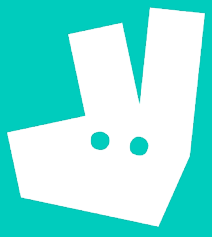
# MODERN SLAVERY STATEMENT 2023



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# INTRODUCTION

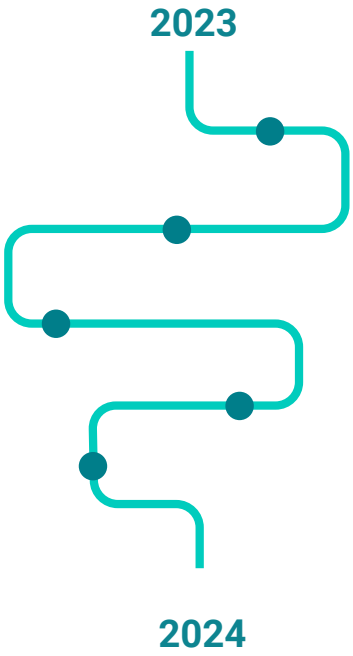
**At Deliveroo, we are fully committed to playing our part in preventing modern slavery in our business, our supply chains and the communities we serve. We believe everyone has a right to safe and fair working conditions, and to be treated with respect.**

The UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. This statement details the steps taken to eliminate abuses and work proactively with our employees and business partners to prevent forced labour, human trafficking and child labour within our business and our supply chain.

In 2023, we continued to focus on embedding our initiatives and strengthening Deliveroo's culture of integrity, supported by a re-branded and expanding Ethics and Compliance team. Due to its scale and complexity, working to address modern slavery risks is an ongoing effort for all organisations. We have made progress on our strategy and will continue to be relentless in our focus to prevent and detect modern slavery in our business and supply chain.

**2023 Year in Review:**
In 2023, highlights of our modern slavery program included:

- Revising and relaunching our employee-facing Code of Conduct, 'The Roo Way';
- Launching our new Company Values, which act as an uncompromising set of core principles that include advocating for fairness and celebrating difference;
- Updating our Modern Slavery policy;
- New Modern Slavery training for employees in roles more likely to bring them into contact with modern slavery issues;
- Communications campaign to coincide with International Human Rights Day; and
- A review of our standard contractual terms and conditions, to ensure that our agreements contain anti-slavery provisions which clearly reflect the standards we expect of our business partners.




This Modern Slavery Statement details the progress we have made to prevent modern slavery in our business and supply chains during the financial year ended 31 December 2023. It is published by Roofoods Ltd (**Deliveroo**) and its subsidiaries in line with Section 54(1) of the Modern Slavery Act 2015.

This statement has been approved by the Deliveroo Board of Directors and signed on its behalf by Will Shu, founder and CEO.



**Will Shu**
Founder and CEO
March 2024

# OUR BUSINESS

## ORGANISATION AND STRUCTURE

**Deliveroo's mission is to transform the way people shop and eat, bringing the neighborhood to their doors by connecting consumers, restaurants, shops and riders. We aim to achieve this by our focus on offering the best value proposition to all three sides of the marketplace: consumers, riders and merchants.**

Our business serves over **7.1 million consumers** monthly. We partner with approximately **183,000 best-loved restaurants and grocery partners**, as well as around **135,000 riders** to provide the best delivery experience in the world.

Deliveroo is headquartered in London, and operates across 10 markets, including Belgium, France, Hong Kong, Italy, Ireland, Kuwait, Qatar, Singapore, the United Arab Emirates, and the United Kingdom, with engineering hubs in India and Poland.

Further details about our company can be found in our 2023 Annual Report.

## OUR GOVERNANCE FRAMEWORK

**Deliveroo's Board of Directors retains oversight and ultimate responsibility for our commitments on tackling modern slavery. Any significant instances of non-compliance with our Modern Slavery Policy or corrective actions will be overseen by the Audit and Risk Committee; there were no such incidents during 2023.**

The Ethics & Compliance team (formerly Regulatory Compliance), which sits within our Legal Department and reports to the General Counsel, is responsible for overseeing the day-to-day implementation of measures that aim to combat modern slavery in our business and supply chains. The team collaborates closely with other functions and continues to build capacity to manage modern slavery risks across the group.

The Ethics & Compliance team also acts as the single escalation point for group-wide modern slavery concerns to ensure matters are investigated and addressed.

## OUR SUPPLY CHAIN

**Suppliers are important to our business so we treat them as partners. In 2023 we onboarded over 400 new suppliers across our business.**

Services continue to represent the largest area of our expenditure with our main costs being the fees paid to riders. In the Middle East our supply chain also includes agencies who work with riders.

Significant areas of spend are on the rider kit and safety equipment that we provide to riders (e.g. helmets, reflective clothing and thermal bags). Although our riders are free to use their own equipment, most choose to opt for our distinctive kit, which ensures that they remain visible, safe and comfortable whilst out making deliveries.

Other expenditure is made up of a variety of goods and services including providing merchants with tablets for processing orders, supplying our Editions kitchens and Hop grocery sites with equipment and general business services of marketing, advertising, IT and corporate services.

Our procurement process is managed through a centralised tool that allows for a consistent way of onboarding and monitoring our supply chain.

# OUR POLICIES

**Modern slavery can take many forms, including labour exploitation, criminal exploitation, sexual exploitation and human trafficking. It is unacceptable and Deliveroo has zero tolerance for it. Deliveroo believes everyone has a right to safe and fair working conditions, and to be treated with respect.**

We reflect this through our policies, which are implemented in all our countries of operation, are accessible to all employees via our intranet and available in local languages where relevant.

**Our Code of Conduct, 'The Roo Way',** outlines how we operate as a business and the expected behaviours of our employees. In 2023, we revised 'The Roo Way', to reflect our maturing business and to provide employees with an engaging, learner-centric tool to guide their daily activities. This company-wide launch was accompanied by employee training and a communications campaign.

We do not tolerate any form of discrimination, harassment or bullying and are committed to promoting a safe and secure working environment for all that promotes equality of opportunity and inclusion. Each of these topics is underpinned by specific **HR policies** that provide more guidance to employees.

We also reviewed and updated our **Modern Slavery Policy** in 2023, as part of our commitment to conduct a review every two years. Our revised policy includes more user-friendly resources, which continue to set out the requirements that employees have to meet in respect of identifying and addressing modern slavery risks and how to report any concerns. Employees are required to complete training and acknowledge their understanding of this policy during their onboarding, and a new enhanced training module was introduced for employees in roles more likely to bring them into contact with modern slavery issues.

Deliveroo also requires all employees seeking to procure goods or services to complete training in advance via our **Spending Deliveroo Money Policy**, which provides our employees with knowledge and guidance on sourcing from trusted suppliers in line with our Business Partner Code of Conduct.

Our **Business Partner Code of Conduct**, together with supporting processes, extends our modern slavery commitments throughout our supply chain. Suppliers are required to read and acknowledge this document before they can be onboarded as a Deliveroo supplier. This document provides third parties with clear guidance on our expectations and includes provisions drawn from international best practice and topics which are important to our business. If we have concerns a supplier does not meet our standards, we seek to collaborate and resolve issues promptly. If the issues flagged are not resolved in a manner and timeframe we consider appropriate, we will not work or continue to work with that supplier.

These policies are supported by Deliveroo's **Speak Up Policy** which provides clear guidance to employees about how to raise concerns without fear of retaliation through our whistleblowing channels. We encourage everyone who works for Deliveroo to report concerns of misconduct, and Speak Up reminders are integrated into all training materials issued by our Ethics & Compliance team. Any reports received concerning modern slavery are investigated by the Ethics & Compliance team. The Audit and Risk Committee receives regular reports on Speak Up activity, including investigation outcomes and follow up actions, with significant findings reported to the Board as necessary.

Deliveroo takes any breach of our policies - including allegations of labour abuse - extremely seriously. To ensure our policies remain effective, they are reviewed in-depth at a minimum of every two years. We may also review policies in the event of a significant or consistent breach, to reflect changes in law or regulation or to adopt emerging best practices. Our Business Partner Code of Conduct and Speak Up Policy are scheduled for a lifecycle review during 2024.

# RISKS OF MODERN SLAVERY AND MITIGATION PROCEDURES

## DUE DILIGENCE PROCESS FOR OUR BUSINESS PARTNERS

We use our impact assessment to guide our risk-based approach to focus our efforts on the areas of our operations and supply chain that represent a greater risk of modern slavery arising.

### RIDERS

Deliveroo riders are at the heart of the company. Their safety and wellbeing are taken extremely seriously. Our engagement of riders is one area where salient modern slavery risks could arise, particularly in high-risk jurisdictions. Being able to identify riders working illegally could help us detect and halt exploitation or abuse were it to occur.

We continue our efforts to combat potential modern slavery risks for riders, through a number of initiatives:

We perform **due diligence** for all prospective riders we engage directly, including the verification of each rider's right to work and criminal record checks (in certain markets);

We continue to further develop the use of technological solutions to establish and verify a rider's identity and right to work. For example, we carry out **identity checks** on riders at onboarding. We have also implemented an identity check system to identify unauthorised riders post-onboarding and ensure they cannot work on our platform, including in some markets having an automated identity check option using facial recognition technology. Given the use of such technologies, we are taking thoughtful and appropriate steps to protect our riders' information and rights under applicable data protection laws;

We provide **regular communication** updates to riders to remind them of the importance of checking any substitute has the right to work in the relevant country;

We take our safeguarding responsibilities seriously and work closely with the authorities in the relevant country if allegations of vulnerable riders are brought to our attention;

We have checks in place regarding rider bank accounts to ensure the account we pay fees to is in the account holder's name, which reduces the risk that rider accounts are sold illegally; and

Where we become aware of a potential issue via any forum (e.g. legitimate riders raising a concern), we investigate and take action where appropriate.

**In addition to the measures we have in place to prevent abuse, we also take steps to listen and respond to the safety and welfare concerns of our riders:**

- Deliveroo has dedicated engagement teams in each of our markets, whose role is to speak directly and regularly with riders and make sure our rider proposition best reflects riders' interests and experiences;
- Regular surveys, feedback tools and focus groups of riders, are used to ensure we understand riders' experiences of using the platform to identify new ways to improve how we work with them;
- We believe that riders should be represented and have a voice within the company. That is why in certain European markets we have rider forums, bodies of elected riders who engage with Deliveroo management. In the UK, Deliveroo has a voluntary partnership agreement with the GMB, giving the GMB collective bargaining rights on pay and consultation rights on benefits and other issues, including riders' health, safety and wellbeing. We have also maintained our collective bargaining agreement in Italy and social dialogue in France;

- Rider safety is a priority and we recognise this through a number of initiatives including:
    - In all markets riders have free access to the global safety app Flare, who Deliveroo have partnered with since 2021. The app detects incidents, streamlining support into our care teams, as well as allowing riders to set emergency contacts should they have an incident on the road;
    - In the UAE, we introduced Mobile Rest Areas to assist riders in managing heat stress during the summer, deploying 11 vehicles with over 700 rider visits per day;
    - In Singapore we recognised Deliveroo's third annual Rider Safety month with a road safety workshop in collaboration with the Singapore Cycling Federation; and
    - In Italy, we worked with charities such as the Red Cross to offer first-aid training sessions to riders.

## MERCHANTS

**Labour exploitation is often a hidden crime and difficult to detect. We recognise that organised criminals often seek to launder funds which are generated through modern slavery.**

We continue to have a robust framework of processes in place to detect and respond to the risks of fraud and money laundering. By targeting the flow of funds with appropriate controls, we can help prevent instances of modern slavery in the restaurant and retail sectors. We continue to utilise blocklist capabilities to prevent the onboarding of merchants we do not wish to do business with - including any merchant identified by relevant bodies as having committed modern slavery offences.

## SUPPLIER DUE DILIGENCE

**We are committed to taking steps to eliminate labour abuses across our supply chain, and to work proactively to mitigate the risks of forced labour, corrupt business practices and unethical conduct occurring within our business and our supply chain.**

Due diligence is conducted on first-tier suppliers during selection and onboarding, and enhanced due diligence is carried out for higher risk categories. We recognise the need for further traceability beyond first-tier suppliers and to identify risks where we have indirect relationships and less visibility. This is a challenge faced by all industries and one which we are shifting focus towards.

To augment our existing procurement capabilities, our business has decided to move to a new procurement system in 2024. This will also allow us to access enhanced third party due diligence capabilities through community based data sharing, including modern slavery, forced labour and improper business practices, within the procurement system itself. We will continue to perform desktop due diligence in advance of a high-risk or medium-risk third party being onboarded, with screening remaining in place for lower-risk third parties. The process is designed to prevent Deliveroo from entering into business with third parties who may present a modern slavery risk. Our augmented procurement and diligence program will also continuously monitor our third party suppliers for any changes in risk profile, alerting us to potential risks at the earliest opportunity, giving us the chance to resolve issues in our supply chain in a prompt manner.

Acknowledgement of, and adherence with, our Business Partner Code of Conduct will remain mandatory for all our new and existing suppliers as part of our onboarding processes. All of the 464 new suppliers onboarded in 2023 acknowledged and agreed to comply with our Business Partner Code of Conduct.

# TRAINING, CULTURE AND ACCOUNTABILITY

**Deliveroo provides annual risk targeted training and circulates regular communications to help educate employees about the risks of modern slavery and human trafficking in our supply chain and in our business.**

## EMPLOYEE TRAINING AND AWARENESS

Our training modules on modern slavery help our employees to understand what the various forms of modern slavery are, provide them with the tools to identify it, and how to report suspected modern slavery violations.

In 2023 a new training module was introduced for employees in roles more likely to bring them into contact with modern slavery issues. The enhanced module uses scenario-based learning to educate employees on ways in which modern slavery could occur in our industry. Continuing into 2024, we will be closely monitoring completion of the training by this group.

We also circulated reminders of our zero tolerance for modern slavery, and an awareness campaign, to all colleagues, to coincide with International Human Rights Day in December.

## SENIOR MANAGEMENT ENGAGEMENT

Our CEO and executive management help foster an ethical corporate culture by establishing a clear tone at the top, regularly emphasising the importance of Deliveroo's values and the Roo Way. In turn, employees are held accountable – and may be subject to disciplinary action up to and including termination – if their actions fail to meet these expectations.

## "SPEAK UP"

Deliveroo encourages all employees to report suspected breaches of our Modern Slavery Policy as soon as possible via our Speak Up Process. This can be done through a number of different channels, including with a manager, HR Business Partner or via our independent reporting platform which offers anonymity. Deliveroo does not tolerate retaliation for genuine concerns raised. The Audit and Risk Committee receives regular reports on Speak Up matters as well as an overview on the effectiveness of our whistleblowing procedures.

## SUPPLY CHAIN AWARENESS AND AGREEMENTS

All suppliers are subject to legal terms and conditions with Deliveroo. We make our supply chain aware of our zero tolerance for modern slavery and the expectations we have through our Business Partner Code of Conduct. All suppliers are required to read this document, and to acknowledge that they understand it and will abide by it, when they are onboarded. We review this document every two years to make sure that it continues to be effective and useful for our supply chain.

# EVALUATING OUR PROGRESS AND LOOKING AHEAD TO 2024

**As modern slavery is a hidden risk, the evaluation of progress continues to be complex. In 2021 we adopted the following key performance indicators (KPIs) to monitor the effectiveness of our approach and will continue to use them going forward.**

| KPI | REASON FOR KPI | 2023 TRACKING |
|---|---|---|
| Number of whistleblowing reports related to modern slavery concerns.<br><br>Number of external reports related to modern slavery concerns | We monitor any concerns reported to us by employees, any part of our supply chain or stakeholders. By monitoring the concerns received together with the actions taken, we can better adapt our policies and procedures. | **0**<br>In 2023, we received zero allegations related to modern slavery or human trafficking allegations through our whistleblowing channels.<br><br>**3**<br>Reports received from external parties which referenced modern slavery allegations; following investigation these were not substantiated. |
| Number of employees trained on modern slavery and human trafficking. | We monitor data regarding the training of our employees on modern slavery to ensure it remains targeted, effective and promotes the right behaviours. | **555**<br>Deliveroo employees completed training on modern slavery in 2023 (being new joiners and those employees who we identified may encounter modern slavery risks in the carrying out of their roles). |
| Number of desktop due diligence assessments conducted. | We maintain procedures to screen our suppliers at the point of onboarding. In addition to initial screening, we conduct desktop due diligence on our high and medium risk third parties. | **464**<br>Third party suppliers were assessed and onboarded via desktop due diligence. All suppliers acknowledged our Business Partner Code of Conduct. |
| Number of factory sites which were subject to audit (either by Deliveroo or through an independent audit company). | Conducting audits of higher risk sites against recognised standards increases transparency and allows us to better engage with suppliers who do not meet our expectations. | **50%** of our international sites from which we procured rider kit had an audit conducted in 2023 (applying either SMETA or equivalent audit methodology) and returned a positive or satisfactory rating. The remaining sites are scheduled for audits in 2024. |

# OUR PLANS FOR 2024

**Our ethical principles of *acting with integrity, treating people with respect and taking responsibility* (as set out in our Code of Conduct), continue to guide our strategy. In 2024 we will continue to transition from embedding initiatives towards a maturing approach which we plan to achieve through the actions set out below.**

| OUR PLAN | WHY ARE WE DOING THIS? | HOW WILL WE MEASURE THIS? |
|---|---|---|
| We will review and relaunch our Business Partner Code of Conduct in 2024 which all new suppliers will be required to acknowledge and agree to comply with. The Code will be translated into the languages relevant to our supply chain. | We are committed to updating our modern slavery materials every two years, to ensure they remain effective helping to reduce modern slavery risk. Translating this document into local languages increases our ability to make our supply chain aware of our zero tolerance for modern slavery. | We aim to launch our updated Business Partner Code of Conduct by the end of H1 2024.<br><br>We aim to have 100% of new Third Parties acknowledge and agree to comply with our refreshed Business Partner Code of Conduct by 31 December 2024. |
| We will continue to refresh our training materials and will ensure that at least 90% of employees whose role is more likely to bring them into contact with modern slavery issues complete annual training on modern slavery and human trafficking. | Our employees in these roles are our eyes and ears for spotting concerns related to modern slavery and human trafficking risk. We strive to empower them to spot the signs and know how to speak up if they see anything of concern. We monitor data regarding the training of our employees on modern slavery to ensure it remains targeted, effective and promotes the right behaviours. | 90% of Deliveroo employees in such roles will have completed annual training on modern slavery and human trafficking by 31 December 2024. |
| Using an augmented procurement platform, we will conduct desktop due diligence reviews on 100% of our new suppliers at onboarding which will include identifying modern slavery risk. We will also conduct a retroactive review of 100% of our existing suppliers. | We maintain procedures to screen our suppliers at the point of onboarding. This allows us to resolve issues promptly if we have concerns a supplier does not meet our standards. | We will launch our Third Party Due Diligence Policy and circulate to all employees who work with our third party suppliers.<br><br>Following the launch of our new procurement system, we will have conducted desktop due diligence on 100% of our new suppliers by 31 December 2024. |
| We will continue the roll-out of regular in-app identity checks to more riders. | This helps to verify a rider's identity and establish and verify a rider's right to work. | Extending new processes and new technologies to additional countries of operation. |