

Our Commitment to Responsible Use of Artificial Intelligence (AI)

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Applicable Countries	All

Our Vision

Our long-term vision is to change the way the world shops - for good. Use of Artificial Intelligence (AI) plays a critical role in maintaining our competitive advantage as a leading technology provider in ecommerce, fulfilment and logistics.

Our Responsible AI Commitments (Commitments) outline our approach to the responsible use of AI, including the development and deployment of AI at Ocado Group. They are our guide to innovating responsibly with AI to deliver high performing systems for our partners and building trust in our capabilities.

Scope

This document provides a framework for all employees, contractors and third-party vendors engaged in AI-related activities. It applies to all AI systems we develop, procure or deploy including:

- Machine learning and deep learning systems
- Natural language processing models
- Computer vision
- Robotic process automation with decision-making capabilities
- AI-powered analytics, statistical approaches and decision-support tools
- Generative AI / GenAI
- Use of third-party AI tools for the purpose of work for Ocado.

Our Responsible AI Commitments

Our Commitments shape how we implement and govern our AI technologies. These Commitments ensure responsible, legal and safe use of AI systems. They are reviewed regularly to ensure alignment with the evolving changes to AI systems including emerging risks and opportunities.

1. **Fairness:** Using high-quality, representative datasets, and mitigating against unfair bias.
2. **Transparency and Explicability:** Ensuring systems are well-documented to demonstrate reliability, trace issues, and provide understandable explanations for users.
3. **Governance:** Ensuring appropriate accountability structures are in place before internal or third-party systems are deployed. Systems are monitored regularly to check performance.
4. **Robustness and Safety:** Integrating privacy and security into design, assessing safety considerations, and building in appropriate safeguards.
5. **Impact:** Ensuring interactions with people are conducted with respect and empathy. Considering the impact of automation on affected staff, communicating in an upfront way and providing opportunities for re-skilling where possible.

Putting Our Commitments into Practice

Bringing our Commitments to life requires conscious effort in our everyday work. As we continue to embed these Commitments into our operations, we are taking clear and practical steps to ensure our approach to AI remains responsible, transparent and compliant.

All AI projects and tools must be registered in our central AI inventory.

We evaluate all registered AI use cases against our Commitments, established compliance and risk frameworks, their business value and their potential risk under the EU AI Act. In line with this legislation, we are committed to ensuring that none of our AI systems fall into the category of “Prohibited AI Practices” as unacceptable risk. Any potential “high-risk” use cases are escalated for review by the AI Strategy & Governance Group.

Our AI guidelines give our employees clear expectations for responsible use. For example, they state that when using AI-generated content employees should:

- Clearly label it as created by AI.
- Ensure it is reviewed by a human for bias and inaccuracies.
- Confirm that any personal data used meets our privacy-by-design standards.

We also invest in building awareness and capability through our mandatory AI literacy programme, delivered in phases and prioritised by roles and responsibilities. This training ensures that everyone using AI at Ocado understands the associated risks, opportunities and the responsibilities that it brings.

Governance and Oversight

The AI Strategy & Governance Group is responsible for the creation and implementation of these Commitments. This Group reports progress to the Ocado Risk Committee at least twice a year. The Ocado Audit Committee monitors the effectiveness of the Risk Committee in governing AI use cases and risks and reports key findings to the Board.

The field of AI use is rapidly evolving and so will our approach. These principles will be reviewed regularly to ensure they remain effective and relevant.

How to Ask a Question or Report a Concern

If you have any questions about how to apply these principles or a concern about how AI is being used at Ocado Group, please email responsibleai-XD@ocado.com or use our [Speak Up](#) service. We will follow up with concerns raised in accordance with our policies and procedures.

Date	Version	Owner	Approved by	Next Scheduled review
November 25	1	Mollie Stoker	AI Strategy & Governance Group	November 2026