GSCOP summary of annual compliance FY 2026

Annual Compliance Report

An annual compliance report for the financial year 2025/26 (29 March 2025 to 27 March 2026), as required by the Groceries (Supply Chain Practices) Market Investigation Order 2009, 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 this financial year, and it has had no formal disputes under the Code during this financial year.

Work with the Groceries Code Adjudicator ("**GCA**")

Iceland consistently works with the GCA to monitor its GSCOP compliance, and to receive and share any feedback on GSCOP and GSCOP-related activities.

Iceland continues to implement the GCA's best practice guidance in relation to cost price increase, and cost price decrease, requests. All feedback that is received from the GCA in relation to Iceland's practices with its suppliers, or any other area of the business, is shared with the appropriate team(s). As always, Iceland strives to improve its relationships with its suppliers.

Iceland Internal Compliance

Iceland cascades a bi-annual GSCOP e-learning training module to all colleagues in supplier-facing departments. The training is updated regularly to reflect any queries or concerns that are brought to the attention of the GSCOP Team. Additionally, the GSCOP Team ran two in-person GSCOP training sessions for Iceland's Buying and Supply Chain Teams in February 2026 to give the colleagues the opportunity to ask questions and discuss real-life examples.

Iceland continues to hold bi-annual GSCOP steering group meetings to enable all supplier-facing departments to communicate any compliance concerns that may have been raised, or forthcoming projects that might affect suppliers, and to discuss Iceland's compliance with GSCOP. The GSCOP Team shares all feedback from the GCA within these meetings, so that all supplier-facing departments are aware of the latest areas of focus for the GCA.

Iceland's Code Compliance Officer ("**CCO**") attends weekly Trading Board meetings with the other directors to gain a full understanding of what is going on throughout the business. He has also attended two supplier conferences, accompanied by the relevant Trading Directors, to get face-to-face feedback from suppliers, and to encourage suppliers to discuss any concerns with him or the wider GSCOP Team. Iceland's CCO and GSCOP Audit Chair have also invited suppliers from each chamber to join them for individual calls to discuss how Iceland works well with its suppliers, and where it can improve. To date, no significant points of concern have been raised.

Iceland held its annual GSCOP compliance audit in March. This helps us to measure the business' compliance with the Code, and to address any future changes that may be required. Any feedback from this audit is shared with the Trading Directors, the CCO and the GSCOP Team, so that any changes can be agreed and implemented. This may include changes to the e-learning training, or having discussions with specific departments, to ensure GSCOP compliance in relation to ongoing projects within the business.

Iceland aims continually to improve its internal compliance. It therefore appreciates all feedback from its suppliers, whether made directly to Iceland or via the GCA, both of which help to improve Iceland's understanding of any issues its suppliers may be facing. In circumstances where the supplier has given us consent to do so, any matters which have been raised with Iceland's CCO have been subsequently shared with senior members of the relevant team.

Iceland continues to perform internal de-listing spot checks to ensure that Buyers are performing de-lists in accordance with the Code, and in a manner that is clear, fair and transparent.

GCA Survey

Iceland was pleased to move up from 13th place in the 2024 survey to 10th place (out of 14 retailers) in the 2025 survey for its perceived overall compliance with the Code in the eyes of its suppliers. Iceland has maintained this position in the 2026 survey.

Iceland continues to work with the GCA to review and understand its GSCOP survey results. It is committed to absorbing the feedback and working with its suppliers to improve their overall perception of Iceland's compliance with the Code.

Reported Matters

Iceland records all complaints received from its suppliers which, if not resolved by the Buyers, are escalated to the Category Managers, Trading Directors and occasionally, if required, the CCO.

Iceland has received six (6) potential GSCOP breaches, or formal complaints, within this financial year.

All of these potential breaches were reported to the GCA within Iceland's quarterly Progress Meeting reports. All but one, have been resolved and closed to the satisfaction of the supplier. Iceland will continue to correspond with the outstanding supplier until it is confirmed this matter is resolved.

Whenever Iceland receives a complaint, it promptly works with the relevant supplier to investigate and resolve the matter to the satisfaction of both parties. Full details of such matters are reported quarterly to the GCA as part of its Progress Meeting report, and annually to the CMA and the GCA.

The CCO is independent from the Buying Team and can listen to complaints from suppliers on a confidential basis. There were no complaints reported to the CCO on a confidential basis during this financial year.

Training

All new colleagues in the Buying Team have received their one-to-one new starter training within one month of their start date, and have been given a copy of the Code by the GSCOP Team or the respective Trading Manager. They also have access to various GSCOP materials, including the Code, the refresher training modules and Iceland's de-list policy, on Iceland's intranet.

All supplier-facing teams in the business have received GSCOP e-learning training twice this financial year as part of Iceland's bi-annual GSCOP training programme. As mentioned above, the Buying Team and the Supply Chain Team each received a face-to-face training session with the GSCOP Team in February 2026.

The GSCOP Team is based in the same building as the Buying Team, the Supply Chain Team and the Finance Team, and has an open-door policy for any ad-hoc GSCOP queries that arise from time to time.

Actions

Iceland has focused on several key projects during this financial year, including:

- updated GSCOP e-learning training with supplier-facing departments;
- face-to-face training sessions with the Buying Team and the Supply Chain Team to discuss the key principles of GSCOP, and answer any GSCOP-related queries;
- supplier conferences to update suppliers on Iceland's trading plans during the financial year and beyond;
- selection of and investment in a new SBO system to improve future forecasting, which is expected to fully roll-out in the next financial year; and
- facilitation of calls between suppliers, the CCO and the GSCOP Audit Chair to improve relationships with suppliers.

Forward Looking

Iceland aims to continue fostering mutually beneficial relationships with its suppliers in the next 12 months, as well as growing long-term partnerships, where possible. It is aware that the growth of the business can only be achieved with the ongoing support of its suppliers.