



Ocado Retail Limited

Modern Day Slavery Statement
Financial Year 6th April 2025 - 29th March 2026

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Introduction



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Opening declaration

In accordance with the UK Modern Slavery Act 2015, Ocado Retail Limited remains steadfast in its mission to identify and eradicate forced labour within our operations and global supply chains. Following the change in our financial year, this statement outlines our strategic oversight and due diligence for the financial year ending 29th March 2026. As our business grows, we continue to evolve our human rights safeguards to ensure they remain robust, responsive, and integrated into our day to day operations.

The global context and our responsibility

The challenge of eliminating modern slavery is a mission of profound scale and

significance. We recognise that global geopolitical and economic instability can often obscure exploitative practices, creating environments where forced labour becomes harder to detect. At Ocado Retail, we are committed to a transparent approach. We ensure that our ethical standards remain clear, providing a strong defence against the risks present in an increasingly unpredictable global landscape.

Strategic progress and evolution

Throughout this reporting period, we have advanced our overarching Human Rights program through key structural enhancements designed to intensify oversight and institutional accountability:

- **Functional Integration:** We have successfully transitioned our Human Rights remit into the broader Sustainability Team. This strategic alignment ensures that ethical labour practices are intrinsically linked to our wider ESG (Environmental, Social, and Governance) strategy and environmental stewardship, fostering a holistic approach to corporate responsibility.
- **Enhanced Due Diligence:** We have tightened our onboarding and retention protocols for Ocado Own Brand products. Currently, all high-priority suppliers, as well as all newly onboarded suppliers regardless of priority status, are required to provide comprehensive disclosures regarding their own Human Rights

programs. We are committed to expanding this requirement to our remaining supplier base within the next financial year.



This statement was approved by the Board of Ocado Retail Ltd. and signed on their behalf by **Hannah Gibson**, Ocado Retail CEO



A photograph of several ripe, orange-colored fruits hanging from a branch with green leaves. A semi-transparent teal rectangular overlay is positioned in the upper-middle part of the image, containing the title text in white. The background is a soft-focus green, suggesting a natural outdoor setting.

Structure, business and governance

Our structure

Ocado Retail Limited (ORL) operates as a 50:50 joint venture between Marks & Spencer Group plc and Ocado Group plc.

Employing approximately 900 colleagues, our operations are headquartered in Hatfield, Hertfordshire, supported by our dedicated Customer Hub in Sunderland, Tyne and Wear.

While both M&S and Ocado Group publish independent Modern Slavery Statements, this report is dedicated exclusively to the operations, supply chains, and specific governance frameworks of ORL. Ocado Retail offers the most extensive selection of any



UK supermarket, providing approximately 45,000 products sourced from a global network.

We maintain a high level of vigilance regarding the diverse labour force that

powers this network. We recognise that certain workforce demographics are inherently more susceptible to exploitation.

Contingent labour:
Temporary and seasonal

workers required for fluctuating demand.

Migrant workers:
Individuals who may be recruited through international or third-party labour agencies.

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Contracted personnel: Agency-sourced staff within various stages of our logistics and production cycles.

The information reported in this document relates to Ocado Own Brand products and suppliers only unless otherwise stated.

Our business

Operational profile and technological leadership

Ocado.com, operated by Ocado Retail, remains the world's largest dedicated online grocery platform. We serve 80% of the UK population, providing an expansive selection of major brands, challenger brands, the M&S food and drink range, and our own Ocado private label products. Our commitment to logistical

excellence ensures a market-leading service characterized by high fulfillment accuracy and minimal substitutions.

Our operational infrastructure is powered by proprietary, world-leading software and automation technology. Every order is meticulously processed through a network of Customer Fulfillment Centres (CFCs) and General Merchandise Distribution Centres. These products are then dispatched to our customers through a comprehensive network of regional spokes or direct from CFCs, via the delivery fleet.

Beyond our core platform, ORL manages Zoom by Ocado, our rapid-delivery

service designed to meet the evolving needs of the modern consumer.

Collaborative logistics and workforce governance

While ORL manages the retail and customer-facing strategy, our physical infrastructure is powered by a strategic partnership with Ocado Group. All fulfilment sites are operated by Ocado Group, which provides essential logistics services to ORL, including the provision of our warehouse operatives and delivery drivers. This collaborative model is governed by a shared commitment to ethical labour standards, ensuring that the personnel who facilitate our deliveries and manage our inventory are protected under a

unified, rigorous human rights framework.

Governance

To ensure our commitments are translated into measurable action, Human Rights and Modern Slavery risks are fully integrated into the Ocado Own Brand, Technical, Compliance & Sustainability Risk Matrix. This unified framework allows us to assess labour risks with the same strategic rigor applied to our core operational and technical safety standards.

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Our governance structure ensures multi-layered accountability across all levels of the organisation:

Board-level oversight:
The Board maintains overall responsibility for monitoring progress against our Human Rights and Modern Slavery strategy, ensuring alignment with our long term corporate governance goals. This is delegated through the Audit Committee who then reports to the Board.

Quarterly strategic reviews:
Detailed progress reports against our established targets are presented every quarter to the Compliance Committee. These sessions facilitate cross functional collaboration and strategic course correction.

Continuous monthly monitoring:
On an operational level, progress is reviewed monthly alongside the ORL Compliance Team. This high-frequency cadence ensures that any emerging risks are identified and addressed in real-time, maintaining the integrity of our overarching Human Rights program.



The image features two large, detailed bunches of dark purple grapes. The grapes on the left are in sharp focus, showing individual berries with a natural bloom. The grapes on the right are slightly more blurred. A horizontal teal banner with a subtle diagonal line pattern runs across the center of the image, containing the word 'Policy' in white. The background is a soft-focus view of more grapevines and leaves.

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Our policies draw from a number of internationally recognised declarations, standards and codes. These form the basis of how we operate and are listed below

- The UN Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The UN Global Compact
- The Base Code of the Ethical Trading Initiative (ETI)

Our policies

SUPPLIER MANUAL

Our Supplier Manual is a contractually binding part of our trading conditions, mandating rigorous operational standards for all suppliers. This requirement applies to every Ocado Retail supplier specifically requires formal adherence to the ETI Base Code labour standards.

ETHICAL SOURCING POLICY

This document details Ocado Retail's human rights requirements for suppliers supplying into any of our businesses. This includes details of the due diligence requirements, including ethical audits and where we expect suppliers to take additional steps to protect workers in our supply chains.

HUMAN RIGHTS POLICY

This policy serves as the formal framework for Ocado Retail's commitment to upholding the highest standards of ethics and respect for human rights across its operations and supply chains.

HUMAN RIGHTS ESCALATION AND REMEDATION POLICY

This policy outlines our approach to the escalation and remediation of human rights issues. This is to ensure access to remedy for workers and communities within our own operations and adequate engagement with suppliers and third parties when issues arise in our supply chains.

WHISTLEBLOWING POLICY

Our Whistleblowing Policy provides a secure framework for colleagues to disclose concerns regarding workplace safety, fraud, or unethical conduct. We are committed to ensuring that all legitimate reports can be made in confidence, without risk of detriment, victimisation, or disciplinary action.

ANTI BRIBERY POLICY

Our Anti Bribery and Corruption Policy defines the collective responsibility of our business and its workforce to prevent financial crime. It establishes clear protocols for managing risks related to bribery, corruption, and money laundering, ensuring we meet our legal obligations and maintain the highest level of institutional integrity.

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Ocado Own Brand supply chain

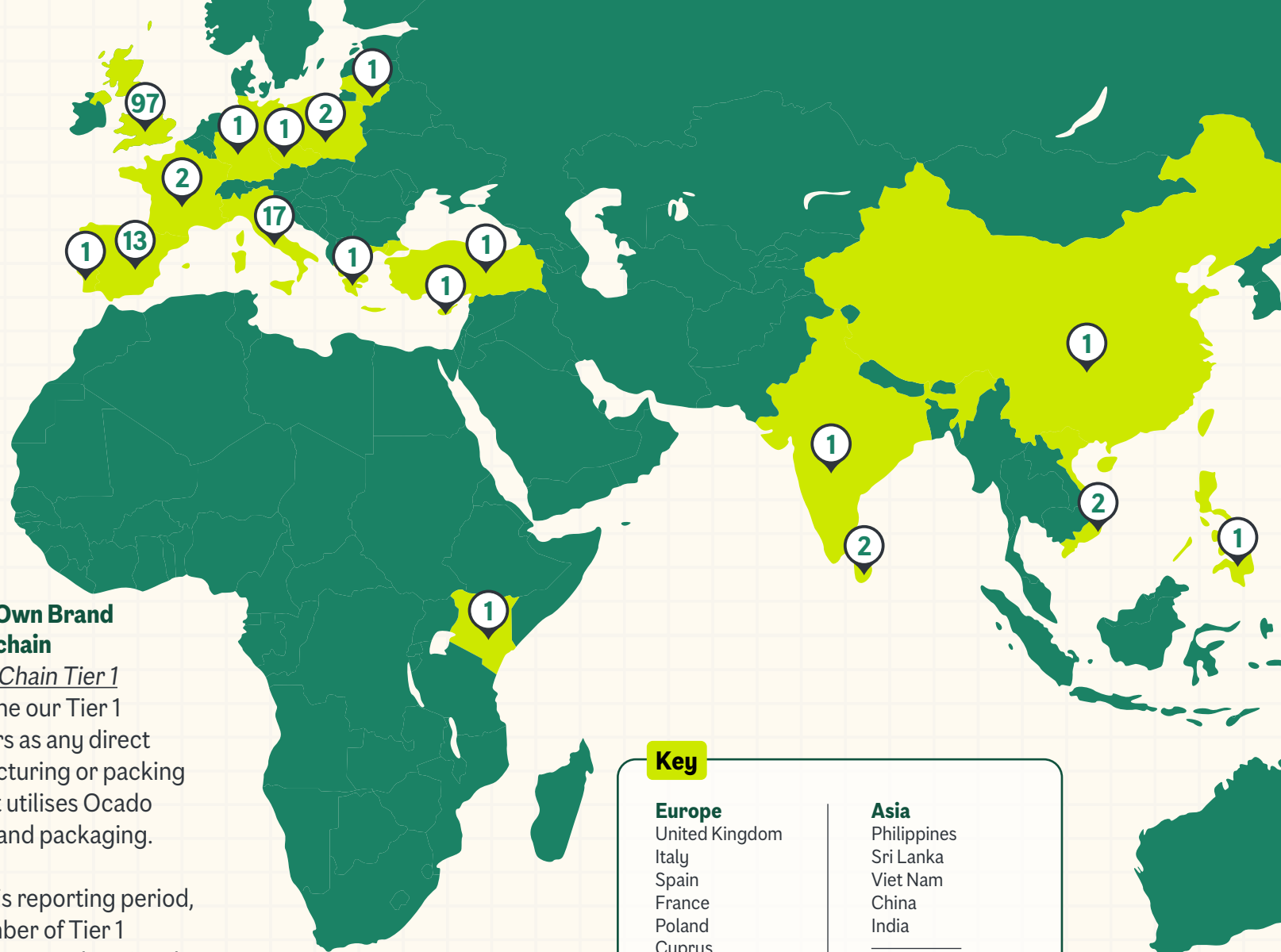
Supply Chain Tier 1

We define our Tier 1
suppliers as any direct
manufacturing or packing
site that utilises Ocado
Own Brand packaging.

As of this reporting period,
the number of Tier 1
suppliers providing Ocado
Own Brand products has
decreased from 147 to 146.

The majority of our Own
Brand production remains

rooted in the UK, allowing
for closer oversight and
alignment with national
labour standards. Our
primary sourcing regions are:



Key

Europe

United Kingdom
Italy
Spain
France
Poland
Cyprus
Czech Republic
Germany
Greece
Lithuania
Portugal
Turkey

Asia

Philippines
Sri Lanka
Viet Nam
China
India

Africa

Kenya





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Ocado Retail requires the following from our Tier 1 supplier sites. This is set out in the Ethical Sourcing Policy provided to suppliers at time of onboarding.

Audit frequency

We use the SEDEX RADAR tool to categorise site risk and dictate audit frequency:

- High Risk: Annual 2-Pillar semi-announced SEDEX Members Ethical Trade Audit (SMETA).
- Low or Medium Risk: 2-Pillar semi-announced SMETA on a three yearly basis

Alternative certifications

We also recognize SA8000, SIZA, and Business Social Compliance Initiative (BSCI) certifications.

Unannounced inspections

Any site supplying Ocado Retail may be subject to an

unannounced ethical audit at any time, regardless of country risk rating.

Onboarding suppliers

For new suppliers, a SMETA must be completed and all business critical and critical findings closed before the commencement of supply.

Incident reporting

Suppliers must alert the Ocado Retail Responsible Sourcing Manager within 24 hours if any business-critical non-conformance is identified.

Worker welfare and Grievance mechanisms

Workplace Voice: All suppliers must provide workers (including agency staff) with access to a direct workplace grievance mechanism.

Prominent awareness: UK suppliers are required

to display Unseen UK Modern Slavery hotline posters in high-footfall areas. International suppliers must prominently display Ocado Ethicspoint helpline details in the appropriate local languages.



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Assessing risk

A fundamental pillar of our due diligence is the systematic assessment of risk using the SEDEX Risk Radar for Tier 1 Ocado Own Brand Suppliers. This data-driven approach allows us to move beyond broad assumptions and focus our resources where they are most needed.

How we assess risk

SEDEX issues a 'combined' risk rating to sites (scored from 1–10). This score is a sophisticated metric derived from:

- **Inherent Risk:** Country and sector-level data (e.g., geographic vulnerability or high-labour-intensity sectors).
- **Site-Specific Inputs:** Detailed data from the site's Self-Assessment Questionnaire (SAQ) and workforce profile.

These scores can fluctuate in real-time based on updates to the SAQ or if non-compliances from a previous audit become overdue.

Risk categorisation & audit frequency

Our audit requirements are strictly aligned with these numerical categories to ensure high-risk areas receive the most frequent oversight:

- **High Risk (Combined score 6–10):** Requires an annual 2-Pillar semi-announced SEDEX Members Ethical Trade Audit (SMETA).
- **Medium Risk (Combined score 4–5.9):** Requires a 2-Pillar semi-announced SMETA on a three-yearly basis.
- **Low Risk (Combined score 0–3.9):** Requires a 2-Pillar semi-announced SMETA on a three-yearly basis.

Why this is essential for due diligence

Integrating the SEDEX Risk Radar into our strategy is critical for several reasons:

- **Targeted Resource Allocation:** We must prioritise interventions. The Radar identifies "hotspots" where the risk of exploitation is statistically higher.
- **Dynamic Monitoring:** Because scores fluctuate based on real-time data, our due diligence is not a "point-in-time" check but a continuous monitoring process.
- **Evidence-Based Decisions:** This scoring provides an objective framework for the Buying and Technical teams to make informed decisions regarding supplier onboarding and continued partnership.

- **Reducing Ambiguity:** By combining inherent country risks with actual site behavior (via the SAQ), we gain a nuanced view of the difference between "geographical risk" and "operational performance."

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Due diligence

To move beyond static assessments, Ocado Retail maintains a rigorous, multi-layered monitoring cycle. This ensures that our risk data is current and that non-compliances are addressed through a structured escalation process.

Monthly governance & reporting cycle

On a monthly basis, we conduct a comprehensive refresh of our SEDEX Monthly Tracker. This process covers all approved, active, and inactive sites, as well as those currently in the onboarding phase. Key activities include:

- **Data Hygiene:** Removing links for delisted sites and integrating newly onboarded partners to ensure 100% visibility of the active supply base.
- **Metric Tracking:** We monitor a comprehensive suite of indicators, including country of origin, combined risk ratings, audit history (dates, types, and nature), and SEDEX membership status.
- **Non Compliance Management:** We track the specific volume and severity of findings, Minor, Major, Critical, and Business Critical non compliances.
- **Targeted Intervention:** We proactively contact non compliant Tier 1 suppliers regarding incomplete or outdated SAQs, overdue audits, or major non compliances that have remained unresolved for over six months.

- **Tier 2 Visibility:** We record risk ratings and non compliance progress for Tier 2 sites to maintain a holistic view of deep tier supply chain health.

Weekly high-impact monitoring

Our weekly cycle focuses on the immediate mitigation of high severity risks. We refresh non compliance data for all audits conducted within the last three years to ensure no critical issues are overlooked.

- **Critical Non Compliance Project:** We maintain direct contact with all Tier 1 and Tier 2 suppliers who have open Business Critical or overdue Critical non compliances.
- **Verification & Resolution:** We track progress through specific resolution paths, including Desktop Reviews (verifying corrective

actions) and Follow up Verification (confirming audits are booked). Where a finding cannot be closed immediately, we require evidence of specific actions taken to mitigate the associated risks.

- **Escalation Protocol:** All newly identified findings are integrated into our communication cycle, while existing findings follow a strictly defined escalation process to ensure timely resolution.

KPIs

The status of our compliance based KPIs for FY26 is as follows: -

Measure	Target	Status 2023	Status 2024	Status 2026
% of Ocado Own Range Tier 1 suppliers registered on Sedex	100%	100%	100%	100%
% of Ocado Own Range Tier 1 suppliers with a Sedex Self-Assessment Questionnaire completed to 100%	100%	97%	97%	100%
% of Ocado Own Range Tier 1 suppliers with a two pillar SMETA in the past three years	100%	94%	98%	100%*
% of Ocado Own Range High Risk Tier 1 suppliers with a two pillar SMETA in the past year	100%	75%	92%	90%**

*1 low-risk supplier went past their due date in March 2026, but has subsequently now had their SMETA.

** 1 high-risk supplier, who has not had an audit within the last year, has an audit booked in for October.

This has been given an internal exception due to circumstances beyond the control of the site.

Following a change to our reporting year in 2024, our Modern Slavery Statement for that period covered an extended 16-month cycle (January 2024 – March 2025), incorporating all relevant 2025 data. Our subsequent statement will cover the period April 2025 – March 2026.

Serious incidents

The status of our compliance based KPIs for FY26 is as follows:

Measure	Status 2026
Number of cases with modern slavery and/or labour abuse indicators identified in own supply chain	1

In collaboration with Unseen: 25 cases shared, with three cases directly linked to our supply chain. In these cases, Ocado attended 11 collaborative calls which included engagement with other stakeholders in the sector.

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Monitoring & actions

For Business Critical and Critical SMETA non-conformances that remain unresolved beyond their agreed deadlines and become overdue, we implement a rigorous weekly engagement process. This mechanism is used as a last resort to ensure that human rights standards are being upheld and that sites are taking definitive, documented action to remediate their SMETA findings. This process is implemented for all sites linked to us, both Tier 1 & Tier 2.

Our approach prioritises meaningful dialogue; we proactively offer resources and guidance to help suppliers overcome barriers to compliance and achieve resolution. However, where a supplier

demonstrates a persistent lack of engagement or fails to provide evidence of progress, we follow a strict 5-week internal escalation pathway.

This process was implemented in May 2025 and as of end of financial year, March 2026, 2 suppliers have reached week 3. None have gone past this point.

Our internal escalation pathway



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Assessing risk

Strategic implementation
of the FNET Due
Diligence Tool

The introduction of enhanced due diligence for high priority commodities in 2025 was a strategic move designed to ensure our resources are directed toward the areas of greatest potential impact. Central to this approach was the selection of the FNET Due Diligence Tool.

Industry alignment and
expert development

We purposefully chose the FNET tool because it is an established, industry recognised framework developed specifically by the FNET Due Diligence Working Group. By utilizing a tool co-created by the industry, we ensure that our assessment criteria are not only robust but also directly relevant to the salient human

rights risks found within food supply chains.

Minimising duplication

A primary objective in our due diligence strategy is to avoid placing an unnecessary administrative burden on our partners. We recognise that many of our Tier 1 suppliers are already active members of FNET or supply other retailers who utilise the same framework.

Suppliers who have already completed the assessment for their own internal due diligence or for other customers can share their existing data with Ocado Retail. This significantly reduces duplication, and allows our suppliers to focus their time and resources on implementing meaningful workplace improvements rather than repetitive data entry.

Informing

resource allocation

The data gathered through the FNET tool provides Ocado Retail with a clear “Human Rights Maturity” profile for each high-priority supplier. This intelligence is vital for our resource planning; it allows us to identify which suppliers have advanced programmes and which require more intensive support from our Human Rights Manager and consultants.

**These products listed
in our Ethical Sourcing
Policy are considered
high priority:**

Berries

Chicken – Thailand

Citrus fruits

Cocoa

Coffee

Corned beef

Dried fruit and nuts

Eggs

Flour

Palm oil

Prawns

Salads,

including tomatoes,
lettuce, radishes, etc.

Spices and Dried

Herbs

Sugar

Tea

Tropical fruits,

including pineapples,
bananas, avocados, etc.

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Due diligence & actions

For these priority categories, we require Tier 1 suppliers to complete the FNET Due Diligence Tool annually. Furthermore, this self-assessment is a mandatory requirement for all new suppliers during the onboarding process, regardless of their priority status. This ensures that we have a clear baseline for every new partner entering our supply chain, allowing us to further assess risk and maturity from the outset.

We purposefully chose the FNET tool because it is an industry-recognised framework developed by the FNET Due Diligence Working Group. Its adoption minimises duplication and 'audit fatigue' for suppliers who may already utilise the tool for other customers or their own internal monitoring.

The tool evaluates a supplier's human rights programme across six critical areas:

- 1) **Traceability:** The level of visibility into the source of raw materials.
- 2) **Risk Assessment:** The robustness of the supplier's internal risk identification processes.
- 3) **Action:** The tangible steps taken to mitigate and prevent human rights risks.
- 4) **Performance:** How effectively the supplier monitors and measures their impact.
- 5) **Remedy:** The systems in place to address and correct abuses if they occur.
- 6) **Communication:** How transparently the supplier reports on their ethical performance.

Scoring and supplier performance

Upon completion, suppliers are categorised into one of four maturity levels: Below Foundation, Foundation, Intermediate, or Advanced.

- **Our Target:** Ocado Retail's clear expectation is for all suppliers to reach a minimum of Foundation level.
- **Actions and Supplier Support:** We are committed to a collaborative approach. For the four suppliers currently scoring Below Foundation, we have collaborated directly with them and our Human Rights Consultant to create tailored action plans and timelines to complete by.

- **2027 Strategic Goal:** Ocado Retail is committed to supporting these partners by providing the necessary resources, guidance, and expertise to ensure that all suppliers in our network reach the Foundation level by 2027.

This enhanced oversight ensures that for our most complex supply chains, we are moving beyond simple compliance to actively building the capacity of our partners to protect worker rights.

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Internal training

All Ocado Retail employees are required to complete mandatory Human Rights & Modern Slavery training within the first three months of joining, with a mandatory refresher every year thereafter. This practical training ensures that every member of our team is equipped with the knowledge to recognise and respond to human rights risks.

The training program ensures that colleagues understand their role in safeguarding our supply chain. The mandatory modules include:

- **Human Rights Fundamentals:** An introduction to “What are human rights?” and how these principles fit within our sustainability framework.

- **Strategic Alignment:** Why supporting human rights is vital to our business and an overview of Ocado’s Human Rights Strategy.
- **Modern Slavery Awareness:** Modules defining Modern Slavery, highlighting salient human rights issues, and presenting Modern Slavery facts.
- **Operational Safeguarding:** Guidance on identifying victims and exploiters, paired with clear procedures for reporting suspicions of modern slavery through our protected channels.
- **Assessment:** The training concludes with a formal assessment to verify that all colleagues have attained a robust understanding of the subject matter.

- By requiring this annual training, we maintain a culture of transparency and proactive defence, ensuring that the eradication of modern slavery remains a collective responsibility across the business.



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Procurement training

Ocado have worked closely with our partner Stronger Together to develop specialized training for our buying teams, emphasising ethical procurement practices and identifying risk indicators during supplier visits. This initiative reinforces the principle that identifying and addressing human rights risks is a shared responsibility across the organisation.

The training modules developed for this program include:

- **Introduction & Modern Slavery Overview:** Core concepts and definitions.
- **Purchasing Practices:** Analysing the impact of buying decisions on labour standards.
- **Risk Identification:** Spotting the signs of exploitation and identifying

supplier visit “red flags.”

- **Ethical Partnerships:** Best practices for building and maintaining ethical relationships with our supply base.
- **Due Diligence Accountability:** Defining the Commercial team’s specific role in Ocado’s wider human rights due diligence approach.
- **Knowledge Test:** A formal assessment to verify competency in ethical procurement.

This training will be rolled out to all Ocado Own Brand Buyers and Trading Managers starting mid 2026, ensuring those closest to our supply chain have the necessary tools to maintain our high ethical standards.

Supplier training

As part of our ethical sourcing policy and our sponsorship of Stronger

Together, it is a requirement for our UK-based suppliers to complete specialized training modules, including “Tackling Modern Slavery in UK Businesses” and “Advanced Tackling Modern Slavery.”

These participatory workshops support our partners in implementing robust and effective anti-slavery programs. The sessions are designed to help businesses:

- Progress existing risk management processes and implement industry good practice.
- Build confidence in conducting effective modern slavery due diligence.
- Strengthen procedures for managing suspected or reported cases of forced labour within their own operations.

- By providing and requiring these resources, we support our UK supply base in taking proactive steps to protect workers and meet their ethical, legal, and transparency obligations.

As part of Ocado Retail’s sponsorship of the Stronger Together Consumer Goods Programme, our suppliers in the UK and Ireland have access to a suite of free workshops focused on tackling forced labour across operations and supply chains. In our 2025/6 financial year, 90 suppliers completed the ‘Tackling Modern Slavery in Business – UK and Ireland’ workshop and 15 suppliers completed the ‘Advanced Tackling Modern Slavery in UK Businesses’ workshop.



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Case study: Ethical due diligence in southern Spain

Following an investigation into accommodation standards in the UK, Ocado Retail extended its proactive ethical trade due diligence to its international supply chain. These sites were selected due to the link between the UK Tier 1 sites and the Spanish sites that

supply them. In October 2025, a comprehensive three-day assessment was conducted in Almería, Spain.

Scope and methodology

The visit was led by a third-party Human Rights specialist alongside the Ocado Human Rights Manager, with a commercial buying colleague

accompanying the team to provide integrated business oversight. The assessment focused on a second-tier coordination hub and four associated grower sites within the horticulture sector:

Duration

A three day visit conducted from the 21st to the 23rd of October 2025.

Site inspections

Physical tours were conducted at the second-tier supplier's central packing facility, their own greenhouse site, and four independent growers within their network.

Worker voice

Confidential interviews were conducted on site with a randomly selected representative sample of local and migrant workers. Topics discussed included, pay, recruitment fees & working conditions.

Language and interpretation

Interviews were held in Spanish, French and Arabic. To ensure clear communication, especially with workers who could not read, the team utilised audible translation tools.

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Document review

The team performed a thorough audit of employment contracts, time records, payroll data, and health and safety procedures.

Key findings and results

The assessment concluded that all visited sites were operating in full alignment with recognized ethical trade principles and Spanish labour law. No major non-compliances or indicators of forced, bonded, or child labour were identified.

Key observations included:

Fair compensation

All interviewed workers reported receiving legal wages at or above the minimum, and any voluntary overtime was paid correctly. Living Standards: Workers were found to be living

in decent, self-funded accommodation, which the assessment noted as a reflection of fair wages and regular employment in the sector.

Safe working environments

High housekeeping standards were observed, with workspaces kept tidy and free from hazards. Workers used appropriate personal protective equipment (PPE) and had access to clean rest areas and drinking water.

Management engagement

The supplier demonstrated strong engagement and had already implemented recommendations from a previous third-party ethical trade gap analysis.

Conclusion

This visit confirmed that the tier 2 sites visited are maintaining safe, respectful,

and well-managed workplaces. The overall assessment found that ethical standards were met, with evidence of a genuine commitment to continuous improvement in labour practices.



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Partnerships and memberships

Joint school project with Fyffes

Community Investment: Infrastructure and Education in Belize

In 2024, Ocado Retail partnered with our long-standing supplier, Fyffes, to fund a major infrastructure project in Bladen Village, Toledo District, Belize. This initiative is a cornerstone of our commitment to ensuring that our supply chains contribute positively to the communities from which we source.

- **Project Scope:** Together with Fyffes, we co-funded a £192,300 GBP investment to construct a new five-classroom block and a dedicated preschool building at the Fabian Cayetano R.C. Primary School.
- **Impact on Vulnerable Communities:** The project



replaced dilapidated, unsafe, and pest-infested structures with modern, secure facilities. These now provide a safe learning environment for 271 students,

including 22 preschoolers.

- **Climate Resilience:** Beyond education, the newly constructed buildings are certified hurricane shelters, providing a vital safety net for the village's

800 residents during extreme weather events.

- **Holistic Support:** Alongside the physical infrastructure, the project ensures children have access to a healthy and nutritional breakfast, recognizing that food security is intrinsically linked to educational success and long-term community resilience.

By investing in the foundational needs of our producers' communities such as safety, education, and nutrition, we take proactive steps to reduce the systemic vulnerabilities that can lead to labour exploitation in remote agricultural regions.

Joining the Modern Slavery Intelligence Network

In 2025, Ocado Retail joined the Modern Slavery Intelligence Network

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(MSIN) to further enhance our due diligence capabilities. MSIN is a pioneering non-profit collaboration within the UK food and agriculture sector, established in direct response to the findings of Operation Fort the UK's largest modern slavery investigation.

As active members of MSIN, we share intelligence with industry peers to create an in-depth view of modern slavery trends, generating new insights to protect vulnerable workers. This collaboration provides several key benefits to our strategy:

- **Proactive Intelligence Sharing:** A secure and innovative platform that facilitates collective action and allows us to proactively disrupt exploitative criminal activity.

- **Risk Escalation:** Provides a dedicated space to raise alarms regarding high-risk threats and report suspicions of exploitation that require immediate attention.
- **Demonstrable Progress:** Offers clear evidence of our activity and continuous improvement in achieving compliance and managing reputational risk.

Whistleblowing hotline

We have successfully launched Speak Up, a bespoke whistleblowing platform designed specifically for Ocado Retail. This transition represents a strategic move away from a shared platform with Ocado Group, allowing us to establish greater operational control and provide a clearer, more tailored reporting path for our stakeholders.

- **Internal Colleague Engagement:** The "Speak Up" platform is the primary reporting channel for all internal colleagues. It provides a secure, confidential, and anonymous environment for raising concerns beyond modern slavery, including bullying, harassment, fraud, illegal or anti-competitive behavior, or any other unethical workplace conduct.
- **International Supply Chain Access:** Access to the platform has been extended to our non-UK based Own Brand supplier sites. This ensures that workers and management within our international supply network have a direct, anonymous, and secure line to report suspicions of modern slavery, exploitation, or labour rights violations.

- **Specialised UK Support:** We continue to direct our UK-based supplier sites to utilize the Unseen Modern Slavery Helpline for all human rights and modern slavery concerns. This ensures that UK partners have access to specialized, local expertise while our internal teams and international partners benefit from the dedicated oversight of the "Speak Up" platform.

This evolution of our reporting infrastructure ensures that every individual in our network, regardless of location, has access to a secure, independent, and effective voice, with the option to remain completely anonymous.

A close-up photograph of several ripe, red raspberries hanging from a green stem with serrated leaves. The raspberries are in sharp focus, showing their characteristic bumpy texture. A semi-transparent dark green banner is overlaid on the left side of the image, containing white text.

**Continuous
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Continuous improvement

Ocado Retail views human rights due diligence not as a static compliance exercise, but as an evolving programme of continuous improvement. As we look ahead, we are committed to strengthening our oversight, expanding our frameworks, and ensuring that no area of our operations or supply chain remains unmonitored. To achieve this, our strategic focus will center on two primary forward-looking initiatives:

Rollout of the Third-Party Storage Policy

Recognising that risks of labour exploitation extend beyond manufacturing and packing sites, we are actively rolling out a comprehensive Third-Party Storage Policy. This includes facilities operated by Ocado Logistics.

- **Extended Oversight:**
This policy extends our strict ethical standards to third party warehousing within our network.
- **Consistent Auditing:**
These facilities will be integrated into our broader risk assessment framework, ensuring third party logistics partners demonstrate full alignment with our ethical sourcing criteria.

HRDD Document Requirements for All Onboarding Suppliers

Building on the successful integration of the FNET Due Diligence Tool, we are expanding our scope by mandating complete Human Rights Due Diligence (HRDD) documentation for all Ocado Own Brand suppliers we on board, regardless of priority status.

- **Eliminating Blind Spots:**
While we maintain focused

resource allocation on high priority commodities, this change ensures that no new supplier enters the Ocado Retail network without a thorough evaluation of their human rights management.

- **Standardised Excellence:**
By making HRDD mandatory for all incoming suppliers, we create a unified culture of accountability and ensure that every new partnership aligns with our 2027 strategic goal of achieving a minimum of Foundation level compliance across our entire footprint.

Through these combined measures, Ocado Retail continues to proactively adapt its due diligence framework to meet emerging risks, ensuring robust protection for workers throughout our business.



Partnerships and memberships



British Retail Consortium

The BRC is a trade association for UK retail representing over 200 major retailers. The BRC's unique position as an interface between the UK retail industry, Government, and third-party organisations is indispensable as a means to influence policy, provide collective media responses, discuss industry best practice, and provide on-the-ground information and updates on modern slavery incidents in the UK.



Food Network for Ethical Trade (FNET)

The Food Network for Ethical Trade is a member-led initiative which is committed to improving the lives and livelihoods of workers in food supply chains. FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions.

The Food Network for Ethical Trade (FNET) was established in 2016 by several major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade. FNET aims to support members to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and to build a forum for sharing issues and best practice.

Through its collaborative work, FNET aims to improve labour conditions in agriculture and food processing, both in the UK and internationally, by setting industry-wide expectations and ensuring they are communicated and supported throughout supply chains.

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Throughout 2025, membership of FNET supported Ocado Retail to understand and track the human rights risks in their operations and supply chains and to improve their planning and mitigation efforts. In 2025, FNET hosted 23 fortnightly calls for members, with expert speakers across different sectoral issues. These speakers shared insights relating to current and emerging human rights risks, ongoing ethical trade issues and opportunities for collaboration.

FNET hosts five working groups for its members: responsible recruitment, climate change and human rights, developing common due diligence tools, empowering work, and raw materials and services. In 2025, FNET coordinated 20 working group meetings and many sub-group meetings to develop tools/resources to tackle recruitment fees, improve worker representation and employee engagement, better understand salient risks, co-create guidance on topics such as remediation, heat stress and using lived experience to identify gaps in management practices. Via training webinars and working groups, FNET supported members to better understand sectoral risks on key commodities, including spices, dairy and fishing, and Goods Not for Resale sectors, such as haulage and warehousing.

FNET supported members to manage serious issues by facilitating collaboration between members to jointly investigate alleged abuses, including potential modern slavery cases.

Additionally, FNET facilitated calls with other stakeholders on members' behalf, such as Sedex consultations on new SMETA requirements, Seasonal Worker Scheme Taskforce on seasonal and skilled worker labour risks to drive alignment on remediation, recruitment and supply chain management practices.

Ocado Retail has also continued to take part in a retailer alignment group coordinated by FNET to reduce duplication and improve the effectiveness of retailer approaches to human rights due diligence, including modern slavery. FNET also supported our us with incident management, via the Serious Incident Escalation Protocol.



**MODERN SLAVERY
INTELLIGENCE
NETWORK (MSIN)**

Modern Slavery Intelligence Network (MSIN)

The Modern Slavery Intelligence Network (MSIN) is a groundbreaking non-profit collaboration in the UK food and agriculture sector, created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation. MSIN facilitates the sharing of anonymised intelligence across its members to understand patterns and trends of modern slavery within the sector.

Membership of MSIN enhances an organisation's ability to identify, prevent, and respond to human rights abuses across its operations and supply

chains. By participating in a trusted intelligencesharing community, members gain access to expert insights, practical tools, and a safe environment for open dialogue that would otherwise be difficult to find. Exploitation isn't just displaced across the sector but truly disrupted.

Shared visibility enables earlier detection of emerging threats and a more informed response, leading to stronger governance, robust risk assessments, and effective remediation pathways. Membership also highlights a commitment to transparency and continuous improvement.

Over the last year, data sharing has accelerated, driven by streamlined processes for submitting information, more intelligence reports from members, and new organisations joining the network.

In September, one MSIN member reported a suspicious online recruitment channel. That same day, another MSIN member shared intelligence about two other suspicious labour providers. Both these labour providers and the recruitment agency were registered at the same address, pointing to a potential organised crime link that would not have been spotted but for the information-sharing facilitated by MSIN. This has the potential not only to prevent members from working with illicit agencies and labour providers, but also to disrupt an organised crime network exploiting individuals within the UK's food and agriculture sector.

Ultimately, MSIN empowers organisations to act with greater confidence in their fight against modern slavery by turning information into meaningful action. Participation demonstrates that tackling exploitation requires collaboration, vigilance, and shared responsibility.



Sedex

Partnership with SEDEX: Our global data standard

To maintain a transparent and ethical supply chain, Ocado Retail utilizes SEDEX (the Supplier Ethical Data Exchange) as our primary platform for managing and sharing labour standards data.

Who is SEDEX and what do they do?

SEDEX is a global profit for purpose organisation that hosts the world's largest collaborative platform for sharing ethical supply chain data. It provides businesses with the tools to manage their performance around labour rights, health and safety, the environment, and business ethics.

At the core of their service is the SMETA (SEDEX Members Ethical Trade Audit), an industry-leading audit methodology that standardizes how ethical inspections are conducted. By using the SEDEX platform, our suppliers can share one set of data and one audit report with multiple customers, significantly reducing "audit fatigue" and allowing partners to focus on operational improvements rather than repetitive administrative tasks.

Why we use SEDEX as our global standard

We have adopted SEDEX as our global standard for several critical reasons:

- **Benchmarking and Consistency:** It provides a universal language for ethical compliance, allowing us to compare risk profiles across different countries and sectors using the same criteria.
- **End-to-End Visibility:** The platform enables us to map beyond Tier 1, providing a clearer view of the labour conditions deep within our supply chain.
- **Data-Driven Due Diligence:** The automated Risk Radar scoring allows our teams to prioritize interventions based on objective, real-time data rather than subjective assessments.

Dedicated SEDEX Ethical Coordinator

To maximize the value of this partnership, we employ a dedicated SEDEX Sustainability Coordinator one day a week. This specialist role serves as the bridge between our commercial teams, our suppliers, and the platform itself. Their remit includes:

- **Supplier Support:** Helping partners navigate the platform and achieve 100% completion of their Self-Assessment Questionnaires (SAQs).
- **Compliance Monitoring:** Ensuring our Tier 1 Suppliers are up to date with our ethical requirements,
- **Data Integrity:** Managing the complex mapping of our global supply base and ensuring all links are accurately maintained and current.
- **Trend Analysis:** Monitoring the platform for systemic shifts in risk ratings across our sourcing regions.



Speak Up

As part of our commitment to maintaining a transparent and ethical business culture, Ocado Retail has partnered with People Intouch to implement SpeakUp®, an industry-leading whistleblowing and ethics reporting platform. This partnership allows us to provide a secure, professional, and accessible voice to everyone within our remit from our internal colleagues to our international supply base.

Platform capabilities and expertise

SpeakUp is an all-in-one ethics and compliance platform utilised by over 600 global organisations. It is designed to lower the barriers to reporting by offering:

- **Total Anonymity and Security:** The platform utilises a unique numerical username and password system, ensuring that reporters can communicate with Ocado's compliance team without ever revealing their identity.
- **Multilingual Support:** With support for over 100 languages, SpeakUp allows our international partners to report concerns in their native tongue, which is vital for accurately capturing the nuances of labor exploitation or human rights issues.
- **Multi-Device Intake:** Reports can be submitted 24/7 via a dedicated web portal, a mobile app, or a secure telephone hotline, ensuring accessibility for workers regardless of their location or access to technology.



Responsible recruitment | Fair work | Free from exploitation

Stronger Together

In 2025 we continued to sponsor the Forced Labour Stream of the Stronger Together Consumer Goods Programme, a multi-stakeholder initiative supporting businesses in the UK and Ireland consumer goods sector, empowering them to take decisive action across their operations and supply chains to tackle forced labour and embed responsible recruitment. As Sponsors, Ocado employees and our suppliers have access to a suite of free interactive training workshops, resources and tools to support tackling labour exploitation in operations and supply chains, including 'Tackling Modern Slavery in Business – UK and Ireland' and 'Advanced Tackling Modern Slavery in UK Businesses' training. Ocado became a sponsor of the forced labour workstream to focus on encouraging our suppliers to attend Stronger Together training that is delivered by experts from the consumer goods sector to build understanding of sector specific forced labour risks and to embed good practice.



Unseen

Established in 2007, Unseen is a UK charity working towards a world without slavery. They run the UK's Modern Slavery & Exploitation Helpline, provide safehouses and support in the community for survivors of modern slavery, as well as working with businesses, governments, other charities, and statutory agencies to bring about positive and transformational change.

Ocado Retail are a member of Unseen's Helpline Business Portal, a secure online platform where we receive redacted information reported to the Helpline concerning our own operations or supply chains. Unseen then support the Ocado Retail with facilitating next steps including collaboration with other stakeholders, investigating concerns and identifying areas requiring action.

As a member of Unseen's business services, we also get access to Unseen's whole business network, expert live webinars, cross-sector collaboration, and latest insights.

Our partnership with Unseen helps support the 365 day a year operation of the Helpline, which provides a vital lifeline to potential victims.

