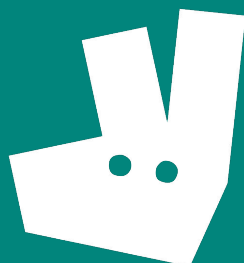


MODERN SLAVERY STATEMENT 2024



deliveroo



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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.

2024 Year in Review

- We set several goals for our modern slavery program in 2024, the main focus of which was on developing our internal resources, enhancing oversight of our supplier risks and continuing to strengthen controls covering certain rider-related risks.
- We refreshed and communicated our Business Partner Code of Conduct to our third parties who are required to accept and follow it. It outlines the standards that our business partners must uphold and is available in various languages.
- We refreshed our modern slavery awareness training, with 92% of relevant employees completing the module in this calendar year.
- Using a revamped third party compliance due diligence process, we conducted comprehensive desktop diligence on 100% of our global supply chain.
- Rider safety and security remains a priority at Deliveroo, and that includes the security of rider accounts accessed through the Deliveroo rider app. In order to help keep rider accounts secure and guard against unauthorised use, we expanded our 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 (and in many markets, their registered substitutes also) to ensure that the individual who onboarded with us is still in possession of their rider account.



This Modern Slavery Statement details the steps Deliveroo has taken to prevent modern slavery, including forced labour, child labour and human trafficking in our business and supply chains during the financial year ended 31 December 2024. 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

March 2025



Our business

ORGANISATION AND STRUCTURE

Deliveroo's mission is to transform the way people shop and eat, bringing the neighbourhood 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 million consumers** monthly. We partner with over **180,000 best-loved restaurants and grocery partners**, as well as over **140,000 riders** to provide the best delivery experience in the world.

Deliveroo is headquartered in London, and operates across 9 markets, including Belgium, France, 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 [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 2024.

The Ethics & Compliance team, part of our Legal Department and reporting to the General Counsel, oversees the implementation of measures to combat modern slavery in our business and supply chains. This team works closely with other departments to strengthen our capacity to address modern slavery risks.

Additionally, the Ethics & Compliance team serves as the central escalation point for any group-wide modern slavery concerns, ensuring that all issues are thoroughly investigated and remediated.

OUR SUPPLY CHAIN

Suppliers are important to our business so we take great care when choosing them. In 2024 we worked with over 1,600 suppliers - including over 300 new suppliers - across our global business.

Services account for the largest portion of our expenditure, primarily driven by fees paid to riders. In the Middle East, our supply chain also includes agencies that work with riders.

A portion of our spending goes towards rider kits and safety equipment, such as helmets, reflective clothing, and thermal bags. While riders can use their own equipment, most prefer our distinctive kit for visibility, safety, and comfort during deliveries.

Additionally, we invest in various goods and services, including tablets for merchants, equipment for our Editions kitchens and Hop grocery sites, and general business services like marketing, advertising, IT, and corporate support.

Our procurement process is managed through a centralised system that ensures a consistent approach to onboarding and monitoring our supply chain.



Our policies

Modern slavery can manifest as labour exploitation, criminal exploitation, sexual exploitation, and human trafficking. Deliveroo has zero tolerance for these unlawful practices and believes everyone deserves safe, fair working conditions and respect.

Our policies reflect this commitment and are implemented across all our operating countries. They are accessible to all employees via our intranet and provided in local languages where applicable.

Our **Code of Conduct** outlines our business operations and the expected behaviours of employees. It clearly states our zero tolerance for discrimination, harassment, and bullying, emphasising our commitment to a safe and inclusive workplace. Each of these topics is underpinned by specific **HR policies** that provide more guidance to employees.

Our employee-facing **Modern Slavery Policy** is designed to help employees understand what modern slavery looks like and what they can do to prevent it. Employees continue 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 them with knowledge and guidance on sourcing from trusted suppliers in line with our Business Partner Code of Conduct.

Our **Business Partner Code of Conduct**, along with supporting processes, extends our modern slavery commitments throughout our supply chain. Suppliers must read and acknowledge this document before onboarding. This document outlines our expectations and incorporates international best practices relevant 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 employee-facing **Speak Up Policy** which provides clear guidance to employees about how to raise concerns - anonymously if preferred - without fear of retaliation. This Policy was revised in 2024, and encourages everyone who works for Deliveroo to report concerns of misconduct, with Speak Up reminders 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.



Risks of modern slavery & 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.

RIDERS

Deliveroo riders are at the heart of our company, and their safety and wellbeing are a top priority. Our engagement of riders is one area where salient modern slavery risks could emerge, 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 expand 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. We also ensure that substitute riders in certain markets complete identity verification before they are able to ride on the platform. 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 and their responsibility of checking that 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

When 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 UK we ran events on fire safety relating to e-bike batteries with the London Fire Brigade;
 - In the UAE, we maintain Mobile Rest Areas to assist riders in managing heat stress during the summer;
 - In Singapore we marked our annual Rider Safety month with a road safety workshop in collaboration with the Singapore Cycling Federation, as well as other events with the Civil Defence Force, Health Promotion Board, Red Cross Singapore, and the Traffic Police; 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 hidden and hard to detect. We recognise that organised criminals may launder funds generated through modern slavery. To combat this, we maintain a robust framework to detect and respond to fraud and money laundering risks. By targeting the flow of funds with appropriate controls, we can help keep bad actors off the platform and prevent instances of modern slavery in the restaurant and retail sectors. By implementing targeted controls on fund flows, we aim to prevent modern slavery in the restaurant and retail sectors. We also use blocklist capabilities to prevent onboarding merchants identified 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, with enhanced due diligence for higher-risk categories. To augment our existing procurement capabilities, we implemented a new procurement system in 2024, enhancing our third party due diligence capabilities for compliance risks such as modern slavery, forced labour and improper business practices. We continue to perform desktop due diligence in advance of a third party being onboarded, to prevent Deliveroo from entering into business with third parties who may present a modern slavery risk. We 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 300+ new suppliers onboarded in 2024 acknowledged and agreed to comply with our Business Partner Code of Conduct.



Training, culture & 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 2024, 92% of employees in roles more likely to bring them into contact with modern slavery issues completed our “Spotting the Signs of Modern Slavery” module.

We continue to remind our employees of our zero tolerance for modern slavery, regularly highlight our resources and Speak Up channels, including campaigns 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 Code of Conduct. 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 in 2024 and look ahead to 2025

EVALUATING OUR PROGRESS IN 2024

As modern slavery is a hidden risk, the evaluation of progress continues to be complex. We have been using key performance indicators (KPIs) to monitor the effectiveness of our approach for a number of years.

KPI	REASON FOR KPI	2024 TRACKING
Number of whistleblowing reports and 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.	 1 In 2024, we received one allegation related to modern slavery or human trafficking through our whistleblowing channels; following investigation this was not substantiated. 3 We received three reports 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. Our employees 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.	 774 Deliveroo employees completed training on modern slavery in 2024. This equates to 92% of Relevant Employees: our target in 2024 was 90%.
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.	 322 (100%) New third party suppliers were screened for modern slavery risk using our desktop due diligence platform. All suppliers acknowledged our Business Partner Code of Conduct. 1673 (100%) Existing third party suppliers were screened for modern slavery risk using our desktop due diligence platform. No instances or allegations of modern slavery were noted.



KPI	REASON FOR KPI	2024 TRACKING
In 2024 we committed to reviewing and relaunching our Business Partner Code of Conduct , translating it into the languages relevant for 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.	 <p>The Business Partner Code of Conduct was updated in 2024 and translated into our supply chain languages. The document was circulated to all existing third parties, added to our restaurant and rider portals, and has been acknowledged and agreed to by 100% of new third parties.</p>
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.	 <p>All of our international manufacturing sites from which we procured rider or restaurant kit had an audit conducted in 2023 or 2024 (applying either SMETA or equivalent audit methodology) and returned a positive or satisfactory rating.</p>
We will continue to make use of technology solutions to regularly verify rider identity in-app .	This helps to verify a rider's identity and establish and verify a rider's right to work.	 <p>In 2024 we expanded our use of technological solutions to establish and verify a rider's identity and right to work, including in some markets (i) having an automated identity check option using facial recognition and (ii) a process for verifying the identity of substitutes.</p>



LOOKING AHEAD TO 2025

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 2025 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?
Maintain metrics on whistleblowing reports and 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.	Number of internal and external reports received and whether they are substantiated.
Maintain metrics on 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. Our employees 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.	90% of relevant Deliveroo employees will have completed annual training on modern slavery and human trafficking.
We will conduct a review of our rider agencies in the Middle East , to ensure they are complying with expected standards and behaviours, and that riders are not at risk of modern slavery.	<p>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.</p> <p>We actively oversee our rider agencies and offboarded one agency during 2024 following a failure to meet our standards.</p>	Completed review of rider agencies in the Middle East and the implementation of any remedial measures, as needed.