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Human Rights & Ethical Trade

UPHOLDING HUMAN RIGHTS AND PROTECTING OUR WORKERS

From growers and farm workers, to packers and truckers, we enforce consistent, rigorous standards to protect workers.

To ensure we are upholding the rights of people impacted by our business and continually driving improvements, we have adopted a range of approaches and have integrated targets across the business.

We underpin our business operations with strong, long term relationships, making sure that we work with our suppliers to address the challenges facing our wider supply chains . Our core standards are outlined in our [Supplier Code of Conduct](#), which is fundamental to the relationship between Lidl and its contracted business partners. It defines the social expectations of all global direct and indirect suppliers and forms an integral part of our commercial contracts.

No child labour

No discrimination

No forced labour

Fair pay

Work safety

Freedom of association

Further Information

No child labour

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

No discrimination

Distinction, exclusion or preference made on the basis of race, colour, gender, religion (among other characteristics), "which has the effect of nullifying or impairing equality of opportunity and treatment in employment or occupation".

No forced labour

Situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.

Fair pay

A living income or living wage should provide for food, water, housing, education, healthcare, transportation as well as offer the opportunity to save in case of unexpected events.

Work safety

Health and safety in the workplace must be guaranteed. Contravening fundamental human rights in terms of working conditions, equipment and facilities in the workplace is prohibited. Employees must be given adequate, regular training on health and safety in the workplace.

Freedom of association

An important aspect of employee rights is the freedom to form employee representative bodies. We therefore aim to promote freedom of association to allow workers to organise themselves effectively and engage with stakeholders to better understand and overcome the barriers to freedom of association.



Further Information

Our full Code of Conduct can be downloaded [here](#)

Human rights due diligence

As part of our commitment to the UN Guiding Principles on Business and Human Rights (UNGPs), we implement human rights due diligence as part of our business operations. This means that we systematically monitor and assess human rights risks in our supply chains. Our risk assessment process is informed by greater transparency, our social compliance programme, internationally recognised assessment tools, as well as knowledge gathered through our supplier relationships and engagement with stakeholders.

Over the last year, the Lidl Group conducted a human rights review of its global supply chains, enabling us to better understand the risks facing people who work in our supply chains. More information on our approach, as well as further information on the high risk commodities and countries identified through the process, can be found within our 'Human Rights in the Supply Chain Policy'.

[Download our Human Rights in the Supply Chain Policy](#)

Human Rights Impact Assessments

As part of our human rights due diligence approach, we are committed to conducting and publishing three human rights impact assessments (HRIAs) per year across the Lidl Group, in line with internationally recognised methodologies. So far we have conducted HRIA's based on Kenyan tea, Spanish berries and bananas from Colombia. You can learn about all our HRIA's [here](#).

Gender Equality in the Supply Chain



We know that women play a crucial role within our food supply chains and understand that women can be more vulnerable to human rights violations, violence and abuse. Discriminatory social norms such as lower literacy skills, limited access to land rights and gender-based discrimination can limit women's empowerment and their ability to achieve the same political, economic and social status as men within agricultural supply chains. Through our supply chain risk assessment, we understand that gender discrimination is prevalent within our supply chains.

In order to develop our approach to supporting gender equality and women's empowerment, we implement projects and programmes in key priority supply chains. We continue to work closely with partners to promote and support resilience amongst farmers and their communities, and provide updates on the impact of our programmes through our CSR reporting.

The Lidl Group is a signatory to the UN Women's Empowerment Principles (WEPs). The WEPs are a collaborative initiative between UN Women and the UN Global Compact, and is the first global initiative which aims to promote women's empowerment and gender equality within businesses and their wider supply chains.

Further information on the steps we are taking on this topic, can be found as part of our Gender Equality in the Supply Chain policy.

[Download our Gender Equality in the supply chain policy](#)

Effective grievance mechanisms

Access to an effective grievance mechanism for employees in global supply chains is an essential part of corporate due diligence, in order to uncover human rights risks and potential rights violations. In practice this often poses a challenge, as employees with varying circumstances - e.g. language skills, access to technology, cultural differences - should all have equal access to an effective grievance mechanism.

Lidl recognises 'effective grievance mechanisms' as defined by the UN Guiding Principles on Business and Human Rights (UNGPs), meaning that they are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue. Grievance mechanisms form part of our Supplier Code of Conduct and we firmly believe that when these are implemented effectively, human rights violations can be better identified and thereby remediated in a meaningful way.

Lidl has therefore set itself the goal of piloting grievance mechanisms in various supply chains, in order to identify scalable and effective approaches. As a first step, we have started to pilot grievance mechanisms in three high risk supply chains:

Berries, Spain

As part of this pilot project, we have worked with our partner Elevate on a new, effective grievance mechanism for workers in the berry sector in Huelva, Spain. The grievance mechanism will be piloted with selected producers as part of the 2021/2022 harvest season. This mechanism has multiple grievance channels, including a hotline operated by trained staff, as well as the ability to report complaints via Whatsapp. Complaints are accepted in any language and verbal exchange with the hotline employees is possible in Spanish, Arabic and English. All workers are trained in the use of the grievance mechanism. As the majority of the workers on site are women from North Africa and Eastern Europe, all hotline employees are women. We will evaluate this pilot after the end of the harvest season, and report on results and next steps.

Coconut milk, Vietnam

In Vietnam we are piloting a grievance mechanism which is provided by the service provider Ulula in cooperation with Amfori. This is a mechanism that is tested in both non-food and food sectors. Lidl is participating in this project with production facilities in both the textile and coconut milk sector. As part of this pilot, workers are provided with various channels to share their grievance. As several clients are often active in a production facility, grievances are investigated formally with the involvement of a third party and remedial measures are developed. The pilot will run until mid-2022 and will continue thereafter with the potential for scaling up the project.

Palm oil

We are working with our suppliers Griesson - de Beukelaer and Cargill to pilot an effective grievance mechanism in the palm oil sector. As part of the pilot, we will work with selected palm oil suppliers and their palm oil plantations to evaluate whether the grievance mechanism is suitable for a further roll-out in other regions or in relation to other product groups. The pilot is currently in the development phase and is expected to run until the end of 2022.

Working towards Living Wages



Under The Universal Declaration of Human Rights, everyone who works has the right to just and favourable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection. Within global food supply chains legal minimum wages are often insufficient, below what is needed to achieve the Sustainable Development Goals and too low to ensure the basic needs of farmers and employees are met.

Lidl is committed to taking an action-orientated approach to working towards achieving living incomes and living wages within our global supply chains, thereby closing existing income and wage gaps. We are committed to publishing wage gaps in order to measure our progress and show our accountability.

We have implemented programs in four high-risk supply chains aimed at working towards living wages and living incomes for workers:

- [Way to go!: Cocoa](#)
- [World Banana Forum and Fairtrade: Bananas](#)
- [Living Wage benchmark: Fruit & Veg](#)
- [Action Collaboration Transformation: Textiles](#)

Transparency



Supply chain transparency plays a vital role in our commitment to upholding human rights. We are continually developing [transparency in our supply chains](#), helping us better understand the complex journey that our products take to reach our shelves. We are one of the first global retailers to publicly disclose supply chain data within our food and non-food supply chains and we are committed to increasing this further.

ENGAGING WITH STAKEHOLDERS & MULTI-STAKEHOLDER INITIATIVES

At Lidl we actively engage with a variety of stakeholders, including civil society organisations, NGOs and trade unions to develop and implement our human rights due diligence. Through this collaboration we are able to gain insights which feed into our wider risk assessment processes.

In addition to bilateral stakeholder engagement we understand that multi-stakeholder initiatives play a vital role in leveraging supply chain action to drive systemic change, enabling us to go beyond an auditing approach. Lidl actively engages in multi-stakeholder initiatives (MSIs) to advocate for progress, including the Roundtable for Responsible Soy, the Roundtable for Sustainable Palm Oil and the World Banana Forum.

Through our work with stakeholders, we are able to influence and engage governments on issues relating to specific workers' rights issues within the supply chain or specific commodities. In recent years this has included action within our [seafood](#), [soy](#) and [fruit and veg](#) supply chains.

Responsible Recruitment



We understand that the recruitment and supply of temporary, contract and seasonal labour is an area of risk within our supply chain. As part of our commitment to supporting the Dhaka Principles for Migration with Dignity, we are taking steps to ensure responsible recruitment and migration with dignity within our supply chains. In 2018 we published our [Responsible Recruitment in Supply Chains policy](#). This policy outlines the expectations of all suppliers that use labour providers as part of their business operations and outlines our approach to ensuring that workers recruited through these mechanisms have their rights protected.

We implement a range of policies to guide the recruitment of the colleagues we employ, both directly and indirectly through recruitment agencies, to protect them from the risk of modern-day slavery. These policies include our Anti-Harassment Policy, Grievance Procedure and Eligibility to Work procedure. We continue to engage with partners on this topic and will evolve our policies as understanding increases

MODERN DAY SLAVERY

The International Labour Organization (ILO) estimates that at least 21 million people worldwide are victims of forced labour. It is regarded as the fastest growing criminal industry and has been identified across multiple private sector economies, from construction and manufacturing to agriculture and fishing. Victims of slavery are often hidden within complex supply chains,

controlled and threatened by criminal perpetrators, making their plight challenging to both identify and effectively remediate. Therefore we believe the only way to approach this topic is to ensure collaborative actions with other retailers and industry groups.

We welcome the Modern Slavery Act which the UK government introduced in 2015, enforcing businesses with a turnover of 36 million or more, to publicly disclose their approach and actions to tackle forced labour and human trafficking. Please review our [Modern Slavery Statement Archive](#) for our reports to date.

Lidl also works collaboratively to go beyond audit and drive change at an industry level:

In order to compliment social audits we are taking actions in our highest risk food supply chains.

- Within the Spanish fresh produce sector, which is a key source for a wide proportion of our [fruit and veg](#) lines (including berries, brassicas and citrus), we pool pre-competitive data with other retailers to identify priority topics areas relating to human rights risks. Areas for further capacity building are identified and implemented through supplier training sessions in the Spanish Ethical Trade supplier forums.
- Through our work as part of the Retail [Cocoa](#) Collaboration, we are working with other retailers to use our collective leverage to assess the actions and progress being made by major cocoa traders working across the industry and multiple cocoa sourcing regions, on issues such as forced and child labour, incomes and deforestation. This process is raising awareness of the importance of these topics with powerful supply chain actors and maps areas of risk and improvement. The insights gained will be used to guide next steps.
- In the global [banana](#) industry we are working collaboratively with our supplier, the World Banana Forum and Fairtrade to go beyond audit and increase incomes and wages. These interventions will impact all identified high-risk countries including Colombia, Belize, Brazil and Costa Rica among many others.

Smallholders

We recognise the need to support smallholder farmers to increase their resilience and prosperity. We have implemented a range of programs to support smallholder farmers within many of our key commodity supply chains.

Within the [Fairtrade](#) system it is estimated that more than 1.48 million farmers are members of small-scale producer organisations, a large majority of Fairtrade producers, producing products including coffee, cocoa and cotton. The Fairtrade Standard provides a framework for smallholder producers to build resilient and thriving organisations, generate more benefits for themselves and their communities and improve farming practices. By supporting Fairtrade producer organisations have access to training on how to strengthen their management practices and provide protection for workers. The Fairtrade Premium allows small-scale producers to drive sustainable social and economic development for their organisations, families and community. In addition, co-operatives have the flexibility to design relevant policies, including gender, to increase active and equal participation for women to access the benefits associated with Fairtrade.

Our programmes in high risk supply chains are developed and implemented in close collaboration with expert partners. Examples include improving resilience to the impacts of climate change, training towards better agricultural practices, as well as supporting women on the issue of land-rights.

Working with our non-food suppliers

We have been a member of the Business Social Compliance Initiative (BSCI) since 2007, committing us to improving working conditions for people employed in our non-food supply chains. As part of the membership, Lidl's non-food suppliers are required to regularly carry out independent social audits by qualified local personnel for all non-food producers and to comply with recognised international labour standards.

Recognising that audits only present us with a snapshot in time and do not necessarily drive improvements in themselves, we work to understand the root cause of the issues and take appropriate remediating steps. Expert partners work closely with our factories to develop and

implement corrective actions following an audit.

Since 2008, we have also focused on going 'beyond compliance' in Bangladesh, working in partnership with the German Association for International Cooperation (GIZ) to provide dedicated training programmes for production facilities to support compliance with international labour standards. Our current joint programme focuses on Bangladesh, where GIZ currently employs more than 20 people who work exclusively for Lidl and to date have delivered on-the-ground training to 80 textile manufacturers across the country. [Learn more about this training program here.](#)

We are a member of the Bangladesh Accord, which is an independent, legally-binding agreement between brands and trade unions designed to work towards a safe and healthy Bangladeshi ready-made garment industry. [Learn more about this program here.](#)

Social auditing



As part of our due diligence approach, we have established a risk-based social auditing programme, conducting third-party independent audits to measure performance against our Supplier Code of Conduct. These provide us with an important snapshot of our supply chain performance on human rights and working conditions. Following audits commissioned at our sites, suppliers develop corrective actions to address any issues raised, which we monitor on an ongoing basis.

Although we recognise the limitations of audits in their ability to effectively improve working conditions or detect violations that are often hidden, such as forced labour, we feel they play an important role in our due diligence to gather supply chain information at a point in time. Through these independent assessments we gather information to support our wider risk analysis that informs our approach. We work collaboratively with suppliers to address areas of non-compliance, ensuring we tackle any challenging issues head-on.

SUPPORTING DOCUMENTS

Our Ethical Trade Training Resources for Suppliers document is a freely available document that signposts Lidl suppliers to training resources. A full document is available on request from CSR@lidl.co.uk.

Our Lidl GB Supplier Social Compliance Guidance outlines the expectations of all our direct suppliers and provides greater transparency on our ethical trade monitoring programme.

[Click here to review all supplier guidance documents](#)

Information

- [Data Protection](#)
- [Legal](#)
- [Cookie Declaration](#)
- [Compliance](#)
- [Whistleblowing](#)
- [Modern Slavery Statement](#)
- [The Schwarz Group Sustainability Report, 2018/19](#)
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