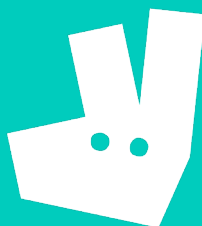


MODERN SLAVERY STATEMENT 2022



deliveroo

CONTENTS

03 Introduction

04 About Us

04 Our business

05 Our supply chain

06 Our governance and policies

06 Our governance framework

07 Our policies

08 Our impact assessment

08 Our salient modern slavery risks

09 Due diligence process for our partners and supply chain

09 Riders

10 Restaurant partners

11 Supplier due diligence

12 Raising awareness in our business

13 Evaluating our progress and looking ahead to 2023

14 Our plans for 2023

INTRODUCTION

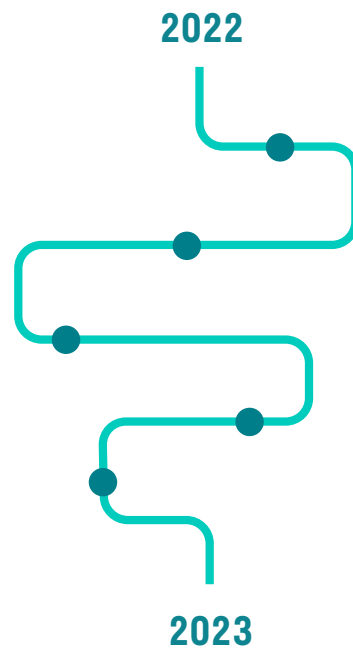
The UK Modern Slavery Act 2015 (the **Act**) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. At Deliveroo, we are fully committed to playing our part in preventing modern slavery in our business, our supply chains and the communities we serve.

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 taking steps to eliminate 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.

2022 Year in Review:

During 2021 we launched several improvements and new initiatives, including our partnership with Sedex, expanded identity check systems for riders and the roll-out of our revised Business Partner Code of Conduct. Whilst we have lots more to accomplish, we recognise that fully embedding processes across an entire organisation takes time.

Our central theme for 2022 was working to ensure our 2021 initiatives function as well in practice as we had intended. We have worked hard to implement changes that will be sustainable and effective in reducing the risk of modern slavery occurring in our business or supply chain. Our journey is not complete but we made good progress against our 2022 objectives and we continued to build capacity across the company.



This is Deliveroo's fifth 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 2022. 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 Will Shu, founder and CEO.

Will Shu
 Founder and CEO
 March 2023

ABOUT US

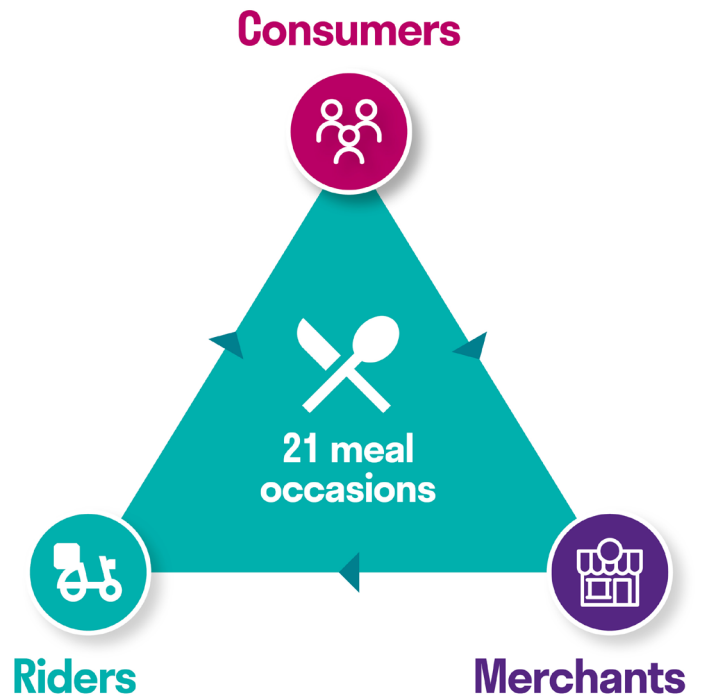
OUR BUSINESS

Our business is a hyperlocal three-sided online marketplace. We connect consumers, riders and merchants across markets to bring people the food they love. We are a global online platform, yet a very local business. Our consumers, riders and merchants live and operate within their local neighbourhoods. Through our sophisticated logistics technology, we unlock a wealth of hyperlocal choice, at the right price, with fast and reliable delivery.

Our business serves over **7 million consumers** monthly. We partner with **158,000 restaurants**, **18,000 grocery sites** and **150,000 riders** to bring people the food they love and provide the best food delivery service in the world.

Deliveroo is headquartered in London, with offices around the globe. We operate across 10 markets, including Belgium, France, Hong Kong, Italy, Ireland, Qatar, Singapore, United Arab Emirates, Kuwait and the United Kingdom.

In 2022 we entered the food delivery market in Qatar, formally launching operations in October 2022 which strengthened our business in the Middle East region. Alongside this we exited Australia and the Netherlands in November 2022. We also successfully launched a new engineering centre in India, which complements our existing hub in Poland.



OUR SUPPLY CHAIN

Suppliers are critical to our business so we treat them as partners. We procured goods or services from approximately **1,700 suppliers** in 2022.

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.



SERVICES



GOODS

Goods

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. Our insulated bags help to keep food at the right temperature until it reaches its destination.

Other expenditure is made up of a variety of goods and services including providing restaurants 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 to ensure our values are applied appropriately and consistently across our supplier base.

Further details of our company can be found in our 2022 Annual Report.

OUR GOVERNANCE AND POLICIES

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 2022. 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 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 Regulatory Compliance team also acts as the single escalation point for group-wide modern slavery concerns to ensure matters are investigated and addressed.

OUR POLICIES

Our policies, which are implemented in all our countries of operation, are accessible to all employees via our intranet and 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. These commitments will be further strengthened in 2023 with the relaunch of an updated Code of Conduct.

Deliveroo's **Modern Slavery Policy** sets out the requirements that employees have to meet in respect of identifying and addressing modern slavery risks 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. In 2022 the policy was revised and enhancements were made to the case management and investigation process. 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. 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.

Our **Business Partner Code of Conduct**, together with supporting processes, extends our modern slavery commitments throughout our supply chain. This provides our suppliers with clear guidance on our expectations and includes provisions drawn from international best practice and topics which are important to our business. Suppliers are required to read and acknowledge understanding of the Code as part of our supplier onboarding process. 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 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. As set out on Page 14, our Code of Conduct and Modern Slavery Policy are scheduled for a lifecycle review during 2023.

OUR IMPACT ASSESSMENT

As we set out in our statement last year, our work to prevent modern slavery is shaped by a detailed impact assessment which maps our business and supply chain activities against recognised indicators of modern slavery risk, including:

- employment of vulnerable people;
- employment of informal, temporary or low skilled workers;
- sectors at increased risk of labour exploitation; and
- external benchmarking indices (such as the Global Slavery Index and Transparency International's Corruption Perceptions Index) and reports by external bodies (such as UK Gangmasters & Labour Abuse Authority, which continues to consider the food industry as a sector at risk for modern slavery and forced labour).

The assessment remains an important part of our response framework to ensure that we are targeting our efforts at our salient modern slavery risks and to ensure that our areas of greatest potential exposure have clear action plans in place. Whilst our view on our most salient modern slavery risks has not changed (see below), we recognise that our business and the risks we face can evolve rapidly. That's why we view our impact assessment as dynamic and update it throughout the year.

OUR SALIENT MODERN SLAVERY RISKS

Areas of potential exposure continue to include our use of rider agencies in the Middle East - expanded in 2022 to include Qatar - who directly engage riders. We follow an enhanced approach for onboarding and monitoring the performance of our rider agencies in the Middle East that aims to reduce potential modern slavery risk.

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 2022 we continued to ensure mitigation strategies were in place to address these risks (further explained in page 09 below).

Other areas of potential exposure are linked to our procurement of rider kit and safety equipment, equipment for our Editions and Hop sites, and sustainable packaging as these are supplied from higher-risk geographies. 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.

DUE DILIGENCE PROCESS FOR OUR PARTNERS AND SUPPLY CHAIN

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. As explained on page 08, our engagement of riders is one area where salient modern slavery risks 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, such as:

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 continue to explore and further develop the use of technological solutions to verify a rider's identity and establish and verify a rider's right to work. For example, we carry out **identity checks on riders** at onboarding. Since 2021, 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 **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;

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 have checks in place regarding rider bank accounts. In the UK and other markets, when riders are onboarded or wish to change the bank account into which their fees are paid, the new account is put through a verification process to check that the new account belongs to the named account holder, which reduces the risk that rider accounts are sold illegally; and

In Italy we signed a Memorandum of Understanding to combat gangmaster and illegal work through the industry association AssoDelivery. We are implementing this agreement by actively collaborating with local authorities and other food delivery platforms to prevent gangmaster behaviour, illicit intermediation and exploitation in the food delivery sector.

STRENGTHENING THE RIDER VOICE AND SUPPORTING OUR RIDERS

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, an in-app feedback tool 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 some European markets we have rider forums, bodies of elected riders who engage with Deliveroo management. In the UK, Deliveroo and the GMB Union signed a first-of-its-kind Voluntary Partnership Agreement 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 entered social dialogue in France and maintained our collective bargaining agreement in Italy; and.

Rider safety is a priority and so we launched a number of initiatives including: in Singapore, free health screening and mental health wellbeing sessions; in the UAE, our 'Roo Van' provides free bike repairs; and in Kuwait and Italy, we worked with charities such as the Red Crescent Society and the Red Cross to offer first-aid training sessions to riders.

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.

We 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 sector.

In 2022 we expanded our blocklist capabilities to prevent the onboarding of restaurants we do not wish to do business with - including any restaurant identified by relevant bodies as having committed modern slavery offences.

SUPPLIER DUE DILIGENCE

We are committed to take steps to eliminate labour abuses, 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.

The procurement risks identified in our impact assessment (Page 08) were factored into our supplier vetting process. This year we have applied the lessons learned from 2021 to refine and embed our risk-based approach. As we set out last year, we screen suppliers based on key criteria, including the country in which the supplier is based, the type of industry, the product being supplied and themes of potential negative impact to workers or stakeholders. We continue to address potential modern slavery risks in our supply chain, through a number of initiatives, including:

Targeted enhanced due diligence at onboarding for suppliers categorised as potentially higher-risk due to their geography or other factors. This enhanced due diligence includes questionnaires, audits and monitoring.

We partner with Sedex, a not for profit organisation that provides a web-based database of information on labour standards compliance and provides tools to help companies improve their sustainable business practices. By enabling suppliers to share this ethical data with retailers the Sedex system helps to drive convergence on standards, and helps to reduce the cost and duplication of ethical audits for suppliers.

In 2021, we began rolling-out a requirement to be registered with Sedex to some of our higher risk suppliers - such as manufacturers of rider kit and safety equipment. The platform allows us to easily access information and leverage Sedex's risk assessment tools. These suppliers were receptive to this initiative and those who were not already registered with Sedex have joined or taken steps to join the platform. This provided us with a deeper understanding and visibility of certain suppliers' ethical audit performance so we may take preventative action as appropriate. We are taking a phased risk-based approach to this requirement which will continue in 2023.

Every supplier that works with us is required to acknowledge and comply with our Business Partner Code of Conduct, which expressly prohibits forced labour and any form of abuse. Our standard contracts also include appropriate modern slavery clauses. 705 new suppliers were onboarded in 2022.

Our initiatives in action:

In October 2022 we launched operations in Qatar. We partner with rider agencies who directly employ riders, which is the same model we adopt for UAE and Kuwait. We know from our impact assessment that working with agencies in this manner represents one of our salient modern slavery risks. Our history of operating in similar markets gave us an important lens through which to understand the risks in Qatar and how they needed to be managed. This allowed us to put an enhanced spotlight on the process from the initial decision to launch, determining which agencies to work with and ultimately how we can work with agencies going forwards. As part of our vetting process, each agency was required to fill in detailed questionnaires following which site visits and inspections were carried out.

Following our risk-based approach, where there may be increased risks of human rights issues, an enhanced due diligence process is applied. An example of this was our assessment of a potential supplier in China which operates an agricultural farm. Due to both the nature of the industry and the jurisdiction, additional vetting occurred prior to selection. This provided us with a greater understanding of the supplier and determined our decision to work together.

RAISING AWARENESS IN OUR BUSINESS

We continue to seek to combat potential modern slavery risks in our business through a number of initiatives, such as:

Employee training

As referenced in our 2021 statement, we created and rolled-out targeted modern slavery training which is mandatory for new employees. The training module is designed to help employees understand Deliveroo's Modern Slavery Policy and the specific risks in our business. Training is delivered through our new learning management system which provides greater performance tracking and feedback on the employee training we deliver. In 2022, 1,765 employees completed the training. We continue to track engagement so that the training resonates and is well understood by everyone.

Senior Management Engagement

Onboarding for new country General Managers and Executives by Regulatory Compliance includes an overview of risks relating to modern slavery and how we manage them.

“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 Committee receives regular reports on Speak Up matters as well as an overview on the effectiveness of our whistleblowing procedures.

Our suppliers have always been able to raise concerns to representatives in the business. In 2022 we expanded the availability of our independent reporting platform to third parties in France, with further expansion planned in 2023.

Knowledge sharing with grocery partners

As partners with One Stop, our Regulatory Compliance team were provided with the opportunity to complete training courses with “Stronger Together”, a not-for-profit organisation that provides practical resources to support responsible labour practices. These learnings were applied back into our business, strengthening our commitment to combat these risks.

EVALUATING OUR PROGRESS AND LOOKING AHEAD TO 2023

Our focus this year was to embed the initiatives introduced in 2021 and ensure understanding and proper implementation was achieved. 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 forwards.

KPI	REASON FOR KPI	2022 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 2022, 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, elective and promotes the right behaviours.	1,765 employees completed training on modern slavery throughout the year.
Number of desktop due diligence assessments conducted.	We maintain procedures to screen our suppliers at the point of onboarding.	705 suppliers were assessed and onboarded via the desktop due diligence exercise summarised in page 11.
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.	5 international sites from which we procured rider kit had an audit conducted in 2022 (applying either SMETA or equivalent audit methodology) and returned a positive or satisfactory rating.

OUR PLANS FOR 2023

Our principles of acting with *integrity*, *treating people with respect* and *taking responsibility*, continue to guide our strategy for 2023 and beyond. In 2023 we will continue to implement our strategy and transition from embedding initiatives towards a maturing approach which we plan to achieve through the following actions:

1

Revise and relaunch our employee Code of Conduct . We are updating our Code to reflect our maturing business and to provide employees with an engaging, learner-centric tool to guide their daily activities. Getting that right takes time, and we decided to reschedule it from 2022 but it remains a key priority for us;

2

Conduct an in-depth review of our impact assessment, our Modern Slavery Policy and our Modern Slavery employee training, exercising our commitment to update the materials every two years so that they remain effective in helping reduce modern slavery risk;

3

We made progress with Sedex during 2022 but we aim to continue to expand our enhanced third party due diligence roll-out with Sedex to more of our supplier base in 2023, to ensure we have the means to spot and address risks within our supply chain;

4

Continue the roll-out of post-onboarding, in-app identity checks to more riders and in more markets;

5

Undertake a refresh of our standard contract templates and terms and conditions, ensuring they continue to address potential risk effectively in an evolving risk landscape; and

6

Conduct a review of our processes in Qatar and implement lessons learned across our business in the Middle East.