

MODERN SLAVERY STATEMENT 2021



deliveroo

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INTRODUCTION

Section A

Deliveroo's mission is to be the definitive online food company. For us that means being the platform people turn to whenever they think about food. We are building a company that is committed to supporting our marketplace of consumers, restaurants, grocers and riders, and being a part of the communities we serve.

At Deliveroo, we believe everyone has a right to safe and fair working conditions, and to be treated with respect. We recognise that incidents of modern slavery occur in every sector - including the food industry - and we are determined in our efforts to address this complex issue. We are committed to the elimination of abuses and work proactively with our business partners to prevent forced labour, human trafficking and child labour within our business and our supply chain. Our employees and business partners are expected to raise concerns using appropriate reporting channels. We investigate all such reports robustly and implement corrective actions where appropriate.

Highlights of our 2021 activity:

Revised and relaunched our Business Partner Code of Conduct to clearly set out our expectations and allow for more effective engagement with our supply chain on page 10.

Made improvements to our third party due diligence process and engaged with Sedex - the online supplier data exchange - to better equip us to address our higher risk suppliers on page 21.

Launched a series of training and capacity building initiatives, focused on our employees and our riders on page 16.

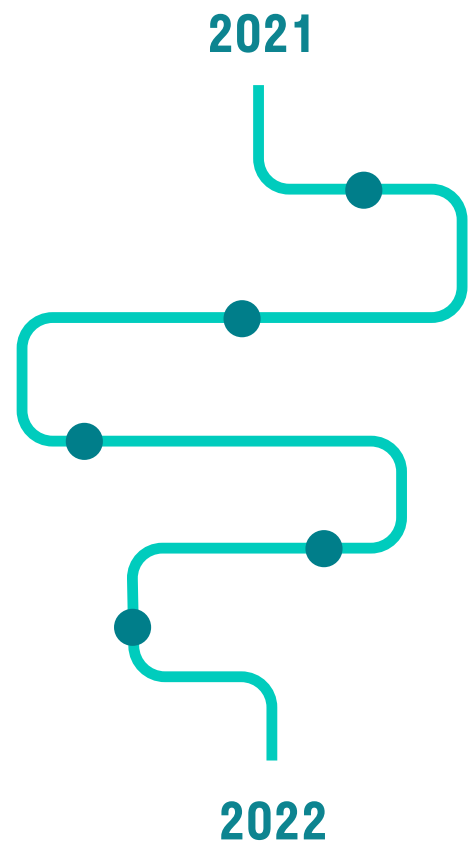
Strengthened the measures we have in place to detect and prevent unauthorised riders on page 18.

This is Deliveroo's fourth Modern Slavery Statement and details the progress we have made to prevent modern slavery in our business and supply chains during the financial year ended 31 December 2021. This statement is published by Roofoods Ltd (Deliveroo) and its subsidiaries in line with the Modern Slavery Act 2015.

This statement has been approved by the Deliveroo Board of Directors and signed on its behalf by Adam Miller, Chief Financial Officer.

Adam Miller

Adam Miller
Chief Financial Officer
March 2022



OUR **BUSINESS** **& SUPPLY CHAIN**

Section B

OUR BUSINESS

Since 2013, Deliveroo has pioneered on-demand food delivery via a hyperlocal three-sided online marketplace, connecting local consumers, restaurants and grocers, and riders. Deliveroo now operates in over 800 locations across 11 operating markets as of December 2021. Our business is supported by small non-operating hubs in Poland, Ukraine and the US. We have partnered with over **160,000** of the best-loved restaurant and grocery partners globally, as well as over **180,000 riders**.

We have a relentless desire to develop the best proposition for each of the three sides of our marketplace. That is why we have developed innovations such as our Editions delivery-only kitchens, helping restaurants to expand while bringing the best-loved restaurant brands to more customers; and our Plus subscription programme, which has unlocked access to unlimited free delivery for consumers for a fixed monthly fee.

2021 saw us launch **Deliveroo Hop**; our new rapid grocery delivery service. Operating from delivery-only grocery stores, and using state of the art technology, we provide customers with their favourite groceries in **as little as 10 minutes**. Rapid grocery delivery sits alongside our existing and fast-growing on-demand grocery service, which already delivers from over 11,000 partner grocery sites globally.

1

For consumers

Deliveroo has unlocked broad choice and fast delivery times, working with restaurants and grocers who overwhelmingly have never offered an online presence and on-demand deliveries before.

2

For restaurants and grocers

Deliveroo not only provides logistics, but, more importantly, an incremental demand generation channel, including access to millions of new consumers alongside online marketing tools to grow their business effectively.

3

For riders

Deliveroo offers highly flexible work which they can rely on for attractive earnings and security.

OUR SUPPLY CHAIN

To support our operations, we purchase a variety of goods and services globally. We procured goods or services from approximately **1,500 suppliers** within the last 12 months.

Services

Services 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.

Other services we procure include marketing and advertising services, IT and technology services, outsourced business processes (e.g. customer care services provided by offshore service centres in Philippines, India, Romania, Morocco, Ivory Coast, Suriname, Malaysia, South Africa and Jordan) and corporate services (ranging from facilities management to professional service firms).

Goods

We procure rider kit and safety equipment (e.g. the helmets, reflective clothing and thermal bags that we provide to riders). 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. Our insulated bags help to keep food at the right temperature until it reaches its destination.

We provide restaurants with tablets so that they can process orders and interact with our platform.

We have also launched a range of eco-friendly packaging items on our 'Packaging Store' which are available to restaurant partners across many markets, helping partners choose more environmentally-friendly packaging options.

With the launch of Deliveroo Hop, our supply chain has expanded to include partner-branded and own-label products from certain grocery partners. We also purchase equipment to fit out our Editions kitchens and Hop delivery-only grocery sites.



SERVICES

GOODS

To inform our approach and ensure we are targeting our resources at the parts of our business at highest risk of modern slavery, we conducted an in-depth review of our supply chain in 2021. The results of that exercise are explained in section D below.

COVID-19

We seek to ensure that our consumers, riders, partners and employees are provided with safe and healthy working conditions. At no time has that commitment been more important or challenging than during the COVID-19 pandemic. An ongoing priority in 2021 and beyond has been to serve our customers while looking after people; and ensuring the health and safety of our riders and restaurant partners.

Employees

For our employees, we allowed an extended period of working from home where required and have implemented procedures (increased cleaning, social distancing, thermometer checks and lateral flow testing) to ensure that employees can also work safely from our offices.

Riders

Riders provided a vital lifeline to those who were isolating. To support them, we introduced a Rider Support Fund to ensure riders had access to financial support if they were ill through COVID or needed to self-isolate because they had come into contact with someone who had the disease; and we provided free hygiene products to riders, such as hand sanitisers and masks to ensure they were safe while working with Deliveroo.

Consumers

We took a range of measures to ensure our consumers could continue to use our service safely. For example, we introduced contact-free delivery to protect customers receiving deliveries; we teamed up with grocery partners to allow customers to order on demand groceries instead of having to queue in person or book a slot far in advance online.

Partners

We were proud to provide support measures for our partners and maintained these throughout 2021, giving consumers and partners alike the confidence to continue using delivery. We maintained our contactless delivery process; lowered our onboarding fees to reduce the financial hurdle of providing delivery; continued our restaurant tipping feature in the app, enabling customers to support their local restaurants; continued our Table Service feature, allowing customers order for dine-in through their Deliveroo app.

OUR GOVERNANCE AND POLICIES

Section C

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 and corrective action will be overseen by the Audit & Risk Committee. The Regulatory Compliance team, who sit within our Legal function and report to the General Counsel, is responsible for overseeing the day-to-day implementation of measures 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. Working groups are established as needed and attended by business personnel to strengthen governance and monitor progress against key parts of our modern slavery strategy.

The Regulatory Compliance team also acts as the single escalation point for modern slavery concerns to ensure matters are investigated and addressed.

OUR POLICIES

As reported in previous statements, we have several policies in place that are relevant to modern slavery. Policies are accessible to all employees via our intranet and are available in local language where relevant.

Deliveroo's **Code of Conduct** outlines how we operate as a business and the expected behaviours of our employees. We will 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.

Deliveroo's **Modern Slavery Policy** sets out the requirements that employees have to meet and describes how to report any concerns. Employees are required to complete training and acknowledge understanding of this policy during their onboarding.

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

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. We encourage everyone who works for Deliveroo to report concerns of misconduct. Any reports received concerning modern slavery are investigated by the Regulatory Compliance team. Investigation outcomes, significant findings and status updates are reported to the Audit & Risk Committee.

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 understanding of the Code as part of our supplier onboarding process. The Code was revised in 2021 (see the box below). 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.

All of these policies provide instruction on how to raise concerns. We take any breach of our policies - including allegations of labour abuse - extremely seriously.

To meet our modern slavery objectives, policies (and any related written procedures and guidance) are reviewed over time to ensure they remain effective. This is particularly relevant in our business where we often move quickly to launch new innovations (such as Editions and Hop) and we embrace the challenges of the new, on-demand economy (which can lead to new regulation). At a minimum, an in-depth review takes place every 2 years of policies relevant to modern slavery.

During 2021 we revised our **Business Partner Code of Conduct** to make it easier for suppliers to understand and meet our expectations, as well as for us to engage during the course of a relationship. A cross-functional team was involved in the process, which included colleagues from our countries of operation across the group. The new Code introduced the following changes:

Benchmarking to international standards: the Code draws upon international standards - including the Ethical Trading Initiative (ETI) Base Code which is applied by Sedex during its Sedex Members Ethical Trade Audits (SMETA) - whilst also addressing topics which are important to our business (such as food safety).

Aligning with best practice: we have updated for best practice. For example, we included a specific provision around supplier emergency preparedness which we consider highly relevant to any future pandemic response. We also included a provision to support our belief that individuals should not be required to pay fees associated with their recruitment.

Addressing issues seen in our supply chain: input was sought from those who manage some of our higher risk suppliers to understand what deficiencies they have encountered during the year (for example, extensive use of overtime for certain factory workers in China). These topics are now specifically addressed by the new Code.

Aligning with our sustainability goals: we have extended the obligations to minimise negative environmental impacts and sourcing sustainably.

OUR IMPACT **ASSESSMENT**

Section D

OUR IMPACT ASSESSMENT

The food industry continues to be a high risk sector for modern slavery and forced labour. As modern slavery is often a complex and hidden crime, conducting an effective risk assessment is vital to identify potential concerns and prioritise our efforts.

We continue to refine and tailor our assessment to ensure that we are focusing our efforts on those areas that present the greatest risk. Our 2021 modern slavery impact assessment mapped our business and supply chain activities against recognised indicators of modern slavery risk, including:

employment of vulnerable groups;

employment of informal, temporary or low skilled workers;

sectors at increased risk of labour exploitation;

external benchmarking indices, such as the Global Slavery Index and Transparency International's Corruption Perceptions Index.

OUR SALIENT MODERN SLAVERY RISKS

Our impact assessment helps to identify our salient modern slavery risks and where they are most likely to appear in our business and supply chain.

Our greatest areas of potential exposure are linked to our procurement of goods from countries at higher risk of modern slavery issues - being rider kit and safety equipment, equipment for our Editions and Hop sites, and sustainable packaging. Our impact assessment also determined that certain services provided in higher-risk jurisdictions may also carry an increased level of risk - such as our customer care vendors and facilities management services. In these cases, the most salient modern slavery risk is that a supplier may be using exploitative labour practices. We have begun work to further address these risks by implementing an enhanced third party due diligence and monitoring program, in coordination with Sedex (further explained in section F below).

Rider welfare is very important to our business and an area that is subject to regular review and investment. The key rider welfare risks include rider safety, the risk of unfair labour practices by a rider agency and the risk that a rider could substitute to another individual who could be a victim of modern slavery. During 2021 we continued to ensure mitigation strategies were in place to address these risks (further explained in section F below).

Our impact assessment is revised annually, and more frequently if necessary because of business growth, changes to risk areas or changes to legislation. For example, in 2021 the introduction of Hop required us to refresh our impact assessment out-of-cycle following which we implemented enhanced due diligence requirements in relation to our grocery partners.

COMBATING **MODERN SLAVERY** **RISK IN OUR BUSINESS**

Section E

Within our business, the vast majority of employees are engaged on permanent contracts which lowers the risk of exploitation (typically higher for agent or contract workers). But we understand the importance of persistent vigilance and have continued to raise awareness so our employees are able to identify the signs of modern slavery and act on them appropriately. In 2021 we revised our **Modern Slavery training** for new employees in the UK and for all employees in Australia, to improve effectiveness and elevate best practice expectations. We will extend that training globally in 2022. In December, we recognised International Human Rights Day by delivering targeted comms to all group employees, raising awareness of these important issues and outlining the actions we are taking to address them. We are tracking engagement with our training and comms campaign to allow us to improve our messaging in 2022.

With the continued expansion of Editions and Hop, our on-site workforce continues to grow. Relevant modern slavery policies have been made available to employees. In 2022 we will review the content of these policies and how the information can best be delivered to all parts of our workforce.

Employees have always been able to raise concerns - including any that relate to modern slavery issues - via an online form or discussing those concerns with a manager or HR Business Partner. In 2021 we made preparations for the launch of a new '**Speak Up**' platform for all employees. During the year we revised the process for conducting investigations

into Speak Up matters and created a new investigation protocol. Case managers attended several workshops outlining the requirements of the new protocol and sharing best practice for a robust investigation and remediation process. The new, independent platform is intended to make the process easier for employees to raise concerns and allow us to improve communication whilst protecting anonymity. A revised Speak Up Policy was subsequently launched alongside the new platform in January 2022. Tracking Speak Up reports which relate to modern slavery will be one of the ways we continue to monitor the effectiveness of our program in 2022.

Members of the Regulatory Compliance team are participants in the "We Are Deliveroo" program which provides employees with the opportunity to become more familiar with our business through voluntary sessions as a rider, in our care team, and in our Editions kitchens. Understanding each of these roles is something we feel is important to building and strengthening an approach to modern slavery that supports all sides of the marketplace.

COMBATING MODERN SLAVERY RISK IN OUR SUPPLY CHAIN

Section F

RIDERS

Deliveroo takes rider safety and wellbeing extremely seriously. As explained in section D above, we recognise rider welfare as one of our salient modern slavery risks. Being able to identify riders working illegally could help us detect and halt exploitation or abuse were it to occur. No single control can address the risk so we have implemented a series of measures as summarised below (which vary by country of operation):

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 (where legally permitted);

We take steps to prevent previously terminated riders from re-onboarding;

In certain markets we conduct targeted physical spot-checks to confirm that a rider is either the account holder or a legitimate substitute who has the right to work in the relevant country. Our ability to conduct these checks was impacted by COVID-19. In 2021 we introduced targeted virtual spot checks, initially in Hong Kong, but are expanding on an as-needed basis to other markets;

We monitor key metrics for suspicious activity in order to identify potential fraudulent activity (e.g. where a rider logs an unrealistically high number of hours) and take action where appropriate;

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 work with authorities in the relevant country if we become aware that an unauthorised rider issue may exist. For example, in Italy we signed a Memorandum of Understanding with relevant local authorities as part of an industry coalition to tackle illegal riding. In France we have signed a charter, alongside other platforms, organised by the Ministry of Labour, to commit to tackling illegal substitution;

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;

We continue to explore the use of technological solutions to verify a rider's identity and establish and monitor a rider's right to work. In certain markets we have been using facial recognition technology since 2020 to onboard riders, and in 2021, we trialled the technology in our largest market (the UK) to identify unauthorised riders post-onboarding. We are also in the advanced stages of phasing this into other markets. We acknowledge the legal framework regarding facial recognition can be complex and we are taking all reasonable steps to protect our riders' rights under applicable data protection laws; and

We have checks in place regarding rider bank accounts. In the UK and Ireland, when riders wish to change the bank account into which their fees are paid, the new account is put through an automated verification process to check that the new account belongs to the named account holder, which reduces the risk that rider accounts are sold illegally. This process is due to be rolled out more widely in 2022, and replace existing manual checks.

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.

Engagement

We have taken steps in some markets to strengthen the rider voice within the company through the creation of Rider Forums, which are bodies of rider representatives elected by other riders. We will establish such Forums in more of our markets in 2022 and find new ways to engage with those who choose to work with us. We work with over **180,000 riders** globally and have dedicated rider engagement teams in all markets. Those teams conduct regular rider surveys; **85% of riders** are either satisfied or very satisfied working with Deliveroo.

Security

We offer all riders automatic, free accident, injury and third party liability insurance to protect them while out on the road. In 2021 we went further in many markets by extending our insurance to cover periods of illness and to pay-out on the birth of a child so riders can spend time at home with their family. We aim to roll this out in more markets in time.

Supplementary training

In the UK, our rider engagement team met with riders and subsequently developed a series of bespoke safety training designed to help keep our riders and communities safe. We partnered with Neighbourhood Watch and the Metropolitan Police to prepare education videos on topics including spotting the signs of modern slavery, female harassment and drug dealing. The videos are available to view via a mobile phone and have been well-received by riders. We plan to extend availability to other markets in 2022.

Reporting concerns

We have a global rider support team as well as local teams who are on hand to address any concerns or issues that riders may raise. Any potential modern slavery concerns are escalated to the Regulatory Compliance team. In addition, our **Business Partner Code of Conduct** contains details of how riders can contact the Regulatory Compliance team directly in relation to breaches of the Code.

RESTAURANT PARTNERS

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. By targeting the flow of funds with robust fraud and money laundering controls, we can help prevent instances of modern slavery in the restaurant sector.

Due diligence

As we referred to in our 2020 statement, we maintain due diligence procedures to identify risks posed by individual restaurant partners. In addition to collecting standard restaurant information, our diligence procedures include (1) conducting ID checks through a third-party identity verification provider and (2) a tax verification check to validate that our partner details are consistent with information registered with local tax authorities. In 2021 we introduced an automated process to detect and prevent restaurants who have previously been suspended for poor practices from rejoining the platform.

Fraud detection and prevention

We also maintain fraud detection and prevention measures to monitor performance whilst on our platform, including the use of 3D Secure authentication checks and third-party tools which utilise machine learning algorithms to predict and prevent payment fraud.

Our robust approach to fraud prevention is primarily intended to maintain the integrity of our platform and protect all sides of our marketplace from fraud. But we also believe that our controls play an important role in helping to prevent restaurants involved in illegal exploitation from using our platform to hide their crimes.

SUPPLY CHAIN

We are committed to identifying and mitigating risks across our supply chain including corrupt business practices, unethical conduct or human rights concerns. We are continuing to evolve our processes to most effectively identify and mitigate such risks. This holistic approach is reflected in our new, enhanced third party due diligence procedures.

We adopt a risk-based approach. For those suppliers not deemed higher risk, we have a supplier vetting process that includes questions on a supplier's ethical policies and practices. The questionnaire is supplemented by a desktop assessment, with any concerns escalated to the Regulatory Compliance team for further consideration. As noted in section C above, our Business Partner Code of Conduct is embedded within the procurement process, so suppliers are required to acknowledge and factor in its requirements before engaging with us. Our standard contracts also include appropriate modern slavery clauses.

For higher-risk suppliers - being those identified by our impact assessment and listed in section D above - we take further steps.

In 2021 we engaged with Sedex, a not-for-profit organisation that provides tools and services to help companies improve their sustainable business practices and source responsibly. Some of our higher risk suppliers - such as the manufacturers of rider kit and safety equipment at sites in India and China - already share data with us through the Sedex platform, including due diligence self-assessment questionnaires and audit results. We monitor and actively engage with these suppliers. Where potential non-conformance is identified, we will work with them on remedial action. Our new Business Partner Code of Conduct draws on the same standards used to conduct SMETA audits which we believe will make it easier to engage with and manage our suppliers. Not all of our highest risk suppliers are registered with Sedex. We are taking a phased approach to the Sedex roll-out which will continue in 2022 but our eventual aim is for all our suppliers of rider kit and safety equipment, and sustainable packaging to become registered with Sedex (or an equivalent) by the end of 2023. We identified 41 such higher risk suppliers who we conducted business with in 2021 and will report on our progress with regards to the Sedex roll-out in 2022.

Sedex is not an appropriate risk identification and management tool for all our higher risk suppliers. In these cases, we recognise the need to adopt an enhanced due diligence and monitoring process (such as longer-form self-assessment questionnaires and follow-up engagement such as interviews or site-visits). Given that rider welfare is one of our salient modern slavery risks, we follow an enhanced approach for our rider agencies in Kuwait and UAE (which was summarised in detail in our 2020 modern slavery statement). We have also adopted an enhanced due diligence process for our Hop grocery partners. We plan to phase in a similar approach by category so that by the end of 2022 we cover all higher-risk suppliers using either an enhanced due diligence process or via Sedex.

Through our Business Partner Code of Conduct, we provide details by which suppliers may raise concerns directly with the Regulatory Compliance team.

MONITORING THE EFFECTIVENESS OF OUR RESPONSE

Section G

Modern slavery is a hidden risk, making the evaluation of progress complex. We use the following key performance indicators (KPIs) to monitor the effectiveness of our approach.

KPI	REASON FOR KPI	2021 TRACKING
Number of whistleblowing reports related to modern slavery concerns.	We monitor any whistleblower concerns reported to us by employees or any part of our supply chain. By monitoring the concerns received together with the actions taken, we can better adapt our policies and procedures.	As of 31 December 2021, there were no Speak Up reports received relating to slavery or human trafficking.
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.	713 employees completed training on modern slavery throughout the year. A new training module was launched in Q4, the impact of which we will be able to report on in more detail in our 2022 statement.
Number of desktop due diligence assessments conducted.	We maintain procedures to screen our suppliers at the point of onboarding.	674 suppliers were assessed and onboarded via the desktop due diligence exercise summarised in Section F.
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.	All 7 international sites from which we procured rider kit had an audit conducted in 2021 (applying either SMETA or equivalent audit methodology) and returned a positive or satisfactory rating.

OUR PLANS FOR 2022

Section H

Whilst we have made significant progress, we have more planned for 2022. Over the next 12 months we will continue to strengthen our approach, and in 2022 we are aiming to:

1	Revise and relaunch our employee Code of Conduct, reinforcing our commitments to operating with the highest ethical standards;
2	Continue to expand our enhanced third party due diligence roll-out with Sedex, to ensure we have the means to spot and address risks within our supply chain;
3	Enhance and roll-out further modern slavery training, to continue to empower our employees to identify and respond to modern slavery risks;
4	Implement a new learning management system that will provide greater performance tracking and quantitative feedback on the employee training we deliver;
5	Continue to engage with our riders to provide support and raise awareness and establish Rider Forums in more of our markets;
6	Extend modern slavery training for riders to jurisdictions outside the UK;
7	Review the policies, training and comms available to employees within Editions and Hop to ensure we effectively spread our message as our business expands;
8	Identify and use opportunities for collaboration with restaurant and grocery partners to obtain and share knowledge;
9	Roll out technological solutions to improve our ability to detect and prevent riders working illegally.

Together with the KPIs described in section G, we will report on the progress of the goals listed above in our next modern slavery statement.