

GCA investigation into Co-operative Group Limited – progress towards following GCA recommendations



[GCA investigation into Co-operative Group Limited – progress towards following GCA recommendations](#) (PDF, 192KB, 2 pages)

Requirements of Co-operative Group Limited to enable me to monitor its compliance with my recommendations (paragraph 59 of the report of my investigation)

GCA view as of 9 December 2019

I required Co-operative Group Limited (Co-op) to provide a detailed implementation plan within four weeks of the publication of the report of my investigation setting out how it would comply with my recommendations.

I consider that Co-op has met this requirement.

I required a response from Co-op to the recommendations on a quarterly basis.

I moved monitoring of Co-op compliance with my recommendations to business as usual.

Recommendations

Recommendation 1: Co-op must have adequate governance to oversee and manage its compliance with the Code.

I consider that Co-op has an appropriate approach to following this recommendation.

Recommendation 2: Co-op legal, compliance and audit functions must have sufficient co-ordinated oversight of Co-op systems to ensure Code compliance.

I consider that Co-op has an appropriate approach to following this recommendation.

Recommendation 3: Co-op IT systems must support Code compliance.

I consider that Co-op has an appropriate approach to following this recommendation.

Recommendation 4: Co-op must adequately train on the Code all employees who make decisions which affect a Supplier's commercial arrangements with Co-op.

I consider that Co-op has an appropriate approach to following this recommendation.

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Recommendation 5: Co-op must in any potential De-listing situation communicate with affected Suppliers to enable Co-op to decide what is a significant reduction in volume and reasonable notice.

I consider that Co-op has an appropriate approach to following this recommendation.

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