

Introduction

dunnhumby Limited is publishing this statement under the provision of the Modern Slavery Act 2015 (the 'Act') on behalf of the dunnhumby Group. The Act requires dunnhumby to state the actions we have taken during the fiscal year to ensure modern slavery is not taking place in our operations and supply chains. This statement refers to the fiscal year ending 28 February 2023.

As an international data science organization, dunnhumby believes the risk of modern slavery within our business to be low. However, modern slavery can be challenging to identify, particularly when it occurs within complicated supply chains and therefore no business can be considered immune.

dunnhumby is committed to ensuring that modern slavery, human trafficking, bonded and forced labor have no place in or around our business. dunnhumby encourages an honest and open culture and requires all employees to always act with integrity.

Our Code of Business Conduct and associated processes/policies support our approach to tackling any risk.

Organization structure and supply chains.

A world-leader in customer science, dunnhumby has pioneered the use of big data to drive growth for retailers and brands since 1989.

With more than 35 offices in 25 countries, dunnhumby's strategic process, proprietary insights and multichannel media capabilities deliver competitive advantage for FMCG and retail clients.

dunnhumby currently has a supply base of circa 1000 active suppliers. Our main categories of purchasing spend are technology, print and creative, property, facilities, and professional services. Most of these active suppliers provide services from the UK and Europe. We review our global supplier base on an ongoing basis to ensure that due diligence is carried out on all existing suppliers and have in the past 12 months improved our due diligence processes for new suppliers.

A full due diligence assessment is carried out before any new supplier is on-boarded. This assessment covers a range of topics including regulatory and legal compliance, bribery and corruption, HR, and business integrity.

Policies in relation to slavery and human trafficking.

dunnhumby understands that people lie at the heart of this legislation. We have a responsibility to respect the human rights of, and an opportunity to make a difference to, our employees, customers, the communities we operate in and the people who work throughout our supply chain.

Our Code of Business Conduct places our core values of courage, passion, collaboration, and curiosity at the center of how we behave toward our clients, clients' customers, suppliers and to each other. Acting legally and ethically and following our policies are some of the ways in which we ensure that we always do our best for our clients, our client's customers and for each other. Our business is built on being the champion for customers. This value is embedded throughout our business, resonates with our employees, and frames how we expect the suppliers we work with to engage with their colleagues, customers, and suppliers. We therefore seek to do business only with suppliers who have similar values and ethics as ourselves.

dunnhumby does not tolerate slavery, human trafficking, bonded labour, forced labour, child labour or child exploitation.

We have implemented several policies which allow us to manage human rights within our business and externally with our suppliers, including our Code of Business Conduct, and our procurement and supplier management processes. The Code of Business Conduct can be found on the [dunnhumby website](#).

Due diligence processes.

As a data science services organization, we believe the risk of modern slavery within our own business to be low. We recognize, however, that through our supply chain we could be indirectly exposed to the risk of modern slavery and human trafficking.

Aligned with the approach taken elsewhere in the Tesco Group, for our key suppliers we have sought to identify issues or supply chains where workers are more vulnerable to abuses like slavery.

As part of this process, we have considered:

- the types of service provided by our suppliers.
- the type of labour used, for example, permanent or agency.
- whether there are any known issues in the country of origin of our suppliers
- whether there are any issues in the country where services are provided, which may feature further down the supply chain for example in relation to the sourcing of materials and components.

Over the past 12 months, we have identified all high-risk suppliers and completed a review of their contracts.

Risk Assessment and Management.

dunnhumby has put in place several procedures to ensure that modern slavery does not occur in our business or supply chains.

Recruitment and Employment

Most of our colleagues are directly employed and full time.

dunnhumby has comprehensive recruitment processes and procedures in place, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or forced labour. All colleagues have Terms and Conditions which are regularly reviewed in line with employment law and best practice.

Where we require the use of agency labour, dunnhumby only uses reputable employment agencies, the majority of which we have long-standing relationships with. If we engage any temporary staff from agencies, we work closely with the agency to ensure the necessary due diligence is conducted prior to their appointment, to safeguard against modern slavery.

Whistleblowing

We recognize the importance of effective grievance mechanisms in mitigating the risk of modern slavery.

dunnhumby has a comprehensive whistleblowing policy (Speak Up Policy) which encourages all our employees, suppliers, and stakeholders to speak out if they have concerns about any activity, breach of law, breach of our Code of Business Conduct, dangers to the public and any concealment of information. Our policy is designed to make it easy for all colleagues and suppliers to speak up and report anonymously without any risk to their employment or suffering any form of retribution. We have augmented this control this year by making our whistleblowing resources available in an additional six languages, as well as launching an awareness campaign for all colleagues.

Key Performance Indictors to measure effectiveness of steps being taken.

In addition to publishing the Modern Slavery Statement, we report any critical breaches of our policies to our Risk & Compliance Committee and to Tesco Group. In FY23, we did not identify any indicators of modern slavery in our own operations or supply chains.

We also monitor progress against the commitments we make within our Modern Slavery Statement each year.

In FY24 we will provide ongoing training on modern slavery risks to our procurement teams, supplier management colleagues and internal business owners. We will further strengthen our ongoing due diligence processes for existing suppliers globally and improve awareness of our Code of Business Conduct amongst our suppliers.

Training on modern slavery and trafficking.

In addition to having suitable policies in place, dunnhumby understands that a key part of our commitment to the Act is to ensure all our colleagues understand and comply with high ethical standards and integrity. We embed this in our business via the dunnhumby values, our Code of Business Conduct and annual training to support our colleagues' understanding of managing ethical issues and nurturing compliance with all laws. We have refreshed this training over the past 12 months and 100% of our colleagues have completed it.

Next Steps.

We will continue to strengthen our approach to managing the risk of Modern Slavery within our business. Our ambitions include:

- Providing bespoke training on modern slavery risks to key colleagues including our procurement team, supplier management colleagues and internal business owners.
- Further strengthening our on-going due diligence process for existing suppliers, globally, prioritizing those identified as higher risk.
- Improving awareness and understanding of our Code of Business Conduct and associated company policies amongst our supplier population, including a Supplier Code of Conduct and training.

Rob Bliss, CFO dunnhumby Limited