

Notice of Investigation

GCA statutory responsibilities

- 1. The role of the Groceries Code Adjudicator (GCA), conferred upon it by the Groceries Code Adjudicator Act 2013 (the Act), is to enforce the Groceries Supply Code of Practice (the Code) and to encourage and monitor compliance with it.
- 2. The Code applies to Aldi Stores Limited, Amazon.com, Inc (Amazon), Asda Stores Limited, B&M European Value Retail SA, Co-operative Group Limited, Iceland Foods Limited, J Sainsbury plc, Lidl GB Limited, Marks & Spencer plc, Ocado Retail Limited, Tesco plc, TJ Morris Limited, Waitrose Limited, and Wm Morrison Supermarkets Limited.

GCA decision to launch an investigation

The GCA has considered information submitted to it and has made an assessment of that information in line with the published *Statutory guidance on how the Groceries Code Adjudicator will carry out investigation and enforcement functions*¹.

The GCA has concluded that it has reasonable grounds to suspect that Amazon has broken paragraph 5 of the Code (No delay in Payments) in relation to certain of its practices from 1 March 2022, the date of Amazon's designation, to 20 June 2025, the date of this Notice.

The GCA has escalated its concerns in accordance with its published collaborative approach to regulation. There has been a period of increased engagement during which Amazon has made some changes to address issues related to paragraph 5 of the Code and to address compliance issues related to other paragraphs of the Code.

The GCA remains concerned about Amazon's compliance with the Code and has decided that an investigation should be commenced to understand fully: the extent to which paragraph 5 of the Code may have been breached, any impact of Amazon's conduct on suppliers, and the root causes of any issues.

Having applied its published prioritisation principles and being satisfied that it is proportionate to investigate, the GCA is launching an investigation into the conduct of Amazon in respect of paragraph 5 of the Code: No delay in Payments, which states that:

¹ https://www.gov.uk/government/publications/statutory-guidance

"A Retailer must pay a Supplier for Groceries delivered to that Retailer's specification in accordance with the relevant Supply Agreement, and, in any case, within a reasonable time after the date of the Supplier's invoice."

Investigation scope

The GCA's investigation will consider the nature, extent and impact of practices which may have resulted in delays in Payments including, but not limited to, Amazon's receipt of goods and payment processes, its processes for managing and escalating supplier concerns relating to deductions from payments, and its use of settlements of deductions in its commercial negotiations with suppliers.

Retailers to be investigated

This investigation will be into Amazon and will not extend to other designated retailers. If, during the course of the investigation, evidence is presented to the GCA which indicates that the same practices have been carried out by other designated retailers, consideration will be given to what action would then be appropriate for the GCA to take in respect of them, in line with published GCA guidance including its prioritisation principles.

Investigation review time period

The investigation will consider the conduct of Amazon from 1 March 2022, the date of Amazon's designation, to 20 June 2025, the date of this Notice. The focus of the investigation will be on the period since 1 January 2024, in order to have the fullest understanding of Amazon's contemporaneous practices.

Call for evidence

The GCA accordingly calls for evidence relevant to its determination of whether Amazon has broken paragraph 5 of the Code and of the effect that this has had on suppliers.

The deadline for submission of evidence is 4pm on 8 August 2025. Submissions may be made by completing the GCA's confidential questionnaire, or on paper or in electronic form submitted to the GCA at:

Groceries Code Adjudicator
7th Floor, The Cabot
25 Cabot Square
Canary Wharf
London
E14 4QZ

E-mail to: enquiries@GroceriesCode.gov.uk

Confidentiality and data protection

The GCA has a statutory duty to keep information, including information provided in response to its call for evidence confidential. The statutory guidance provides that information which identifies a supplier will be confidential unless that supplier waives confidentiality.

This means that no individual supplier or respondent to the call for evidence will be named, or otherwise be identifiable either in the report or in any other way to Amazon.

The GCA may refer in its investigation report or elsewhere to evidence from submissions in an anonymised way. That means that the GCA might refer to evidence provided, but not in any way that makes individuals or businesses identifiable.

The GCA may, under its statutory powers, request further information from respondents arising from the call for evidence.

Please be aware that information provided in response to the call for evidence may be the subject of a request under the Freedom of Information Act 2000 (or other UK legislation).

The GCA will process personal data in accordance with all applicable data protection laws and its privacy notice.

20 June 2025