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## Designated retailers' GSCOP reports – 2020-21

# A review

**John Noble**  
**15 December 2021**

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## Summary

2020-21 was an unprecedented year in UK grocery with extreme pressures felt by retailers and suppliers alike in a climate of significant uncertainty. Early in the pandemic there were calls for GSCOP to be suspended, calls resisted by the Groceries Code Adjudicator (GCA) on the basis that the Code was sufficiently flexible to operate even in such exceptional circumstances.

The summary reports featured here suggest that the GCA was correct. During the reporting period, the number of alleged breaches were fewer than in previous years and the number of disputes was largely unchanged (and at a low level). While during the pandemic retailers were particularly reliant on effective partnerships with their suppliers to keep shelves stocked, the level of compliance reflected in the reports is still noteworthy.

Breaches, alleged breaches and disputes form only part of the compliance picture. Retailers are also required to outline the steps they are taking to ensure compliance and most reports give good insights. Training features strongly and much of that had to move online though there is no sense that training effort reduced in the period.

While retailers' summary annual reports give one perspective on GSCOP compliance, the GCA's [supplier survey](#) gives another. In this year's survey, fewer suppliers reported experiencing Code-related issues, with a still-high 29% being down from 36% in 2020, and suppliers reported fewer incidents of all the issues covered by the Code except one. This consistency illustrates a step in the right direction and provides good evidence of how a code, monitored and enforced by an effective adjudicator, can incentivise and deliver fair and lawful trading in a large, complex, fast-moving industry, even in the most challenging of commercial climates.

At the end of 2020 the GCA took over responsibility for collecting and reviewing compliance reports from the Competition and Markets Authority to whom they are still submitted. The summary reports here are therefore the first to be reviewed under this new regime.

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## Review of summary compliance reports

### 1 Background

This is the Group's eleventh report on grocery retailers' published compliance with the Groceries Supply Code of Practice (GSCOP). Earlier reports are available on our [website](#). This report relates to the thirteen grocery retailers designated under The GSCOP Order<sup>1</sup>. The Order requires designated retailers to publish an annual summary of their compliance for each complete financial year during which the Order is in force. The summary must be published in their annual company report if they have one or "clearly and prominently" on their website if not. The summary must contain an overview of instances of breaches or alleged breaches, steps taken to ensure compliance (including training) and disputes with suppliers, along with their outcome.

- 2 This report features TJ Morris for the first time, following its designation in 2019.

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<sup>1</sup> [The Groceries \(Supply Chain Practices\) Market Investigation Order 2009](#), paragraph 10(5).

### 3 Reporting

All relevant designated retailers published reports either in their annual reports or on their websites, or both in the case of Marks & Spencer. For the third time, Iceland had not submitted its compliance report though it did publish a summary. Each report is replicated at the end of this document, while the table below summarises those areas on which retailers are required to report (see section 10 (5) of the [GSCOP Order 2009](#)).

	Alleged breaches / issues	Actual breaches	Disputes	Outcome	Training
Aldi	ND	-	2	All resolved	✓
Asda	31	-	1	26 resolved	✓
B&M	0	-	0	-	✓
Co-op	34	-	1	29 resolved / withdrawn 4 remain under review	✓
Iceland	5	-	0	Resolved	✓
Lidl	11	-	0	9 resolved. 1 ongoing	✓
M&S	4	-	0	3 resolved. 1 ongoing	✓
Morrisons	3	-	-	Unresolved	✓
Ocado	3	-	0	All resolved	✓
J Sainsbury	7	-	0	All resolved	✓
T J Morris	6	-	0	ND	✓
Tesco	20	-	0	19 resolved. 1 ongoing	✓
Waitrose	ND	-	ND	ND	✓
	ND = Not disclosed				

- 4 Most retailers report on alleged breaches, along with disputes and their outcome. This year Waitrose is the exception in not giving quantified information on alleged breaches, disputes or outcomes, despite one of the lengthier reports. All other retailers state either there have been no alleged breaches or give some numbers. It is therefore unclear from its report how Waitrose performed in relation to this aspect of its compliance with the Code. This lack of quantified reporting would seem at odds with the obligations under the Order.
- 5 TJ Morris is the only retailer to quantify the number of alleged breaches but not give any information on outcomes, an obligation under the Order.
- 6 The oversight of retailers' compliance reports changed at the end of 2020, with the GCA taking over from the Competition and Markets Authority in requesting and reviewing them. The GCA's published records of progress meetings held with Code Compliance Officers show that reports were discussed with individual retailers once submitted. This new approach may well account for most of the reports being fuller

and more insightful than in previous years and that this is likely to be sustained. If so, this is a positive development.

#### 7 **Alleged breaches**

Aldi and Waitrose give no information on alleged breaches, though it is encouraging that all other eleven retailers did report on this aspect, including when there were no such issues (B&M).

- 8 Taken overall, the number of alleged breaches, at 124, are fewer than reported in the previous year (155), despite there being one additional designated retailer. This is particularly notable in light of the unique and challenging trading conditions that prevailed in 2020-21 and is testament to the efforts of the Adjudicator and designated retailers' commitment to compliance.

- 9 The following retailers saw a reduction in alleged breaches compared to the previous year: B&M, Iceland, M&S, J Sainsbury and Tesco. Tesco is of particular note, reporting 20 alleged breaches down from 45 the previous year. It is also unique in giving some insight to the nature of alleged breaches, with the majority concerning delisting decisions. It would be helpful were others to give such insights.

#### 10 **Actual breaches**

No retailer reports any actual breaches. A reportable breach is only likely to come to light following an investigation by the GCA and there have been no investigations in this reporting period. However it cannot be concluded that there have been no actual breaches as these may have been dealt with behind the scenes. It can however be concluded that there have been no officially-declared GSCOP breaches in 2020-21.

#### 11 **Disputes**

A dispute arises when a supplier notifies a retailer's Code Compliance Officer that it believes the retailer has not fulfilled its functions under the Code and wishes to instigate the dispute resolution procedure (paragraph 11(2)).

- 12 Only Aldi, Asda and The Co-op report disputes arising and then in low numbers. Disputes are most likely in the case of delisting, when the supplier may feel it has little left to lose. In a trading environment in which a number of retailers are reducing range, more disputes might have been anticipated. In fact, the total number of reported disputes (4) is only 1 higher than the previous year (though in that year four retailers did not provide information on this aspect of their compliance).

#### 13 **Outcome** (of alleged breaches and/or disputes)

Most retailers give helpful information on the outcome when issues, alleged breaches or disputes are raised by suppliers, with the significant majority being resolved in the reporting period. Morrisons report the highest number of Code-related complaints being unresolved (3). Aldi, Asda, Lidl, M&S and Tesco give information on the status of issues raised in the previous period.

- 14 Lidl and Ocado provide helpful transparency by indicating the escalation levels which issues reach and where they are resolved. The levels are:

Level 1: issue raised / resolved at any level (typically buying team)

Level 2: issue raised / resolved by the Code Compliance Officer

Level 3: Formal dispute raised / resolved

Level 4: Subject to an arbitration, by the GCA / other

15 **Steps taken to ensure compliance**

All retailers report on the training they provide to existing and new staff, with many giving actual numbers of those trained (Aldi: 612; Asda: 209; The Co-op: 771; Lidl: 87; M&S: >300; Ocado: 538; Sainsbury's: 1,700). Due to the introduction of social distancing measures imposed as a response to the pandemic, there were reports of training moving online.

- 16 Most reports outline in some detail how they work internally and with suppliers to improve compliance, relationships and ways of working. These include, for example, seeking to improve forecasting performance and supply chain processes.

17 **Other observations**

This reporting period covers the arrival of the pandemic and Government measures to slow its spread. Many reports highlight the unprecedented challenges that arose and how retailers worked with suppliers to ensure continuity of supply for shoppers. There are references to improved terms for smaller suppliers and how some suppliers, facing challenges from the closure of the food service and hospitality sectors, were supported.

- 18 The vast majority of summary compliance reports are full and far from the formulaic approach seen in the early years of GSCOP, no doubt at least in part due to the new scrutiny from the GCA. TJ Morris, in its first summary report, is the exception by being brief and sparse and Waitrose's report is the least forthcoming in areas of required reporting. It will be instructive to see whether these retailers adopt a different approach to their 2021-22 reporting.

**J A Noble**  
**15 December 2021**

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## GSCOP

### Retailers' published summaries of their reports to the CMA

Retailer	Statement
Aldi	<p><b>General Information</b></p> <p>[Background to the Code]</p> <p>Our last annual report was submitted in April 2021 covering the period 1 January 2020 to 31 December 2020.</p> <p><b>Code-related Developments During 2020</b></p> <p>The GCA Annual Survey 2020 confirmed that Aldi continued to be ranked top by Suppliers in terms of overall compliance with the Code, now for the <b>7th year in a row!</b> Overall, 97% of Aldi Suppliers surveyed said Aldi complied with the Code 'Consistently or Mostly Well'. We value the feedback of all of our Suppliers who took part and give careful consideration to what you tell us, whether this be supportive or identifying areas for further improvement.</p> <p>2020 saw an exceptionally challenging trading environment for both retailers and Suppliers given the ongoing COVID-19 pandemic and the uncertainty associated with post-Brexit trading arrangements commencing at the end of the year. We are proud to have worked together with our Suppliers, and within the framework of the Code, to feed the nation whatever the challenge.</p> <p>Despite what has gone well, we know we can't afford to be complacent and have therefore continued to invest effort to ensure we deliver our Code commitments consistently and effectively.</p> <p>During 2020, we have:</p> <ul style="list-style-type: none"> <li>• Reviewed and refreshed the GSCOP training our Primary and Senior buyers receive on joining our Buying Teams, and on which they are refreshed annually</li> <li>• Extended the training to include Buying Teams working on categories excluded from the Code definition of Groceries</li> <li>• Trained 612 colleagues using these materials</li> <li>• Undertaken our own internal assurance review of Aldi's compliance with the Code</li> <li>• Issued a twice yearly GSCOP Supplier newsletter; highlighting important developments under the Code, the work of the GCA and the importance of Suppliers' understanding the protections the Code provides them</li> <li>• Continued regular meetings and dialogue with the GCA</li> </ul> <p>Mark White was appointed as the second GCA succeeding Christine Tacon on 31 October 2020, following an extension to her role in light of the challenges faced because of the COVID-19 pandemic. We look forward to continuing the same collaborative approach with the new GCA, to further develop and apply Code best practice during his term of office.</p> <p><b>Supplier Disputes</b></p> <p>Aldi fully supports the requirements of the Code, and these are aligned with the Aldi core values of Consistency, Simplicity and Responsibility. We pride ourselves on</p>

building long-term and mutually beneficial relationships with our Suppliers, and compliance with the Code firmly underpins this.

However, disputes can occur in any commercial relationship from time to time. Where these occur, we would encourage Suppliers to discuss any issues directly with their Buying Team in the first instance, so we have an opportunity to resolve them as quickly as possible. Where an issue can't be resolved, Suppliers have the right to contact the Aldi Code Compliance Officer on any Code-related issue, raising a formal dispute under the Code if they so choose. Having carefully considered the circumstances, we will always seek to agree fair and reasonable resolutions to issues that our Suppliers have raised with us.

Two new disputes were raised with buying teams during 2020. Both of these were resolved within Aldi's informal dispute process to the satisfaction of the Suppliers. One further dispute was carried over from the previous year where the Supplier had chosen to exercise their prerogative to request GCA arbitration under the Code's formal dispute process. However, a commercial settlement was reached with the Supplier in February 2020.

[The statement gives the Code Compliance Officer's contact details and a link to the GCA's Code Compliance Pack]

Asda

[Background to the Code]

[Asda website](#)  
– [Notes and](#)  
[policies](#)

We delivered our tenth report, covering the period from 1 January 2020 to 31 December 2020, to the CMA and the GCA on 30 April 2021.

#### **Supplier feedback and steps taken**

We are pleased by the results of the GCA's 2020 Annual Supplier Survey. Over the six years that the GCA survey has been in place, we have seen significant improvements in supplier perception.

In 2020, 94% of our suppliers believed that we comply with the Code 'consistently' or 'mostly well', we were also ranked second for how we conduct our supplier relationships and third out of thirteen designated retailers for our overall compliance with the Code. Asda is pleased with the results, however, we continue to identify and implement improvements to existing practices. For example, we take the time to reflect on any Code-related issue which a supplier partner raises, to ensure we have the best processes in place or identify how we can continue to improve our supplier partner experiences when working with Asda.

The impact of the Covid-19 pandemic over the course of the past year has had a considerable impact on both Asda and our suppliers. We have provided support to our supplier partners, including via regular communications (for example, holding virtual supplier conferences) with suppliers around what changes we have made, as well as providing a dedicated central contact point for suppliers to share feedback.

To support suppliers during the ongoing pandemic, Asda and IPL shortened the payment terms for our smaller suppliers, to help mitigate any cash flow challenges during this time.

Further improvements Asda has introduced in the past year include:

- The introduction of additional guardrails with respect to how we handle and approach post-payment claims, to further facilitate positive engagement and successful resolution of these claims.

- The launch of a two-stage appeals process to supplement Asda's Good Faith Receiving programme. This was introduced in partnership with suppliers and the Simply Supply Chain group, to ensure that the appeals process adds tangible value to suppliers.
- The adoption of new operational and strategic approaches applied by Asda's Supply Chain team when collaborating with supplier partners. Within Asda's supply chain we have enhanced our communications and supplier training, and invested resource to focus on longer-term supplier development and relationship management. This includes the introduction of specialist Collaboration Analysts across the Operational Supply Chain team, and the launch of our Supply Chain Collaboration Board, where Asda and suppliers jointly define priorities and agree on projects to work on together.
- Enhancements to existing forecasting processes and operations. For instance, Asda has obtained full value from sales forecasting which has been facilitated by the introduction of specialist Demand Planners. This has proven to be vitally important, given the unique challenges posed to forecasting accuracy, ordering and product availability during a global pandemic.

### **Training**

In response to the changes caused by the Covid-19 pandemic to Home Office work operations, we adjusted the GSCOP training and awareness programme for our colleagues, moving away from the traditional classroom-based learning experience. We introduced a new online platform for Asda buyers which contains a wealth of guidance, training and awareness materials to support our buyers with Code compliance.

During 2020, 160 buying colleagues received Asda's GSCOP computer-based learning module and one colleague completed the learning module in early January 2021; all 49 IPL buying colleagues completed at least one form of Code related training. Utilising technology, Asda and IPL continue to provide training to a wide range of areas of the business, extending beyond the Buying team to support whole house compliance. During 2020, Asda and IPL provided bespoke and virtual training modules to colleagues from the Logistics, Supply, Technical and Finance teams.

### **Reportable Issues in the Annual Compliance Report**

We received 31 alleged breaches in 2020. Of these, twenty have been successfully resolved within the reporting period. An additional six alleged breaches were subsequently resolved in early 2021.

One alleged breach which initiated in 2020 proceeded to a formal Dispute, as defined under Article 11 of the Order.

### **Contact Asda's Code Compliance Officer**

Given the challenges posed by pandemic over the past year, we value and are immensely proud of the inter-dependent relationship that has been established with our supplier partners.

[The statement gives the Code Compliance Officer's contact details]

*Date: 30 April 2021*

<p>B&amp;M</p> <p><a href="#">Annual Report &amp; Accounts 2021</a></p> <p>(Page 41)</p>	<p>The Groceries Code and the Order regulate certain aspects of the relationships of B&amp;M and Heron Foods in the UK with their grocery goods suppliers. Under the Groceries Code retailers are required to deal with their suppliers fairly and lawfully at all times.</p> <p>In the UK, B&amp;M and Heron Foods have established compliance procedures under the Groceries Code. Those businesses have materially complied with the Groceries Code throughout the year under review.</p> <p>B&amp;M and Heron Foods became designated retailers under the Order, and thereby subject to the Groceries Code, on 01 November 2018.</p> <p>In relation to the second annual compliance report of B&amp;M and Heron Foods for the year to 31 March 2021, there were no formal disputes under the Groceries Code. There were also no Groceries Code related issues raised by suppliers with B&amp;M or Heron Foods of any potential non-compliance with the Groceries Code. The report was submitted to our Audit &amp; Risk Committee members in June 2021 and it was approved by them for submitting to the Competition and Markets Authority and the Grocery Code Adjudicator.</p> <p>In the year under review B&amp;M and Heron Foods have carried out training and guidance programmes with colleagues on the Groceries Code. Training has been provided by external consultants to existing staff. There is a new joiner guidance document and also external training packs for new colleagues joining the buying teams in each of those Group businesses. During the year under review buying colleagues who deal with grocery suppliers have also completed declarations confirming their compliance with the Groceries Code, and, that all instances of any complaints received under the Groceries Code have been reported to either the Buying Office Manager or Code Compliance Officer.</p> <p>Following the retirement of Paul McDonald as the Group CFO in November 2020, his successor Alex Russo was appointed as our Group's Code Compliance Officer.</p>
<p>The Co-operative</p> <p><a href="#">Annual Report &amp; Accounts 2020</a></p>	<p>In January 2020, the Groceries Code Adjudicator (GCA) published her view on the progress made by Co-operative Group Limited towards satisfaction of the recommendations set out in her March 2019 investigation report. We were pleased to note the GCA recognised the significant work that Co-op had undertaken to improve its Code compliance and that she had accordingly reverted the monitoring of Co-op compliance to business as usual.</p> <p>We have maintained our whole business approach to monitoring compliance with the Code, with regular reporting at various governance forums. The Code Compliance Officer reports regularly to the Risk and Audit Committee on the programme of compliance activity. The Committee also approved the Annual Compliance Report for submission to the Competition and Markets Authority as required by the Groceries (Supply Chain Practices) Market Investigation Order 2009. See page 83.</p> <p>In a year where the pandemic has caused massive disruption to our Co-op and our suppliers, our continuing commitment to a sustainable culture of self-sufficiency and self-regulation has helped maintain our levels of compliance.</p> <p>Christine Tacon was succeeded as GCA by Mark White in October 2020, and we value his commitment to continue with the collaborative approach. Our Code Compliance Officer actively and visibly encourages suppliers to share their</p>

experiences of dealing with the Co-op and to report any Code related concerns in confidence ([CCO@coop.co.uk](mailto:CCO@coop.co.uk)).

In 2020, we trained 771 colleagues across Buying, Finance, Supply Chain and other functions. Our training has adapted to the challenges posed by working remotely. We have also tailored it to reflect the specific roles and responsibilities of the different teams and compliance risks they are exposed to. As per our duties with the Order all relevant colleagues receive a copy of the Code within seven days of starting in their role.

During 2020, suppliers raised 34 Code related issues with us. This includes one issue withdrawn by a supplier. We resolved the other concerns through discussion with suppliers, Buying, Finance, Supply Chain and other relevant functions, sometimes with the involvement of the CCO. Four issues were still under review at the end of the reporting period and only one is in dispute.

Iceland  
Financial  
statements  
Iceland Food  
Ltd For the 52  
week period  
ended 26  
March 2021

An annual compliance report, as required by the Groceries (Supply Chain Practices) Market Investigation Order 2009 (the "Order"), for the financial year 2020/21 (which ran from 30 March 2020 to 27 March 2021), is currently being drafted and will be submitted to, and approved by, Iceland's Audit Committee upon completion.

Iceland believes that it has materially complied with the Groceries Supply Code of Practice ("GSCOP") during the reporting period, and it has had no formal disputes under the Code, during the reporting period.

#### **Report Matters**

Available free  
from [Companies  
House](#)  
(Company no.  
01107406)

The report contains all complaints that have been received from suppliers which, if not resolved by the Buyers, are escalated to the Category Managers, Trading Directors and occasionally, if required, the Code Compliance Officer. The report confirmed that we had five reported breaches, potential breaches, or formal complaints, made against the business, or reported within the business as a pre-emptive measure within the reporting period, under GSCOP.

All five of these potential breaches were reported where necessary to the GCA as part of our quarterly progress meeting reports and have been resolved and closed. Whenever we receive a complaint, we promptly work with the relevant supplier to investigate and resolve the matter to the satisfaction of both parties. Full details of the matters are reported annually to the CMA (Competition and Markets Authority) and the GCA (Groceries Code Adjudicator).

#### **Training**

All members of our Buying Team have been given a copy of GSCOP and receive bi-annual refresher e-learning training, as well as ad-hoc one-to-one training if required. All new members of the Buying Team receive a copy of GSCOP and one to one training as part of their induction. All relevant teams, which have contact with suppliers, have received e-learning training, as part of our bi-annual training programme. Our e-learning training is updated regularly to reflect: (i) key issues that have arisen in compliance with GSCOP; and (ii) any feedback we have received from suppliers. This year, we are in the process of updating the e-learning training to make it more interactive, with breach-based scenarios, to help educate the colleagues on what to do, and what not to do, in their day-to-day roles.

### **Internal Compliance**

In our efforts to improve internal compliance, we appreciate all feedback from suppliers, whether made directly to Iceland or through the GCA, which helps us to improve our understanding of any issues which the suppliers may have. Where the relevant supplier consents, any matters which have been raised with Iceland have been shared with the relevant senior teams, and we have taken on board this feedback, and aim to continue to improve our long-term relationships with suppliers.

We continue to hold bi-annual steering group meetings to ensure all supplier-facing departments communicate to each other with any concerns which may have been raised, and to discuss any projects which might involve GSCOP compliance.

We continue to work on our supplier database, however other projects, including depot delivery system payments and credits (for late deliveries and late unloading respectively), are currently on hold due to COVID-19.

We continue to work on our forecasting system, which should enable Iceland and the suppliers to communicate forecasts, and changes of these forecasts transparently, and easily, via a new system. We are working hard to finalise this system as soon as we can.

We have undertaken our annual internal audit to assess our colleagues' understanding of GSCOP and to ensure ongoing compliance. This is part of the annual compliance report and will be disclosed in accordance with GSCOP.

### **Actions**

Our plans to invest in the way we work with suppliers have focused on several key projects within the reporting period. These include:

- continued work on the new forecasting system;
- continued work on the new supplier database to improve access to our terms and conditions;
- financial agreements, and policies which together form our supply agreement;
- continued ongoing commitment to entering into longer term agreements with our key suppliers, to build long term partnerships with those suppliers; and
- an emphasis on improving our de-listing process with suppliers, where we need to reduce significantly the volume of goods, or no longer need the goods at all.

### **Forward Looking**

With the unprecedented demands faced by retailers and suppliers over the reporting period, we look forward to a more normal 12 months in working with our suppliers in 2021.

Lidl

[Corporate website](#)

This report details the actions taken by Lidl Great Britain Limited to ensure ongoing compliance with the Groceries Supply Code of Practice (GSCOP), which came into force on 4th February 2010.

This document also gives account, for the Company's last full financial year (FY 20/21), of any allegations or disputes that were raised by Suppliers, the level at which they were raised and resolved.

**Actions undertaken prior to commencement of GCSOP:****In conjunction with external solicitors:**

- All existing Terms and Conditions checked for compliance with the Code.
- Reference to GSCOP made in relation to all existing contracts.

**Review of 2020-2021****In-house compliance measures:**

Grocery Code Adjudicator (GCA) Visit 26.03.20:

Lidl GB invited the GCA again this year to speak privately with Lidl's Chief Executive Officer, Chief Financial Officer and Chief Commercial Officer, and to present to Lidl GB's senior buyers and key stakeholders from other supplier-facing departments. The visit was conducted remotely via video conference due to the Covid-19 outbreak. The meeting and presentation were well received and ensured Code compliance continues to have a high profile at Lidl GB.

Separate introductory meetings have taken place between the new GCA, Mark White, and the CCO, the CFO, and CEO remotely via video conference between September and November 2020.

The CCO is further planning on inviting the GCA to visit Lidl later in the year when Lidl will have moved Head Office locations.

**Training:**

The CCO worked to develop a GSCOP e-learning for Lidl's Buying team with Lidl's Learning & Development team and an external training development company. This launched on 01.09.2020 and replaced the face-to-face annual GSCOP refresher training. All Lidl buyers and buying coordinators (87 employees at the end of the reporting period) completed the e-learning in the months following the launch. The e-learning is also assigned to new starters in the Buying team.

The e-learning is complemented by quarterly 'GSCOP Updates' meetings, which the CCO introduced in November 2020, and which allow the CCO to share GCA news and guidance, inform the Buying team of any updates to internal GSCOP processes, and use the opportunity to review recent supplier complaints to ensure learnings can be drawn.

**Internal Review of Policies:**

Over the past year, Lidl GB has undertaken the following actions:

- Launch of a GSCOP e-learning for Lidl's Buying team. This will be reviewed and updated for the next refresher training period.
- Implementation of a comprehensive GSCOP audit as part of Lidl's whole organisation approach to Code compliance. Internal GSCOP processes have been further strengthened as a result.
- Developed and launched a Supplier Information Pack to improve supplier understanding of Lidl's ways of working.
- Following on from the previous year, there is continued focus on working with suppliers to reduce the number of price differences and quantity discrepancies.
- Continued monitoring of Lidl GB's payment performance (this process was first started in March 2018) and is now taking place more frequently every other month.

**Disputes:**

No disputes have been raised to the CCO under Articles 11(2) or 11(3) of the Groceries (Supply Chain Practices) Market Investigation Order 2009.

Listed below are the instances in which a supplier has escalated a concern that is within the scope of the Code or the Order:

- In six instances, a supplier concern was raised at level 1 and resolved at level 1 (concern raised with any other party in the business, typically the Buying team).
- In one instance, a supplier concern was raised at level 2 and resolved at level 1.
- In three instances, a supplier concern was raised at level 2 and resolved at level 2.
- One incident is reported as ongoing.
- No disputes have been escalated to level 3 (direct contact with CCO, formal dispute raised).
- No disputes have been escalated to level 4 (arbitration by GCA or other).

**M&S**

[Annual report and financial statements 2020](#)

The Groceries (Supply Chain Practices) Market Investigation Order 2009 (the “Order”) and The Groceries Supply Code of Practice (the “Code”) impose obligations on M&S regarding its relationships with its suppliers of groceries. Under the Order and Code, M&S is required to submit an annual compliance report to the Audit Committee for approval and then to the Competition and Markets Authority and Groceries Code Adjudicator (“GCA”).

M&S submitted its report, covering the period from 29 March 2020 to 3 April 2021 to the Audit Committee on 12 May 2021. It was approved on 20 May 2021.

In accordance with the Order, a summary of that compliance report is set out below.

M&S believes that it has materially complied with the Code and the Order during the relevant period. No formal disputes under the Code have arisen during the reporting period. There have been four instances during the reporting period in which suppliers have either alleged a breach or made a reference to potential non-compliance with the Code. M&S has worked with the suppliers to address the issues raised and three of them have been resolved or closed. One additional Code reference made by a supplier before 29 March 2020 was also resolved during the reporting period.

A detailed summary of the compliance report is available on our website.

**[M&S Website](#)**

The Groceries (Supply Chain Practices) Market Investigation Order 2009 (the “Order”) and The Groceries Supply Code of Practice (the “Code”) impose obligations on M&S regarding its relationships with its suppliers of groceries. Under the Order and Code, M&S is required to submit an annual compliance report to the Audit Committee for approval and then to the Competition and Markets Authority and Groceries Code Adjudicator (“GCA”).

**Annual Compliance Report**

M&S submitted its report, covering the period from 29 March 2020 to 3 April 2021, to the Audit Committee on 12 May 2021. It was approved on 20 May 2021. Working with the GCA M&S welcomes the appointment of the new GCA, Mark White. During 2020/21, Mr White met with our Chief Executive Officer and Audit Chair and attended several meetings with our Commercial Director,

Foods and Code Compliance Officer. We are committed to working collaboratively with Mr White and building on the progress made by his predecessor Christine Tacon.

Following feedback from the new GCA, M&S has further enhanced its internal Code compliance controls for the buying team and other supplier facing colleagues by instituting new Code compliance self-certification procedures and a new remuneration policy which makes pay rises, bonus payments and share awards contingent on Code compliance.

### **Training**

During 2020/21, we updated our on-line Code training module which is mandatory for all members of the buying team and other supplier facing colleagues. The training, which has been completed and passed by more than 300 colleagues during the reporting period, includes introductory video messages from the GCA and our Commercial Director, Foods.

Our on-line module was complemented by several tailored, in person training sessions delivered by our CCO (remotely delivered) to a wide range of relevant teams within M&S.

### **Other actions taken to enhance compliance**

As a result of feedback from GCA and suppliers, and to help achieve business objectives, M&S has taken steps during the reporting period to enhance Code compliance and improve ways for working with our suppliers. Key initiatives include the following:

- **Supplier Engagement Programme:** During 2020/21 M&S has undertaken an engagement programme, led by senior management, to ensure we listen to suppliers' concerns (Code related and otherwise), learn from them, and work collaboratively to take appropriate action in response.
- **Reducing Artwork and design charges:** In response to supplier feedback in the 2020 Annual Survey, we reduced artwork and design charges for suppliers during the reporting period.
- **Supplier invoice queries:** We took steps to minimise supplier invoice queries and ensure that, when they do arise, they are addressed swiftly; including (i) increasing the size of the Vendor Support team, (ii) improving data quality and (iii) proactively working with suppliers to ensure they understand our invoicing and payment processes.

### **Compliance and Disputes**

M&S believes that it has materially complied with the Code and the Order during the reporting period. No formal disputes under GSCOP arose during the reporting period.

### **Supplier queries and allegations**

In accordance with the Code and GCA guidelines, M&S has identified and reported to the GCA on all instances where suppliers have either alleged a breach or referred to potential non-compliance with the Code. Four instances arose during the reporting period, of which 3 were closed or resolved at the end of the reporting period. An additional Code issue which arose before the reporting period was also resolved.

Morrisons plc [Annual Report and Financial Statements 2020/21](#) GSCOP applies to designated grocery retailers in the UK, adding specific regulations into the trading relationships between retailers and their suppliers. We take our responsibilities to suppliers seriously and have established ways of working that enable us to build strong collaborative relationships. For more details see [morrison-corporate.com/suppliers](https://www.morrisons-corporate.com/suppliers).

We listen hard to our suppliers at all times and this became even more important during the last year. We responded quickly to support suppliers, particularly small suppliers, facing difficulties as a result of the pandemic. This included moving to immediate payment terms for all existing and any new smaller suppliers (over 3,000 in total), onboarding new small suppliers and increasing distribution for existing small suppliers who had suffered reduced demand from food service and hospitality and opening steak and seafood bars in store to support British farmers.

Over the past year, we have made significant investments into our commercial and supply chain systems and processes, including our Delivery Scheduling, Warehouse Management and Supplier Database systems to improve the ways in which we communicate with our suppliers.

We actively engage with the relevant regulatory bodies, the Groceries Code Adjudicator (GCA) and the Competition and Markets Authority (CMA), to build best practice. We meet regularly with the GCA and provide updates on our activity and details on specific areas of interest to the Adjudicator. As in previous years, our Code Compliance Officer (CCO) has provided support to the GCA to help familiarise new retailers designated to operate under the Code.

Effective Compliance Risk Management is critical to delivering on our commitments to all our stakeholders. We have well established governance structures to support GSCOP compliance. This includes a group consisting of Senior Leadership team members from all relevant functions. Routine updates are also provided to our Executive Committee and to our Corporate Compliance and Responsibility Committee including developments about the operation of the Code. We formally report details of activity over the year and specific concerns raised with our CCO to the GCA and to the CMA at the financial year end.

Our Legal, Compliance and Audit teams work closely together to provide colleagues across the business with the support and guidance needed to comply with the Code. We provide training, guidance and support to all colleagues in our trading teams together with bespoke training for relevant colleagues in our Supply Chain and Finance teams through a range of formats. We review and update all of our training activities and materials throughout the year to take account of any new learnings, build in current real life examples and to reflect additional guidance from the GCA.

In the 2020 GSCOP supplier survey conducted by YouGov on behalf of the GCA, 93% of suppliers rated Morrisons as complying with the Groceries Code 'mostly' or 'consistently well'. Working with the GCA, our encouragement of suppliers to complete the anonymous survey led to Morrisons having the second most suppliers complete the survey of all designated retailers.

GSCOP related enquiries are dealt with in accordance with the regulations. Any matter not resolved directly with a buyer is escalated to the relevant Category Director and, if requested, to our CCO. During 2020/21 we were contacted by suppliers to review concerns including in the following areas:

- Requesting review of supplier delisting decisions including extensions to notice periods

- Queries relating to resolution of goods receipt and invoice disputes
- Asking for clarification on details of discussions regarding commercial terms

At all stages, we try to resolve the concern by talking to the supplier openly and honestly and this approach is generally successful in reaching a swift resolution.

As at the end of the financial year, there were three direct Code related complaints which are yet to be resolved. Contact details and further up-to-date information can be found at [morrison.co.uk/gscop](http://morrison.co.uk/gscop).

#### Ocado Retail

[Ocado website](#)

The Groceries (Supply Chain Practices) Market Investigation Order 2009 and The Groceries Supply Code of Practice (Code) have been in effect since 4th February 2010. They apply to grocery retailers with a turnover above £1 billion and impose obligations governing their relationships with suppliers. This includes submitting an Annual Compliance Report to the Competition and Markets Authority and the Groceries Code Adjudicator.

Ocado Group plc was originally designated on 1st November 2018 and superseded by Ocado Retail Limited on 16th October 2019 following the creation of the latter through a joint venture between Ocado Group plc and Marks & Spencer plc on 5th August 2019.

We recognise the crucial role that our suppliers play in meeting the expectations of our customers at Ocado Retail. We're committed to engaging collaboratively with our suppliers to ensure our relationships are conducted fairly and lawfully, in line with the requirements of the Code. This summary of our Annual Compliance Report is for the period of 2nd December 2019 to 29th November 2020.

#### **Background**

During this financial year, Ocado Retail undertook its biggest operational change to date as we implemented the changeover from selling Waitrose products to selling M&S products, launching the public-facing element of the joint venture. This was accompanied by a full range review and detailed supplier negotiations as we worked to reset and establish the new proposition. The Buying Team was briefed throughout this process on the Code requirements and the approach to take when dealing with our suppliers to ensure we work in a collaborative and transparent way.

During the initial COVID-19 restrictions we experienced high levels of customer demand and worked closely with our suppliers to help prioritise products that customers wanted the most. This was achieved during a short period of time and is testament to our collaborative approach to building good relationships with our suppliers. We are grateful to our suppliers for their support during this period of uncertainty and we have continued to monitor customer demand to ensure we are able to meet their expectations.

Ocado Retail has met all reporting requirements through timely submission of the Annual Compliance Report for 2019 to the CMA and submission of the Progress Update Reports to the GCA during 2020. The CCO has provided ad-hoc updates to the GCA when requests have been received for further information and was available for additional phone contact by the GCA for monthly updates relating to any supplier escalations arising from activities undertaken during the initial stages of COVID-19.

**Governance**

We developed a new governance structure and implemented this throughout the financial year. This includes monthly review meetings that are held with each supplier-facing business area, including Buying, Finance and Supply Chain Teams, to review key metrics, project initiatives impacting suppliers and any supplier escalations. The purpose is to identify trends, maintain oversight and agree any actions on a continuous improvement basis. We have also introduced quarterly governance meetings with functional directors to ensure visibility and engagement at senior levels of the organisation. The CCO provides regular updates to the Audit Committee and there is a standing agenda item to review progress at each audit meeting.

**Training**

We created a new online training module for Annual Refresher Training that took place during April and May. The module is also used as the basis for induction training, with all new starters required to complete this within the first two weeks of joining the organisation. Over the course of the financial year, a total of 538 colleagues from Ocado Retail and Ocado Group completed the online module, which represents 97% of those eligible, with the remainder having recently joined the organisation prior to the end of the year.

We also developed new training material to support trainer-led sessions for supplier facing business areas, with an initial focus on the Buying Team. The training outlines our shared culture and individual responsibilities to ensure a strong behavioural foundation for compliance with the Code. The core elements of the Code are highlighted and are further supported by a number of case studies, themes and key messages. The sessions are designed to be interactive and colleagues are encouraged to ask questions throughout, with delivery taking place virtually due to social distancing restrictions. Following a successful pilot, 101 colleagues were trained by the end of the financial year.

**New Starters**

We have strengthened our new starter process to include a welcome email that is sent by the CCO to new colleagues. This outlines our designated status and provides a link to the Code, advises on the training requirements, and provides further contact details for help and support. We are also introducing a step for new colleagues to check-in with their line manager before they make any contact with suppliers so that we can ensure we are comfortable with their level of knowledge. These steps have also been incorporated into our induction material to ensure a consistent message for colleagues joining the organisation.

**Supplier Initiatives & Communications**

We have agreed that the CCO will be included at an early stage in all core projects that affect suppliers, which represents a step change in our approach. This ensures appropriate communications to suppliers that outline the initiative, benefits, any potential implications and the approach that will be taken, ensuring clarity and timeliness of core messages.

During this financial year there have been a number of communications to suppliers relating to COVID-19, the joint venture with Marks & Spencer plc, branded sourcing negotiations, tender processes, the opening of a new Customer Fulfilment Centre and Brexit. In conjunction with the Legal Team, the CCO provides guidance on the proposed communications and the requirements for supplier engagement relating to

any changes that may amend the future relationship. Project Teams are required to track the issuing of communications, dealing with any bounce-backs, queries or issues as appropriate, and providing updates to the CCO as part of the overall project progression.

### Supplier Survey

We were pleased with the results of the Groceries Code Adjudicator's annual Supplier Survey that highlighted that the majority of our suppliers, 93%, agree that Ocado Retail conducts its trading relationships fairly, in good faith and without duress, placing us 7th out of 13 retailers. We are grateful to our suppliers for taking the time to provide their feedback and have reviewed the results with each of the teams responsible in order to identify areas where additional actions can be taken to further improve our performance.

### Supplier Disputes

Our teams work closely with suppliers to resolve any issues that arise, the vast majority of which are resolved at the first point of contact. During the financial year we did not receive any formal disputes and dealt with three escalations informally as follows: -

- Two complaints were received and resolved by the Buying Team (level one)
- One complaint was received and resolved by the CCO (level two)

The three complaints were considered to be within the scope of the Code and were resolved in conjunction with each supplier concerned. Alongside the resolution we also identified additional steps that we have built into our approach in order to avoid any recurrence.

### Key Contacts

We encourage all of our suppliers to raise any queries or feedback directly with their named contact within the Buying Team or with the Senior Buying Manager for their category. Alternatively, any payment or invoicing issues can be directed to [payables@ocadoretail.com](mailto:payables@ocadoretail.com).

If any of our suppliers wish to raise queries outside of the Buying Team or would like to have a conversation in confidence, please contact our Code Compliance Officer (CCO), Robert Skelton, by email at [scop@ocadoretail.com](mailto:scop@ocadoretail.com).

Contact details for the Groceries Code Adjudicator (GCA) along with more information about GSCOP can be found [here](#).

J Sainsbury  
plc

[Annual report  
and financial  
statements  
2021](#)

Sainsbury's GSCOP compliance framework is based on a collaborative relationship with the GCA, clear policies and procedures, mandatory training and regular monitoring and reporting of compliance. Sainsbury's also has specific internal resource who provide all relevant colleagues with day-to-day advice and guidance.

The CCO and the GCA meet on a regular basis to discuss general and emerging risk areas as well as Sainsbury's approach to compliance. The new Chief Executive Officer met with the new GCA, emphasising the importance to the business of strong supplier relationships, underpinned by GSCOP principles.

Relevant policies are reviewed and updated on at least an annual basis and are made available to colleagues. This is supported by Sainsbury's GSCOP training, which is

compulsory for colleagues who are part of the Buying Team and for colleagues who are directly or indirectly involved in decisions that impact GSCOP. As a result, over 1,700 colleagues completed appropriate training during the year. GSCOP training is reviewed and refreshed annually. This year, the format of training was updated to reflect the move to home working and the content was updated to provide specific advice in relation to COVID-19.

Regular meetings are held between the CCO, Legal, Internal Audit and the Commercial Planning team to identify and assess emerging risk areas and an established compliance monitoring programme is embedded within the business. The Operating Board and Audit Committee are updated four times a year on GSCOP matters.

A key area of focus this year has been to work collaboratively with our suppliers to ensure continuity of food supplies. Our legal team provided real-time support and advice to the business on a variety of issues. We also provided financial support for suppliers by accelerating payments to smaller suppliers and other suppliers in financial difficulties.

This increased collaboration may have contributed to the lower number of potential breaches raised by suppliers in comparison to last financial year. Eight potential breaches were reported in FY20/21 (17 in FY19/20). Of the eight potential breaches of GSCOP, one was deemed to be outside of the Code. The remaining seven were resolved either within our Trading Division using standard escalation procedures, or through discussions between the CCO and the supplier. None were pursued as formal disputes with the CCO or referred to the GCA for arbitration. Causes of potential breaches are reviewed to identify areas for improvement.

TJ Morris

[Corporate website](#)

This is a summary of the annual compliance report submitted to the Competition and Markets Authority and Groceries Code Adjudicator in accordance with The Groceries (Supply Chain Practices) Market Investigation Order 2009 (the 'Order').

#### **Steps take to Comply with the Order and Groceries Supply Code of Practice ('GSCOP')**

- Appointment of a Code Compliance Officer.
- Incorporated GSCOP into all supply agreements.
- Procedures have been adapted to ensure written terms and Article 6, of the Order, notices are issued on supplier set up.
- Providing existing suppliers with written terms of their supply agreement and the information required by Article 6 of the Order.
- Producing guidance for suppliers to enable them to understand what constitutes their supply agreement.
- Training all buyers.
- Implementing online training.
- Internal functions have been adjusted to ensure terms are recorded.

#### **Issues Raised by Suppliers**

No disputes under Article 11 of the Order have been raised by suppliers.

Six suppliers raised items for the Senior Buyer to review.

Tesco plc

[Annual report and Financial Statements 2021](#)

The Code regulates aspects of the commercial relationship between 13 designated grocery retailers in the UK and their suppliers of grocery products. The aim of the Code is to establish and embed the overarching principles of fairness and lawfulness within retailer – supplier relationships. Specific supplier protections under the Code include the obligation for agreements to be in writing and copies retained; reasonable notice to be given of changes to the supply chain or reduction in the volume of purchases; and a number of provisions relating to payments to suppliers, including obligations for retailers to pay suppliers in full and without delay.

Retailer compliance with the Code is overseen by the Groceries Code Adjudicator (GCA). In 2020/21, we continued to engage constructively and positively with both Christine Tacon and her successor Mark White around areas of key interest to the GCA, including our approach to GSCOP compliance, risk management, and longstanding topics such as delays in payment, delisting and forensic auditing.

Our Code compliance programme continues to strengthen and transform the way we work with suppliers. This year, we have implemented various new and/or improved supplier-facing systems to improve transparency with our suppliers. Furthermore, we improved internal guidance on Code-related topics such as delisting and introduced a new approach for managing our supplier lifecycle with small suppliers (our Small Supplier Principles).

Against the backdrop of COVID-19 and Brexit, we have continued to work constructively with our suppliers, including providing improved shorter payment terms for our smaller suppliers. We were pleased that in the GCA's annual supplier survey for 2020, 93% of our suppliers recognised that we comply 'consistently well' or 'mostly well' with the Code.

In our own Supplier Viewpoint survey, conducted in January 2021, the results continue to reflect the progress we have made with our supplier relationships. Both our total Group and UK scores for suppliers rating their satisfaction with Tesco, as either 'extremely satisfied' or 'very satisfied', were our highest scores to date, at 85% and 85.6%, respectively. Among topics relevant to the Code, our strongest score in Viewpoint continues to be 'Tesco pays promptly (within policy terms)' at 93.6%.

Also, in the 2020 independent, industry-wide Advantage survey of retailers, we were pleased to be ranked first in five of the six categories, coming second by one percentage point in the remaining category and, retaining our first place ranking overall.

During the preceding financial year, we provided annual refresher training for all colleagues involved in buying groceries. Our GSCOP training module includes a link to the Code to ensure that all new starters and colleagues transferring from another division receive a copy. All colleagues, both new and current, received and completed training successfully.

This year, 22 Code-related issues, were raised by suppliers, down from 45 during 2019/20. In addition, five issues were carried over from 2019/20.

The majority of concerns raised by suppliers related to delisting decisions, but in almost all of these cases the suppliers were not alleging a breach of GSCOP but were instead seeking to have the delisting decision reviewed (or elements of it, such as the number of SKUs to be delisted or the duration of the notice period). Two of the issues raised, were found to be outside the scope of the Code. No formal Disputes (as defined by Part 5, Article 11 of the GSCOP Order) were received during the year.

At the end of the reporting period, we had resolved 26 of the 27 concerns that were raised during the preceding year (or which were open at the start of the year), following further discussion between the buying team and the relevant supplier, or between our Code Compliance Officer and the supplier.

## Waitrose

[John Lewis Partnership Ltd Annual Report and Accounts 2021](#)

Waitrose is subject to the Groceries (Supply Chain Practices) Market Investigation Order 2009 (the “Order”) and the Groceries Supply Code of Practice (“GSCoP” also referred to as the “Code”).

Both the Order and, in particular, the Code, regulates Waitrose’s everyday trading relationships with our grocery suppliers, ensuring that as a Designated Retailer, we treat our suppliers fairly and in accordance with the Code. The Order also includes provisions on training requirements for our buyers, mandates a need for agreements to be in place with all our groceries suppliers and that any such agreements incorporate the Code. These principles, and the desire to treat our suppliers fairly, are also enshrined within our Principle 6 and Rule 96 of the John Lewis Partnership’s Constitution and are therefore in keeping with the Partnership’s general ethos.

As required by the Order, the Waitrose Code Compliance Officer (“CCO”) is obliged to present a report detailing our compliance to the Code to the Partnership’s Audit and Risk Committee, for onwards submission to the Competition and Markets Authority (“CMA”). The reporting period covered was 26 January 2020 to 30 January 2021 and was submitted to the CMA on 13 April 2021.

### WORK WITH THE GROCERIES CODE ADJUDICATOR (“GCA”)

Retailer compliance with the Code is regulated by the GCA. Over the past year we have seen Mark White take over from Christine Tacon in this role and we have continued to work with Mark and his team in the same cooperative manner that we enjoyed with Christine.

Our collaborative approach with the GCA supports us in identifying underlying issues and trends, and allows us to address individual supplier concerns that the GCA may bring to our attention.

The Chair of the Audit and Risk Committee, Andy Martin, also attended a meeting with the new GCA in the autumn.

### WORK WITH SUPPLIERS

We have made wholesale improvements to the content and usability of our supplier portal, Waitrose Engage, to enable suppliers to find the resources and assistance they require more easily. As part of this, we have also provided further information on Engage about the Code, the GCA and the role of the Waitrose CCO, providing additional assurance to suppliers that any concerns that they bring to the CCO’s attention will be dealt with confidentially.

### *Covid-19*

The Covid-19 crisis placed unprecedented demand on our business and supply base. Waitrose responded to this with clear and regular communications to our suppliers, explaining the necessity behind the fast-paced and often quite drastic measures that we had to take to maintain our core services and supplies and play our part in feeding the nation. These regular communications were supported by extensive guidance from our Legal and Commercial Management teams, which emphasised the Code and a need to do what we reasonably could to support our suppliers. With every key

decision that was communicated, suppliers were actively encouraged to reach out to us if they had concerns or required support. We conducted weekly calls with key suppliers to ensure we understood and could react to issues that our suppliers were facing and to get feedback on how our comms were landing. We were pleased to learn that our suppliers felt our communications during the crisis were clear and that our buyers were well-informed, accessible and dynamic in their dealings with them.

Whilst other retailers shortened their payment terms for small suppliers during the crisis, Waitrose already had these measures in place as a matter of course for the majority of our small suppliers.

The CCO and Senior Finance Manager responsible for GSCoP were also regular attendees at key executive and Covid-19 planning meetings respectively throughout the crisis, enabling a Code lens to be applied throughout our key decision-making.

#### INTERNAL WORK

Compliance with the Code by Waitrose is overseen by the GSCoP Steering Group, comprising the CCO and representatives from the Commercial, Legal, Finance, and Supply Chain teams. The team meets on a monthly basis and is supported by a GSCoP weekly group (with similar attendees) who monitor ongoing complaints, industry trends and collaborate on continuous improvement activities as well as producing training materials and guidance for our Partners.

This year, we have revised the mandatory GSCoP e-learning that our Partners receive, upweighting training in certain areas where the roles that certain teams now carry out have evolved and are more supplier-facing (requiring, therefore, a more in-depth understanding of the Code).

Our e-learning is also supplemented by training sessions before key events (such as prior to our annual supplier negotiations in the autumn) which has relevant content dedicated to Code compliance, as well as by our “Legal briefing” training sessions for all Trading Partners which are led by Legal, Compliance, Commercial Management and the CCO. This year's sessions focused on delisting, using the appropriate language when making requests of suppliers, payment for positioning and the new Partnership Contract Management system, Coupa.

#### *Contracts project*

In October 2020 the John Lewis Partnership launched its new contract management tool, Coupa. This is a pan-Partnership system which will also act as a repository for the main aspects of our agreements with Suppliers, including, in particular, supplier acceptance to our core terms and policies, embodied within our Conditions of Purchase. In time for this change, Waitrose took the opportunity to review our mandatory policies and Conditions of Purchase with a view to updating and streamlining them with the aim of making Waitrose a simpler retailer to deal with. Following an extensive exercise between our Legal team, policy owners and key commercial stakeholders, the revised terms have been significantly improved from a supplier perspective and are assessed to be fair, reasonable and easy to digest, whilst also making it overtly clear where the Code has been incorporated. In addition, where policies have cost recovery mechanisms, any applicable charging structures and revenue streams have also been revised and streamlined to ensure that they are fair, transparent and justifiable.

#### SUMMARY

The Partnership continues to take compliance with the Code very seriously and Waitrose has worked hard over the past year to continue to make further

improvements to our overall GSCoP compliance. Our progress in this respect has been significantly aided by the fact that our GSCoP governance and operational groups have become more established in their roles over the past year (with the Steering and Working Groups having been first established in 2019). Where a Code-related issue or complaint has been identified, Waitrose will always seek to understand the root cause of the problem and in the case of a supplier complaint, the reasons behind their concerns with the ultimate aim of resolving the issues quickly and ensuring that our suppliers have been treated fairly and in line with the Code. We welcome queries and feedback from our suppliers and, to that end, invite any suppliers reading this report who may have had issues or have any suggested improvements to our Code-related ways of working, to please contact their buyer in the first instance or our CCO, Matt Wilson, which can be done in complete confidence.