



# Modern Slavery Statement

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This statement is made by Lidl Great Britain Limited (Lidl GB) pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ending 28th February 2025.





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# Introduction

We are committed to playing our part in eradicating modern slavery by proactively understanding and addressing the risks in our business operations and supply chains.

We recognise the need to both anticipate and remedy instances of exploitation. Our targeted actions include strengthening Lidl’s internal processes and overarching transparency, participating in industry initiatives to maximise our impact, and piloting human rights projects - such as new grievance mechanisms - in sectors with systemic challenges.

We are dedicated to reporting on our progress; transparency is vital to safeguard those at risk of abuse and unsafe working conditions.

In the last financial year, we have:

- Conducted three new Human Rights Impact Assessments (HRIAs).
- Begun the roll out of Ecovadis across the Lidl GB national supply base.
- Published an updated Lidl Group ‘Human Rights in the Supply Chain’ progress report.
- Committed to expanding the Lidl Banana Living Wage Project to Lidl GB national suppliers.
- Completed the Modern Slavery Awareness eLearning roll out, expanding to our regional distribution centre (RDC) colleagues.
- Relaunched our sustainability governance and launched quarterly board level reporting on key sustainability KPIs.

Through these steps, we are strengthening our due diligence. However, we know there is much more to be done. Looking ahead, we will continue to deepen our understanding of human rights risks in our operations and supply chain. We will also implement further measures to protect workers, such as:

- Expanding gender equality training in the banana sector in partnership with our longstanding supplier, Fyffes.
- Implementing a new programme in our tea supply chain to address living incomes in the sector.
- Implementing action plans in high risk supply chains, to address identified challenges.

By the end of 2025, we will also conduct and finalise three more HRIAs, meeting our commitment to complete 15 by 2025.

We will continue working to ensure that our human rights strategy is fit for purpose and adaptable to future challenges. Our purpose of making good food accessible to everyone is one that can only be achieved by treating the dedicated people who grow, pick and process our products fairly and with dignity.

Our ninth modern slavery statement outlines the work we have done over the financial year ending 28th February 2025.



# Organisation structure and supply chains

**As a business, we strive to work in a way that champions fairness and quality.**

Our purpose at Lidl GB is to make good food accessible to everyone.

We strive to do this in a way that's fair and responsible, by supporting our colleagues, customers, and communities - including those we source our raw materials and products from globally.

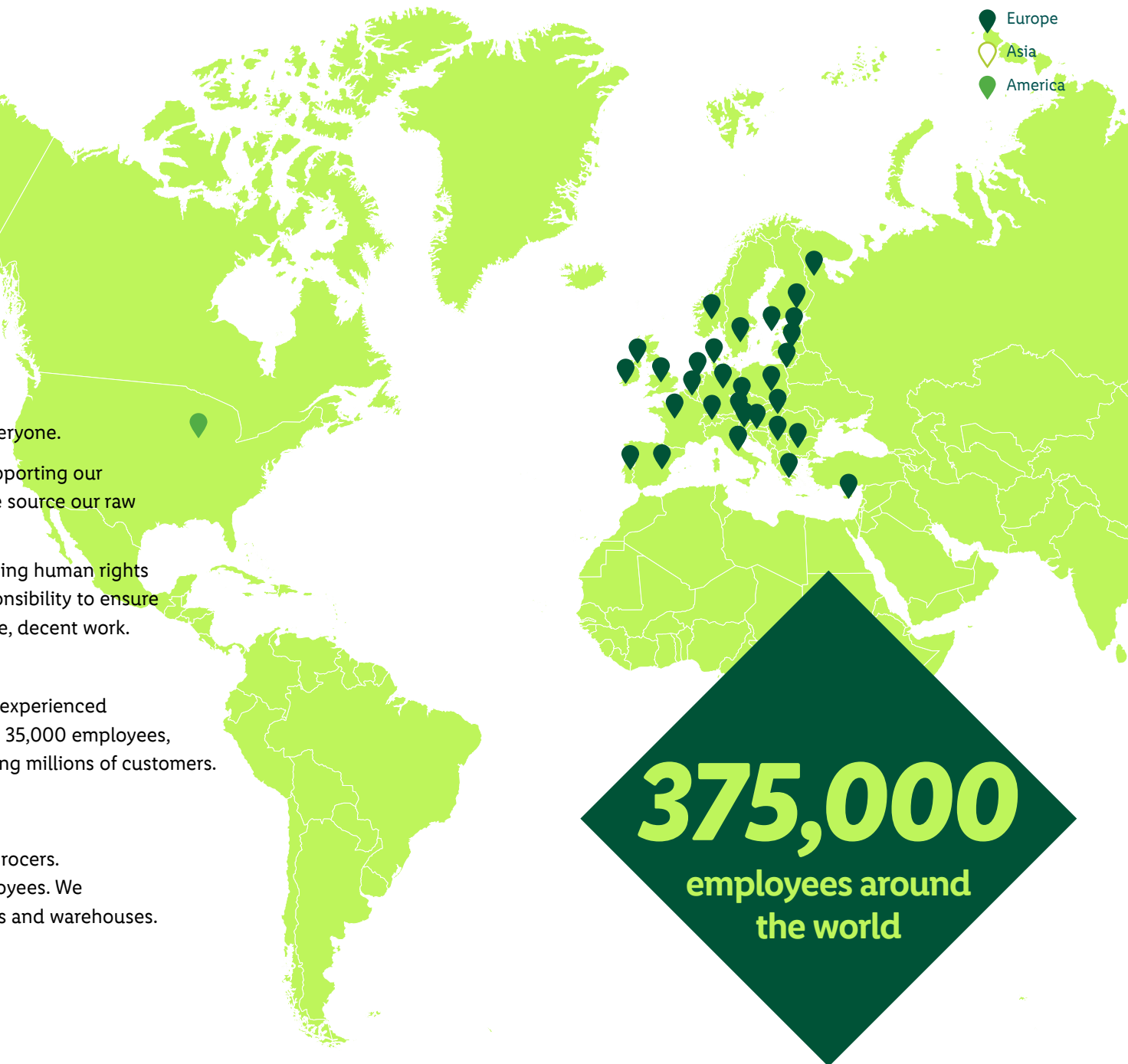
As part of this, we are committed to protecting and championing human rights across our supply chain. We recognise and embrace our responsibility to ensure that the people who produce our products have access to safe, decent work.

## Great Britain

Since establishing ourselves in Great Britain in 1994, we have experienced continuous growth. In England, Scotland, and Wales, we have 35,000 employees, over 980 stores and 14 distribution centres all ultimately serving millions of customers.

## International

Part of Schwarz Retail Group, Lidl is one of Europe's leading grocers. In 31 countries around the world, we have over 375,000 employees. We operate over 12,350 stores and more than 225 logistics centres and warehouses.



## Our supply chains and products

Thousands of local and international suppliers and partners produce our ingredients, raw materials, and finished products. These instrumental relationships help us to fulfil our mission of providing for our growing and loyal customer base.

Our products are negotiated by Buying teams based in our Lidl GB head office, at our international office in Germany and throughout our network of Lidl markets in Europe.

As a business, we understand our responsibility to improve living and working conditions wherever our products are manufactured, and we take proactive steps to reduce the risk of modern day slavery.

Own-brand lines make up the majority of the products we offer our customers, so they are the primary focus for our modern slavery strategy and overarching human rights due diligence.

# 35,000 employees

# 980 stores

# 14 distribution centres







# 700 suppliers

To offer our customers a diverse range of food and fresh produce, we source from over 700 suppliers.

# 1,200 suppliers

We source our non food products from over 1,200 suppliers, across 9 countries.

# Backing British

Our core range of fresh beef, poultry, pork, eggs, milk, cream, and block butter are 100% British.



## Food

To offer our customers a diverse range of food and fresh produce, we source from over 700 suppliers via our national and international buying teams. We have access to a network of other Lidl Buying teams throughout Europe to ensure we only sell the highest quality products at the best price.

Around two-thirds of the products sold in our stores are sourced from British suppliers and within that 100% of our core fresh everyday milk, butter, eggs, cream, chicken, pork and beef are sourced from British farmers.

## Food promotions

During themed weeks in our stores throughout the year, we sell limited offer food and drink products from a variety of countries. While these are not permanently listed in our stores, these items are expected to meet our responsible sourcing requirements.

## Non-food

As a group, we buy and retail non-food products – found in the ‘Middle of Lidl’ – including clothing, accessories, home textiles and hard goods. Within this category we source from over 1,200 suppliers, across 9 countries. Most of our non-food products are bought through our international business (Lidl Stiftung) which manages the Lidl Group’s global non-food ethical trading programme.

## Procurement

Our Procurement team plays a critical role in supporting our operations by sourcing the goods and services essential to running our business. Managing relationships with over 600 suppliers, the team oversees procurement across a wide range of categories—from store and office equipment to warehouse fittings and technology.

Reflecting our commitment to ethical and sustainable practices and our aim to strengthen our approach, we have integrated sustainability and ethical trade practices into every stage of the procurement process.

As part of our supplier due diligence, (in line with our food buying), we have Corporate Social Responsibility (CSR) as a key criteria in our tender evaluations. This ensures that our procurement suppliers are aligned with our values and are actively working to uphold these practices.

## Human rights and ethical trade

Our internal Responsible Sourcing team works from within our Buying department and supports the delivery of the priority topics linked to our supply chains, including plastics and packaging, sustainable agriculture, sustainable raw materials, healthy and sustainable diets, climate, and human rights.

The Lidl Group has an overarching human rights strategy outlining clear human rights objectives, which we have adopted to reflect the human rights priorities of Lidl GB. This strategy was developed through comprehensive risk assessments and close engagement with specialist stakeholders, which identified the main risks facing workers across our business operations and global supply chains.

For further information about how we are delivering this strategy beyond modern slavery, please review our [Buying Policy for Human Rights in the Supply Chain](#).

## Lidl Human Rights Strategy at a glance:

### Understand our impact

We identify risk and opportunities in our supply chains

### Enforce standards

We promote the ILO core conventions

### Promote fair supply chains

We promote living wages and incomes

### Driving systemic change

We engage in development programmes, initiatives and projects

Governance

Overarching responsibility for upholding human rights due diligence sits with the CEO of Lidl GB. A set governance structure exists across all Lidl markets to ensure a robust chain of accountability. In the next financial year we plan to strengthen this approach, by ensuring CSR is further embedded.

Through this process, the Lidl GB board formally monitors our progress on key human rights and modern slavery topics.

Lidl Group

CEO

Accountable for corporate due diligence (including respect for human rights and environmental impacts)

Board Director

Responsible for the implementation of corporate due diligence at an international department level

CSR & Buying Departments

Enables strategy implementation at a national level and integrates within purchasing practices

Lidl Great Britain

CEO

Accountable for corporate due diligence (including respect for human rights and environmental impacts)

Board Director

Responsible for the implementation of corporate due diligence at an international department level

CSR & Buying Departments

Enables strategy implementation at a national level and integrates within purchasing practices



# Partnerships

Through these longstanding partnerships, we work to address risks in our British operations and UK supply base, and global raw material supply chains. Examples of how we engage with these organisations to prevent and mitigate modern slavery are outlined throughout this statement.



# Policies

**We are committed to developing and embedding policies which uphold human rights and protect workers across the Lidl Group and throughout our global supply chains.**

## For our business

We have established a range of policies to protect and enhance the wellbeing of the colleagues we employ, both directly and indirectly. These policies include our Anti-Harassment Policy; Grievance Policy; Eligibility to Work Procedure; Working Time Regulations Policy and Equal Opportunities Policy.

Since 2018, we have had a wellbeing strategy called “Feel Good Five” focusing on the five ‘pillars’ of social wellbeing, physical and nutritional health, mental health, learning and financial health. Through our dedicated Employee Assistance Programme, a range of free and confidential services are available for all employees, including counselling, cognitive behavioural therapy, and a confidential helpline.



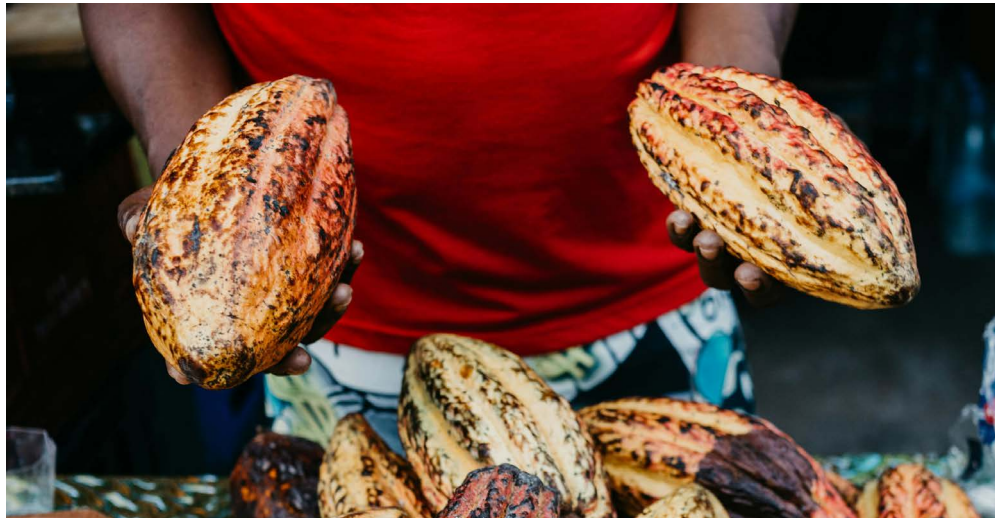
Our Feel Good Five  
**Your wellbeing  
matters**

## For our supply chains

We align our practices with internationally recognised frameworks, including the below:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGPs)
- UN Convention of the Rights of the Child
- UN Convention of the Elimination of All Forms of Discrimination against Women
- OECD Guidelines for Multinational Enterprises
- International Labour Organization Declaration on Fundamental Principles and Rights at Work
- Paris Climate Agreement
- Minamata Convention
- Stockholm Convention
- Basel Convention
- The ten principles of the UN Global Compact (UNGC)

To review all Lidl human rights and raw material policies, please see our [corporate website](#).



The Schwarz Group Business Partners Code of Conduct (CoC) outlines the minimum standards expected across our business operations and supply base, including Lidl's zero tolerance approach to forced labour, involuntary prison labour and child labour. We require all our suppliers and direct business partners to uphold its clauses.

The Sustainable Purchasing Policy (SPP) is an additional contractual document for food, F&V and non-food suppliers, outlining additional requirements or procedures on a variety of human rights and environmental supply chain topics.

It includes responsible recruitment, protecting the rights of children and young people, grievance mechanisms and redress. This document was developed to support our own brand suppliers to embed enhanced due diligence within their own business and wider supply chain.

## Ecovadis

To support our suppliers in benchmarking and progressing their human rights and environmental due diligence practices, Lidl has committed to expanding its partnership with Ecovadis to all own-brand food, F&V and non-food suppliers.

Through this platform, suppliers complete a detailed self-assessment across themes such as: human rights, ethics and sustainable procurement. Ecovadis then review and rate the supplier questionnaires and evidence provided, and offers guidance to strengthen procedures or policies, aiming for continuous improvement. By the end of the financial year, all suppliers in scope will be meeting this commitment.

# Risk Assessment & Management

**We structure our modern slavery strategy using a risk-based approach. This means systematically identifying and addressing the most adverse, actual, and potential risks within our business and supply chains as a matter of priority.**

Guided by the UN Guiding Principles on Business and Human Rights, we take accountability for the adverse impacts of our business and review opportunities for continual improvements. We do this by identifying key risks, developing tangible actions and implementing enhancements to our working practices and buying policies in collaboration with external partners.





## 2024 risk assessment

The raw materials risk assessment we conducted in 2024 analysed the human rights risks for a variety of different raw materials present in our supply chains.

Identified high-risk raw materials and their associated risks/countries of origin are displayed in the table to the right.

- 01** Child labour
- 02** Forced labour
- 03** Fair remuneration
- 04** Land rights
- 05** Occupational health & safety
- 06** Discrimination
- 07** Freedom of association

### TROPICAL FRUITS



- 01 – India, Brazil, Turkey
- 02 – India, Brazil, Turkey
- 03 – India, Brazil, Turkey
- 04 – Ecuador, Colombia
- 05 – India, Ecuador, Colombia
- 06 – India, Ecuador, Colombia
- 07 – India, Ecuador, Colombia

### SPICES



- 01 – India, Turkey
- 02 – India, Poland, Turkey
- 03 – India, Turkey
- 04 – India
- 05 – India, Turkey
- 06 – India, Turkey
- 07 – India, Turkey

### COFFEE



- 01 – Brazil, Vietnam, Honduras
- 02 – Brazil, Vietnam, Honduras
- 03 – Brazil, Vietnam, Honduras
- 04 – Colombia
- 05 – Brazil, Vietnam, Honduras
- 06 – Ethiopia
- 07 – Brazil, Honduras

### COTTON



- 01 – India, China, Pakistan
- 02 – India, China, Pakistan
- 03 – India, China, Pakistan
- 04 – India
- 05 – India, China, Pakistan
- 06 – India, Pakistan, Turkey
- 07 – India, China, Pakistan

### COCOA



- 01 – Côte d'Ivoire, Ghana, Nigeria
- 02 – Côte d'Ivoire, Ghana, Nigeria
- 03 – Côte d'Ivoire, Ghana, Nigeria
- 04 – India, Cameroon
- 05 – Côte d'Ivoire, Ghana, Nigeria
- 06 – Ghana, Nigeria
- 07 – India, Ecuador

### TEA



- 01 – China, India, Sri Lanka
- 02 – China, India, Sri Lanka
- 03 – China, India, Sri Lanka
- 04 – India, Indonesia
- 05 – China, India, Sri Lanka
- 06 – India, Sri Lanka
- 07 – China, India

### NUTS



- 01 – Vietnam, Nigeria, India, China, Cote d'Ivoire, Turkey, Argentina
- 02 – Vietnam, Nigeria, India, China, Cote d'Ivoire, Turkey, Argentina
- 03 – Argentina, Vietnam, China
- 04 – India, Burundi, Indonesia
- 05 – Argentina, Vietnam, China
- 06 – India, Nigeria, Turkey
- 07 – China, India, Nigeria

### RICE



- 01 – China, Cambodia, Indonesia
- 02 – China, Cambodia, Indonesia
- 03 – China, Cambodia, Indonesia
- 04 – Cambodia, Indonesia
- 05 – China, Cambodia, Indonesia
- 06 – Cambodia, Indonesia
- 07 – China, Cambodia, Indonesia

### PLANTS & FLOWERS



- 01 – Ethiopia, Kenya, Turkey
- 02 – Ethiopia, Kenya, Turkey
- 03 – Ethiopia, Kenya, Turkey
- 04 – Costa Rica
- 05 – Ethiopia, Kenya, Turkey
- 06 – Turkey
- 07 – Turkey

### SUGARCANE



- 01 – Brazil, India, China
- 02 – Brazil, India, China
- 03 – Brazil, India, China
- 04 – India
- 05 – Brazil, India, China
- 06 – India, Pakistan
- 07 – Brazil, India, China

### PALM OIL



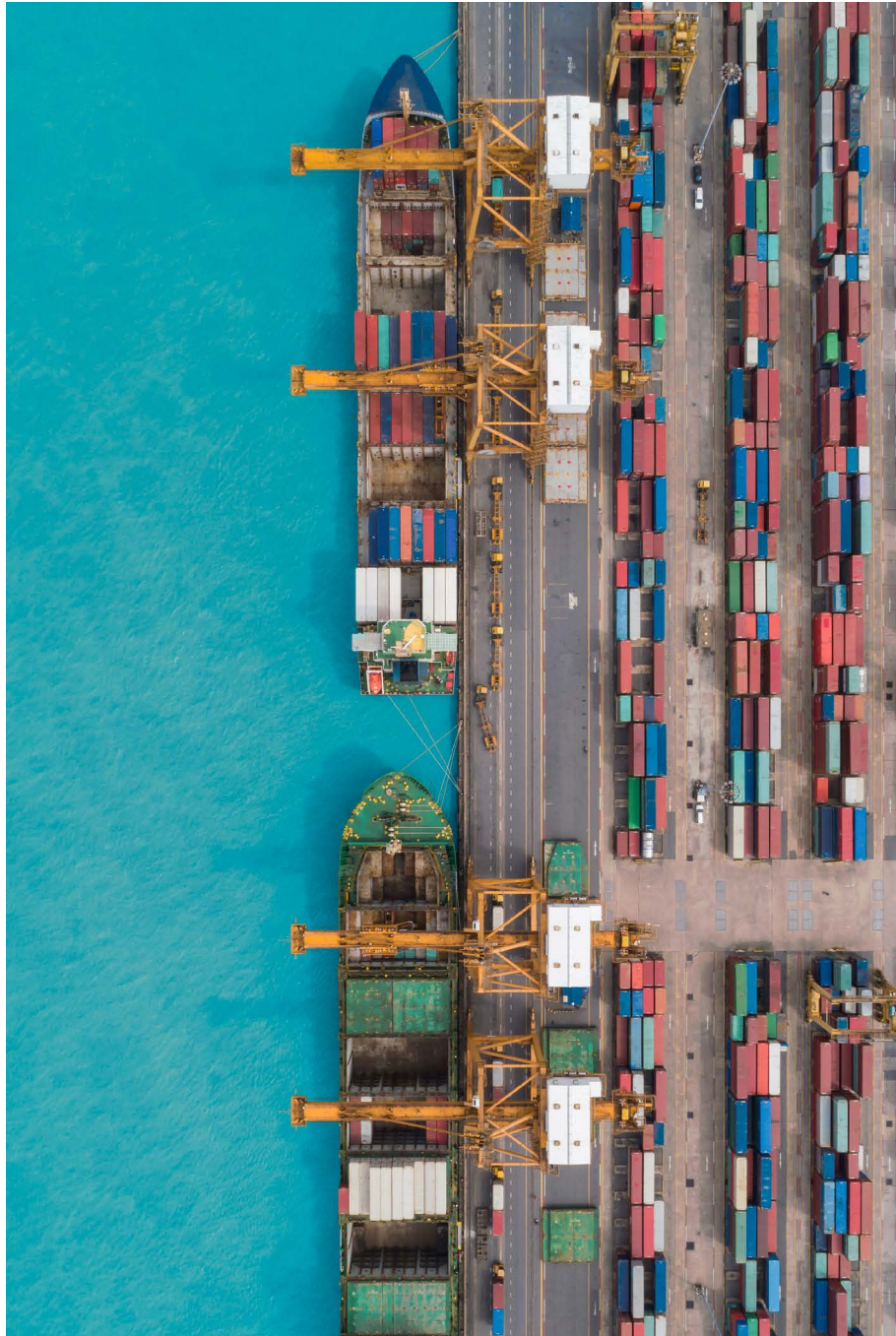
- 01 – Indonesia, Malaysia, Papua New Guinea
- 02 – Indonesia, Malaysia, Papua New Guinea
- 03 – Indonesia, Malaysia, Papua New Guinea
- 04 – Indonesia, Papua New Guinea
- 05 – Indonesia, Malaysia, Papua New Guinea
- 06 – Indonesia
- 07 – Indonesia, Malaysia, Papua New Guinea

### FISH & SHELLFISH



- 01 – China, Ecuador, India
- 02 – China, Ecuador, India
- 03 – China, Ecuador, India
- 04 – n/a
- 05 – China, Ecuador, India
- 06 – India
- 07 – Ecuador, India





## Supply chain transparency

Supply chain transparency remains a core element of our human rights strategy. By continuing to disclose the complex nature of our global sourcing, we are holding ourselves accountable for the impact we have within our food and non-food supply chains.

Our goal is to consistently build on these efforts. That's why since 2017, we have annually updated our tier one non-food and hardware supplier lists on our website.

We have also expanded this to our tier one food supplier list; in January 2020 we were one of the first UK retailers to disclose our entire fruit and vegetable supplier list.

In 2021, we began publishing information 'beyond tier one'. This means disclosing the supply chain actors that we work with indirectly, starting with recognised high-risk product categories: bananas, tea and strawberries. For all of these supply chains, we have conducted and published a HRIA.

On a national level, we have also disclosed our fish and seafood supply chain, including our fish feed suppliers. This is an extension of our long-term commitment to the Ocean Disclosure Project where we publish our farmed and wild-caught supply chains on an annual basis.

In this reporting period, we published a new supply chain list for our farmed warm-water shrimp. This was in response to the Lidl GB HRIA and action plan based on farmed shrimp sourced from India, conducted in 2022.

Mapping our critical raw materials and ingredients remains a priority and this is an area we will continue to focus on in the coming year.



## Third-party certification schemes

Third-party certification schemes are a vital initial step in our human rights due diligence journey. They help to ensure that the sites we source from undergo regular external monitoring and operate in line with approved standards across environmental and social criteria.

We have committed to sourcing all critical raw materials more sustainably by the end of 2025. For a full list of our identified critical raw materials and Lidl's corresponding targets, please see our [Raw Materials Policy](#).

## Fairtrade

Since 2006, we have partnered with leading independent certifier Fairtrade to help secure a fairer deal for the farmers and workers in some of our raw material supply chains. Our actions include supporting improved livelihoods – one example being our 'Way To Go' chocolate, launched in 2019, which contributes to efforts towards achieving living incomes for producers.

We are proud to have grown our selection of Fairtrade certified products over the years. This can create greater security for farmers, from long-term contracts to safer working conditions. It can also mean more reliable income for producers, independent of fluctuating global market prices, through the set Fairtrade Minimum Price.

In 2024, Lidl GB continued to represent almost half (49%) of the UK retailer market for own-brand Fairtrade cocoa.





## Social compliance programme

The Lidl GB social compliance programme enables insight into the many suppliers we work with which grow, manufacture, and package all of our food products.

### We require all Lidl GB negotiated own brand, food suppliers to:

- Connect to Lidl GB on the Sedex platform and provide full visibility
- Complete the Sedex self-assessment questionnaire (SAQ)
- Complete an annual audit (if site/s identified as high-risk)
- Attend Stronger Together's 'Tackling Modern Slavery' workshop (UK-based suppliers only)

At the close of 2024/25 financial year, 91% of our direct food suppliers were compliant to Lidl GB Sedex requirements. Further detail on our [supplier ethical requirements](#) can be found on our corporate website.

Within the non-food supply chain, all tier one producers in identified high-risk countries must have a valid social (e.g. BSCI) and environmental (e.g. ISO 14001 or BEPI) audit. We also implement specific policies to promote responsible recruitment and tackle the root causes of forced labour and child labour.

## Supply chain audits

We use Sedex - a data platform for supply chain assessment – to understand key information about our supply base including the number, gender, and nationality of suppliers' employees, and use of temporary/agency workers.



Sedex risk assesses suppliers (ranking them low, medium, or high) based on several factors, including inherent risk based on location country and sector, and information taken from their SAQ.

We require suppliers who have been identified as high-risk to undertake an independent ethical audit. Ethical audits are closely monitored to ensure that corrective actions are closed off in the agreed timescales.

In FY24, 50 suppliers were identified as high risk, however 179 social audits were conducted across our supply base. Within these audits, 594 critical non-compliances were identified and addressed.

We understand the limitations of ethical audits - particularly their ability to only capture results at a moment in time and their limited capability to address the most adverse instances of labour exploitation, such as modern slavery. However, we consider audits a useful tool to understand suppliers' management systems and measure these against the expectations of our CoC and SPP.

## Human Rights Impact Assessments (HRIAs)

HRIAs are a form of human rights due diligence, typically conducted in high-risk supply chains. Their fundamental purpose is to build a picture of where and how specific business and supply chain activities have the potential to impact internationally recognised human rights.

The Lidl Group has a target to complete three HRIAs a year until 2025. These assessments enable us to develop Lidl-specific supply chain action plans, to address identified risks which are not typically detected through other due diligence methods e.g. social audits.

During this reporting period, Lidl kicked off three new HRIAs: roses from Kenya, oranges from Brazil and charcoal sourced from Namibia.

All of our final [HRIA reports, action plans and progress reports](#) are published on our corporate website.

# Responsible recruitment

## Pay and contracts

Good pay plays a vital part in responsible recruitment, as it can reduce the need for employees to seek out supplementary work which is often more precarious.

For this reason, we are committed to paying our direct employees industry-leading wage rates. In 2015, we were proud to become the first supermarket in the UK to pay the voluntary living wage as recommended by the Living Wage Foundation. We continue to align with this, and in some instances, exceed it.

In June 2024, we implemented a pay rise for hourly-paid colleagues - a move representing an investment of over £2.5 million, following a £37 million investment in March 2024.

In February 2025, we also announced an investment of almost £15 million into our colleagues’ pay - including increases for salaried colleagues across the business - effective as of March 2025.

We recognise that workers may be more vulnerable to exploitation if they lack employment stability and decent pay. Therefore we ensure that, where possible, people employed by Lidl are recruited on permanent contracts. We aim to ensure that temporary workers are only used for periods of high demand, or as a temporary measure until permanent workers can be recruited.



# Monitoring labour providers

Poor recruitment practices can drive modern slavery, with significant risk where vulnerable workers are in desperate need of employment and/or have emigrated for work. Internal hiring managers across the business have a yearly refresher around recruitment practises to ensure consistent fairness and compliance.

- We require 100% of our labour providers to be certified by the Gangmasters and Labour Abuse Authority (GLAA).
- We assess our processes to ensure that the labour providers we work with at our RDCs meet our ethical and responsible recruitment requirements and have access to industry-leading modern slavery training.
- We continue to recommend additional due diligence measures to ensure that we only work with responsible labour providers.
- We have been working with the Seasonal Workers Scheme (SWS) Taskforce to further roll out the Responsible Recruitment Progress Assessment.
- Risk of exploitation rises where we work with labour agencies to help manage peaks in labour demand, so we have put in place procedures to mitigate this.

## Recruitment fees

At a Group level, we actively support the Employer Pays Principle (EPP) to help tackle the issue of workers potentially falling into debt bondage and exploitation. This states: ‘No worker should pay for a job – the costs of recruitment should be borne not by the worker but the employer’.

As members of the Food Network for Ethical Trade (FNET) Responsible Recruitment working group, we’re constantly learning how to put this commitment into practice. As members of the SWS Taskforce, we have funded (alongside DEFRA) an EPP Feasibility Study, understanding how EPP can be embedded into the UK horticulture sector. The results of this study will be published in the next financial year.

## Whistleblowing & supply chain grievance mechanisms

### In our business

As a responsible business, it is of the greatest importance to us to be able to identify serious breaches of our CoC as early as possible, including any allegations or indicators of modern slavery. For this reason, we operate a number of channels through which employees, business partners and members of the public can raise concerns. Confidential reports can be made directly to Lidl's Compliance Team by email, post, online and/or indirectly to our external law firm. When notified of any allegations we take a victim-centred, efficient, and collaborative approach to our investigations.

### In our supply chains

Ensuring that workers have access to an effective grievance mechanism in global supply chains is an essential part of corporate due diligence, as this enables human rights risks and potential rights violations to be uncovered and addressed. This is a key element of our SPP.

We recognise 'effective grievance mechanisms' as defined by the UNGPs, meaning that they are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

When it comes to ensuring that grievance mechanisms are impactful, we know that considering the specific context of the industry, country, and site is crucial. Furthermore, we are conscious that access to grievance mechanisms may be more limited for women, migrant workers, and smallholders.

In instances where we have worked to improve practices and remain unable to confirm adequate protection of human rights, we reserve the right to withdraw our business in a responsible manner.

### Unseen

The UK Modern Slavery & Exploitation Helpline is a victim-centric helpline, run by the anti-slavery charity Unseen. Through this Helpline, potential victims and members of the public are able to contact fully trained call handlers to report concerns and be supported by specialist organisations, for example safe houses, faith organisations, the National Referral Mechanism or law enforcement.

In the last financial year, Lidl GB has become a member of the 'Unseen Business Portal'. This is an online platform where information reported to the Modern Slavery Helpline is shared with member businesses. Through this portal, cases can connect multiple businesses and enable cross-industry collaboration to support efficient case handling and remediation efforts.

For further information on the grievance mechanisms Lidl continue to embed within our supply chains, please refer to our [Human Rights in the Supply Chain, Progress Report \(2024\)](#). Information on the Lidl GB pilot grievance mechanism rolled out in Indian farmed shrimp is on page 20.



## Supply chain grievance reports in financial year 24/25

Reports of supply chain grievances cases related to labour exploitation or modern slavery indicators can come through various channels, internally or externally, including through our close industry peers and business partnerships. When we are made aware of a supply chain case, we follow the UK Food Supply Chain Serious Incident Escalation Protocol, to ensure we are working with the relevant stakeholders to collaborate on an investigation and action plan, ensuring an efficient, streamlined process.

In the last financial year, ten cases were reported through the below channels:

Reporting channel	Number of reports in FY24/25	Country of origin
Ethical Trading Initiative (ETI)	1	Kenya
Fairtrade	1	Kenya
Lidl Whistleblowing channel	2	UK
Media	1	UK
SEA Alliance	1	UK
Tier 1 supplier	3	UK, China
Unseen	1	UK



## Grievance mechanism: Farmed shrimp, India

In 2022, Lidl collaborated on a HRIA with two US retailers and the human rights consultancy LRQA. Several salient human rights issues were identified, including debt bondage, freedom of movement, issues of physical safety and security, forced overtime, and discrimination. The findings also indicated that workers often did not know a grievance mechanism was available and/or did not trust the grievance mechanisms in place.

In response to these findings, the Ungal Kural (Your Voice) helpline, was set up as an effective grievance mechanism in line with the UNGPs. The aim of the Helpline was to ensure workers have access to appropriate remedies, as well as to prevent and minimise human rights-related risks at farmed shrimp sites. By providing workers with access to an independent, third-party grievance mechanism to report concerns and issues, the Helpline also aimed to promote supportive workplace environments in the supply chain.

The grievance mechanism was established at seven farmed shrimp sites, with 923 workers trained on how to use and report concerns through the grievance mechanism, on average, 77% of the workforce at each site were trained on the Helpline. During the first 6-months, following the launch of the grievance mechanism:

- There were 66 calls (contact made) received through the Helpline
- 11 cases were reported, indicating awareness of the Helpline’s existence.
- 91% of the cases were rated as high-risk.
- 7 out of 10 high-risk cases were reported after the first month of the Helpline operation, implying that enhanced trust and word-of-mouth are resulting in workers to be more willing to report cases.
- The Helpline received reports of various issues that were identified in the HRIA, including wage-related, housing conditions, absence of contracts and sexual abuse and harassment.

The Helpline continued for a further 12-months following the end of the initial 6-month pilot. The Lidl farms engaged with this grievance mechanism did not

receive any reports to the Helpline in this period, several factors may have contributed to this, including:

- Site management’s failure to adequately promote the Helpline to newly hired workers;
- Concerns regarding potential retaliation by management;
- A preference among workers to directly communicate issues to management, or;
- A lack of understanding regarding the functioning of the Helpline.

Learnings from the pilot showed that the grievance mechanism model requires additional modifications to accommodate the inherent complexities and challenges in an informal sector like farmed shrimp, and an industry wide collaborative model is needed to ensure financial sustainability.

The initial ambition was to increase the scale of this pilot to more processing sites and farms and expand to additional retailers or suppliers working in the region. However, based on the limited cases being reported and the learnings from the complete 18-month pilot, it was decided that the grievance mechanism in its current form would come to an end. LRQA enabled a responsible departure, ensuring workers and management were updated and made aware of the new process to raise a grievance following this pilot end.

Lidl will take these learnings forward as part of the continuation of the Lidl shrimp HRIA action plan and reestablish increased due diligence measures in this supply chain, which will be shared in future reports.



## UK agriculture and the Seasonal Workers Scheme Taskforce

In March 2023, the Seasonal Worker Scheme (SWS) Taskforce was formed following multi-stakeholder roundtables conducted in the previous year. These roundtables were set up to understand and address escalating reports surrounding recruitment and employment practices of migrant workers as part of the UK government Seasonal Workers Scheme.

### The Taskforce formalised five working groups, developed as a direct outcome of the Roundtables:

- Education, information and grievance mechanisms
- Due diligence and good practice during recruitment
- Due diligence and good practice on farm
- Improving worker finances
- Policy, enforcement and stakeholder engagement

These workstreams aimed to establish actions that would identify, prevent, mitigate, or remediate the risks and cases that were being reported through the SWS, including cases of illegal recruitment fees and poor living or working conditions.

The SWS Taskforce has a mission of “working collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers’ rights in the UK Seasonal Worker Scheme and wider UK horticulture.”



### In 2024, key progress updates include:

- Six in-person and one virtual grower roadshows were conducted, reaching over 380 delegates between growers, Scheme Operators, retailers, and other businesses in the industry. 162 of these delegates are part of Lidl’s supply base.
- Six in-person and one virtual supervisor train-the-trainer sessions, reaching over 330 delegates between growers, Scheme Operators, retailers, and other businesses in the industry. 43 of these delegates are part of Lidl’s supply base.
- Further development and outreach of the UK seasonal worker version of the ‘Just Good Work’ worker information app.
- Commitment and contract for the Employer Pays Principle Feasibility Study within the horticulture sector, a project co-funded by the SWS Taskforce and Defra.
- Development of the Independent Seasonal Worker Survey, run by Ulula, as an ongoing, regular, independent survey of UK seasonal workers’, to identify actions that can be taken in-season to address working, living and human rights challenges.
- Further roll-out of the Responsible Recruitment Progress Assessments (RRPAs) to Scheme Operators to help identify performance levels, management system gaps and improvement recommendations.

### In 2025, the Taskforce workstreams will be consolidated to three working groups to address key areas for continued due diligence:

- Workers’ education, information, communication, grievance mechanisms and remediation
- Due diligence and good practice during recruitment and on farm
- Employer Pays Principle Feasibility Study

For further detail on the progress made in 2024, please refer to the [Seasonal Worker Scheme Taskforce](#) website.

## Gender equality

There are multiple potential indicators that may impact an individual's vulnerability to exploitation and modern slavery. Data suggests that gender alone can be a particularly strong factor. Across the world, women and girls are disproportionately affected by forced labour and child labour.

### Banana supply chain

Within our banana supply chain, we have been working with our key supplier Fyffes since 2020 to develop and roll out the BSR HERessentials digital training.

### Training modules included topics on:

- Gender equality & human rights
- Financial management
- Gender-based violence and harassment
- Access to grievance mechanisms

The initial pilot was kicked off in Costa Rica and Belize in 2021 and has since expanded to a total of 27 plantations across Colombia, Nicaragua and Ecuador. During this period, the project trained over 3,000 workers in Fyffes and Lidl's joint supply chain. The programme ended in May 2024, due to the end of the contractual period with the implementing partner and ongoing limitations to scalability.

Lidl and Fyffes are working to re-launch this training with a new implementation partner and, updated content, ensuring a more efficient, self-sustaining programme, therefore improving scalability and increased exposure across Lidl's banana supply base.

## Gender Based Violence and Harassment (GBVH)

We understand Gender Based Violence and Harassment (GBVH) remains underreported and under addressed, particularly upstream our supply base within global agriculture contexts. The nature and terms of women's work, along with physical isolation of farms and estates, can put women in positions of significant vulnerability. Within recent years, there have been a number of reports within the supply chain, making this a priority to address. At a Lidl Group level, we have established a GBVH action plan, which outlines the approach Lidl will take to address this systemic challenge. More information on this can be found on our [website](#).



## Living wages

Fair remuneration is a fundamental human right enabling workers to secure a dignified standard of living for themselves and their families. Since 2006, we have advocated for this in our CoC.

By working towards living wages and incomes, we have the opportunity to mitigate multiple supply chain risk factors, including workers vulnerability to labour exploitation and forced labour.

We were the first discounter to join the Action Collaboration Transformation (ACT) initiative, a global agreement striving for collective bargaining for higher wages in the countries where goods are produced. After carrying out a survey of over 3,000 production facilities, we developed an internal strategy aimed at implementing responsible purchasing practices by 2025 based on the principles of ACT. This involves working with our business partners to better enable wage increases in textile production.

### UK Retailer Banana Commitment

In March 2023, supported by IDH and alongside other major UK retailers, Lidl GB signed up to a industry leading living wage commitment in the banana supply chain: ‘As a coalition of UK retailers, we will strive for workers in our banana supply chains to receive a living wage by the end of 2027.’

To meet this commitment, we have been collecting wage data from within our supply chain using the IDH Salary Matrix, analysing our company processes and procurement practices, and working with other retail initiatives, suppliers, producers and stakeholders to understand and address wage disparities in the supply base. The coalition is working closely with a wide range of specialist and local stakeholders, including certification bodies Fairtrade and Rainforest Alliance.

Further details on this retailer commitment and the Principles of Engagement are available [here](#).

In the second year of this commitment, Lidl GB continued to collect data using the IDH Salary Matrix, to help build a picture within the banana supply chain:

- 321 Salary Matrices were completed by producers in Lidl GB’s supply chain in 2024 (the data collected was based on the 2023 calendar year)
- The completed Salary Matrices represented 40,406 employees
- Over 15,000 of these employees are paid below the living wage gap (39%)
- The average living wage gap across six sourcing countries was 14.9%
- The average living wage gap for men was 14.5%. The average gap for women workers was slightly higher at 15.5%

The data above is based on self-reported information from the producers in our supply chain. To ensure the data gathered is accurate the retail group have initiated data verification of approximately 10% of the salary matrices submitted.

### Lidl Banana Living Wage Project

Since 2022, Lidl has been piloting an approach to pay voluntary contributions and close Lidl’s share of the wage gap.

This project involves:

- Training suppliers on the Lidl approach
- Using supply chain data to calculate the wage gap per plantation and the premium required to close the gap per worker
- Auditing and validating the data
- Where wage gaps are identified, developing action plans with producers and suppliers to select an appropriate method of payment to workers.

In 2024, Lidl GB announced it will roll out this project for national suppliers. For further information on the Lidl Banana Living Wage Project, please refer to our [Human Rights in the Supply Chain, Progress Report \(2024\)](#).



# Training

An important element of tackling modern slavery is raising awareness across our internal departments and among our colleagues.

## Head office, stores, and Regional Distribution Centres (RDCs)

In 2021, we developed our first internal 'Modern Slavery Awareness' eLearning, aimed at ensuring that all colleagues understand what modern slavery is, how to spot indicators of potential exploitation and where to report concerns. The training is based on insights from specialist organisation Stronger Together. Key information from this eLearning, including details of specialist services e.g., modern slavery hotlines, are permanently available on our internal Lidl intranet platform.

The initial launch of this eLearning, was targeted at desk-based colleagues across head office and RDC departments. In 2022, we met our commitment to extend this to all store colleagues, who are the frontline of our business and critical to support in the identification of potential indicators in their store and community environment. In the last financial year, we have completed the third and final phase of the roll out of this Modern Slavery Awareness eLearning, by extending the content to all operational RDC colleagues.

To ensure the training remains engaging and relevant to the diverse job roles we have within our business, the eLearning content has been updated in this financial year with a new Stronger Together video case study, used to explain how modern slavery can take place and what employees can do to report concerns.



Image taken from Stronger Together Lidl GB Modern Slavery Awareness Training

## Buying

Our Buying department interacts with multiple external businesses and agrees contracts with supplier partners on a regular basis. To ensure that buyers understand the potential risk within their specialist category, Lidl GB's CSR team trains the department as part of the annual range review cycle, sharing the human rights challenges and topics related to each product, raw material, or sourcing country.

This training also includes the actions we are taking as a business to address human rights risks, with the intention for buyers to make informed decisions and to raise these issues with their suppliers.

The Lidl Group has also rolled out a CSR Buying eLearning, introducing key responsible sourcing topics to buyers. This eLearning shares guidelines on how Lidl buyers can minimise negative impacts and make a positive difference by adopting responsible purchasing practices, enhancing supply chain transparency, increasing product certification, and introducing specialised development programmes.

All of our UK-based, tier one food suppliers must attend Stronger Together's 'Tackling Modern Slavery in UK Businesses' training as part of CSR Buying requirements. We also recommend this workshop for our external labour providers and Procurement suppliers.



# Measuring Progress

By setting clear action-orientated goals and key performance indicators (KPIs), we are able to measure our progress over time and ensure that we are on target to meet our commitments to tackling modern slavery in our business and supply chains.






KPI	Goal	FY21/22	FY22/23	FY23/24	FY24/25
<b>Total number of tier one suppliers attending Stronger Togethers' 'Tackling Modern Slavery in UK Businesses' training (since the start of GB's sponsorship)</b>	<b>Full disclosure</b>	<b>551</b>	<b>605</b>	<b>693</b>	<b>787</b>
<b>% of current tier one suppliers attending Stronger Togethers' 'Tackling Modern Slavery in UK Businesses' training</b>	<b>100%</b>	<b>97%</b>	<b>462** 97%</b>	<b>341 96%</b>	<b>336 92%</b>
<b>% of employees trained through Modern Slavery Awareness eLearning</b>	<b>100%</b>	<b>2,669* 99%</b>	<b>22,155 99%</b>	<b>New timing of annual roll out***</b>	<b>26,499 99%</b>
<b>% of current tier one suppliers compliant to Lidl GB's Sedex requirements</b>	<b>100%</b>	<b>89%</b>	<b>447** 94%</b>	<b>345 92%</b>	<b>352 91%</b>
<b>Total number of tier one suppliers identified as high risk on Sedex</b>	<b>Full disclosure</b>	<b>52</b>	<b>59</b>	<b>28</b>	<b>50</b>
<b>Total number of supplier third party social audits conducted</b>	<b>Full disclosure</b>	<b>215</b>	<b>217</b>	<b>135</b>	<b>179</b>
<b>Total number of HRIAs underway or completed</b>	<b>15 by 2025</b>	<b>6 40%</b>	<b>9 60%</b>	<b>12 80%</b>	<b>15 100%</b>

\*In this FY, only desk-based colleagues participated in the eLearning.

\*\*new methodology used to report number of suppliers. Previously, supplier numbers were duplicated where suppliers worked across multiple food categories.

\*\*\* No training was conducted in this period, due to updated timing of annual roll out.



Progress on plans outlined in previous statement	Status	
<b>Publish HRIA action plans for the Indian farmed shrimp and South African Wine HRIAs conducted in 2022.</b> - Action carried over from FY22 report	Page 16	
<b>Publish an action plan outlining our approach to tackling gender-based violence in accordance with ILO convention 190, as well as gender-specific data for three high-risk supply chains.</b> - Action carried over from FY22 report	Page 22	
<b>Extend the grievance mechanism pilot in the aquaculture sector of Andhra Pradesh, India and encourage other brands or retailers working in the sector to participate.</b>	Page 20	
<b>Expand the pilot of the Banana Living Wage Project across additional Lidl markets.</b>	Page 23	
<b>Continue membership and participation in SWS Taskforce and working groups, aiming to tackle identified risks to migrant labour in the UK agriculture sector.</b>	Page 21	
<b>Develop programmes providing female and male workers in our high-risk supply chains with access to effective, gender-sensitive grievance mechanisms. We will also develop a scholarship program and highlight vocational opportunities for women across these supply chains.</b>	Page 18	
<b>Re-develop the gender training programme in the Fyffes and Lidl banana supply chain and establish next steps following the pilot in the tea supply chain.</b>	Page 22	
<b>Roll out our updated Modern Slavery Awareness eLearning, aiming to make the content more relatable and engaging for colleagues across all departments.</b>	Page 24	

# Looking Ahead

## In 2025, we will:

- Improve supply chain due diligence through the completion of the Ecovadis roll out for food, F&V and non food, own brand suppliers.
- Expand and formalise the Lidl approach to supply chain transparency, to enable a deeper understanding and insight into critical raw material supply chains e.g. cocoa, tea and coffee.
- Conduct and finalise the final three HRIAs, to meet the Lidl commitment to complete 15 by 2025. Continue to establish and strengthen due diligence and remediation measures through HRIA action plans.
- Complete the re-launch of the Lidl and Fyffes banana gender equality training programme and establish new KPIs to measure the impact of training on the well-being and experience of female workers.
- Roll out of the Lidl Banana Living Wage Project for Lidl GB national banana suppliers, working towards closing the wage gap and therefore improving livelihoods for workers in the supply base.
- Introduce a new supply chain programme in the tea sector, working to address low incomes, following our Kenyan tea HRIA action plan.

