

CO-OP MODERN SLAVERY STATEMENT 2025

CONTENTS

About Co-op	03
Policies & Governance	05
Assessing & Managing Risk	07
Due Diligence	10
Training & Awareness Raising	30
Monitoring & Evaluation	35



OWNED BY YOU.
RIGHT BY YOU.

CEO STATEMENT

Within our movement and across our markets, our Co-op has taken a leading position on human rights for many years now. And our members, who own and shape our business, continue to tell us how much human rights matter to them.

We remain completely committed to doing the right thing and we expect the same from our suppliers and our partners, as we co-operatively support the welfare of each and every worker connected to our Co-op.

I am sad to say, as I have said here before, that some of the same challenges continued to influence the geopolitical climate in 2025. Economic drivers have seen businesses recoil from commitments, where we have stayed steadfast in our goals to tackle forced labour, child labour and other forms of exploitation.

Our Co-op, and every other co-operative around the world, adheres to the same Values. These Values include caring for others, equity, equality and social responsibility. This last year, I have been so proud of our Co-op's resilience and our ability to prioritise being the best possible business in line with our Values, even during unprecedented events.

Today, we continue to integrate human rights into our business model. Having taken the leap in 2023 to independently review what we do, we have spent much of 2024 and 2025 developing a Pan-Co-op approach to human rights.

We now have a passionate team of colleagues from all areas of our Group who meet regularly, set targets and take action, to understand any risk to human rights and determine how we can make a positive impact.

Where this work will always be a priority, I am grateful to them, everyone who supported the positive outcomes in this year's statement, and to those who identified where we can go even further.



Shirine Khoury-Haq
CEO, The
Co-op Group¹



OUR KEY ACHIEVEMENTS IN 2025

1. We launched a **new Pan-Co-op Ethical Trade & Human Rights Working Group** to establish a unified approach to identifying, preventing and mitigating human rights risks, and to review actions already taken.
2. In Food, our supplier management programme drove **5,691 improvement actions** based on audit findings and **addressed 21 new human rights issues** through non-audit channels (see [here](#)).
3. **We reached 3,717 people across 150 events in 5 countries in our Food global supplier engagement programme** and worked collaboratively to develop tools, guidance and training programmes in the UK, Egypt, Kenya, Morocco, Spain and South Africa. These focused on critical areas including worker accommodation, grievance mechanisms and gender-based violence and harassment (GBVH) prevention (see [here](#)).
4. Working with the Seasonal Worker Scheme (SWS) Taskforce, we trained **425 growers** through Grower Roadshow events, implemented an **independent worker survey** and supported a series of multi-stakeholder roundtable events to respond to a feasibility study on the **Employer Pays Principle (EPP) in UK agriculture** (see [here](#)).
5. Our Goods Not For Resale (GNFR) and Q-Commerce teams worked closely with partner companies - including **Just Eat, Uber Eats and Deliveroo** - to examine their modern slavery management processes and procedures (see [here](#)).
6. In Funeralcare, we mapped our Tier 2 supply chain and collaborated with GNFR colleagues to profile these organisations using **EcoVadis IQ** in order to better understand risks (see [here](#)).
7. In Logistics, we partnered with central teams to create a **15-minute modern slavery awareness session**, which will become a certified module within the annual Driver Certificate of Professional Competence (DCPC) course and reach all our Co-op drivers in the first half of 2026 (see [here](#)).
8. Internally, our **Anti-Slavery Week campaign** in October reached **over a thousand colleagues** through a multi-channel approach, featuring short videos from leaders across all business units explaining why combating modern slavery matters to us (see [here](#)).
9. We achieved a **Gold EcoVadis medal**, which places us in the top 5% of all companies assessed by EcoVadis over the past 12 months.

¹ Shirine stepped down as CEO on 29 March 2026.

ABOUT CO-OP

Our Co-op is the UK's largest consumer co-operative, with more than 7 million active member owners and a presence in every postal area in the country.

We are a major food retailer and wholesaler, the UK's largest provider of funeral services, a leading provider of regulated consumer legal services and a significant provider of life-planning and insurance products. Our businesses are all UK-based and our main support centre is in Manchester.

BEING A CO-OP

The Co-operative Movement has championed organisations with clear social purpose since 1844, and our Co-op proudly carries forward this legacy. We deliver value for our member owners, and the communities in which we operate, by running a thriving co-operative enterprise.

Our approach to business matters deeply to us. We uphold rigorous standards in responsible retailing and customer service. As a campaigning business, we advocate on issues important to our member owners. Through excellent products and services, we expand our customer reach, grow our membership and amplify our Co-op's positive impact on society.

Further details about our business are available in our 2025 Annual Report and Social Value and Sustainability Report [here](#).

OUR PEOPLE

We have a long history of caring for our workforce and putting colleague voices at the heart of our decision-making. We work with 2 recognised trade unions: the [Union of Shop, Distributive and Allied Workers](#) (USDAW) and [Unite](#). Regular engagement through our Employee Relations (ER) frameworks has fostered strong partnerships across Co-op, enabling effective ER management and successful change delivery.

Collective agreements apply to 99% of colleagues, covering annual salary reviews and some terms and conditions.

We also have 6 colleague networks that play an integral part in promoting a diverse and inclusive culture at Co-op. These are key consultation forums for our subject matter expert teams and our Operating Board. Additionally, colleagues can have their say via our Talkback Pulse surveys, 'omnibus' surveys on topical business issues and 'lifecycle' research on key moments, from onboarding and exit research to operational initiatives.

In 2025, we:

- Embedded our new "Assessment and Selection" tool as part of our recruitment process.
- Introduced a new screening provider to shorten employee screening times and manage legal, reputational or commercial risks.



- Standardised our onboarding process across Co-op, which includes performance review checks at weeks 4, 8 and 12.
- Updated our mandatory "Drawing the Line" training on bullying, harassment and discrimination.
- Invited over 43,000 frontline colleagues in Retail and Funeralcare to complete mandatory training modules. This supports colleague safety through understanding of, and adherence to, key processes and legislation.
- Received feedback from 78% of our colleagues via Talkback.

OUR SUPPLY CHAINS

We source products and services from thousands of suppliers worldwide for all areas of our business and recognise that we operate through complex supply chains. We prioritise mapping high-risk supply chains and full traceability remains our longer-term ambition, particularly for raw material suppliers in our Food, GNFR and Funeralcare supply chains. We assess human rights risks throughout the business, covering physical goods – whether for internal use or resale – and the services we use or provide (see our Food map [here](#) and our GNFR and Funeralcare map [here](#), along with details of our salient human rights risks [here](#)).



7.2m
ACTIVE MEMBER
OWNERS



53,000
COLLEAGUES



UK-BASED
MAIN SUPPORT
CENTRE IN MANCHESTER



FOOD

Our Operations

3 Routes to market (stores, online and business to business²)

2,348 Co-op stores

4,143 Locations supplied by wholesale

Our Supply Chains

270 Co-op brand suppliers

8 Product categories (ambient, BWS³, bakery, chilled, food to go, produce, protein and non-food)

2,988 Sites across **66** countries mapped (Top 5 sourcing countries: UK, Spain, Morocco, South Africa and Chile)

784,657 Workers (46.76% are female workers and 55.75% are temporary workers)

GNFR

Our Operations

Procurement of essential goods and services for:

5 Key categories (Property, Logistics, Human Resources (HR) and Professional Services, Technology and Marketing)

12 Depots and vehicle maintenance units (VMUs)

Our Supply Chains

2,200 Suppliers

20 Countries

1,400 Core drivers⁴

3,230 Workers (46.76% are female workers and 55.75% are temporary workers)

15,600 Workers in mapped Tier 2 supply chain

LIFE SERVICES

Our Operations

3 Legal Services key services (major provider of regulated consumer legal services, particularly probate and wills)

6 Insurance products (covering car, van, home, travel, pet and life)

5 Funeralcare Goods For Resale (GFR) products (coffins, caskets, headstones, memorial stones and flowers)

806 Funeralcare locations

Our Funeralcare Supply Chains

34 Strategic suppliers

214 Regional florists

14 Manufacturing countries

31 Raw material sourcing countries

393 Workers across our audited supply chains

² Franchise, Wholesale (including Nisa) and Federal Retail Trading Services (FRTS). Co-op Franchises are independent businesses that use our Co-op systems and often look and feel like our owned stores. Our wholesale business supplies products to independent shops including many under the Nisa brand; these stores stock Co-op products alongside products bought elsewhere. Our FRTS business sources products and provides logistics services for independent co-operative societies.

³ Beer, wine and spirits.

⁴ Co-op/3PL drivers.

POLICIES AND GOVERNANCE

Our [Co-operative Values and Principles](#) shape how we conduct our business and form the foundation of our policies and governance.

Our policies encompass all international labour rights, including protection from forced labour, modern slavery and harsh or inhumane treatment. Our approach is based on the principles of the [Universal Declaration of Human Rights](#) (UDHR), core [International Labour Organization](#) (ILO) standards, the [Ethical Trading Initiative \(ETI\) Base Code](#) and national and international legislation. We apply the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#) to protect and respect human rights throughout our operations.

All our policies are developed by colleagues, and we seek input from external parties such as unions, suppliers or civil society organisations. Our Pan-Co-op approach has been brought to life through collaboration between teams to align policies and, in 2026, we will continue to build our group-wide approach.

	POLICY NAME (YEAR OF LAST UPDATE)	DESCRIPTION
Colleague-facing	Code of Business Conduct (2016)	Sets out expectations of how our colleagues should engage with our members, customers, suppliers and the wider community.
	All Colleague Code (2025)	Sets out the behaviours we expect from all colleagues at Co-op, linked to our Disciplinary and Bullying, Harassment and Discrimination policies. The code helps us with our own actions and helps us hold others to account.
	Eligibility to work process (2025)	Ensures everyone who works with us, including agency workers and contractors, has a legal right to work in the UK. Supported by a Right to Work app that further reduces risk of illegal working.
	Whistleblowing policy (2025)	Policy detailing how colleagues can share concerns about working practices at Co-op, including possible modern slavery in our business or supply chain. Also accessible to workers at our Tier 1 own-brand supplier sites in the UK.
	Bullying and Harassment policy (2025)	Policy that applies to all colleagues, agency workers and contractors, and sets out our position on zero tolerance.
	Grievance policy and process (2025)	Policy that applies to all colleagues, agency workers and contractors and sets out the steps we take to deal with a complaint from a colleague.
Supplier-facing	Ethical Trade Guidance for Colleagues (2025)	Guides to support Co-op Food and GNFR colleagues buying and managing products and services, which include escalation processes to help address emerging risks and Non-Conformance (NC).
	Human Rights and Ethical Trade Position Statement (2023)	A Co-op-wide approach to protecting the fundamental rights of workers in our supply chains. It covers all international labour rights, including protection from forced labour, modern slavery and harsh or inhumane treatment.
	Sound Sourcing Code of Conduct (SSCC) (2023)	Workplace and employment standards expected of suppliers based on the ETI Base Code and core international labour standards. Compliance is tracked through supplier monitoring programmes.
	Grievance and Remedy Policy (2022)	A Co-op-wide approach to the responsibility we share with suppliers to identify grievances and provide remedy for human rights abuses in global supply chains.
	Anti-Bullying, Harassment and Discrimination Policy (2025)	Supplier equivalent of internal policy that extends our standards to suppliers and is enforced via our grievance and whistleblowing procedures. Updated to set out our zero-tolerance position.
	NEW: Co-op Sourcing Policy Statement: International Conflict, Human Rights Abuses and Violation of International Law (2025)	Sets out when Co-op will not source products, ingredients or services from countries where credible international assessments identify serious, community-wide human rights abuses or violations of international law, and how existing sourcing will be managed responsibly in line with our wider ethical trade framework.
	Supplier contracts and Requests for Proposals (RfP) (2025)	Contracts ensure our suppliers meet robust standards for human rights and labour conditions and include a requirement to regularly complete assessments on Sedex or EcoVadis . RfPs ask ethical and sustainability risk questions to support early identification of potential issues and, in 2025, these questions were enhanced to link to our new Co-op Sourcing Policy.

	POLICY NAME (YEAR OF LAST UPDATE)	DESCRIPTION
Supplier-facing	Supplier Guides to Ethical Trade and Sustainability	Guides for our suppliers in Food and GNFR to meet our ethical trade and sustainability requirements, including our Supplier Behaviour Framework.
	UK Food Supply Chain Serious Incident Escalation Management Protocol (2025)	Food-specific - Co-op, along with other UK Food Retailers, has agreed to follow a 5-stage process for serious incident management, including modern slavery and exploitative practices. It also includes a collaborative protocol, to guide situations where multiple retailers and suppliers are involved in an incident.
	Third-Party Supply Management Policy (2024) and Supplier Management Framework (SMF) (2025)	GNFR-specific - Guidance and framework for colleagues buying products and services for use in our business. Outlines governance requirements for managing suppliers, including regular ethical reviews with high-risk suppliers.
	UN Women's Empowerment Principles (UN WEPs) (2023)	We have signed up to the UN WEPs which is a holistic framework for businesses to promote gender equality and women's empowerment in the workplace, marketplace and community.

GOVERNANCE

Overall responsibility for modern slavery sits with our Board, and our Modern Slavery Statement is approved by our CEO. Modern slavery risk is managed through the business within the following structures:

Risk and Audit Committee (RAC)

Independent oversight of Co-op's risks, financial reporting, internal controls and audit processes.

Business Risk and Assurance Committee (BRAC)

Oversight of brand and reputation, regulatory compliance and supply chain and operational resilience principal risks.

Business Unit Leads

Accountability for implementation of ethical and sustainability policies.

Business Units

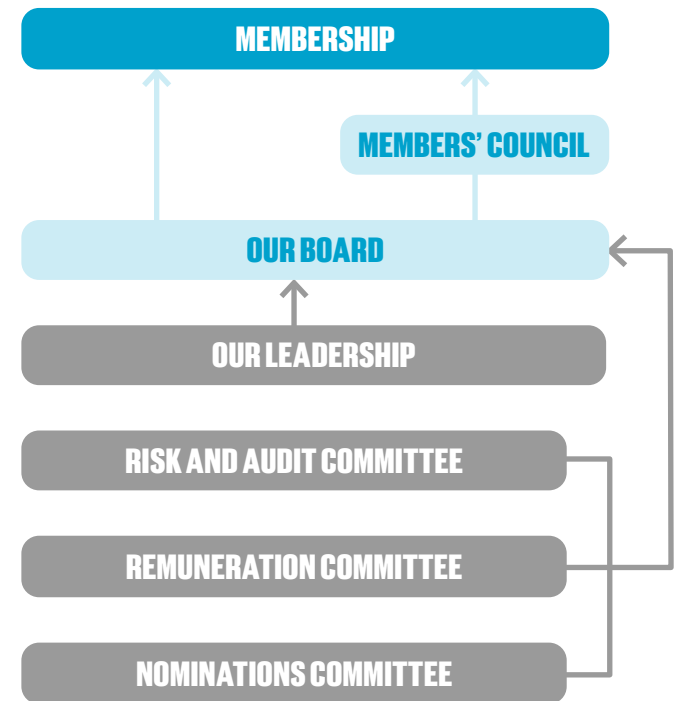
Responsible for developing and implementing ethical and sustainability policies and delivering human rights commitments. Respond to emerging issues in our operations and supply chains.

Pan-Co-op Ethical Trade & Human Rights Working Group

This newly created working group is responsible for delivering actions on ethical trade, human rights and modern slavery and to ensure business units provide updates on progress against targets. This working group reports to the Sustainability Governance Forum, which oversees issues such as human rights, climate change, sustainable sourcing and healthy & sustainable diets.

Corporate risk framework

Ethical trade and human rights are also embedded in our corporate risk framework, with consideration of modern slavery included in our brand and reputation, regulatory compliance and supply chain and operational resilience principal risks. In 2024, our Operating Board commissioned an internal audit of Co-op's modern slavery risk management which resulted in the development of a Pan-Co-op human rights risk assessment.



ASSESSING AND MANAGING RISK

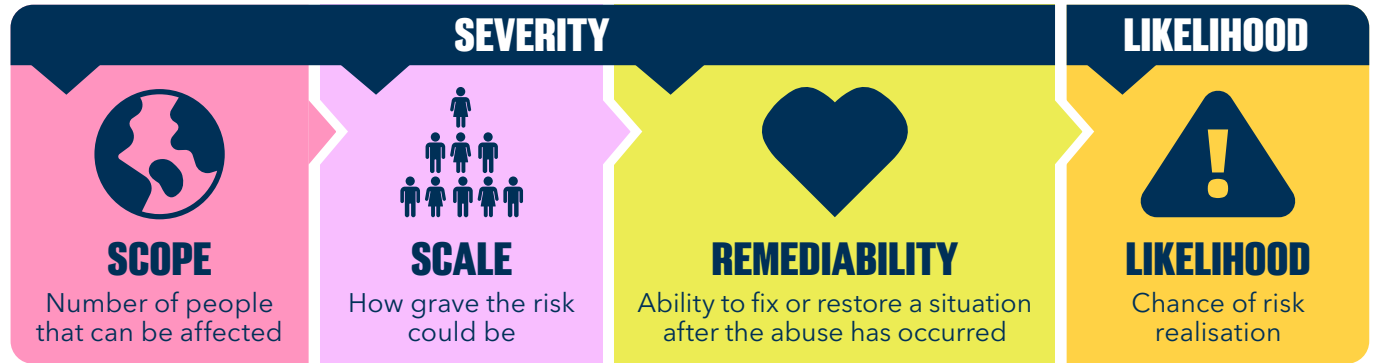
To understand the risks of modern slavery within our operations and supply chains, we undertake a risk-based and ongoing assessment process.

We draw on a range of internal and external data sources, including reputable third-party risk indicators and on-the-ground insights from site visits and supplier engagement.

Identified risks are assessed and prioritised based on their severity to people and likelihood of occurrence, in line with the UN Guiding Principles on Business and Human Rights. This enables us to identify our salient modern slavery risks and to focus our efforts on preventing, mitigating and addressing the most significant risks to employees and workers within our supply chain.

PAN-CO-OP HUMAN RIGHTS RISK ASSESSMENT

In 2024, we conducted a Pan-Co-op human rights risk assessment to ensure greater coherence in our approach to tackling modern slavery, with 10 business units and high-risk teams producing action plans (see page 7 of our [2024 statement](#) for how this was put together). In 2025, these action plans were taken to the Board and are regularly reviewed via the Pan-Co-op Ethical Trade & Human Rights Working Group.



OUR THIRD PARTY RISK DATA SOURCES

- **External country and industry research and risk indicators** via [Sedex](#) and [EcoVadis](#) include:
 - The [ILO](#): data and conventions on labour standards, occupational accidents, forced labour and working conditions.
 - The [World Risk Poll](#): Informs health, safety and hygiene risk scores with data on people's experiences with workplace injuries and their ability to report safety issues.
 - The [International Trade Union Confederation \(ITUC\)](#): Data on workers' rights in different countries presented in the Global Rights Index.
 - The [World Bank](#): General country-level data influences risk scores.
 - The [World Economic Forum](#): Data used in the risk assessment algorithm.
 - [Notre Dame Global Adaptation Initiative \(ND-GAIN\)](#): [ND-GAIN Country Index](#) assessments on country climate vulnerability and their readiness to improve resilience.

- [UN agencies](#): UN agency information on risk drivers, such as poverty.
- Media and Non-Governmental Organisation (NGO) insights
- [Food Network for Ethical Trade \(FNET\)](#) Country Risk Rating and FNET Risk Assessment

PROGRAMME RISK DATA

- Supplier due diligence visits
- Direct supplier, grower and worker feedback
- Site-based ethical audits and self-assessment questionnaires (SAQ)
- Due diligence assessments and programme initiatives
- Internal tracking of grievances, allegations and incidents of modern slavery
- Business intelligence, department collaboration and information sharing
- Our partnerships, such as the [Modern Slavery Intelligence Network \(MSIN\)](#) (see [here](#))

OUR SALIENT PAN-CO-OP HUMAN RIGHTS RISKS

This map presents the salient human rights risks identified across our businesses, drawing on insights from our risk assessment data sources. Further information on our Food and GNFR risk assessments, and the actions we are taking to address these risks, is provided elsewhere in this statement [here](#) and on our [website](#).

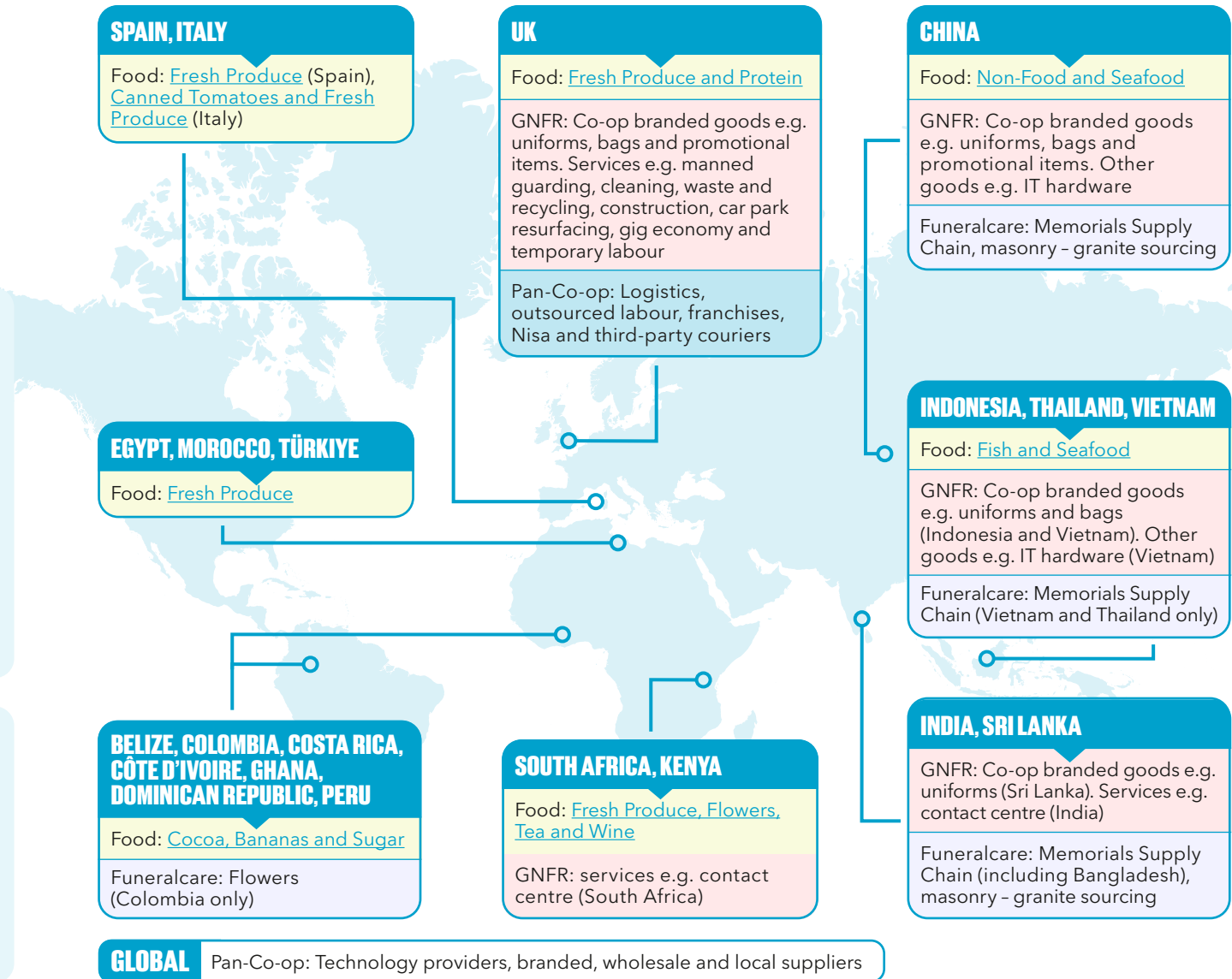
Below we highlight the groups of people who are more likely to be at risk of exploitative practices within our operations and supply chains.

VULNERABLE DEMOGRAPHICS:

- Low paid, unskilled labour
- Migrant workers
- Informal and gig workers
- Workers in countries with weak labour laws or enforcement
- Female and marginalised peoples
- Sub-contracted labour
- Third-party workers through labour and service providers
- Workers in lower tiers of long and complex supply chains

SALIENT EXPLOITATION TYPES:

- Weak worker voice
- Poor health and safety practices
- Unethical recruitment and recruitment fees
- Discrimination
- Underpayment
- Long working hours
- Inadequate HR policies and processes



ONBOARDING NEW SUPPLIER RISK ASSESSMENT

A fundamental process that each business unit applies is a risk assessment when onboarding suppliers and/or new sites. These risk assessments then inform our ongoing due diligence processes (see [here](#)).

- **Food:** We embed human rights and ethical trade criteria into our tendering processes. All new Tier 1 sites located in high-risk countries must have an independent Sedex Members Ethical Trade Audit (SMETA) conducted within the past 18 months before commencing trade. Once onboarded, all Tier 1 sites are required to register on Sedex and complete the SAQ as a condition of trade. Our salient-risk assessment identifies produce and seafood as high-risk categories, so we require Tier 2 visibility, including completed SAQs and we work with suppliers to ensure issues are addressed

in audits that are shared with us.

- **GNFR:** We integrate ethical and sustainability risk considerations into all RfPs. Suppliers are assessed on the basis of holding a visible EcoVadis scorecard. Where suppliers are identified as high ethical risk, we also engage [EthiFinance](#) to conduct additional due diligence where required. We assign high-risk status based on a range of human rights and ethical indicators, including labour type, sector and country of operation.

SUPPLY CHAIN TRANSPARENCY

Transparency across our suppliers, service providers and the individuals within our supply chains is essential to assessing human rights risks in our operations and beyond. Our most advanced transparency work is within our Food supply chains, where site, worker and freedom of association data is

annually published for our sourcing countries at Tier 1 level, and for prioritised high-risk supply chains to farm level on [Open Supply Hub](#) and on our [website](#) we publish disaggregated [country data](#).

Strengthening supply chain transparency remains a core commitment, and we will seek to add more high-risk supply chains onto Open Supply Hub to give stakeholders better tools to engage with our supply chain information and contribute to wider industry transparency efforts. For our 2025 sourcing, we have continued to publish our Tier 1 and beyond Tier 1 top and stone fruit, pork and warm water prawns sourcing data. With the exception of the pork supply chain data, we are now sharing this information on Open Supply Hub.

In addition, we contribute to industry transparency of all our farmed and wild-caught seafood sourced by the Co-op by participating in the [Ocean Disclosure Project](#).

RISK ASSESSMENT KEY UPDATES

We recognise that human rights risks within supply chains evolve over time and require ongoing, adaptive risk assessments to ensure we can effectively prevent and mitigate any potential impacts arising from our business activities. Over the past year, we have taken several steps to strengthen and evolve our risk assessment processes, and we will continue to build on this progress throughout 2026.

BUSINESS UNIT	ACTIONS TAKEN IN 2025	PLANNED ACTIVITY IN 2026
Food	<ul style="list-style-type: none"> • Published disaggregated worker data for our Food supply chains and separated worker committee and trade union data • Worked with Sedex on understanding and addressing forced-labour risks in supply chains through analysis of the Forced Labour Indicator (FLI) Report 	<ul style="list-style-type: none"> • Publish additional high-risk supply chains on Open Supply Hub • Embed greater insights on forced labour, recruitment fees and gender into our risk assessment processes
GNFR	<ul style="list-style-type: none"> • Modern slavery awareness checks were integrated into the 2025 risk-based logistics audit • Modern slavery risk assessments carried out at 12 depots • Registered 34 out of 35 construction suppliers on EcoVadis • EcoVadis assessments secured from major food delivery platforms 	<ul style="list-style-type: none"> • Modern slavery risk scoring to be embedded within logistics risk register to develop action plans to mitigate risks to the business • Development of supplier ongoing management through training of contract management team
Life Services	<ul style="list-style-type: none"> • 100% of Tier 1 suppliers and 80% of Tier 2 suppliers identified and risk assessed using EcoVadis IQ • Mapping of 201 Tier 2 suppliers who supply 34 business critical Tier 1 suppliers 	<ul style="list-style-type: none"> • Extension of supply chain mapping to cover all GFR categories

DUE DILIGENCE MONITORING

Human rights due diligence is the continuous process that an organisation carries out to identify, prevent, mitigate and account for how they address actual and potential adverse impacts on people. We focus on prevention and mitigation actions, including monitoring, engagement, programmes and initiatives, on our highest risk suppliers.

We have outlined in the table (right) how we use monitoring and engagement across our business units and where we go beyond these processes to work on in-depth, often collaborative programmes and initiatives to prevent and mitigate human rights risks including forced labour.

Our business units employ comprehensive monitoring programmes which include employment screening checks, audits, supplier assessments and ongoing supplier management. Given that we work with a diverse range of goods and service providers – many with complex supply chains spanning multiple countries – our internal and supply chain monitoring takes several interconnected forms.

Co-op is continuing to strengthen its ongoing supplier assessments, recognising that our approach varies across different business units. Through the Pan-Co-op Ethical Trade & Human Rights Working Group, we are working to align our processes, share learning from the Food ethical trade programme and we provide more details on our ongoing Monitoring and Evaluation [here](#).

CO-OP COLLEAGUE RISK MONITORING

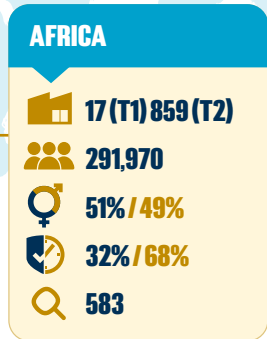
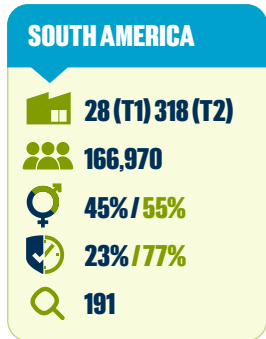
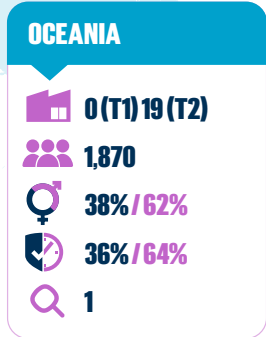
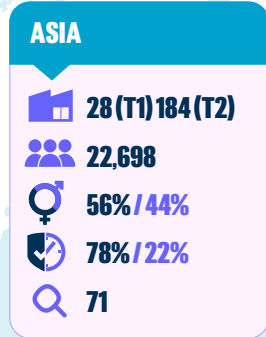
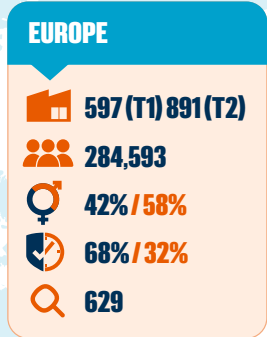
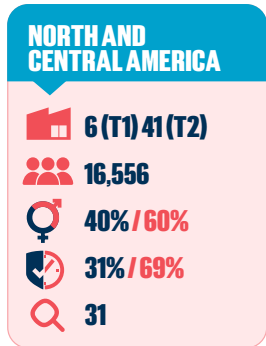
This year, we updated our internal systems to enable more robust pre-employment screening checks. We also launched a new mandatory training module for all people managers across our Support Centre, with plans to roll it out business-wide in 2026. This training addresses gaps in modern slavery risk awareness and aims to increase the likelihood of modern slavery risks being identified in our stores and at our Support Centre.

SUPPLY CHAIN ASSESSMENTS

	SUPPLIER SELF-ASSESSMENT	THIRD-PARTY AUDITS AND ASSESSMENTS
Food	<ul style="list-style-type: none"> All our Co-op brand Tier 1 suppliers must register on the Sedex platform and complete the SAQ Many service providers to our Food Tier 1 suppliers complete the Sedex Goods Provider SAQ, which is designed to facilitate the monitoring of risks associated with recruiting workers in a high-risk sector 	<ul style="list-style-type: none"> Tier 1 sites located in high-risk countries must have an independent SMETA (or equivalent) conducted within the last 18 months prior to the commencement of trade and every 24 months ongoing. Prioritised Tier 2 sites in high-risk supply chains such as produce and protein are included in scope Additional assessment tools such as site visits, direct worker reporting and information received through whistleblowing lines and grievance mechanisms provide ongoing assessments of working conditions on site
GNFR	<ul style="list-style-type: none"> We require all Strategic, Critical and Operational suppliers (who make up 89% of our annual spend) to complete an EcoVadis assessment. Our contracts require new suppliers to complete this assessment within 3 months of contract signature We also require all Tier 2 high ethical risk suppliers to complete a Sedex SAQ 	<ul style="list-style-type: none"> All Tier 2 high ethical risk suppliers must maintain a valid SMETA. We follow up on identified issues with our Tier 1 suppliers, who manage Tier 2 relationships, to ensure corrective actions are completed In Logistics, we have integrated modern slavery awareness checks into internal audits and assessments at depots
Life Services	<ul style="list-style-type: none"> All our Co-op brand Tier 1 suppliers must register on the Sedex platform and complete the SAQ 	<ul style="list-style-type: none"> Prioritised Tier 2 sites must maintain a valid SMETA


FOOD ETHICAL TRADE MONITORING PROGRAMME

Click [here](#) to view our supply chain information at country level, Tier 1 level and for select high-risk supply chains.



2,988 
Sites (676 T1 / 2,312 T2)

784,657 
Total workers

47% 
Female-identifying workers

53% 
Male-identifying workers

56% 
Permanent workers

44% 
Temporary workers

1,506 
Valid audits

CO-OP FOOD ETHICAL TRADE MONITORING PROGRAMME 2025

- 2,998 sites with 784,657 workers (676 Tier 1 and 2,312 Tier 2)
- 100% of Tier 1 sites with completed SAQs
- 100% of high-risk Tier 1 sites independently audited
- 1,506 valid audits with 1,007 audits taking place in 2025 (356 Tier 1, 651 Tier 2)
- 7,072 issues raised (including 718 in the Collaborative Action Required (CAR⁵) findings) with 5,691 issues addressed

31 issues (1%) were breaches of the Sound Sourcing Principle of ‘employment is freely chosen’ (reflecting issues such as isolated occurrences of deductions taken from workers’ wages, compulsory overtime and excessive fees paid upon termination of contract). 18 of these issues had been addressed by suppliers at the end of 2025, resulting in changes such as policies to reduce workers’ fees, revised terms and conditions in contracts and clearer payment processes. No issues relating to ‘employment is freely chosen’ were overdue or raised as a CAR⁵.

See our [Social Value and Sustainability Report](#) for more details.

Food Case Study 1

ENHANCED DUE DILIGENCE

Beyond our core monitoring programme, we have engaged in a wide range of projects as part of enhanced due diligence approaches to increase our understanding of issues in our global supply chain. We have continued to support platforms such as the [MSIN](#), the [Unseen Modern Slavery Portal](#), [Canal Foros](#) & [App Foros](#), [Just Good Work](#) and the SWS Survey to gather insights and intelligence and hear directly from workers (see updates on grievances in our supply chain [here](#) and how we work with our stakeholders [here](#)). We have also continued to support investigations into issues in our supply chain (see [here](#)), as well as sector and issue focused research and projects in the seafood and produce sectors (see the case study [here](#) and the risk table [here](#)). Key new activities in 2025 include:

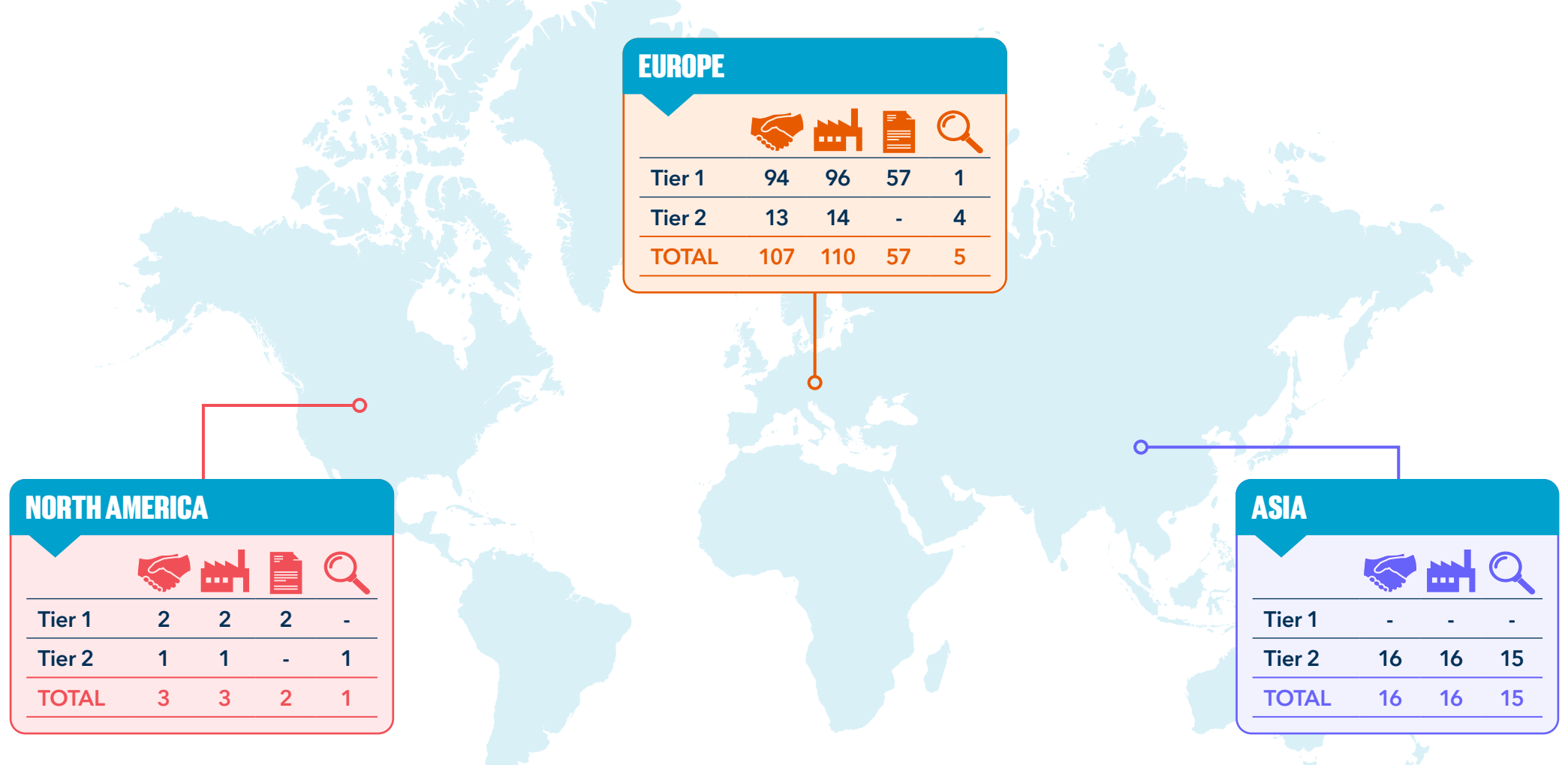
FLI Analysis: We are working with [Sedex](#) to analyse FLI trends in our monitoring programme and to support the early identification of forced-labour risks. The project reviewed the most recent audit results and applied the ILO FLIs, alongside assessing management systems failure, recognising that the absence of basic protections

can itself create significant risk. A total of 974 findings were identified: 92% were possible indicators and 8% were strong indicators. There were no definite indicators identified. We are investigating the indicators and developing recommendations to integrate FLI insights into our ongoing risk analysis and mitigation strategies.

Recruitment Corridors Database: Shared data is important in building a clear picture of worker migration patterns in global supply chains and to increase visibility of exploitation risk and issues. We are participating in a multi-stakeholder, cross-industry initiative facilitated by [Impactt](#) to develop a freely available map of labour migration corridors at a higher risk of recruitment fees and related costs. This resource aims to provide free public access to data on recruitment fees and related costs paid by workers to enable and inform human rights due diligence processes and decisions affecting migrant workers’ human rights. As part of the proof-of-concept phase, data on 119 recruitment pathways has been captured on the platform which is due to be launched by mid-2026.

⁵ In September 2024, Sedex introduced the “Collaborative Action Required” (CAR) category. A CAR is used to identify certain SMETA Workplace Requirements issues where a site may not meet the ETI Base Code but the usual mechanisms of NC verification and closure are not appropriate because there needs to be input from additional stakeholders and a longer timeframe to address issues. Sedex does not currently prescribe a closure date nor a verification methodology for these findings.

GNFR AND FUNERALCARE ETHICAL TRADE MONITORING PROGRAMME



129 Sites

126 Suppliers

17,247 Total workers⁶

60% Female-identifying workers

40% Male-identifying workers

87% Permanent workers

13% Temporary workers

21 Audits

59 EcoVadis assessments

⁶ Worker numbers are only collected from sites that have completed the Sedex SAQ.

GNFR Case Study 1

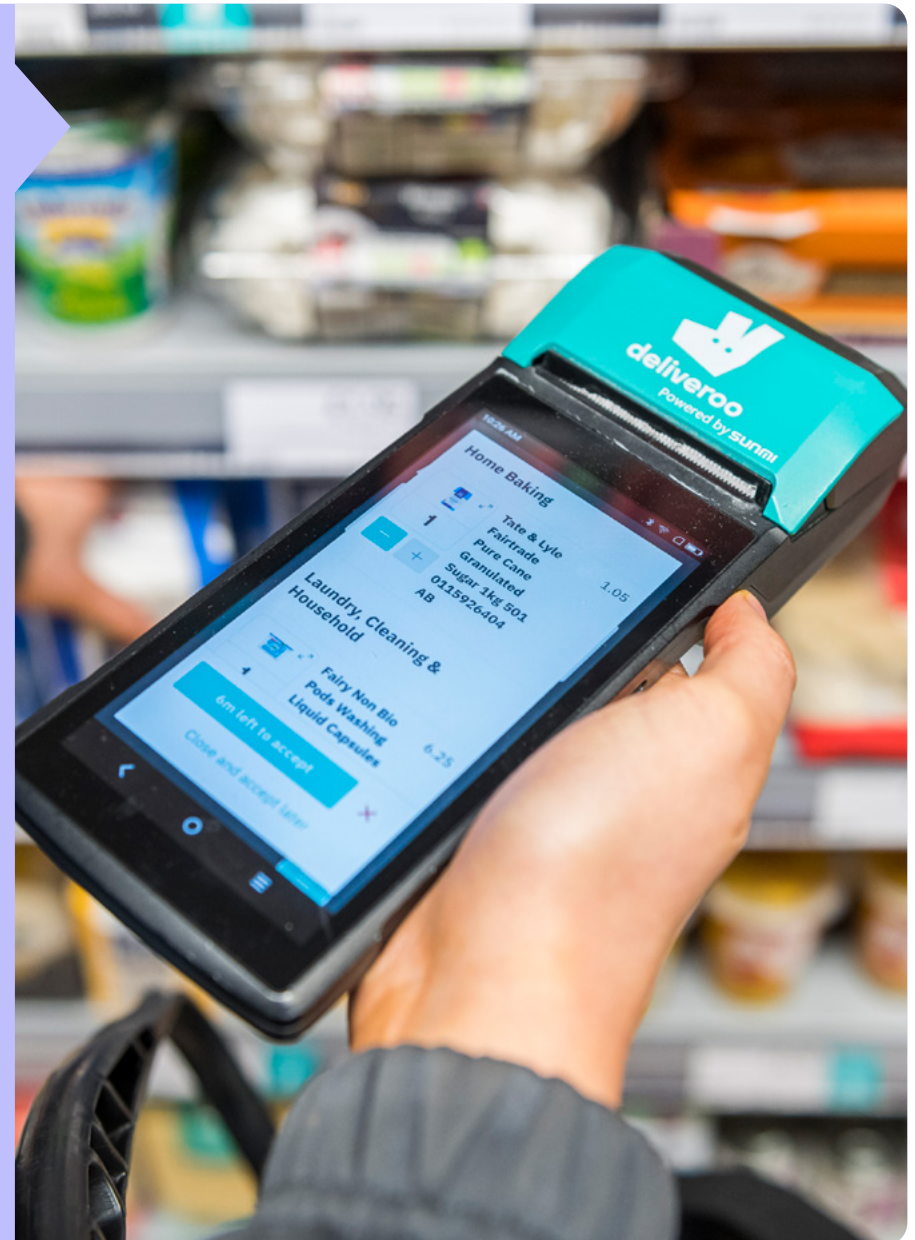
PIONEERING ETHICAL STANDARDS IN FOOD DELIVERY PARTNERSHIPS – COLLABORATING WITH JUST EAT, DELIVEROO AND UBER EATS

Working within the Pan-Co-op Ethical Trade & Human Rights Working Group during 2025 helped to identify the potential risks of forced labour linked to food delivery partners. This was further supported by a Home Office roundtable on rider substitution within the main aggregator services (Just Eat, Deliveroo and Uber Eats).

We recognise the critical role that the aggregator companies play in managing modern slavery and ethical trade risks, however, we also acknowledge what we need to do as an ethical retailer is to ensure risks are mitigated within the supply chain. As a result, our GNFR and Q-Commerce teams have worked directly with food delivery partners to discuss their approaches to processes and principles which impact modern slavery. We worked closely with all 3 main partners to align on sustainability priorities and build the business case for continuous assessment and in 2025 became the first UK retailer to successfully engage all 3 partners in completing EcoVadis assessments. This achievement demonstrates our leadership in extending ethical sourcing

and responsible business practices beyond conventional retail suppliers into the rapidly expanding food delivery sector. By securing EcoVadis participation from these major delivery platforms, we established a new industry benchmark for transparency and accountability while mitigating potential modern slavery risks.

As per our commitment last year, we have also introduced Compliance Quarterly Business Reviews (QBR) with each of our key Q-Commerce partners. These sessions allow compliance related topics, including the driver substitute process, to be discussed in a focused leadership forum which is separate from the more commercially focused QBR sessions throughout the year. All Q-Commerce partners have been supportive and keen to engage with us for these sessions, and whilst the partner organisation is responsible for drivers and driver processes - including the substitute process and driver welfare - as a partner organisation it is important we have an opportunity to review this and explore opportunities for improvements.



DUE DILIGENCE: MITIGATING RISKS IN OUR FOOD SUPPLY CHAINS

The areas where we face the highest risks of modern slavery, and where we can have the biggest impact in addressing these risks and wider labour abuses, are within our Food Co-op brand suppliers and supply chains. Our approach to prevention and mitigation goes beyond ongoing monitoring for these supply chains and focuses on visits, programmes, collaborative stakeholder engagement and initiatives. Below we list the key mitigating steps we took in 2025. Further details can be found on our [website](#).

RISK AREA, COUNTRY AND SUPPLY CHAIN	KEY MITIGATING STEPS TO ADDRESS SALIENT RISKS IN 2025
<p>Risk area 1. UK Modern Slavery and Vulnerable Workers Fresh Produce and Protein</p>	<ul style="list-style-type: none"> • Strengthened worker voice and responsible recruitment through the UK SWS Taskforce (see here) by expanding independent worker voice channels (including surveys, multilingual support lines and the Just Good Work app), delivering grower roadshows, Advisory, Conciliation and Arbitration Service (ACAS)-aligned grievance mechanism training, and completing the EPP Feasibility Study and roundtable events to discuss recruitment fee risks and mitigation • Enhanced human rights risk mitigation by contributing to the UK Nephrops Human Rights Impact Assessment (HRIA) and action plan; responding to and addressing issues raised under the UK Food Retailer Serious Incident Escalation Policy; and actively participating in our partnerships (see here) • Built supplier capability on diversity and inclusion through our Endless Inclusion Hub (see page 61 of our Social Value and Sustainability Report here) and supported suppliers on key developments in UK legislation and tackling modern slavery (see here) • Conducted due diligence visits across 11 UK produce and protein suppliers with a focus on management of seasonal workers
<p>Risk area 2. Thailand, Indonesia and Vietnam Modern Slavery, Vulnerable Workers and Workers' Voice Fish and Farmed Seafood</p>	<ul style="list-style-type: none"> • Worked collaboratively to publish the Responsible Recruitment in Tuna Processing study, identifying practical ways to strengthen responsible recruitment in shore-based tuna processing and improve conditions for migrant workers (see here) • Updated our commitment to 100% Aquaculture Stewardship Council (ASC) certification for all own-brand farmed seafood by 2027, further strengthening environmental and social standards across aquaculture supply chains • Continued active engagement in industry wide initiatives through the Seafood Ethics Action (SEA) Alliance, FNET and ETI to improve labour standards in seafood supply chains, including collaborative efforts to tackle recruitment fee risks identified in parts of the sector (see here)
<p>Risk area 3. Spain Modern Slavery and Vulnerable Workers Fresh Produce</p>	<ul style="list-style-type: none"> • Sponsor of the Spain Ethical Trade Forums (ETF) which marked its 10-year anniversary with an international conference and impact study showcasing progress, shared learning and strengthened collaboration (see here) • Supported the expansion of independent grievance mechanisms through the Spain ETF's Canal Foros, now covering 41 Spanish growers, and the ETI Grievance Mechanism in Agriculture project • Supported the roll-out of App Foros including a worker engagement plan for migrant workers in both Spain and key countries of origin • Conducted due diligence visits to 6 produce suppliers with a focus on management of seasonal workers, steps to address the impacts of climate change and embedding effective grievance mechanisms

RISK AREA, COUNTRY AND SUPPLY CHAIN	KEY MITIGATING STEPS TO ADDRESS SALIENT RISKS IN 2025
<p>Risk area 4. Italy Modern Slavery and Vulnerable Workers Canned Tomatoes and Fresh Produce</p>	<ul style="list-style-type: none"> • Improved access to grievance mechanisms for vulnerable workers in agricultural supply chains by supporting ETI's 2-year Grievance Mechanisms in Agriculture (GMA) project • Conducted a due diligence visit to the Italian canned tomato supply chain, identifying risks including inadequate migrant worker accommodation, illegal recruitment fees and climate related impacts such as extreme heat. The visit reinforced joint commitments to improving supply chain transparency, strengthening worker voice mechanisms, enhancing climate resilience efforts and mitigating ongoing recruitment risks
<p>Risk area 5. Egypt, Morocco and Türkiye Modern Slavery and Vulnerable Workers Fresh Produce</p>	<ul style="list-style-type: none"> • Continued support for the Egyptian Suppliers Ethical Trade (ESET) Forum, enabling collaboration on improved conditions for casual labourers and marking its 15th anniversary with an impact assessment and sponsorship of a new worker awareness app (see here) • Strengthened worker voice by implementing independent direct worker reporting across Egyptian sites using &Wider's survey tool • Worked collaboratively to launch new accommodation standards in Morocco and began assessing the feasibility of a multi-stakeholder forum to address wider labour-rights challenges (see here) • Supported a child-labour prevention project in Türkiye's horticulture supply chain focused on addressing root causes of child labour (see here) • Due diligence visits to Morocco and Egypt, priority focus areas identified for future activities including management of seasonal workers, gender empowerment and the prevention of gender-based violence and child labour, embedding effective worker representation and grievance mechanisms, mitigating the impacts of climate change on workers and producers
<p>Risk area 6. South Africa and Kenya Modern Slavery, Vulnerable Workers, Workers' Voice and Smallholders Fresh Produce, Tea, Flowers and Wine</p>	<ul style="list-style-type: none"> • New partnership with Stronger Together South Africa to provide free training and resources to our in-country supply chain. Stronger engagement with the Sustainability Initiative of South Africa (SIZA) which supports growers and packhouses to adhere to ethical and environmental practices and runs the Voice for All grievance mechanism • Continued partnership with flower supplier through the Inua Dada gender-empowerment initiative, culminating in publication of the programme's Endline Report • Worked collaboratively to deliver 4 in-country workshops on preventing gender-based violence in Kenya and South Africa and launched the Gender Action in Agriculture Initiative (GAIA) Principles to embed gender-sensitive approaches (see case study here) • Continued working with tea suppliers to resolve GBVH issues through a new multi-stakeholder group
<p>Risk area 7. China Vulnerable Workers and Workers' Voice Non-Food and Fish</p>	<ul style="list-style-type: none"> • Worked with priority suppliers to map high-risk supply chains (seafood) beyond Tier 1, improving transparency and identification of salient human rights risks • Strengthened engagement with a key non-food supplier in China, focusing on improving supplier capability, performance and collaborative management of systemic labour rights challenges
<p>Risk area 8. Belize, Colombia, Costa Rica, Côte D'Ivoire, Dominican Republic, Ghana and Peru Vulnerable Workers, Workers' Voice and Smallholders Cocoa, Bananas and Sugar</p>	<ul style="list-style-type: none"> • Continued to support workers across our 100% Fairtrade supply chains cocoa, banana and sugar, including skills training and programmes to strengthen smallholder resilience and livelihoods (see here) • Work on delivery of the UK Retailer Commitment on Living Wages in Banana Supply Chains which in 2025 included joining other retailers in a 2-year project with Banana Link in Ghana and Cameroon to secure living wages through social dialogue (see here) • We launched a sustainable cocoa Productivity Improvement Programme (PIP) with our supplier and Fairtrade Foundation to support 2 key co-operatives within our cocoa supply chain in Peru. The programme will work with farmers and workers to improve soil fertility, enhance productivity, increase the use of natural fertilisers and reduce incidence of pests and diseases

Food Case Study 2

HUMAN RIGHTS COLLABORATION IN MOROCCO

Morocco is an important source of seasonal fresh produce for Co-op, however, the region presents significant human rights challenges due to labour scarcity, seasonal labour and gender equity. We source from 120 Moroccan production sites employing around 40,000 workers.

To support improvements in accommodation standards, in 2024, we joined an initiative with other UK retailers and importers, commissioning Partner Africa to create [practical guidance on improving worker accommodation](#), tailored to Moroccan fresh produce growers. The project involved supplier facility visits and consultation with Moroccan enterprises and workers living in accommodation, ensuring the recommendations supported continuous improvement that respects both workers' needs, international human rights due diligence standards and local legislation. 17 Moroccan-based businesses were involved in the accommodation project, and 183 accommodation users. The guidance launched in May 2025 and was downloaded 87 times by December 2025.

“Templates provide a consistent framework for assessing and improving dormitory conditions. This ensures that all farms are working towards the same standards outlined in the guide...” - **Farm manager**

“Everything we need is included, we just want to thank you for this initiative and also for the farm that provides us with all these accommodation conditions for free” - **Worker**

Given Morocco's increasing strategic importance, we joined a Steering Committee to champion running stakeholder events focused on critical human rights vulnerabilities and assessing appetite for an independent responsible sourcing hub in Morocco. Similar independent forums in Spain and Egypt have delivered substantial impact and provide a framework for successful collaboration. The events will be held in 2026 and developed in consultation with growers and worker representation.



Food Case Study 3

GENDER ACTION IN AGRICULTURE INITIATIVE (GAIA)

In 2025, along with 8 other retailers, Co-op provided funding for the [ETI GAIA Initiative](#) to develop a set of [principles](#) to enable aligned and coordinated action in commercial agriculture and fisheries. This funding facilitated the equitable participation of suppliers, NGOs and workers and their representatives in the process; with over 90 organisations from Kenyan tea and flower and South African citrus sectors and the business and human rights field represented.

The principles apply to all businesses with respect to the impacts their activities have on workers' rights and the risk of GBVH in their own operations and their supply chain. The principle outline is that responsibility should be shared with business partners and upheld at all levels of the supply chain. Just as the principles themselves, supporting tools and resources, actions and implementation should remain tripartite company-trade union-NGO collaboration.

In 2025, we have continued to engage in multi-stakeholder responses to address the root cause of sensitive issues identified in the supply chain. Looking ahead, we will use these principles to guide dialogue and joint-action to address the root causes of GBVH in commercial agriculture and fishery supply chains. In 2026, we are committed to working collaboratively with our suppliers to pilot the implementation of these principles in a minimum of 2 high-risk supply chains.

Food Case Study 4

MAKING PROGRESS IN COMPLEX SUPPLY CHAINS: SEAFOOD

Seafood remains a high-risk category for human rights concerns due to the complexity and global nature of supply chains, alongside systemic issues including unethical recruitment, forced labour, poor health and safety, limited worker voice and modern slavery risks. To strengthen our approach, we have updated our [Supplier Seafood Sourcing Standard](#). This reinforces robust due diligence and ethical practices at sea and sets clear expectations that suppliers uphold internationally recognised standards, including the [ILO Work in Fishing Convention \(C.188\)](#), ILO Core Labour Standards and relevant mandatory human rights due diligence legislation.

In 2025, we [announced our transition to 100% ASC certification](#) for all own-brand farmed seafood by 2027, building on our existing commitments. Recognising that the challenges in global seafood

cannot be addressed by individual companies alone, we actively participate in collaborative forums including the SEA Alliance, UK Nephrops Fisheries Improvement Programme (FIP), the ETI and FNET. These partnerships help build capacity and resilience across the sector while advocating for stronger protections for fishers (see Stakeholder Engagement table [here](#)).

To support sharing best practice, earlier in the year the [Responsible Recruitment Practices and EPP in the Global Tuna Processing Sector](#) report was published, co-funded by Co-op alongside industry partners, buyers and suppliers such as Greencore and Princes. The research examined migrant worker conditions across 5 countries, highlighted enforcement gaps and provided guidance on embedding ethical recruitment. It also underscored the role of industry

associations in driving coordinated action. Following the report's recommendations, these associations have begun implementing plans to strengthen responsible recruitment across supply networks.

We also provided financial support, along with industry partners, for a HRIA of the UK Nephrops industry, delivered by [SeaFish](#). The project includes stakeholder engagement, site visits and the development of action plans, with completion in 2026.

Looking ahead, in 2026 we will work with ETI and trade unions to support adoption of the [ILO Guidelines for Fair Labour Market Services for Migrant Fishers](#), a global non-binding standard promoting ethical recruitment and fair treatment of migrant fishers.



GRIEVANCES AND DEALING WITH MODERN SLAVERY CONCERNS

Providing channels for colleagues, workers and communities impacted by our business to raise issues is an essential part of human rights risk management.

Our [Grievance and Remedy policy](#) aligns with the UN Guiding Principles on Business and Human Rights and applies to our operations and supply chain. We recognise that people raising concerns is an indicator of effective grievance mechanisms and that effective investigation and remediation require a victim-centred, consultative and multi-stakeholder approach.

We are committed to supporting grievance channels that are confidential, equitable, accessible and trusted, ensuring people can voice concerns without fear of reprisal. These principles cultivate confidence that concerns will be handled safely and addressed meaningfully.

Our [Whistleblowing Policy](#) is delivered through the global [Speak Up service](#), enabling internal and supply chain stakeholders to confidentially and anonymously disclose ethical concerns, including modern slavery.

To better identify potential modern slavery or other labour rights violations, we draw on intelligence from multiple sources such as worker voice, suppliers and independent sources. In 2025, we maintained close collaboration with Unseen which flagged 6 concerns linked to our supply chains and the MSIN, which shared 18 pieces of intelligence with Co-op. See [here](#) for further details on these partnerships.

OUR OPERATIONS

Our Co-op colleagues can have their voice heard in many ways at our Co-op. Our annual Talkback survey invites all colleagues to have their say on a range of workplace topics, in confidence, to guide all managers to support their teams with making improvements. Our Colleague Voice network of colleagues from all our different businesses and functions, provides employee feedback on topical issues as well as being a key consultation forum for our subject matter expert teams and our Operating Board.

Following feedback and discussions with the trade union group, we have firmed up the grievance and appeals process around the role of the ER Investigator in these processes. Regular meetings are held in all parts of our businesses during the year, with colleague and trade union representatives to gather feedback and share information.

SUPPLY CHAIN ACTIVITY

Our Grievance and Remedy policy states “A grievance is a report by a worker or other third party of a violation of national or international laws, the [ETI Base Code](#) or [Co-op’s Sound Sourcing Code of Conduct](#) that has occurred in Co-op’s supply chain and has a direct adverse human rights impact”. We log all supply chain concerns that could amount to a grievance or a serious incident. We acknowledge our shared responsibility with suppliers to identify concerns and grievances relating to human rights

and recognise that collaborative approaches and engaging independent experts for case management and investigation represent best practice, guided by the [UK Food Supply Chain Incident Escalation and Management Protocol](#). We evaluate the severity of each claim and our connection and leverage to determine appropriate steps, typically investigating and engaging relevant stakeholders to understand the issue and its impact. Long-standing, trusted partnerships with suppliers are integral to our approach, encouraging transparent disclosure of the challenges they face and providing a supportive environment to resolve them.



We fund initiatives that continuously strengthen worker voice and establish effective grievance mechanisms in key sourcing countries.

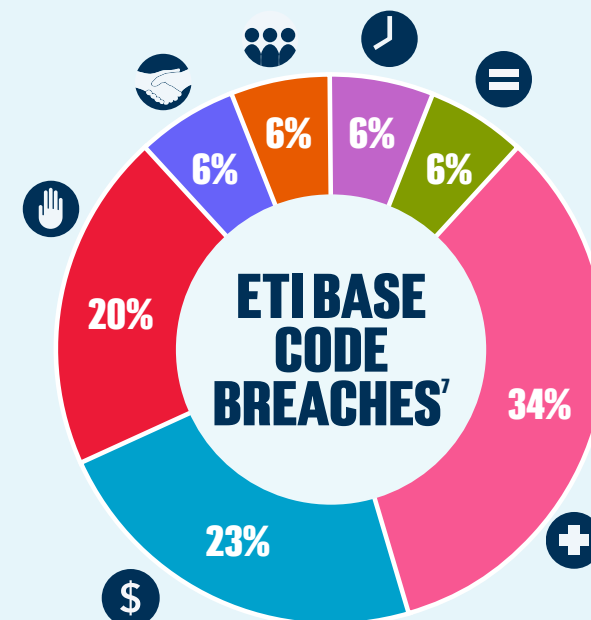
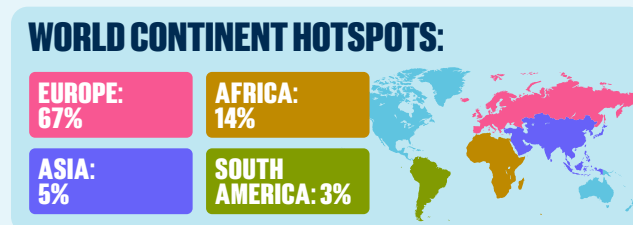
Our 2025 activity includes:

- **UK:** through the UK SWS Taskforce collaboration, we have rolled out an independent seasonal workers survey, provided ACAS training on grievance mechanisms to growers and co-developed a multilingual seasonal worker support line.
- **Spain:** we continue to support and monitor grievances raised through [Canal Foros](#). In 2025, 35 sites have fully implemented the grievance mechanism, and 7 sites are in progress. 69 grievances were lodged to Canal Foros, with 53 resolved and 16 under investigation.
- **South Africa:** we monitor grievances raised through SIZA's [Voice for All programme](#). In 2025, 9 grievances were lodged in our South African supply chain. 8 cases have been resolved in full, with satisfactory resolutions achieved for all parties involved. 1 case remains under investigation after which a remedial action plan will be proposed.
- **Italy:** we supported the [ETI's Grievance Mechanism in Agriculture project](#) (funded by the UK Government's Modern Slavery Innovation Fund III), which has now concluded. Here, Co-op and others piloted ways to expand access to grievance mechanisms for vulnerable workers in targeted agricultural supply chains in Italy and Spain. This led to improved information sharing on recruitment and mitigating worker risks by creating a modern slavery prevention network across West and North Africa.

See [here](#) for more information about our work with these partners.

SUMMARY OF ALLEGATIONS RAISED IN OUR OPERATIONS AND SUPPLY CHAINS

The following information provides an overview and examples of incidents, concerns or allegations of modern slavery indicators or serious incidents that we have responded to in 2025.



⁷ Percentages are rounded to the nearest full percentage.




THE ETI BASE CODE

- Employment is freely chosen
- No harsh or inhumane treatment is allowed
- Working conditions are safe and hygienic
- Child labour shall not be used
- Freedom of association and the right to collective bargaining are respected
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided

EXAMPLES OF HOW WE MANAGED ALLEGATIONS RAISED IN OUR OPERATIONS AND SUPPLY CHAINS






The following information provides an overview of incidents, concerns or allegations indicating potential modern slavery or other serious issues identified through non-audit channels in 2025, together with details of how we responded to these reports and the actions taken to remedy harm where identified. No modern slavery or labour exploitation concerns or allegations linked to our GNFR or Life Services business units were reported in 2025.






Cases raised to Co-op that are not summarised below did not amount to serious incidents or modern slavery indicators or are in a sensitive stage of investigation and will be shared in our next statement. These cases were still treated as part of our concern and allegation management processes, where they were investigated and addressed through agreed remediation plans. All cases are reflected in our summary figures.

BUSINESS UNIT	SOURCE CHANNEL	LOCATION	ETIBASE CODE	SUMMARY	STATUS ^{8,9}
1. Food	Whistleblower	UK		<p>Context: An Unseen helpline report was received regarding concerns about working hours, general treatment and health and safety affecting migrant fishers aboard 2 vessels operating in UK waters.</p> <p>Response: Collaborative approach taken with other retailers. 1 retailer had identified no issues on a recent vessel visit. The supplier was provided with a summary of concerns and confirmed that the concerns had been reported to Border Force, who subsequently passed the information to the Maritime and Coastguard Agency (MCA). The MCA conducted a visit and interviewed crew members aboard 1 of the vessels.</p> <p>Outcome: The MCA found no concerns with employment of crew or their conditions. The allegations were unsubstantiated.</p>	Allegation unsubstantiated No remedy required based on the investigation's findings
2. Food	Civil Society & Trade Union	Peru		<p>Context: Worker fatality on a fruit farm and subsequent strikes by 100-150 workers citing human rights abuses.</p> <p>Response: Collaborative meeting between Co-op, direct supplier and grower to discuss root causes and developments.</p> <p>Outcome: Cause remains under independent investigation with health and safety recommendations pending. A crisis committee was established to provide ongoing support to the bereaved family. Safety precautions have been reinforced with verification checks. Disciplinary measures were adopted where appropriate. Strike action was resolved through agreement between site management and union representatives.</p>	Investigation ongoing Remedy partially implemented
3. Food	Supplier	UK		<p>Context: A strategic supplier notified Co-op of poor employment practices identified during their acquisition of another Co-op supplier that had fallen into administration. It was discovered that 53 workers had not been paid for time worked during their final month.</p> <p>Response: Our strategic supplier transferred workers to their business following correct legal processes and ensured all outstanding payments were made to the affected workers as soon as they became aware of the non-payment.</p> <p>Outcome: Workers were paid for all hours worked.</p>	Allegations substantiated Remedy implemented

⁸ Allegation status shown as: 1) substantiated - allegations were found to be true 2) partially substantiated - part of the allegations were found to be true and other parts were not 3) unsubstantiated - none of the allegations were found to be true 4) investigation ongoing - allegations have not been fully investigated at the time of publication.

⁹ On the basis of investigative recommendations and stakeholder consultation, we use the following criteria for remedy in our Food supply chains: 1) remedy agreed - remedy has been agreed by stakeholders and will be implemented 2) remedy implemented - remedy has been provided 3) remedy partially implemented - remedy has been partially provided as investigations have not concluded at this time 4) continuous improvement - where an allegation has not been substantiated but improvements have been made to management systems based on the findings of the investigation 5) no remedy required based on the findings of investigation.

BUSINESS UNIT	SOURCE CHANNEL	LOCATION	ETIBASE CODE	SUMMARY	STATUS
4. Food	Supplier	Zimbabwe		<p>Context: Worker fatality on a fruit farm caused by falling from employer-provided transport when the vehicle started its journey.</p> <p>Response: The supplier established a crisis committee to provide duty of care and review transport provisions. An independent SMETA was commissioned with transport provisions included in scope.</p> <p>Outcome: The audit raised no transport-related non-compliances. Managers were equipped to provide psychosocial support to colleagues, as professional counselling is unavailable in the remote location. Family support exceeded the Collective Bargaining Agreement, including payment of school fees for the deceased's children. Transport safety improvements included an updated transport policy, increased driver safety responsibilities, and employment of a transport supervisor.</p>	Allegation substantiated Remedy implemented
5. Food	Supplier	UK		<p>Context: Unannounced Gangmasters and Labour Abuse Authority (GLAA) document review took place on a fruit farm due to anonymous complaints raised in 2024 and 2025. Allegations included a case of unacceptable supervisor behaviour and underpayment.</p> <p>Response: Our direct supplier carried out on-site worker interviews to ensure robust due diligence.</p> <p>Outcome: Overall, allegations were unsubstantiated and workers felt valued and able to raise concerns to management. Workers reported that their mobile phone settings affected access to site notifications, which the grower resolved.</p>	Allegation unsubstantiated No remedy required based on the investigation's findings
6. Food	Civil Society & Trade Union	UK		<p>Context: Allegations at a fruit farm including supervisor manipulation of workers' pick rates and working hours, unfair payment deductions for accommodation, and employment transfers when workers raised complaints.</p> <p>Response: The direct supplier coordinated a response to multiple customers by commissioning an independent investigation with site management to liaise with claimants and assess site processes and worker experience.</p> <p>Outcome: Claims were unsubstantiated. The site has robust management systems in place. As part of continuous improvement, the site has provided greater detail on their grievance procedure, labour agencies have improved worker communications, and the site is minimising the use of short-term contracts.</p>	Allegations unsubstantiated Continuous improvements
7. Food	Supplier	Mexico		<p>Context: 16 workers and 2 drivers were involved in an accident involving employer-provided transport when travelling to the farming region, resulting in 5 fatalities.</p> <p>Response: The incident was subject to an official investigation, which concluded the accident was caused by the driver not taking due care and attention. The supplier's policies and training were reviewed. No legal fault was found.</p> <p>Outcome: The grower supported the victims and their families, paying funeral expenses and medical expenses not covered by medical centres. Risk assessment communications were improved to increase worker and contractor understanding. Additionally, the grower has delivered improved driver awareness training and reinforced the importance of taking breaks while driving.</p>	Allegation substantiated Remedy implemented
8. Food	Civil Society & Trade Union	Mauritius		<p>Context: ETI received concerns regarding undeclared deductions from wages, wages for migrant workers differing from those promised by in-country recruitment agents, and employer provided meals were insufficiently varied or nutritious at a seafood site.</p> <p>Response: Collaboratively agreed that our direct supplier's local HR team at the site would conduct an investigation.</p> <p>Outcome: Recruitment concerns were unsubstantiated, but some workers were unaware of the wage reduction policy for unauthorised leave. The supplier improved the policy communication process and has agreed to redesign payslips in 2026 for clearer communication. The supplier demonstrated that employer provided meals included fresh produce and proteins ranges and has a feedback procedure for catering. The investigation outcome was relayed to the whistleblower.</p>	Allegation unsubstantiated Continuous improvement

BUSINESS UNIT	SOURCE CHANNEL	LOCATION	ETIBASE CODE	SUMMARY	STATUS
9. Food	Whistleblower	UK		<p>Context: Multiple concerns raised about seasonal workers at a vegetable supplier, including forced acceptance of contract changes, poor accommodation and wage discrepancies.</p> <p>Response: Unseen escalated the case to the GLAA, after which the supplier was contacted with anonymised concerns. In response, the supplier commissioned an independent investigation.</p> <p>Outcome: The investigation partially substantiated accommodation and historical payroll issues, which had been managed by a former labour agency. Our supplier had contracted a new labour agency prior to the investigation which had strengthened worker management processes. A debrief meeting with the supplier agreed further due diligence actions.</p>	Allegation partially substantiated Remedy implemented
10. Food	Supplier	Spain		<p>Context: Worker fatality involving machinery at a fruit packhouse.</p> <p>Response: The site facilitated a legal investigation, commissioned an independent health and safety investigation, and provided duty of care to the family and colleagues.</p> <p>Outcome: The site offered financial and emotional support to the family. Investigations found that the worker was not following safety procedures and that there were opportunities for health and safety improvements, including colleague training, new personal protective equipment for staff, additional emergency stop buttons and guards for moving machinery.</p>	Allegation partially substantiated Remedy implemented
11. Food	Whistleblower	UK		<p>Context: Anonymous concerns via the Unseen helpline cited poor accommodation standards and overcrowding at a flower farm's accommodation.</p> <p>Response: Unseen shared a summary of concerns to customers and escalated the matter to the police due to welfare concerns. The police visited the site, advised that the claims were untrue and closed the case. Unseen convened customers, their direct suppliers and the flower farm to discuss the accommodation provisions and the due diligence checks in place.</p> <p>Outcome: All parties were satisfied with law enforcement's due diligence and the farm's ongoing accommodation due diligence. A subsequent customer visit to the site confirmed adequate accommodation standards.</p>	Allegation unsubstantiated No remedy required based on the investigation's findings
12. Food	Supplier	Asia		<p>Context: In 2024, worker interviews identified several indicators of forced labour within our seafood supply chain, including recruitment fees, document retention and excessive working hours.</p> <p>Response: A collaborative working group formed as the affected supplier supplies multiple UK food companies. An action plan was formulated and agreed by the supplier as well as additional actions such as hiring a third party to verify recruitment fees.</p> <p>Outcome: Allegations were substantiated and a remediation plan was developed and is closely monitored by the working group. Passport retention has ceased and the supplier is working to reduce working hours. The working group are aligning with international frameworks to determine an equitable approach to recruitment fee reimbursement and prevention.</p>	Allegation substantiated Remedy partially implemented
13. Food	Supplier	Peru		<p>Context: A motorcyclist carrying 2 passengers collided with a worker transport bus when attempting to overtake in a crossing area, resulting in 1 civilian fatality.</p> <p>Response: None of the workers were harmed. The site reviewed transport safety requirements. Law enforcement investigation is ongoing.</p> <p>Outcome: The site has offered emotional support to workers who witnessed the accident. The site is working with all its transport providers to increase road safety training and reinforce the need for adequate insurance. The site has also increased periodic route reviews.</p>	Investigation ongoing Remedy partially implemented

REMEDY

Our approach to remedy in our supply chains is outlined in our [Grievance and Remedy policy](#). When a partial or fully substantiated human rights issue is identified which requires remedy, our approach focuses on ensuring the safety and fair treatment of individuals as a priority. The remedy we provide may include:

- Restitution (restoring a victim to their original situation before abuses occurred)
- Compensation (financial or otherwise)
- Rehabilitation (medical, physiological or psychological)
- Satisfaction and guarantee of non-repetition (including changes to systems, processes and practices to prevent similar adverse impacts in the future)

We include relevant government and/or civil society backed support as required and remedy is monitored, for example by third parties, and includes feedback from victims where we have established contact.

Where we have not caused or contributed to severe human rights abuses, we will play a role in convening responsible stakeholders to investigate and provide remedy to victims.

We have highlighted 3 projects which show how we take a long-term approach to remedying issues and addressing the root causes of systemic issues in our own operations and our supply chains.

Food Case Study 5

ONGOING WORK: BANANAS AND LIVING WAGES

Since 1998, we've championed living wages across our global supply chain through the ETI Base Code to help workers afford basic needs.

We were the [first UK retailer to sell Fairtrade bananas](#) in 2000 and by 2012 all our bananas were Fairtrade, helping reduce the living wage gap through the Fairtrade premium and base wage.

In March 2023, supported by [The Sustainable Trade Initiative](#) (IDH) and alongside 8 other UK retailers, we signed up to [UK Retail Commitment on living wages in the banana sector](#), pledging to ensure workers receive a living wage and to develop an approach to working on living income for small scale banana farmers by the end of 2027.



To meet this commitment, we've partnered with IDH, our supplier Fyffes and Fairtrade to collect wage data from our supply chains, understand what the living wage gap is within our supply chains and begin discussions on voluntary contributions (VCs) to close living wage gaps in our banana supply chain. In addition, we have supported the verification of salary matrices and participated in international consultations on implementation of VCs.

In the third year of reporting, we collected the following data about our supply chains:

- 47% of our bananas are sourced from Hired Labour Organisations (HLOs), aligning with our policy to source 50% or more from smallholders.
- 54 salary matrices were submitted, covering 99% of the volume purchased from HLO farms.
- Salary matrix data covers 7,726 employees (6,476 males, 1,250 females) across sourcing countries: Colombia, Côte d'Ivoire, Dominican Republic and Ghana.
- 61% earn below the living wage.

In 2026, we will continue to work with IDH, Fyffes and Fairtrade to work on a proposal on how we can meet this commitment by 2027.

Our long-term aim is for workers to earn living wages through social dialogue and improved purchasing practices. In 2025, we joined other retailers in a 2-year project with [Banana Link](#) in Ghana and Cameroon to secure living wages through social dialogue. In 2026, we will evaluate our purchasing practices via the ETI and share findings about how commercial behaviours impact farmers with participating retailers.

Food Case Study 6

ONGOING WORK: ETI TÜRKIYE FLOWERS PROJECT PHASE 3

Since 2023, we have supported 3 phases of a collaborative project managed by the ETI to reduce child labour risks and promote family-friendly, child-safe practices with 3 flower growers in Türkiye. In 2025, we continued supporting the programme to build a more comprehensive approach to identifying and managing risks.

Phase 3 focuses on several key activities: maintaining safe practices and providing additional support where needed; expanding the programme to 3 more flower farms; and addressing a broader range of risks beyond child labour. It began with site visits conducted by direct suppliers, Ethica and [The Centre for Child Rights and Business](#). Initial assessments were positive, with some tools strengthened and additional training provided based on early feedback. Assessments and training on the newly added farms are underway. To date, 17 managers and 82 workers have been engaged to support programme outcomes in this phase.

When evaluating wider risks, it was found that farms in Isparta had reduced management oversight due to their distance from head offices in Antalya. To mitigate this, tailored risk-based action plans will be introduced. Each farm demonstrated its own best practices, including summer schools and family-oriented worker accommodation.

We value the transparency demonstrated by all stakeholders and recognise that meaningful, sustainable progress requires continued investment and engagement. Additional assessments, capacity-building efforts and activities designed to capture workers' voices will continue. A full evaluation of the programme is scheduled in 2026.

BRIGHT FUTURE – REMEDY FOR SURVIVORS OF MODERN SLAVERY

[Bright Future](#) began as a partnership between [Causeway](#) (formerly known as City Hearts) and Co-op. Since then, it has transformed lives by supporting survivors of modern slavery into safe, meaningful employment. Following Bright Future's move to become an independent co-operative in 2020, work has continued to establish robust governance and procedures. They have an established Board of Directors and hold several events for members including an annual general meeting. Bright Future launched in Scotland, extending its national reach and creating new employer partnerships and referrer engagement.

By the end of 2025, Bright Future 'partners' numbered 41 (15 businesses and 26 referrers). Major new business members are Sodexo, DPS and Premier Foods, signalling the strongest employer growth in the co-operative's history. Bright Future now offer placements across many sectors including warehousing, manufacturing, retail and cleaning.

To date, 95 candidates have completed a 4-week work placement, and 75 candidates have accepted a safe and stable contract.

On 30 June 2025, Bright Future marked its 5-year anniversary as a co-operative with a reception in Parliament, held during the UN International Year of Co-operatives. The event was supported by Jess Philips MP, Parliamentary Under-Secretary of State for Safeguarding, who supported a call for more employers to offer job opportunities to survivors of modern slavery. At the event, a survivor of modern slavery who was supported by Bright Future to secure a placement said: *"...I always wanted to work in childcare, but I didn't know how to access jobs like this or where to even begin. Bright Future Co-operative and the nursery gave me the chance I'd been hoping for..."*

In 2025, Bright Future won [Unseen's Business Impact Award](#) in recognition of 'a powerful business initiative that is not only impressive, but genuinely life-changing for vulnerable workers'.



STAKEHOLDER ENGAGEMENT

The table below summarises the collaborative initiatives which we are involved in across multiple business units. These collaborations provide opportunities for us to work with a range of stakeholders including suppliers, trade unions, NGOs and governments to support us to identify, manage and prevent risks as well as to remediate systemic issues identified which we could not resolve on our own.

INITIATIVE	CO-OP'S ROLE & BUSINESS UNITS INVOLVED	2025 KEY ACTIVITY & OUTCOMES
EcoVadis UK, National	GNFR, Funeralcare We partner with EcoVadis to strengthen our commitment to ethical sourcing, sustainability and supply chain transparency. The platform enables us to engage suppliers effectively, identify and mitigate risks, drive continuous improvement and maintain accountability throughout our supply chains.	<ul style="list-style-type: none"> • Our Chief Procurement Officer presented with EcoVadis at the Chartered Institute of Procurement & Supply (CIPS) Futures Conference in the cost vs sustainability session and our Responsible Sourcing Manager and Head of Procurement Strategy, Planning and Supplier Engagement represented Co-op at the EcoVadis World Tour 2025 • We delivered an EcoVadis Supplier Engagement session in January (see here) • EcoVadis led the sustainability breakout session at our GNFR Supplier Conference and were part of the judging panel for our Sustainability Supplier Award
Egyptian Suppliers Ethical Trade Forum (ESET) Egypt, National	Food ESET Forum members are committed to improving working conditions in Egypt. We were pivotal in creating the Forum in 2010 and continue to promote and support it. The forum focuses on projects to strengthen supply chain collaboration and build Egyptian supplier capacity, with a focus on responsible recruitment of seasonal workers, young workers and gender.	Through Co-op's ongoing sponsorship of the ESET Forum, we have supported: <ul style="list-style-type: none"> • Creation of a 6-member Steering Committee which meets regularly to support the governance and development of the Forum. This year, it has established a membership fee structure and has driven strategic projects to support supply chain collaboration and capacity building of Egyptian suppliers • 3 events covered topics such as social insurance, labour supply, living wages and practical implementation tools, with speakers from government, supplier and specialist organisations. Notably, 76 attendees from Egypt, UK and Türkiye attended an international meeting to mark the Forum's 15th anniversary (see here) • Projects in development include: an assessment of Forum activities and future direction, development of child labour prevention and remediation procedures tailored to the Egyptian context, and creating an app to support responsible recruitment and worker training at Egyptian supplier sites
Ethical Trade Initiative (ETI) UK, Global	Food We are a founding member of ETI, an alliance of companies, trade unions and voluntary organisations working to improve the lives of workers globally who produce consumer goods. We actively participate in ETI working groups to address systemic issues.	<ul style="list-style-type: none"> • Participating in the Just Transition working group, which produced resources on flooding impacts on workers and communities, and contributed to ETI's London Climate Action Week event on just transition in food • Co-sponsored the GMA project, which piloted ways to expand grievance mechanism access for vulnerable workers in Italian and Spanish agricultural supply chains (see here) • We co-sponsored the GAIA Initiative, developing principles launched in November to enable aligned action in agriculture and fisheries (see here) • Türkiye Flowers - We funded the third phase of this project, addressing child labour and young worker risks in horticulture (see here)

INITIATIVE	CO-OP'S ROLE & BUSINESS UNITS INVOLVED	2025 KEY ACTIVITY & OUTCOMES
<p>Food Network for Ethical Trade (FNET) UK, National</p>	<p>Food, GNFR FNET is a member-led initiative which is committed to improving the lives and livelihoods of workers in food supply chains. FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions. Through its collaborative work, FNET aims to improve labour conditions in agriculture and food processing, both in the UK and internationally, by setting industry-wide expectations and ensuring they are communicated and supported throughout supply chains. Our Senior Human Rights Manager is a Member Director on the FNET Board.</p>	<ul style="list-style-type: none"> • We attended fortnightly FNET calls, where members shared insights on emerging human rights and ethical trade risks, and engaging with sector experts. We also attended training webinars on salient risks across key commodities and GNFR sectors • We joined 18+ working group meetings to develop practical tools on recruitment fees, worker representation, employee engagement, remediation, heat stress and integrating lived experience into risk identification • Participated in stakeholder calls on SMETA requirements and continued involvement in the retailer alignment group to reduce duplication and strengthen human rights due diligence
<p>Fairtrade Foundation UK, Global</p>	<p>Food We have supported Fairtrade for more than 30 years and are a major UK retailer of Fairtrade goods.</p>	<p>Aligned with our commitment to Fairtrade and collaborative approaches to tackling modern slavery, we engage in programmes with the Fairtrade Foundation and other partners to mitigate modern slavery risks and drive continuous improvement in labour practices, including:</p> <ul style="list-style-type: none"> • Consulted on the Tea Transformation Strategy, contributing insights on supply chain risks, labour rights challenges and opportunities to strengthen worker protections in tea-producing regions • Continued our long-standing partnership with Fairtrade Africa's Women's School of Leadership (WSOL) in cocoa, training female farmers in Ghana and Côte d'Ivoire on leadership, confidence and business skills to improve livelihoods and access to co-operative leadership roles • With The Latin American and Caribbean Network of Fair Trade Small Producers and Workers (CLAC), Fairtrade Foundation and supplier ICAM, replicated the successful banana PIP in cocoa in Peru. This 2-year programme, which started in September 2025, aims to support over 1,100 cocoa producers to increase resilience and livelihoods • Supported the UK Banana Retailer commitment on living wage and living income through stakeholder engagement and developing solutions to bridge living wage gaps
<p>Greater Manchester Modern Slavery Business Network UK, Greater Manchester</p>	<p>Pan-Co-op Co-op helped re-launch the Greater Manchester Modern Slavery Business Network in 2025, enabling businesses based in or connected to Greater Manchester to collaborate on tackling modern slavery. We provide strategic input alongside Stronger Together, The Growth Company, Greater Manchester Combined Authority, University of Manchester and Causeway.</p>	<ul style="list-style-type: none"> • Played an active role in supporting the Network's relaunch. Co-op also hosted the second meeting consulting members on the Network's future direction and key impact indicators. See here for further details • As a member of the Steering Committee, provided input into a seed funding proposal that has been submitted to support future development of the Network
<p>Modern Slavery Intelligence Network (MSIN) UK, National</p>	<p>Food MSIN is a pioneering non-profit collaboration in the UK food sector, created in 2020 following Operation Fort (the UK's largest modern slavery investigation) to share intelligence, understand modern slavery trends and disrupt traffickers.</p>	<p>Through Co-op's sponsorship of MSIN we have supported:</p> <ul style="list-style-type: none"> • Its work with its NGO partner Stop the Traffick to increase intelligence reporting accessibility, and supported the development of shared intelligence. In total, 18 actionable pieces of intelligence (not related to Co-op's supply chains) were shared with members • MSIN organised its third annual conference with a keynote speech from Sarah Champion MP with over 190 people in attendance

INITIATIVE	CO-OP'S ROLE & BUSINESS UNITS INVOLVED	2025 KEY ACTIVITY & OUTCOMES
<p>The Sustainable Trade Initiative (IDH) UK, Global</p>	<p>Food We are a member of the UK Retailer Commitment on Living Wage in Banana Supply Chains, collaborating with IDH, Fairtrade and other retailers to achieve living wages for all hired workers in our banana supply chains.</p>	<ul style="list-style-type: none"> Continued to participate in UK retailer meetings to provide updates and track progress toward the UK Retailer Commitment on Living Wages in Banana Supply Chains Supported several initiatives advancing living wages, including contributing to the ETI Purchasing Practices study, engaging in a collective bargaining project in West Africa led by Banana Link, and conducting in-depth analysis of salary matrix data with attention to gender dynamics Through the Better Together initiative, we worked with European retailers to align on VC mechanisms. To support this, IDH, Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and Sustainable Agriculture Supply Chains Initiative (SASI) published Alignment on the Implementation of Voluntary Contribution Payments, based on stakeholder feedback, outlining best practices for using VCs to help close living wage gaps in the banana sector
<p>Seafood Ethics Action Alliance (SEA Alliance) UK, Global</p>	<p>Food We are an active member of SEA Alliance, working to strengthen human rights due diligence in global seafood supply chains.</p>	<ul style="list-style-type: none"> Attended SEA Alliance meetings and contributed to several working groups, including the newly formed Responsible Recruitment Working Group Supported a funding application for the UK Action Plan and provided input to strengthen its content Participated in ad hoc groups responding to issues and exposés in global seafood supply chains SEA Alliance hosted a workshop at Seafood Expo Global, co-launching a study into responsible recruitment practices and the EPP in the global tuna processing sector, see here
<p>Sedex UK, Global</p>	<p>Food, GNFR We use the Sedex platform (now ISO 27001, ISO 27701 and Sustainable Supply Chain Initiative certified) to manage our ethical trade monitoring programmes. Sedex is a data-led platform with assessment tools and professional services to support businesses to drive sustainable practices in global supply chains.</p>	<ul style="list-style-type: none"> Attended Sedex-delivered webinars and training sessions on the rollout of SMETA 7.1 Participated in stakeholder engagement on proposed updates to the SMETA programme, including audit types and audit validity. A second consultation launched at the end of 2025 focused on CARs and updated issue titles, with final recommendations expected in 2026 We have received ongoing support for Co-op's monitoring programme, including data analysis and insights to strengthen ethical trade oversight and supplier engagement Engaged with Sedex on the launch of its new FLI Tool, reviewing indicator reports and analysing trends to improve early identification and management of forced-labour risks across our supply base (see here) Took part in the Sedex Xchange event, contributing to shared learning and wider stakeholder dialogue
<p>Seasonal Worker Scheme Taskforce (SWS) UK, National</p>	<p>Food Established in 2023, the SWS Taskforce brings together retailers, growers, recruiters, industry bodies, non-profits and governments in its mission of 'working collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK SWS and wider UK horticulture'. Stronger Together co-ordinates the taskforce as Secretariat, governed by a multi-stakeholder Governance Committee on which Co-op is 1 of 3 retailer representatives. We are also a founding member.</p>	<p>Through Co-op's sponsorship of the SWS Taskforce we have supported the following activities:</p> <ul style="list-style-type: none"> Provision of advice and guidance to workers navigating the scheme through the Just Good Work app, reaching 45,000 potential workers and SWS visa holders. 19,000 of these users were new to the app With specialist organisations, developed and delivered a range of pre-season regional roadshows and in-season webinars and free resources for UK agriculture stakeholders Independent in-season worker survey providing live, grower-level and scheme-wide insights and trends to inform work prioritisation, reaching 4,438 workers during the season Co-funding with Defra a feasibility study on the EPP and holding multi-stakeholder roundtables to discuss next steps to mitigate financial risks to seasonal workers Responsible Recruitment Progress Assessments (RRPA) delivered to 4 scheme operators to identify performance levels and improvement areas Developing a multilingual seasonal worker support line, to be launched in 2026 For full details of 2025 activities and 2026 priorities see here

INITIATIVE	CO-OP'S ROLE & BUSINESS UNITS INVOLVED	2025 KEY ACTIVITY & OUTCOMES
<p>Spain Ethical Trade Forums (ETF) (Foros Comercio Ético) Spain, National</p>	<p>Food</p> <p>We played a key role in creating the Spain ETF in 2012 and ensuring its evolution to the current industry-run structure.</p>	<p>Through Co-op's ongoing sponsorship of ETF we have supported:</p> <ul style="list-style-type: none"> • 5 member meetings, including an international meeting in Murcia in June celebrating the Forum's 10-year anniversary which Co-op co-sponsored (see here) • Working group activity ongoing, including 6 online seminars on human rights and environmental topics and sector workshops on social dialogue, housing and working conditions, health and safety, environmental sustainability and human rights due diligence • Presentations at external events including the World Forum for Local Economic Development in Seville and a side event organised by GIZ GmbH, International Organization for Migration (IOM), and AIM Progress during the UN Forum on Business and Human Rights in Geneva. Fruit Attraction trade stand to promote the Forum and support members • Continued development and roll-out of App Foros, a free mobile app providing agriculture workers with information on labour law, rights and local working conditions. There were 433 users in 2025 • Canal Foros grievance mechanism expansion, with fully implemented programmes at 35 sites and with 9 sites going through the implementation process. 53 grievances have been resolved and 16 in progress • First edition of the ETF Awards, recognising 3 local producers with best practices
<p>Stronger Together (Covering Consumer Goods and South Africa) UK, National South Africa, National</p>	<p>Food, People, GNFR, Funeralcare</p> <p>We are a founding sponsor of Stronger Together's Consumer Goods Programme, a sector-specific multi-stakeholder initiative empowering businesses in the UK and Ireland to tackle forced labour and promote responsible recruitment.</p> <p>We also sponsor the forced labour and responsible recruitment workstreams, which provide Co-op and its suppliers access to free training, workshops and resources to embed responsible practices and combat labour exploitation in operations and supply chains.</p> <p>In 2025, we joined and co-sponsored the South African programme.</p>	<ul style="list-style-type: none"> • In 2025, we joined and co-sponsored the South African programme, helping in-country agri-food stakeholders to mitigate labour exploitation and embed responsible recruitment in their operations and downstream supply chains, see here for further details • During Anti-Slavery Week 2025, Co-op hosted the Stronger Together Modern Slavery Champions Event see here for further details. Stronger Together also took part in our GNFR Supplier Conference see here for further details
<p>Sustainable Initiative of South Africa (SIZA) South Africa, National</p>	<p>Food</p> <p>We are a member of SIZA, which supports agricultural stakeholders to improve ethical and environmentally sustainable trade practices. The SIZA platform gives us direct access to site data and audits, enabling us to create bespoke reports to analyse activity and trends. SIZA also runs the Voice for All programme, which provides an independent grievance mechanism as well as resources and training on workers' rights and grievance management.</p>	<ul style="list-style-type: none"> • We became a member of the SIZA platform • 703 sites linked to Co-op have registered for the social SIZA standard. 90% of these sites have valid social audits. 4,477 findings were raised in valid social audits, of which 96% have been resolved. The remaining non-compliances are in progress: 50% relate to health and safety and 25% to wages, benefits and contracts • 9 grievances were lodged with the Voice for All programme on farms and packhouses supplying Co-op. 8 cases have been fully resolved with satisfactory outcomes for all parties. 1 case remains under investigation, after which a remedial action plan will be proposed
<p>Unseen UK, National</p>	<p>Food</p> <p>Unseen is a UK charity providing safe houses and support in the community for survivors of trafficking and modern slavery.</p> <p>We are a member of Unseen's Helpline Business Portal, giving us access to redacted information reported to the Helpline when it concerns our own operations or supply chains. Unseen then supports Co-op with facilitating next steps including collaboration with other stakeholders, investigating concerns and identifying areas requiring action. Co-op also has exclusive access to Unseen's Business Services and Member Resource hubs.</p>	<ul style="list-style-type: none"> • Unseen shared 26 cases with us, of which 6 were linked to our supply chains which were appropriately investigated and resolved • We attended 17 collaborative calls facilitated by Unseen to collectively determine appropriate responses to these cases • Unseen delivered a Modern Slavery Spotlight session to 47 procurement colleagues and engaged with colleagues and suppliers at our GNFR Conference (see here) • At Unseen's annual Business Awards, our Senior Human Rights & Ethical Trade Manager was shortlisted for the Individual Impact Award, which honours individuals who have spearheaded efforts to combat modern slavery within their organisation or the wider sector

TRAINING AND AWARENESS RAISING

Raising awareness amongst both our colleagues and our supply chains is a critical part of how we aim to prevent modern slavery and other labour exploitation risks. Our engagement varies from newsletters and online resources to in-person events and online training, depending on the nature of the risk and the nature of the supply base. We aim to build trust and openness and promote proactive management of human rights risks and remediation of any identified harms.

COLLEAGUE ENGAGEMENT

Our internal training programmes cover modern slavery awareness e-learning, along with bespoke training for supplier-facing teams, events and specialist training opportunities.

In 2025, our modern slavery e-learning became mandatory for all Support Centre colleagues, equipping them to understand modern slavery, identify risks in our operations and supply chains and uphold ethical standards. 1,799 colleagues completed the training compared to 720 colleagues in 2024, achieving a 96% completion rate that demonstrates strong engagement and alignment with our responsible sourcing values. 88% of colleagues said the module improved their understanding of the subject area and 94% are confident they can apply what they learned. The

training module is also available to colleagues across the wider business through our Learning and Development system.

We have provided enhanced training to colleagues who have increased responsibility for managing modern slavery risks. 16 colleagues across our Co-op received 97 hours of training through attending Stronger Together training workshops on human rights due diligence frameworks, tackling modern slavery and responsible recruitment. Our Food human rights team completed the SA8000 Lead Auditor course as well as ETI's Human Rights Fundamental course to build a comprehensive skill sets in these dedicated roles.

BUSINESS-UNIT TRAINING & AWARENESS

Food: Throughout 2025, 59 supplier-facing colleagues attended an Introduction to Ethical Trade session as part of their mandatory onboarding programme or as a refresher. These sessions empower our Food colleagues to embed ethical decision making into daily work across our business.

Our technical team colleagues received dedicated role-specific ethical trade and human rights training as they carry out regular sourcing visits and have strong relationships with our suppliers. The half-day session furthered their understanding of our ethical trade strategy and human rights trends, and upskilled them to enact their responsibility of

supporting our supply chain to adhere to our ethical standards. Here, we also introduced our updated Technical Guide to Ethical Trade.

GNFR: In 2025, we delivered 2 hours of training to over 60 internal attendees made up of colleagues who manage GNFR suppliers. We maintain a dedicated Ethical Trade and Human Rights SharePoint site within our Procurement Hub, providing category teams with guidance, tools and resources. Our GNFR Quarterly Ethical Trade Newsletter is shared with the GNFR Procurement team and the Human Rights Working Group, highlighting news and developments to raise awareness and support identification of ethical risks.

We also delivered an Ethical Trade Refresher via the Procurement Huddle, updating colleagues on the GNFR Ethical Trade Programme and its alignment with international frameworks and legislation. 70 colleagues also attended our GNFR Supplier Management Spotlight Session - see case study box [here](#).

Logistics: We established a partnership between the central team and Logistics Risk and Compliance to refresh modern slavery awareness posters with QR code-linked videos for improved accessibility. Corporate-branded posters were distributed to all depots and VMUs and installed in key colleague areas to reinforce visibility and reporting routes. 100% of depots and VMUs received posters and supporting materials.

We featured modern slavery in Risk Awareness Week in December 2025, a network-wide campaign highlighting key risk themes across depots, designed to raise understanding and engagement. Over 100 colleagues engaged in awareness discussions or audit interviews. We conducted an audit to measure depot colleague understanding of modern slavery indicators and reporting confidence, informing targeted training.

The central team and Logistics developed a 15-minute certified modern slavery awareness session which will be added to the annual DCPC course, scheduled to reach all our Co-op drivers in the first half of 2026.

Property: We communicated human rights and modern slavery risks in Property to all colleagues through regular team meetings to raise awareness of key indicators of modern slavery and human rights issues and to ensure that colleagues know to prioritise reporting issues in this area. A Property colleague has completed Stronger Together training on “Labour supply chain due diligence and partnership” and “Investigative interviewing skills in the workplace”, with the aim to continue to build knowledge and better understanding in this area and support improved responses to any issues raised.

Funeralcare: In 2025, the team carried out several internal training sessions with other GFR buyers, aimed at upskilling them on changes to supplier management and due diligence requirements. Restructuring of the business and staff turnover has created challenges with measuring the impact of training. Our aim for the short term will be to upskill the new buyer to an appropriate knowledge level and to involve our buying assistant more in ethical sourcing requirements so that we don't lose traction on the work that has been achieved since 2023 across all GFR categories and continue to improve where possible.

Training Case Study 1

PAN-CO-OP ACTIVITIES DURING ANTI-SLAVERY WEEK

During Anti-Slavery Week 2025 (13-18 October), we delivered a range of activities for colleagues and suppliers under the theme of #WeAllHaveARoleToPlay, focusing on eradicating modern slavery, human trafficking and exploitation.

Colleague outreach: We communicated via Central News and Viva Engage for Pan-Co-op engagement, alongside business unit-specific sessions that were promoted through weekly updates in the run up to the event. The focus was on internal resources to promote key exploitation indicators and escalation channels and to risk assess situations through learning modules, posters and events.

Leadership video messages: We circulated videos from senior leaders including:

- **Managing Director of Co-op Funeralcare:** Delivered a strong message on why Anti-Slavery Week matters to us and the wider community, emphasising vigilance and collaboration across all business areas, reinforcing our zero-tolerance stance, and encouraging active participation.
- **Retail Director, Co-op Food:** Focused on practical steps colleagues can take to spot signs of modern slavery in day-to-day operations, stressed early intervention and reporting, and explained how our whistleblowing channels and ethical trade teams provide support.
- **Head of Retail Risk and Compliance, Co-op Group:** Highlighted challenges within Logistics and supply chains where risks of exploitation

can be higher and discussed our initiatives to strengthen supplier audits and ensure fair treatment of workers, underlining transparency and collaboration with external partners.

We saw an estimated 1,150 engagements on Viva Engage and Central News. Combined with business unit newsletters and central updates which generated approximately another 5,660 views, the campaign reached all business areas.

Modern Slavery Champion event: We hosted this Stronger Together event available to programme sponsors, their supply chain stakeholders, Greater Manchester Modern Slavery Business Network members and our Co-op colleagues. 60 people attended, and included a local law enforcement update, lived experience insights, our Pan-Co-op approach to modern slavery risk management and a labour provider case study. Colleagues with modern slavery risk management responsibility attended the event and all colleagues could tune in to sessions virtually. Please click the link below to see the welcome from the Independent Anti-Slavery Commissioner.

FOOD SUPPLIER ENGAGEMENT AND TRAINING

Food

Our ethical trade supplier engagement programme enables us to actively listen to and effectively support suppliers with managing human rights issues across our supply chains. Through our comprehensive supplier engagement programme, we reached 3,717 delegates across 150 events in 5 countries. Some of the key 2025 highlights can be found below:

Human Rights & Ethical Trade Strategic Supplier Forum

In July, over 60 attendees joined our forum, which enables representatives from our key Food teams and strategic suppliers to align to our Co-op strategy, share and learn best practice and explore how to face key challenges together. The event covered:

- Learnings from the Spain ETF and an ethical trade visit to Morocco.
- Exploring root causes and resilience building around systemic issues such as seasonal recruitment and climate change.
- Marking the 5 years of Bright Future and outlining opportunities for suppliers to join the survivor remediation programme.
- Supporting alignment with new [Transparency in Supply Chains](#) (TISC) guidance through a Stronger Together briefing, an expert panel with representatives from the [Modern Slavery and Human Rights Policy and Evidence Centre](#), [Align Ltd](#), [Human Rights at Sea](#) and a modern slavery survivor to share lived experience best

practice, and facilitated discussions on ethical survivor engagement.

Stronger Together's Consumer Goods Programme:

Our co-sponsorship grants Co-op and our suppliers access to free interactive training workshops, resources and tools to address labour exploitation in business operations and supply chains. Across the Consumer Goods programme, 1,624 people attended 94 training sessions. Stronger Together also reviewed key resources to include updated technical content, legislative changes, lived experience and alignment with the new TISC guidance.

Stronger Together South Africa programme:

In 2025, we became a sponsor of this programme given the risk saliency and the opportunity it presented to support our in-country supply chain. The programme provides our supply chain stakeholders with free access to training and resources to address modern slavery and exploitation risks. Sponsorship also supports us with in-country risk insights, training and resources. 545 individuals from 193 businesses attended their courses.

"We found the session on Raising Awareness on Trafficking and Exploitation in Supply Chains extremely valuable... This knowledge will support us greatly as we continue to improve our systems and safeguard the wellbeing of all workers."

South African citrus grower

UK SWS Taskforce capacity building: Through the Taskforce, we continue to support events and programmes for our UK produce supply chain. We co-sponsored regional roadshows with the [Fresh Produce Consortium](#), IOM and human rights experts, attended by 426 participants. Sessions covered ethical recruitment, legal requirements, worker welfare and cultural awareness for seasonal workers from Central Asia. We also co-sponsored a webinar series on seasonal best practice and grievance prevention, attended by 116 people. The Just Good Work app, which provides workers with information on the SWS recruitment process and working conditions, was accessed by 45,000 total users in 2025.





Greater Manchester Modern Slavery Network: Recognising that we have a role to play in our home community, we collaborated to re-launch the Network (see [here](#) for its purpose and development). Training and capacity building provided by the Network was delivered through 2 events. 40 delegates attended the first meeting which provided best practice insights on policy, modern slavery prevention and due diligence, industry collaboration and meeting policy requirements. Network members also attended the Modern Slavery Champion event (see [here](#)).

Hosted events: We sponsored and hosted 3 well-received stakeholder events for our key partners, the FNET, the ETI and Stronger Together, reaching over 160 in-person attendees. Events included a Modern Slavery Champion event during Anti-Slavery Week (see [here](#)).

Training Case Study 2

CO-OP'S ROLE IN 25 COMBINED YEARS OF SUPPLIER-RUN FORUMS IN EGYPT AND SPAIN

2025 marked milestone anniversaries for 2 ethical trade forums which we played pivotal roles in to establish: the 10th anniversary of the Spain ETF and the 15th anniversary of the ESET Forum.

Recognising our key role in establishing both these initiatives, our Senior Human Rights and Ethical Trade Manager delivered reflections at both the opening and closing sessions. In November, we were also invited to share our experiences at a [panel](#) event with 100 attendees hosted by the IOM and AIM-Progress at the UN Forum on Business and Human Rights in Geneva. The panel focused on building genuine supplier ownership and featured the work of the ESET Forum and the Spain ETF.

Spain - 10th anniversary: In June, over 180 delegates gathered in Murcia for the tenth anniversary celebration of the Spain ETF. The programme addressed corporate social responsibility (CSR) collaboration, legislative advances in labour standards, and the impact achieved by specialised working groups. Speakers included representatives from the Ministry of Labour, ETI, Stronger Together,

the Wilberforce Institute, FNET, WWF, Oxfam, industry bodies, trade unions and suppliers. The event featured diverse content including interactive breakout sessions, panel discussions, videos and award presentations (for more information see [here](#)).

Egypt - 15th anniversary: In December, 76 people from 48 organisations gathered in Cairo to celebrate the 15th anniversary of the ESET Forum. The event enabled multi-stakeholder discussion on critical topics like youth employment and gender. An Egyptian supplier showcased best practice initiatives for transitioning to direct employment, promoting financial inclusion and providing essential on-site medical, leisure and childcare facilities. The Egyptian Ministry of Labour and the National Organization for Social Insurance also provided key policy updates. An independent assessment of the forum activities found that the majority of members value the role of the forum in improving their labour standards and legal compliance. The assessment also highlighted areas for development, particularly around practical and sector-specific guidance (for more information see [here](#)).



Training Case Study 3

GNFR: BUILDING COLLEAGUE AND SUPPLIER HUMAN RIGHTS CAPACITY

Our GNFR team held various events throughout 2025, which included:

Supplier Management Spotlight Session

This was attended by 70 colleagues and covered the fundamentals of supplier management, including segmentation and the refreshed SMF, while emphasising its role in protecting and generating value for Co-op. Updates included streamlined processes, mandatory standards for strategic and critical suppliers and simplified reporting. The session showcased engagement tools such as quarterly newsletters, Co-op update slides and the annual GNFR Supplier Conference alongside integration of EcoVadis scorecards and ethical risk reviews into supplier meetings.

Modern Slavery Spotlight Sessions

Unseen: This session provided an overview of modern slavery, covering key forms such as forced labour, trafficking and debt bondage alongside practical indicators of risk. It highlighted the UK context and showcased the role of Unseen's 24/7 multilingual helpline in supporting victims and businesses.

Stronger Together: This session highlighted the global scale of modern slavery and explored key risk models such as employer collusion, labour supply chain abuse, rogue colleagues and organised criminal gangs.

Practical indicators like recruitment fees, contract switching, shared bank details and

excessive working hours were discussed alongside the EPP, advocating zero recruitment fees for workers.

GNFR Supplier Conference

Our [GNFR Supplier Conference](#) and [Co-op Difference Awards](#) brought together key partners to champion responsible procurement and celebrate supplier excellence. This year's conference, themed around the UN International Year of Co-operatives, featured market stalls and engagement sessions with organisations including Unseen, Stronger Together and EcoVadis. These partners contributed resources, insights, awards judging and breakout sessions focused on ethical sourcing, modern slavery prevention and responsible business practices. The event also recognised outstanding supplier contributions through the GNFR Co-op Difference Awards, highlighting those who best support Co-op's Vision and Values.



GNFR Supplier Engagement and Training

We have a well-established GNFR Supplier Engagement Programme designed to ensure suppliers feel informed, connected and aligned with the Co-op Vision. We regularly feature human rights and ethical trade content in our GNFR Quarterly Supplier Newsletter and host a range of engagement events throughout the year.

EcoVadis supplier engagement: In January 2025, we delivered our first EcoVadis supplier engagement session to 39 suppliers to support onboarding and deepen understanding. The session was chaired by our Chief Procurement Officer and EcoVadis Account Manager. Also across 37 suppliers, 207 EcoVadis Academy e-learning sessions were completed in 2025.

Modern Slavery e-learning for high ethical risk suppliers:

In May 2025, our GNFR Procurement team worked with Learning and Development to roll out Supplier Modern Slavery Awareness e-learning to 80 high ethical risk suppliers (defined by our risk assessment, see [here](#)) in Tier 1 and 2. This achieved an impressive 97% completion rate, reinforcing supplier awareness and accountability. The course covers risk identification, management and remediation, promoting transparency and accountability, with completion tracked and reported.

Continuous improvement and plans for 2026

In 2025, our approach to supplier engagement either went deeper along supply chains by extending to indirect suppliers, or supporting established programmes in high risk sourcing countries, or by enhancing supplier resources. Ongoing colleague training and supplier training are now embedded in our yearly engagement cycle for Food, GNFR and Funeralcare. In 2026, we will refresh our colleague modern slavery e-learning to ensure evolving risks, best practice and learning are shared. We will also continue to engage and train high-risk suppliers, including providing access to our modern slavery e-learning for high-risk GNFR suppliers.

MONITORING AND EVALUATION

Monitoring and Evaluation (M&E) helps us understand how effectively we are identifying, preventing and responding to modern slavery across our operations and supply chains. Together, M&E provides evidence to guide decision-making and continuous improvement.

Each year, we set business unit Key Performance Indicators (KPIs) to assess progress against our human rights and ethical trade commitments. Developed with the leadership team, these KPIs align with strategic objectives and are reviewed through the Pan-Co-op Ethical Trade & Human Rights Working Group. See [here](#) for progress.

Evaluating the effectiveness of our programmes informs: sourcing and contracting decisions; supplier engagement; due diligence for high-risk suppliers; and training priorities. We use a combination of quantitative and qualitative data to monitor performance. In 2025, we used the following tools to review our human rights maturity.

EcoVadis – Co-op Sustainability Assessment (Pan-Co-op)

In 2025, Co-op achieved the Gold EcoVadis medal, recognising our strong sustainability management and placing us among the top-performing companies assessed. The rating reflected our robust practices across environment, labour, ethics and sustainable procurement, demonstrating our commitment to responsible business and transparency throughout our value chain.



EcoVadis – Sustainable Procurement Maturity Review

In 2025, we completed the annual EcoVadis Sustainable Procurement Maturity Review, a benchmarking process that evaluates the effectiveness of our responsible sourcing programme.

The review assesses 5 core areas: Vision & Strategy, Governance & Resources, Policies & Processes, Capacity Building and Reporting. We achieved an overall score of 3.36 (proactive), up from 2.89 (responsive) in 2024, exceeding the global average. Co-op was recognised for strong governance embedded within procurement systems, enhanced reporting through dashboards and aligned KPIs, and strengthened supplier engagement via EcoVadis assessments, GNFR communications and capacity building initiatives.

ETI – Corporate Transparency Framework (CTF)

As ETI members, we report annually against 4 core areas: governance and strategy, risk identification and assessment, actions to mitigate and remediate risks, and tracking, measuring and communicating impact. In 2025, we met all of the [ETI's minimum requirements](#). We also participated in a pilot review of 'good and better practice requirements against the [ETI's CTF](#)', where we met 8 of the 14 criteria under which this assessment took place.

FNET Human Rights Due Diligence Maturity Reporting Framework

This reporting tool supports companies to assess the maturity of their Human Rights and Environmental Due Diligence (HREDD). As an FNET member, we annually report against FNET's maturity framework and use the framework to help inform future priorities.

Modern Slavery Statement Benchmarking








Our Modern Slavery Statement review process in 2025 included a benchmarking exercise by human rights consultancy [Inherently Human](#), of our Modern Slavery Statement as well as industry peer statements to identify areas for improvement. This exercise was built on a 2024 benchmarking report conducted by [Ergon Associates](#) (now part of LRQA) and was based on the Government's new [Transparency in Supply Chains guide](#).






Future plans

These external reviews confirm our position as a proactive leader in human rights and provide areas to strengthen our future monitoring and evaluation:

- Ongoing review of maturity using external tools and working with partners
- Enhanced analytics: monitoring supplier data trends by category and segmentation
- Training pathways: monitoring colleague and supplier attendance, completion and engagement in training sessions
- Improved disclosure practices: continuing to publish Pan-Co-op performance, processes, and outcomes in our Modern Slavery Statement to evidence progress and lessons learned

PERFORMANCE AGAINST 2025 TARGETS

BUSINESS UNIT	WHAT WE SAID WE'D DO IN 2025	HOW HAVE WE DONE?	WHAT HAVE WE DONE?
FOOD	We will develop a strategic approach to enhance due diligence with interventions in 10 high-risk supply chains or recruitment corridors.	 ACHIEVED	Beyond our core due diligence monitoring programme (see here), we have engaged in a wide range of projects as part of enhanced due diligence approaches to increase our understanding of issues in our global supply. We have continued to support platforms to gather insights and intelligence and hear directly from workers, supported joint investigations into issues in our supply chains and participated in sector and issue focused research and projects in the seafood and produce sectors. We also carried out projects focused on embedding FLIs into our due diligence activities as well as supporting the development of a collaborative platform to understand the use of recruitment fees in key recruitment corridors (see here).
	We will support our suppliers in improving human rights across our supply chains through the delivery of our global supplier engagement programme, reaching over 2,500 delegates in 50 events.	 ACHIEVED	There were 3,717 delegates reached in 150 events. Events included the launch of accommodation guidance in Morocco , the 10-year anniversary of the Spain ETF , 15-year anniversary of the ESET Forum and the Stronger Together Modern Slavery Champions Event .
	We will champion the role of women and vulnerable people in our supply chains and continue to roll out training to address issues of gender-based violence in the supply chain and support collaborative initiatives to address the root causes.	 ON TRACK	In collaboration with ETI and other partners, we contributed to the delivery of 4 GBVH events and launched the principles for addressing GBVH (see here). We launched a 2-year project in Ghana to tackle living wages through collective bargaining (see case study here).
	We will continue to work collaboratively to eliminate illegal and unfair recruitment fees in our global supply chain.	 ON TRACK	Worked collaboratively to publish The Responsible Recruitment Practices and EPP in the global tuna processing sector report (see here). Supported the launch of the EPP Feasibility Study for UK SWS along with multi-stakeholder roundtables, to follow up on the findings see here . We also sponsored the development of a collaborative platform to understand the use of recruitment fees (see here).
LOGISTICS	We will deepen efforts to understand the risks in the Logistics section of our operations, by expanding the roll out of due diligence audits in our depots.	 ACHIEVED	All due diligence audits were carried out in 2025 supported by an awareness campaign where we held an engagement week at depots during Anti-Slavery Week where we discussed modern slavery and whistleblowing.
CO-OP WHOLESALE	Review DHL's contract, training methods and recruitment process, including via agencies, ensuring compliance with human rights and modern slavery legislation. Ensure all colleagues who are out in stores or working with suppliers complete our Modern Slavery Awareness e-learning.	 ACHIEVED	Full engagement has taken place with DHL, contract and employment process reviewed along with other relevant documents on legislation and compliance - going forward any actions with DHL will sit within GCL. E-learning rolled out to all customer- and supplier-facing colleagues - 100% complete. Guidance document issued to regional development managers to help identify signs of modern slavery in store.
PROPERTY	We will improve understanding of where we are sourcing materials from for construction activities and promote channels for reporting modern slavery concerns to colleagues.	 ON TRACK	Working on an ongoing basis on materials in the construction supply chain to understand where the highest-risk/highest-volume usage materials are sourced from. Channels for reporting modern slavery concerns have been communicated during the year in Property through key communication forums and have also been communicated to Property suppliers through ongoing supplier management meetings. We will continue to review materials sourced to identify modern slavery risks in supply chains then follow on action to consider how this risk can be reduced. We will promote channels to report modern slavery to the business as usual, i.e. regular consistent updates.

BUSINESS UNIT	WHAT WE SAID WE'D DO IN 2025	HOW HAVE WE DONE?	WHAT HAVE WE DONE?
FUNERALCARE	We will review and strengthen our ethical trade policies, processes and guides for procurement colleagues and suppliers.	 ACHIEVED	<p>As part of Tier 2 supplier mapping, we have strengthened clauses within any new supply agreements and new variation agreements around existing policies and future policy alignment.</p> <p>We have also strengthened wording within clauses around sub-contractor/supplier chain changes to ensure transparency from suppliers on any new agreements or variations.</p> <p>Coupa is now used for formal GFR sourcing activity to ensure we have a consistent approach to due diligence when carrying our GFR sourcing.</p> <p>We will continue updating key supply agreements with the policy and sub-contract clause amendments.</p> <p>We are collaborating with the Legal Department to create a GFR framework agreement for supply of product into Funeralcare to be housed on SharePoint.</p> <p>We will begin extending the risk mitigation and contingency activity across all Funeralcare personal options categories and engaging with the risk team.</p>
	We will enhance our diligence activities by mapping our beyond Tier 1 supply chains, embedding action plans to mitigate risks and carrying out SMETAs in our key high-risk supply chains.	 ON TRACK	<p>All Tier 2 supplier information obtained from Tier 1 Funeralcare business critical GFR suppliers. As a supplementary element, their company information has been run through EcoVadis IQ to provide a high-level overview on risk across categories like labour, country and industry.</p> <p>We completed a full risk review of our coffins supply chain with mitigation and disruption contingencies. This activity will be rolled out to all personal options categories in 2026.</p> <p>In 2025, there have been 4 audits carried out across our coffins and memorials supply chains (3 Sedex, 1 Fairtrade).</p> <p>Some Tier 2 suppliers require further information to locate on EcoVadis IQ which we are pursuing from suppliers. At the end of 2025, we have 80% of Tier 2 suppliers mapped and risk categories logged using EcoVadis IQ.</p> <p>Any Tier 2 supplier we cannot locate in EcoVadis IQ will be graded as unclassified and given a higher-risk category.</p>
GNFR	All Strategic, Critical, Operational and High ethical risk suppliers to have a visible EcoVadis scorecard.	 ON TRACK	<p>Strategic - 100% (17 visible scorecards).</p> <p>Critical - 100% (32 visible scorecards).</p> <p>Operational - 92% (154 visible scorecards).</p> <p>High - 96% (57 visible scorecards).</p>
	<p>All high ethical risk Tier 2 suppliers to have a completed Sedex SAQ and up-to-date SMETA.</p> <p>All high ethical risk suppliers to complete our Co-op Modern Slavery Awareness e-learning.</p>	 ON TRACK	<p>SAQ completion - 100%: 27 completed.</p> <p>SMETA - 95%: 18 completed, 1 expired.</p> <p>Modern Slavery Supplier e-learning: 97% completion.</p> <p>78 suppliers completed (52 Tier 1s, 20 Tier 2s), 2 remaining (2 Tier 1s).</p>
Q-COMMERCE	Ensure that dedicated compliance/social value focused Bi-Yearly Business reviews are conducted with each aggregator partner across our delivery network (Uber Eats, Just Eat, Deliveroo and Amazon). This is to ensure that we discuss employment, right to work and rider substitution topics. Keeping abreast of legislation and regulation within the sector and highlighting any known issues or media reports.	 ON TRACK	<p>We continue to work alongside Procurement to ensure Q-Commerce partners are included in relevant protocols such as the completion of the EcoVadis scorecard.</p> <p>We will continue with regular meetings with each partner.</p>

IMPACT INDICATORS

BUSINESS UNIT	AREA OF WORK	2023 IMPACT INDICATORS	2024 IMPACT INDICATORS	2025 IMPACT INDICATORS
PAN-CO-OP	Colleague training	<ul style="list-style-type: none"> 53 colleagues completed modern slavery e-learning. 83% felt the training improved their understanding of modern slavery and 93% were confident they can apply what they learned 	<ul style="list-style-type: none"> 720 colleagues have completed modern slavery e-learning, 86% feel the module has improved their understanding of modern slavery and 89% are confident they can apply what they have learned 	<ul style="list-style-type: none"> 1,799 colleagues have completed modern slavery e-learning, 88% feel the module has improved their understanding of modern slavery and 94% are confident they can apply what they have learned
FOOD	Supply chain monitoring	<ul style="list-style-type: none"> 3,212 sites (682 Tier 1; 2,530 Tier 2) 100% Tier 1 sites with complete SAQs 100% of high-risk Tier 1 sites have a valid audit 1,616 sites with valid audits (513 Tier 1; 1,103 Tier 2) 1,042 audits in 2023 (348 Tier 1; 694 Tier 2) 	<ul style="list-style-type: none"> 3,035 sites (665 Tier 1; 2,370 Tier 2) 100% Tier 1 sites with complete SAQs 100% of high-risk Tier 1 sites have a valid audit 1,581 sites with valid audits (504 Tier 1; 1,077 Tier 2) 953 audits in 2024 (315 Tier 1; 638 Tier 2) 	<ul style="list-style-type: none"> 2,988 sites (676 Tier 1; 2,312 Tier 2) 100% Tier 1 sites with complete SAQs 100% of high-risk Tier 1 sites have a valid audit 1,506 sites with valid audits (518 Tier 1; 988 Tier 2) 1,007 audits in 2025 (356 Tier 1; 651 Tier 2)
	Supplier capacity building	<ul style="list-style-type: none"> 6,452 people from 1,513 suppliers or sites in 121 events globally through roadshows, in-person events, training sessions and webinars 1,735 people from 1,130 suppliers attended Stronger Together and Responsible Recruitment Toolkit (RRT) courses aimed at upskilling attendees to prevent and address modern slavery 	<ul style="list-style-type: none"> 3,135 people from 1,772 suppliers or sites involved in 126 events globally including roadshows, in-person events, training sessions and webinars 1,142 people from 788 suppliers attended Stronger Together and RRT courses aimed at upskilling attendees to prevent and address modern slavery 	<ul style="list-style-type: none"> 3,717 people from 2,341 suppliers or sites involved in 150 events globally, including roadshows, in-person events, training sessions and webinars 1,642 people from 975 suppliers attended Stronger Together forced labour and responsible recruitment courses aimed at upskilling attendees to prevent and address modern slavery
	Workers impacted	<ul style="list-style-type: none"> 33,946 active users of the UK SWS Just Good Work App. This included jobseekers and successful scheme applicants 	<ul style="list-style-type: none"> 60,099 active users of the UK SWS Just Good Work App. This included jobseekers and successful scheme applicants 	<ul style="list-style-type: none"> 45,000 active users of the UK SWS Just Good Work App. This included jobseekers and successful scheme applicants
	Supply chain grievances remediated	<ul style="list-style-type: none"> 8,043 issues raised in valid audits. 93.2% of the issues had been addressed by the suppliers, by the end of 2023, 15 supply chain grievances raised through non-audit channels and remediated by Co-op or in collaboration with others 	<ul style="list-style-type: none"> 6,778 issues raised in valid audits. 94.3% of the issues had been addressed by the suppliers by the end of 2024. 13 supply chain grievances raised through non-audit channels and remediated by Co-op or in collaboration with others 	<ul style="list-style-type: none"> 7,072 issues raised in valid audits. 70.7% of the issues had been addressed by the suppliers by the end of 2025. This reduction is linked to the introduction of CAR status which cannot be closed on Sedex 21 supply chain grievances raised through non-audit channels and remediated by Co-op or in collaboration with others
GNFR	Supply chain monitoring	<ul style="list-style-type: none"> Ethical Trade Programme: 85 suppliers and 97 sites monitored, with 10 sites audited in 2023. 61 issues were raised. 72% of issues had been addressed by the suppliers by the end of 2023 	<ul style="list-style-type: none"> Ethical Trade Programme: 101 suppliers and 107 sites monitored, with 24 sites audited in 2024. 97 issues were raised. 68% of issues had been addressed by the suppliers by the end of 2024 EcoVadis: By the end of 2024, we had visible scorecards for: 16 Strategic suppliers, 27 Critical suppliers, 90 Operational suppliers and 46 High ethical risk suppliers 	<ul style="list-style-type: none"> Ethical Trade Programme: 92 suppliers and 95 sites monitored, with 16 sites audited in 2025. 70 issues were raised. 37% of issues had been addressed by the suppliers by the end of 2025 EcoVadis: By the end of 2025, we had visible scorecards for: 17 Strategic suppliers, 32 Critical suppliers, 154 Operational suppliers and 57 High ethical risk suppliers
FUNERALCARE	Supply chain monitoring	<ul style="list-style-type: none"> 34 suppliers monitored and 2 sites audited 	<ul style="list-style-type: none"> 34 suppliers monitored and 2 sites audited including 1 Tier 3 site. 51 issues were raised. 84% of issues had been addressed by suppliers by the end of 2024 	<ul style="list-style-type: none"> 34 suppliers monitored and 3 sites audited including 1 Tier 3 site. 16 issues were raised. 68% of issues had been addressed by suppliers by the end of 2025

2026 TARGETS

BUSINESS AREA	TARGET
PAN-CO-OP	Pan-Co-op review of key human rights policies with input from key stakeholders, to drive greater alignment and impact.
	Strengthen Pan-Co-op approaches to managing risks and engagement with suppliers to apply best practice from GNFR and Food across different business units.
PEOPLE	Refresh colleague modern slavery e-learning content and ensure 90% uptake of new course for all relevant colleagues by end of 2026.
	Strengthen visibility of mechanisms within the Co-op for colleagues to raise concerns about modern slavery risks so that all colleagues are able to raise these concerns internally.
FOOD	Implement enhanced due diligence approaches with interventions in high-risk supply chains or recruitment corridors.
	Support our suppliers in improving human rights across our supply chains through the delivery of our global supplier engagement programme, working collaboratively to reach over 3,000 delegates in 80 events.
	Champion the role of women and vulnerable people in our supply chains by launching projects to implement the GAIA principles in 2 high-risk supply chains to address the root causes of GBVH.
	Continue to work collaboratively to eliminate illegal and unfair recruitment fees in our global supply chain.
LOGISTICS	Deliver and embed modern slavery awareness across our operation by training all Co-op drivers, reinforcing key messages annually during Risk Awareness Week, and refreshing awareness materials across all distribution centres.
	Conduct a comprehensive review of management systems to mitigate modern slavery across our Logistics agency suppliers and implement clear action plans to address findings.
GNFR	Continue to track Strategic, Critical, Operational and High ethical risk suppliers to ensure they maintain valid EcoVadis scorecards.
	Ensure Tier 2 SAQ completion remains at 100% and expired SMETAs are updated promptly.
	Assign selected high-priority labour and human rights corrective actions in EcoVadis for relevant Strategic, Critical and High ethical risk suppliers.
FUNERALCARE	Have a full group-backed risk assessment and business continuity plan for all 34 critical suppliers.
	Review operational florist supply with a view to consolidation of suppliers to focus on improving standards across the supply chain and ability to influence change.
	Continue to collaborate with GNFR colleagues to create a gap analysis on remaining group policies to identify where we can bring remaining GNFR/group policies into our supply chains without disrupting our business operations or abnormally restricting our supply base.

This Statement was approved by the Board of Co-operative Group Limited on 25 March 2026¹⁰

¹⁰The terms 'Co-op Group', 'Group' or 'Co-op' are all used to refer to the Co-operative Group Limited, which consists of Co-operative Group Food Limited, Co-operative Foodstores Limited, Funeral Services Limited, Co-op Wholesale Limited and The Manx Co-operative Society Limited (among others). The Statement covers the financial period (52 weeks) ending 3 January 2026. A full list of Co-op legal entities covered by the statement can be found [here](#).

Co-operative Group Limited

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www.co-operative.coop/investors/reports

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