and eight non-ETI members have actively participated in this working group since 2019, with positive results especially in terms of supplier relationships. While 2023 saw the working group close, three of its workstreams have been absorbed into a new project focused on grievance mechanisms in Italy and Spanish agriculture, and two may evolve into member task groups.

From 2021-22 participating members reported an increased understanding of human rights developments and of purchasing practices in the Italian context and reported an improved engagement with suppliers. Online training was offered to suppliers on ethical trade, responsible recruitment, and due diligence. Forty-seven participants from 38 organisations attended these webinars and 90% of suppliers reported finding the sessions useful.
In June 2020 ETI established a member Logistics Expert Support Network (LESN) in collaboration with ETI member the International Transport Federation (ITF) to respond to the seafarers’ crew change crisis triggered by the Covid pandemic. In the three years since, the 26 company members, two trade unions, and two other multi-stakeholder groups that make up the LESN, have played a significant role in a groundswell of activity responding to the crisis. This included collective advocacy by trade unions and companies to the ILO and International Maritime Organisation, and ultimately led to a joint tool to help businesses uphold their responsibility to respect human rights in the sector.

It also saw ETI members take steps to map and understand unknown and hitherto hidden parts of their supply chains, from shipping to haulage and warehousing. Company members have since participated in ITF’s human rights due diligence (HRDD) ‘health checks’, gained insights on the impacts of Russia’s invasion of Ukraine on shipping and haulage and explored HRDD in warehousing, including the benefits of ITF’s Warehouse Charter. The impact of this work can be seen across members modern slavery statements and in the signing of memorandums of understanding between some ETI company members and the ITF.

“Building on engagement with the ETI’s Logistics Expert Support Network, we worked with the ITF to assess the risks presented to seafarers on vessels in our supply chains, which have been exacerbated by the COVID-19 pandemic. We trialled the ITFs Human Rights Due Diligence Health Check tool on the vessels used by Morrisons in 2021 and found that 87% were covered by active ITF agreements.”

*Modern Slavery Statement 2021–22, Morrisons*
Crisis response

ETI has always supported and convened members in response to crises where we have a relevant role. This period witnessed a high number of crises impacting global supply chains, many of which called for ETI to respond and advise members on responsible business conduct in the face of heightened risks.

**RUSSIAN INVASION OF UKRAINE**

The Russian invasion of Ukraine in February 2022 has had significant global repercussions for business and human rights.

We have seen impacts on sectors including logistics and horticulture, and for migrant workers from Ukraine and neighbouring countries. Pooling ETI member and partner expertise, we were able to produce guidance and share good practice to inform businesses’ support to workers in their supply chain, as well as to refugees and displaced people seeking employment and integration. When it came to shipping, we were able to draw upon tools developed by the International Transport Federation during Covid, to support companies in mitigating risks to seafarers.

**TÜRKİYE AND SYRIA EARTHQUAKES**

The earthquakes which struck Türkiye and Syria in February 2023, had catastrophic consequences, with over 50,000 confirmed deaths. Essential services, including electricity, gas, water, transportation, and communication remain severely damaged in both countries, as over 160,000 buildings collapsed. Recognising that Türkiye supplies companies within all three sectors of ETI company membership, we were quick to convene members and local stakeholders to establish the reality for workers and communities affected. In the weeks that followed we supported our members by setting out clear expectations for responsible business, and advice on how company members should conduct due diligence and support suppliers following the emergency response.
ETI country programmes

India

Our India based colleagues led dynamic engagement with local stakeholders on various developments impacting the apparel and textile industry between 2021–22.

From the codification of labour laws, the new apprenticeship policy, India’s National Action Plan, and the UK-India Free Trade Agreement, to live wage issues and mass exodus of migrant workers. Focussed work has also been undertaken to raise awareness of global legislative changes on human rights and environmental due diligence and the business case for effective, multi-stakeholder engagement among Indian manufacturers and suppliers, in addressing the issues this legislation aims to tackle.

SECURING FULL WAGES FOR WORKERS

Wage disputes in Karnataka posed a persistent issue during this period, one which exemplified the efficacy of effective multi-stakeholder engagement.

The revision of wage rates amidst lockdown in Karnataka in 2020, left some ambiguity for employers responsible for payment, which subsequently led to revised wages not being reflected in wage packets in the months that followed. In response, worker representatives and campaigners felt that workers had been denied their wage increase, the newly revised Variable Dearness Allowance (VDA) being a key constituent of minimum wage. Indian trade unions approached the Karnataka High Court, which upheld that the revised VDA due to workers could not be deferred.

Over the course of 16 months, ETI intervened engaging with all parties to understand the issues and sought clarification from the state government on the revision and responsibilities within it. ETI convened its members and other brands sourcing from the region, leading a delegation of companies to the Labour Department and influencing suppliers over the period of time. Due to these efforts, individual manufacturers committed to pay workers their enhanced salaries with back pay.

“Bringing this dispute to a resolution was a huge win for workers in Karnataka, and took significant collaboration between stakeholders, which ETI was able to facilitate.”

Alok Singh – Regional Director, South Asia
Our Bangladesh team continued to champion workplace programmes tackling human rights issues endemic to the local apparel and textiles industry during 2021/22. These programmes aimed to mitigate and remedy issues around discrimination and gender-based violence and harassment. They included factory training and dissemination of materials as well as the establishment or revival of sexual harassment complaint committees.

Bangladesh workplace programme - activities & outcomes 2021-3

**Where are the Women?**

Alongside direct workplace programmes, our Bangladesh team led research on the decline of women in the country’s ready-made garment (RMG) sector, alongside partner Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).

Through this research, the team uncovered serious risks of discrimination, particularly as a result of gender stereotypes and bias. The startling decrease in women’s employment in Bangladesh from 80% in the 1980s to roughly 54% today, speaks to the discriminatory and unhealthy work environment which prevails in the sector, coupled with the continued burden of unpaid care work women commonly face at home. This research was launched in March 2023, in Bangladesh and online, at an event attended by over 184 ETI members and stakeholders, and aims to inform stakeholders sourcing from and operating in Bangladesh’s RMG sector of the risks, and facilitate mitigating action.

| 2021-22 | In 2021 these workplace-based programmes reached nearly 6500 participants at 75 factories in 11 of our member’s supply chains. While our international Women’s Day Behaviour Change Campaigns reached over 90,000 participants. The team in Bangladesh formed or re-activated 18 new Sexual Harassment and Complaints Committees (SHCC). Surveys from 19 factories in the 2021/2 Gender Awareness programme’s training modules showed that awareness and understanding of Gender Discrimination within trained groups increased by nearly 80 percentage points. |
| 2022-23 | From 2022-23 nearly 3000 people were trained within workplace programmes, reaching 52 factories within the supply chains of 8 of our members. This year Women’s Day Behaviour Change Campaigns reached over 123,000 participants. In 2022/23, 12 new Sexual Harassment and Complaints Committees (SHCC) were formed or revitalised. |

Our International Women’s Day behaviour change campaigns reached over 90,000 participants.

One of the members of the SHCC network stated, “… When we see that our factory is lagging behind some other factory it motivates us to do better and this also makes us understand where and in which area we need to improve.”

Anonymous, Sexual Health Complaints Committee member
Facilitating an enabling environment

Businesses and supply chains do not exist in isolation – various factors and stakeholders influence the ability of workers to fully exercise their rights.

Governments for example, play a key role in shaping the prevailing regulatory and policy environment, which can in turn be influenced by international conventions, laws, and trade agreements. Between 2021–23, ETI continued to work with members to influence the policy and regulatory environment that enables responsible business and effective action by all along the supply chain to improve respect for human rights at work.

THE INDUSTRY WE WANT (TIWW)

TIWW is a multistakeholder initiative hosted by ETI, Fair Wear Foundation (FWF) and Sustainable Apparel Coalition (SAC) to drive industry-wide progress across the garment and footwear sector.

In 2021 and 2023, TIWW launched its first and second industry dashboard at the OECD Forum, with three key impact metrics – wages, purchasing practices and GHG emissions – to establish a baseline measurement for the garment and footwear industry. The dashboard synthesises extensive wage data on 28 major garment-producing countries, feedback from more than 1000 suppliers across 54 countries and new estimates of apparel sector emissions. Data for each of these metrics will be updated on an annual basis so we can gauge how the industry is progressing and ask bigger, stronger questions about how to support, stimulate and scale progress to transform the industry.

Together, TIWW's dashboard launches have attracted 1000+ registrants, from brands & retailers, manufacturers, trade union, NGOs, governments, and other stakeholders. Throughout each year, the TIWW has hosted three deep-dive sessions on their key impact metrics, supporting stakeholders to understand and engage with the data. Each webinar brought together a diverse set of voices and experts across the supply chain to reflect on the industry's performance and spark discussion around how to drive greater progress. TIWW also increased supplier participation during this period, by translating marketing assets and website pages into nine different languages: Vietnamese, Bengali, Chinese, Turkish, Hindi, Portuguese, French, Spanish, and Italian. The diversity and scale of TIWW’s reach holds huge potential for influencing an enabling environment for human rights progress, from governments and policy to buyers and suppliers.

ALIGNING HUMAN RIGHTS DUE DILIGENCE LEGISLATION TO INTERNATIONAL STANDARDS

In February 2022, the Corporate Sustainability Due Diligence Directive (CSDDD) was proposed by the European Commission.

Since then, ETI has acted to influence this legislation, drawing on 25 years of practical experience and harnessing the expertise of our members, from NGOs such as Anti-slavery International and Save the Children, to trade unions such as the International Transport Workers' Federation, and companies, including several of the EU's largest in the apparel and food retail industries.

In response to proposals and ongoing negotiations, we have developed our own recommendations, lobbied policy makers, and partnered with key stakeholders, including amfori, Fair Wear Foundation, Sustainable Apparel Coalition, Transformers Foundation, and manufacturing groups from the Sustainable Terms of Trade Initiative, on joint recommendations. We urge EU decision-makers to adopt a thorough due diligence strategy that is clear, based on risk to affected people, and aligns with existing international standards: the UN Guiding Principles on Business and Human Rights and the OECD guidelines. We believe all parties involved in any particular supply chain, including workers, are set to benefit from well-designed obligatory human rights due diligence, that facilitates an enabling environment where workers can fully exercise their rights and business has a legal responsibility to secure them.
For human rights, for better business

ETI is a leading alliance of trade unions, NGOs and businesses, working together with key stakeholders to promote practical solutions to end the abuse of human rights at work.

Our vision is a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.

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