

Human Rights Policy

May 2024

Own Brand, Technical, Compliance & Sustainability

The contents of this document are Strictly Private and Confidential and should not be shared or copied without the prior permission of Ocado Retail Limited



Contents

1. Introduction	3
2. Scope and implementation of policy	4
3. Compliance	4
4. Provisions	5
4.1. Child labour must not be used	5
4.2. Employment must be freely chosen	6
4.3. Freedom of association and the right to collective bargaining must be respected	6
4.4. Working conditions are safe and hygienic	6
4.5. Fair wages and benefits are paid on time	7
4.6. Working hours must not be excessive	8
4.7. Discrimination must not be practised	8
4.8. Regular employment is provided	9
4.9. Harsh or inhumane treatment must not be allowed	9
4.10. Community and land rights	10
Document version control	11

1. Introduction

Ocado Retail Limited and its subsidiaries operate and maintain the highest standards of professionalism, honesty, integrity, ethics and respect for human rights.

Human rights are the basic freedoms that belong to everyone, regardless of who they are or where they live.

We are committed to following the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and the Organisation for Economic Cooperation and Development's [OECD Guidelines for Multinational Enterprises](#), ensuring we have policies and processes to prevent, mitigate and remediate potential and actual adverse human rights impacts.

This includes upholding the [Universal Declaration of Human Rights](#) and incorporating the core labour standards set out by the International Labour Organisation (ILO), including those set out in the [ILO's Declaration on Fundamental Principles and Rights at Work](#), and the [Ethical Trading Initiative \(ETI\) Base Code](#).

We are also committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure human rights abuses are not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners in that they have their own human rights policies in place and will hold their own suppliers to the same high standards.

We will ensure there is transparency in our own business and in our approach to tackling human rights issues and complying with all relevant legislation, including addressing modern slavery, which means the offence of servitude, slavery, forced or compulsory labour and human trafficking, throughout our supply chains, consistent with our disclosure obligations under the [UK Modern Slavery Act 2015](#). We will continue to monitor future legislation as the business grows.

2. Scope and implementation of policy

This policy applies to all persons working for or on our behalf of Ocado Retail in any and all capacity. A senior manager, the Ocado Retail Own Brand Technical Compliance Director, oversees the implementation of this policy and its standards. There is regular reporting to the Compliance Committee and Audit Committee on human rights. This policy does not form part of any colleague's contract of employment and we may amend it at any time.

As part of the implementation of this policy, it will be shared with all relevant colleagues and stakeholders, with training provided to ensure an understanding of Ocado Retail's expectations on human rights. Suppliers should also provide training to their own employees and workers as relevant to their role. All Ocado Own Brand UK direct suppliers are required to attend Stronger Together Modern Slavery training, 'Tackling Modern Slavery in UK Business'. One free place on this training session is available to all Ocado Own Brand UK direct suppliers and further information can be found at <https://www.stronger2gether.org/>.

3. Compliance

We take seriously any allegations of human rights abuse in all its forms and take a continuous improvement approach to working with suppliers. We expect all breaches of human rights to be shared with Ocado Retail and for suppliers to address any identified human rights violations.

We may terminate our relationship with individuals or our suppliers if they breach this policy or if they are suspected of, or commit an infraction against, this policy. Before we terminate our relationship, in order to consider the welfare and safety of local workers as a priority, we will give support and guidance to individuals or our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If anyone has any concerns, believe or suspect a breach of this policy has occurred, or that it may occur, they must notify their manager, the person who is responsible for the

relationship between us and the supplier, e.g. an Account Manager, the People Team or report it in accordance with our Whistleblowing Policy as soon as possible.

4. Provisions

The provisions in this policy represent the minimum standards and do not preclude Ocado Retail or our suppliers and business relationships from adopting higher standards. These provisions are referenced and included in the [Ocado Grocery Supplier Manual](#).

4.1. Child labour must not be used

- Child labour is defined by the ILO as ‘work that deprives a child of their childhood, their potential and their dignity, and that is harmful to their physical or mental development, including by interfering with their education’.
- Ocado Retail and its suppliers shall ensure they do not employ individuals younger than 15 in line with the ILO Minimum Age Convention 138 or below the country’s legal minimum age for employment or the age established for completing compulsory education. Robust age verification checks should be in place to ensure this expectation is met.
- When young people, i.e. those under 18 years of age but above the legal working age, are employed, they must not do work that is mentally, physically, socially, or morally dangerous or harmful or interferes with their schooling, as set out in ILO Convention 182. Young people must be afforded extra protection and must not be employed in hazardous work, which includes, but is not limited to, working at night, working overtime, being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise. Employees and workers under the age of 18 must be subject to an appropriate risk assessment and regular monitoring of their health and working conditions.
- In the event child labour is discovered, suppliers shall develop or participate in, and contribute to, policies and programmes that provide for remediation, this could include the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.2. Employment must be freely chosen

- All work must be conducted on a voluntary basis and not under threat of any kind. There must be no use of modern slavery, including forced, bonded, indentured or involuntary prison labour.
- Employees and workers must not be required to pay recruitment fees or monetary deposits for their employment to their employer or any third party agents, such as labour providers. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.
- Employees and workers' original identity and right-to-work documents must not be indefinitely held by their employer or any related third party, for any reason other than appropriate administration processing and immediate return.
- Employees and workers must be able to leave their employer after reasonable notice, the period of which should be agreed upon engagement, and should receive all owed salary.

4.3. Freedom of association and the right to collective bargaining must be respected

- Employees and workers must have the right to join or form trade unions of their own choosing or, where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.
- We have zero tolerance to any subsequent discrimination, harassment or detrimental treatment towards workers or their representatives as a consequence of employees exercising such rights or performing their role as a representative.

4.4. Working conditions are safe and hygienic

- All employees and workers must be provided with clean and safe conditions in all work and residential facilities.

- Employees and workers should have access to clean toilet facilities, potable water and, if applicable, hygienic food storage.
- Adequate steps must be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of occupational hazards inherent in the working environment. In the event of an occupational accident or incident, emergency healthcare must be provided.
- Employees and workers must receive regular health and safety training appropriate for their work so they are able to understand the hazards, risks and control measures associated with their job.
- At least one senior management representative should be assigned responsibility for health and safety, and a risk-based management system should be implemented with clearly defined accountabilities for maintaining it.
- If workers are provided with accommodation by their employer, this must be clean, safe and meet the basic needs of the workers.

4.5. Fair wages and benefits are paid on time

- Wages, benefits and wage deductions must comply with all relevant local and national laws and regulations, including, at the least, the relevant legal minimum wage or a fair representation of the prevailing industry wage and provide all legally mandated benefits and paid leave. Wages should always be enough to meet the basic needs and to provide some discretionary income.
- A transparent process must be established to ensure that employees and workers are compensated in a timely manner and fully understand the wages that they receive.
- Deductions as a disciplinary measure must not be permitted and all disciplinary measures should be recorded.

4.6. Working hours must not be excessive

- Working hours must comply with local and national laws, collective agreements and benchmark industry standards, as appropriate.
- Standard weekly working hours, excluding overtime, must be defined by contract and not exceed 48 hours per week and eight hours a day, to ensure a safe and healthy working environment and adequate rest time between shifts. The total hours worked, including overtime, in any week must not regularly exceed 60 hours in a single week with a minimum of one day rest per week.
- Working hours may only exceed 60 hours in a single week if any of the following conditions are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect employees' and workers' health and safety; and the employer can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents, or emergencies.
- All overtime must be voluntary.

4.7. Discrimination must not be practised

- All employees and workers must be treated with respect and dignity. Any employment relationship must be based on the principle of equal opportunity and fair treatment.
- Employees and workers must not be discriminated against in hiring, compensation, access to training, promotion, termination or retirement based on race, colour, ethnicity, caste, national origin, religion, age, disability, gender, gender identity, sexual orientation, marital status, pregnancy status, union membership or political affiliation.
- The rights of minority and vulnerable groups, i.e. women, children, people with disabilities, indigenous peoples, migrant workers, older persons, etc. must be

protected. In some countries, consideration must be given to additional issues such as age, HIV status and sexual orientation are growing.

4.8. Regular employment is provided

- All employees and workers must be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. This includes being provided with this information in their spoken language.
- Regular employment relationships must not be avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor must any such obligations be avoided through the excessive use of fixed-term contracts of employment.

4.9. Harsh or inhumane treatment must not be allowed

- Workplaces must be free of harsh and inhumane treatment, including any corporal punishment, mental, physical, sexual or verbal abuse and no threat of any such treatment or other forms of intimidation.
- Written disciplinary procedures should be established and explained to workers in terms that are clear and understandable to them. Disciplinary and / or performance management actions should be recorded and explained to workers.
- Workers must have the rights to use trade unions or other appropriate representation at any disciplinary action that may lead to significant disciplinary penalties or dismissal.

4.10. Community and land rights

- Communities, including Indigenous Peoples, can be impacted by land acquisition or use. Ocado Retail and its suppliers must not exploit resources to the disadvantage of local communities.
- The land rights of local and Indigenous Peoples must be upheld and the process of Free Prior and Informed Consent must be respected.