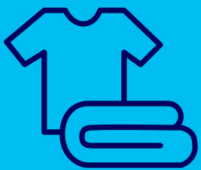


Aldi UK & Ireland Modern Slavery Statement 2025



This statement is published in accordance with Section 54 of the UK Modern Slavery Act 2015*. It explains the steps taken by Aldi UK and Ireland and other relevant group companies during the year ending 31st December 2025 to prevent modern slavery in its business and supply chains.

Human trafficking, forced labour and the exploitation of vulnerable workers are abuses of basic human rights that have no place in our business or supply chain. Preventing this from happening is a global, complex issue that we, as well as our partners and suppliers, are committed to addressing.

*While there is no equivalent legislation in Ireland, we follow the principles of this Act in Ireland as best practice.





At Aldi, operating with honesty and integrity is fundamental to how we do business.

We are committed to respecting human rights and upholding fair labour practices across our operations and supply chains. We expect everyone who grows, makes and supplies our products to be treated with fairness, respect and dignity.

Modern slavery remains a global challenge affecting every economy, industry and sector. According to the latest available data from 2022*, an estimated 50 million people worldwide are living in modern slavery, including nearly 28 million in forced labour. This highlights the scale and complexity of the issue, and the need for sustained, collective action.

Our approach is risk-based and focused on those parts of our business and supply chains with the highest potential risks. We have implemented targeted processes and controls – including supplier due diligence, training and audits – to identify, prevent, mitigate and remediate these risks. Collaboration is central to this approach, and we work closely with suppliers, producers and industry organisations to drive meaningful and lasting change.

In 2025, we continued to strengthen our approach, making measurable progress across key risk areas and deepening our engagement with suppliers and partners. Our progress is subject to regular internal review and independent assessment, with results publicly reported to ensure transparency and accountability. These actions reflect our ongoing commitment to protecting the rights of workers and improving standards across our supply chains.

Modern slavery has no place in our business or supply chains. Tackling it requires constant vigilance and sustained collaboration, and we remain fully committed to identifying risks, taking action and working with suppliers, NGOs, governments and industry partners to help eradicate it wherever it may occur.

This statement was approved by the National Board on 29/06/2026 and is signed on its behalf by:

Giles Hurley
Chief Executive Officer, Aldi UK and Ireland

*<https://www.walkfree.org/global-slavery-index/>

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Key Progress in 2025

As outlined in last year's [Statement](#), we set clear priorities for 2025 focused on strengthening due diligence, increasing awareness and deepening collaboration across high-risk areas of our business and supply chains.

Success
in **5**
key areas

Over the past 12 months, we have made strong progress against these ambitions and continued to build a more robust, coordinated approach to tackling modern slavery:

- We enhanced the implementation of our Modern Slavery Resource Packs by driving closer collaboration between our construction and logistics teams, improving consistency in how risks are identified, managed and mitigated across high-risk operations
- We broadened the rollout of modern slavery e-learnings, with a particular focus on Buying Teams and colleagues with direct supplier engagement, ensuring greater awareness and accountability across key areas of the business
- In partnership with Stronger Together, we continued to promote structured training programmes across our national supply base, supporting suppliers to strengthen their understanding of modern slavery risks and improve labour practices
- Through active participation in the Seasonal Workers Scheme (SWS) Taskforce and the Food Network for Ethical Trade (FNET) Retail Alignment Group, we worked alongside industry partners to address shared challenges and align on best practice across UK retail supply chains
- We continued to support the implementation of best practice across the Aldi South Group, working closely with our International Sustainability Teams to ensure a consistent and effective approach to tackling modern slavery as part of an aligned international approach





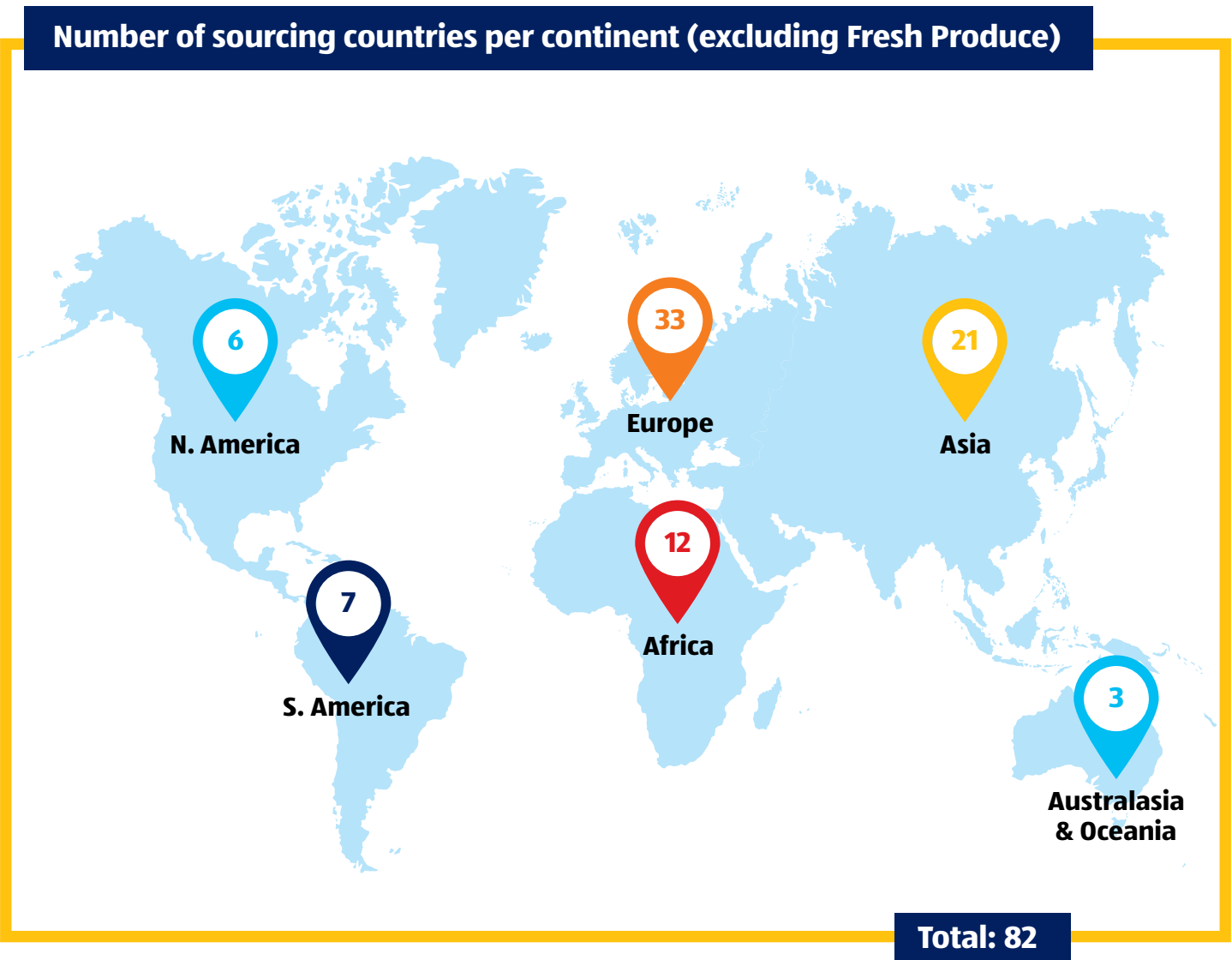
Organisation Structure and Supply Chains

Aldi is a family-owned business founded in 1913. In 1961, the business was divided into two independent groups, Aldi North and Aldi South. Aldi UK and Ireland operate as part of the Aldi South Group, an international retail organisation with a significant global footprint.

The Aldi South Group operates approximately 7,800 stores across 11 countries – Germany, Austria, Switzerland, Slovenia, Hungary, Italy, the USA, the UK, Ireland, Australia and China. It is supported by international departments based in Salzburg, Austria, and Mülheim an der Ruhr, Germany, which provide centralised services including sustainability, procurement, supply chain management, IT, audit, finance and administration.

Aldi South Group's global sourcing model is further supported by Aldi International Buying Asia office in Hong Kong SAR, China. The Corporate Responsibility (CR) Units, based in Hong Kong SAR, China, and Bangladesh, monitor compliance of suppliers and production sites with our sustainability requirements by conducting Aldi Sustainability Assessments, and assist suppliers in the implementation of human rights and environmental standards.

In the UK and Ireland, we continue to grow at scale. As of December 2025, Aldi was the fourth-largest grocer in the UK by market share, operating 1,081 stores in the UK and 166 stores in Ireland.





Organisation Structure and Supply Chains

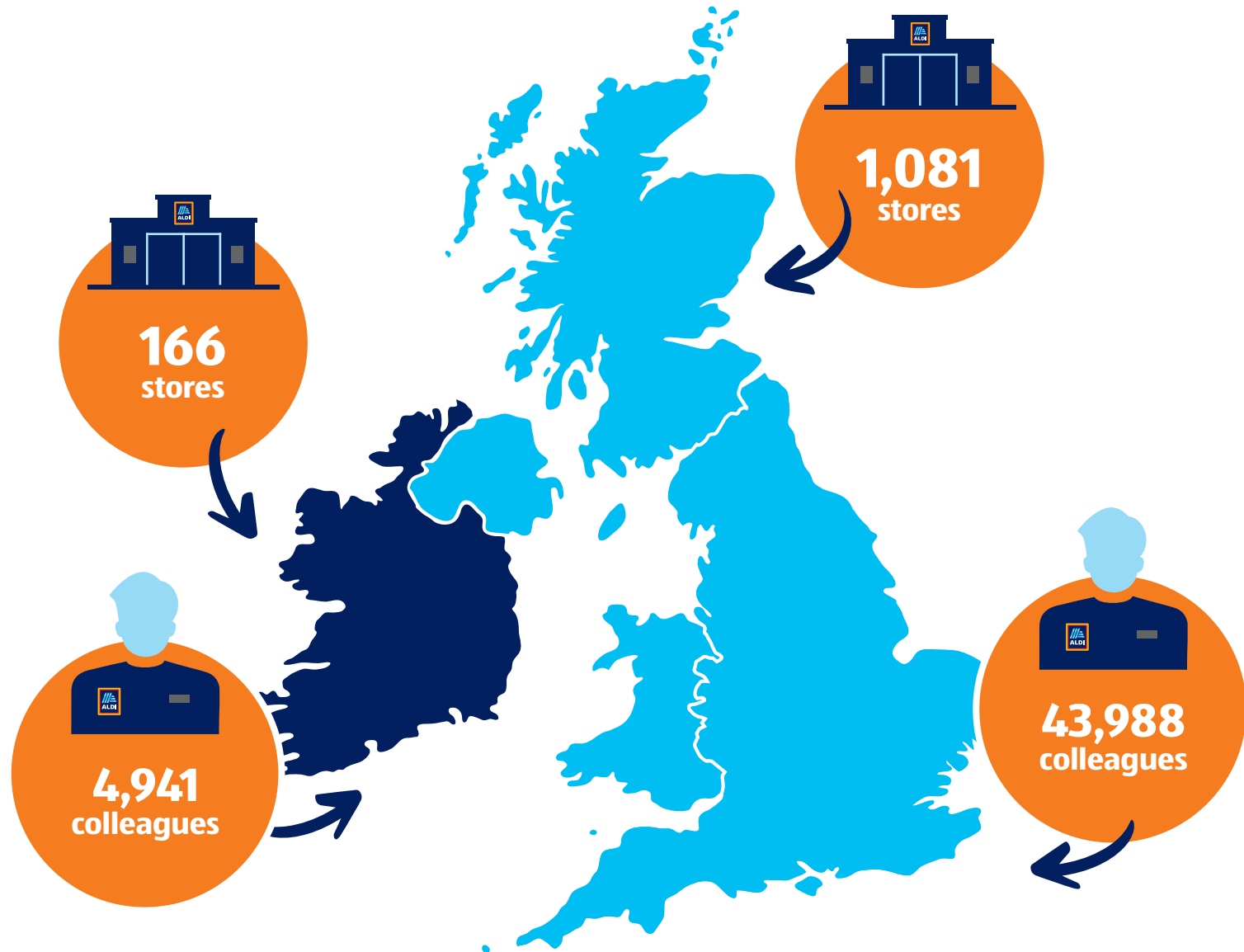
In 2025, we worked with 1,478 direct suppliers across the UK and Ireland, sourcing from 4,817 production sites across 82 countries (excluding fresh produce suppliers). This reflects the scale and complexity of our global supply chains and the importance of maintaining robust oversight across all sourcing regions.

In addition, as of September 2025, our fresh produce supply chains included 525 approved packhouses across 20 countries, supplied by 9,981 grower sites spanning 67 countries. This extensive network highlights both the reach of our sourcing operations and the need for a targeted, risk-based approach to managing labour standards at every stage of production.

While we do not own the companies or sites within our supply chains, we recognise the critical role we play in driving standards. Collaboration is central to our approach, and we work closely with suppliers to ensure working conditions meet our high expectations.

Responsibility for delivering our modern slavery strategy in the UK and Ireland sits with our National Sustainability Department, led by Liz Fox, National Sustainability Director. Her team works closely with our National Buying Department, Aldi South Group's International Sustainability Department, and our CR Units based in Bangladesh and Hong Kong SAR, ensuring alignment between sourcing decisions and ethical standards.

Within the Aldi South Group, the Group Chief Commercial Officer (GCCO), jointly with the International Commercial Officers (ICOs), National Chief Commercial Officers (NCCOs) and the International Sustainability Officer (ISO), is responsible for supervising the implementation of the Sustainability Strategy and compliance within their scope of competence. They make the final decision on sustainability standards, approve ambitions and actions, and monitor progress.





Partnerships

Partnerships are central to our approach to preventing and addressing modern slavery. Given the scale and complexity of global supply chains, collaboration with expert organisations, industry bodies and other stakeholders is essential to driving meaningful and lasting change.

In 2025, we continued to strengthen and expand our network of partners, deepening existing relationships and strengthening our partnerships to address emerging risks. Through this network, we can access specialist expertise, improve visibility across our supply chains and implement more effective, coordinated responses to modern slavery risks.



Bright Future Co-operative

We continue to partner with the Bright Future Co-operative, a supported employment programme designed to help survivors of modern slavery transition into stable, long-term work. The programme provides a structured and accessible pathway back into employment, combining tailored one-to-one support with practical, on-the-job experience.

At the core of the programme is a four-week work placement, giving participants the opportunity to build confidence, develop skills and gain first-hand experience within the workplace. Where placements are successful, candidates are supported into permanent roles, enabling long-term stability and career progression.

In 2025, we successfully rolled out the Bright Future Programme across two Regional Distribution Centres in Bolton and Darlington. As shown in Pablo's story, the programme has delivered positive outcomes for both participants and the business, demonstrating the value of providing structured employment pathways for individuals while strengthening our workforce.

"My experience so far has been excellent. The training was clear, patient, and supportive. The team is great, and I genuinely love the job – most of the time I'm riding in a 'truck,' which I really enjoy! It's been a really positive journey, and if I were advising someone else, I'd definitely tell them to come here. For me, it's the best opportunity I've had.

"At first, I was unsure because of my past. But I trusted Aldi's reputation and believed it could be a great chance to turn things around. I'm so glad I made the decision to join – it's changed my life. The pre-placement visit to the warehouse gave me the confidence to move forward. Seeing the huge facility and so many people working there made me feel hopeful and motivated. It showed me there could be a place for me too.

"When I started, there was no pressure at all. They told me to take my time, and everyone – including the Managers – reassured me that it was okay to go at my own pace. That really helped me feel calm and settle in. My colleagues have also been amazing. If I don't know something, I just ask – they explain it clearly and kindly. It's a really supportive environment, which is so important when you're starting again.

"Overall, I wouldn't change a thing. I feel like I can keep learning and growing here. My advice for others would be to believe in yourself. I want to say thank you to Aldi for helping me find this opportunity. Causeway, and Bright Future Co-operative, I thank you for supporting me on this journey."



Partnerships continued

Improved Workers' Rights in Ethiopian Flowers (IWREF) Programme

We continue to play a leading role in improving labour standards within the Ethiopian flower sector through the long-standing partnership with Fairtrade. In 2025, we were the largest retailer of Fairtrade roses from Ethiopia in both the UK and Ireland; selling more than 24 million roses on Fairtrade terms in the UK, and 2.6 million roses in Ireland, totalling 26.6 million roses combined, demonstrating the scale of our commitment to ethical sourcing.

Beyond sourcing

Since 2019, we have invested more than £400,000 into programmes designed to address systemic risks within this high-risk supply chain, focusing on improving working conditions, strengthening worker rights and increasing inclusion. Partnering with Fairtrade and the Finnish Ministry for Foreign Affairs, these programmes target key industry challenges, including wage progression, worker representation and access to grievance mechanisms.

Between 2022 and 2025, the Improved Workers' Rights in Ethiopian Flowers (IWREF) Programme delivered measurable impact:

- More than 9,850 workers directly engaged, with an estimated 19,400 workers benefiting indirectly through improved wages and better working conditions
- Annual salaries doubled between 2021 and 2025, supported by union-led negotiations and programme-backed wage reviews
- 20 grievance mechanisms established, with an average resolution rate of 86%, improving transparency and worker protection
- 554 assistive devices distributed to workers with disabilities, improving mobility, quality of life and independence
- 90% of workers surveyed reported increased awareness of their labour rights and acknowledged visible improvements in workplace standards
- All participating Producer Organisations implemented Gender Committees and inclusion policies, strengthening representation and accountability
- Over 55% of the Fairtrade Premium Committees, worker representatives and trade union members are now women

In 2025, Fairtrade Africa also completed a comprehensive mapping of workers with disabilities across the flower farms, enabling tailored support and bespoke programme considerations for the future.

These outcomes demonstrate sustained progress in strengthening labour standards and improving worker voice across the sector.

Building on seven years of progress, we will invest a further £100,000 over two years of the Rights in Bloom programme, continuing our partnership with Fairtrade and the Finnish Ministry for Foreign Affairs. This next phase will focus on embedding long-term change by integrating socio-economic initiatives, reinforcing resilient and sustainable livelihoods for flower farm workers.

Beredu Sitea has worked at Herburg Roses for 19 years, as the Chair of the Gender Committee, she has observed these changes first-hand:

"I received training in leadership skills, grievance handling procedures as well as policy development and mainstreaming. These trainings enhanced my ability to lead effectively and to address sensitive issues, particularly those related to gender and workplace grievances.

"We have benefitted greatly from this project. Fairtrade has played a vital role in improving the lives of our workers. Workers are now well aware of their rights and responsibilities, salaries have improved, and labour relations are more constructive."

Through continued investment, collaboration and programme delivery, we are contributing to measurable improvements in working conditions and worker protections within the Ethiopian flower sector, demonstrating how targeted partnerships can drive systemic change in global supply chains.



Flower farm workers, Herburg Roses, Ethiopia



Partnerships continued

Seasonal Worker Scheme (SWS) Taskforce

We continue to support the Seasonal Worker Scheme (SWS) Taskforce, a collaborative coalition of more than 130 individuals from more than 60 organisations, working to safeguard the rights of seasonal workers in UK horticulture. Since its formation, the Taskforce has driven practical improvements across the sector, supported by funding from 10 major retailers, five Scheme Operators and 12 key horticultural suppliers.

In 2025, the Taskforce focused on three priority areas: worker education and grievance mechanisms; responsible recruitment and on-farm practices; and the feasibility of implementing the Employer Pays Principle, which aims to eliminate worker-paid recruitment fees.

Key activity delivered during the year included:

- The rollout of an Independent Worker Survey, providing real-time insights into worker experiences and conditions
- Continued development of the Just Good Work app, used by more than 45,000 people in 2025, improving access to information on worker rights and available support
- Delivery of regional Grower Roadshows, engaging more than 425 delegates and supporting knowledge sharing across the sector
- Targeted training on cultural awareness and gender-based violence prevention, delivered in partnership with the International Organization for Migration (IOM), equipping supervisors and growers to create safer, more inclusive workplaces

The Taskforce also strengthened grievance processes through coordinated training with ACAS, improving how concerns are raised and addressed. In 2026, this work will progress further through a partnership with Unseen, establishing an independently operated multilingual support line. The Seasonal Workers Support Line (SWSL) provides workers with a safe and accessible way to raise concerns, ensuring issues are handled consistently and directed to the right place.

A jointly commissioned Employer Pays Principle Feasibility Study, led by Alma Economics and COMPAS at the University of Oxford, has informed cross-sector dialogue on improving worker finances and reducing the risk of indebtedness and exploitation. Building on this, priorities for 2026 include tackling recruitment scams, continuous improvement and good practice towards International Labour Organization (ILO) guidelines, and continued engagement with government to support improved regulatory frameworks.

Through this collaborative approach, the SWS Taskforce is driving meaningful and sustained improvements in worker protections across the UK horticultural sector. We are proud to support this work, helping to ensure workers' rights are upheld, voices are heard and working environments are safe and fair.

A member of the SWS Taskforce highlighted the impact of this work:

“We’ve seen the positive impact of cultural awareness and gender-based violence training in our community. It has helped Supervisors create safer environments and improved communication on farms.”





Partnerships continued



Accord

We are a signatory to the International Accord, a legally binding agreement between brands and trade unions to improve health and safety in the textile sector. The Accord continues to deliver workplace safety programmes in Bangladesh and Pakistan, strengthening protections for garment workers.



amfori

Through our membership of amfori, we support responsible business practices and strengthen our ESG due diligence. amfori provides tools and frameworks to improve environmental, social and governance standards across global supply chains.



Causeway (LifeSupply)

We continue to support LifeSupply, a programme run by Causeway, a UK-based charity supporting survivors of modern slavery and trafficking. In 2025, we donated £2,800 worth of essential products, including bedding, toys and household goods, helping to create safe and welcoming environments for individuals rebuilding their lives.



Ethical Trading Initiative (ETI)

We're proud to be a full member of the Ethical Trading Initiative (ETI), the leading alliance of trade unions, NGOs and businesses, working together to advance human rights in global supply chains.



Food Network for Ethical Trade (FNET)

Being a member of the Food Network for Ethical Trade (FNET) enables us to work alongside more than 80 suppliers and retailers to use our collective leverage to bring about positive change in global food supply chain working conditions by providing guidance, resources, training, and opportunities for collaboration. In 2025, we participated in the responsible recruitment working group which supports advancing our implementation of responsible business practices.



Partnership for Sustainable Textiles

We became a member of the German Partnership for Sustainable Textiles in 2015. The Partnership for Sustainable Textiles is committed to a social, ecological and corruption-free textile and clothing industry – an industry that respects the rights of all workers, protects the climate as well as the environment, and acts with integrity and within planetary boundaries.



Seafood Ethics Action (SEA) Alliance

We are part of the SEA Alliance, a group of retailers and seafood businesses working to strengthen human rights due diligence in global seafood supply chains and drive improvements in labour standards across the industry.



Partnerships continued



SEDEX

Sedex is a global leader in supply chain sustainability solutions, dedicated to making global supply chains more socially and environmentally sustainable.



Slave-Free Alliance (SFA)

Slave-Free Alliance (SFA) is a trusted partner to businesses committed to respecting human rights across their operations and supply chains. They work collaboratively with organisations to strengthen governance, build resilience against exploitation, and embed responsible business practices that prioritise worker welfare and ethical sourcing. Since 2020, SFA have supported us in identifying and addressing human rights risks through practical due diligence, from strengthening labour standards and supply chain transparency to supporting continuous improvement. Together, we have worked to create safer, more accountable environments for workers throughout our value chain.



Spanish Ethical Trade Forums

We participate in the Spanish Ethical Trade Forums, collaborating with industry partners to improve labour standards and promote best practice within the Spanish agri-food sector.



Stronger Together

We sponsor Stronger Together's Consumer Goods programme, a sector-specific programme that empowers companies to take decisive action to tackle forced labour and mitigate modern slavery. As a sponsor, we, alongside our suppliers gain access to free interactive training workshops, resources and tools to support tackling labour exploitation in operations and supply chains.



Unseen

We have partnered with Unseen, a UK charity working to end modern slavery. This includes supporting survivor services and collaborating on initiatives that improve awareness, reporting and response to modern slavery risks.



Wilberforce Institute

We work with the Wilberforce Institute at the University of Hull to identify and assess labour and human rights risks within supply chains, strengthening its ability to target and address high-risk areas.



Policies

Tackling modern slavery forms part of our broader commitment to respecting human rights and improving working conditions across our global supply chains.

As an international retailer, we use our scale and influence to promote ethical employment practices by setting clear, consistent expectations for our colleagues, suppliers and business partners, supported by robust and responsible buying practices.

We have a comprehensive framework of group-wide policies that governs how we operate. These policies guide our approach to sourcing, recruitment, subcontracting and reporting concerns, ensuring that human rights risks are managed consistently across the business. All policies are aligned with internationally recognised standards and conventions, including:

- Universal Declaration of Human Rights
- The International Labour Organization (ILO) Fundamental Conventions
- United Nations Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- The Ethical Trading Initiative (ETI) Base Code

Our Business Partner Sustainability Standards set out the minimum requirements expected of all business partners. These contractually binding standards prohibit human rights infringements, including forced labour, child labour and discrimination, and uphold workers' rights to freedom of association and collective bargaining.

Our Human Rights and Environmental Due Diligence Policy provides an overview of our commitments and approach to human rights and environmental due diligence. It acts as a central framework, bringing together all policies and standards relating to human rights across the business.

Our Child Labour Policy outlines our commitment to preventing child labour and sets clear requirements for remediation where issues are identified.

Our International Policy on Forced Labour reinforces our zero-tolerance approach to all forms of forced labour, including servitude, slavery, bonded, indentured, trafficked or non-voluntary labour. This policy has been developed in collaboration with the Mekong Club and Stronger Together, and aligns with internationally recognised standards, including the ILO Forced Labour Conventions and the UN Guiding Principles on Business and Human Rights.

All Aldi colleagues in the UK and Ireland receive our Modern Slavery Policy as part of their Employee Handbook at the start of their employment. This provides clear guidance on the definition, indicators and risks of modern slavery, as well as how to report concerns.



Further policies

Additional policy and position statements published by the Aldi South Group include:

- **International Position Statement on Mandatory Human Rights Due Diligence Legislation**
- **International Policy on Gender Equality in Aldi's Supply Chains**
- **International Position Statement on Living Wages and Living Incomes**

We seek to uphold our commitments and requirements through integration of our Business Partner Sustainability Standards, along with other supply chain requirements, into supplier contracts, and implementation of due diligence measures within our supply chains. Particular focus is placed on production conditions in high-risk sourcing supply chains, where additional oversight is required.

As many products are not sourced directly from producers, building strategic, long-term relationships with these partners is essential to delivering strong sustainability performance. We continue to strengthen our approach to ensure that our standards and requirements are implemented not only at first-tier level, but throughout the supply chain, including at production sites and farms.



Our Approach to Due Diligence

Our due diligence approach is designed to ensure that all commitments to human rights and environmental standards are consistently upheld across operations and supply chains. This approach covers all potential adverse impacts that we may be causing, contributing to, or is directly linked to, through business activities and relationships.

Within the scope of our due diligence measures are all business partners who supply goods or services to us, encompassing both merchandise and non-merchandise suppliers (both direct and indirect), as well as all colleagues. Our priority is to prevent and mitigate risks wherever they arise, prioritising based on severity and likelihood. Where adverse impacts are identified, we are committed to taking appropriate action, including implementing remediation where necessary and working with business partners to address issues effectively.



Risk Assessment and Management

To identify and address risks within our supply chains, we conduct ongoing human rights risk assessments, audits and supplier evaluations, alongside active participation in multi-stakeholder initiatives and industry-wide data sharing.

This approach enables us to continuously strengthen our understanding of risk and respond to emerging issues across both our supply chains and internal operations.

Our risk analyses have identified the following human rights risks as particularly salient across our supply chains.

These risks are embedded within our policies, standards and due diligence processes:

- Discrimination
- Freedom of association
- Forced labour
- Child labour
- Occupational health and safety
- Wages and income

We also collaborate with a range of partners to monitor trends and emerging risks. This includes analysing insights from the National Referral Mechanism and organisations such as Unseen, whose reporting has highlighted sectors of increased vulnerability. For example, analysis of the Unseen Annual Report 2024 identified construction as one of the highest-risk sectors for labour exploitation.





Our Approach to Due Diligence continued

Preventative measures

The following measures, among others, are implemented as part of our wider due diligence strategy.

On-site Modern Slavery Risk Assessments

In 2025, we carried out 10 modern slavery risk assessments across higher-risk areas including construction, store maintenance, produce and waste management, working in collaboration with partners including SFA, the Wilberforce Institute, Stronger Together and The Reassurance Network.

Recognising construction-related activities as a key risk area, we conducted a series of proactive risk assessments within our national store maintenance supply chain, in partnership with SFA. Three of our largest maintenance suppliers were assessed, representing a cross-section of skilled and lower-skilled labour roles.

These assessments included detailed reviews of supplier policies, management systems and working practices. Common areas for improvement were identified, including limited access to whistleblowing mechanisms, a lack of employee-facing modern slavery policies and gaps in training and awareness.

Following these assessments, we worked closely with suppliers to implement targeted improvements. This included the development of bespoke modern slavery training, strengthening policy accessibility for workers and improving the visibility of internal reporting channels.

These assessments provide detailed insight into supplier practices, working conditions, and risk controls. All suppliers assessed receive clear, actionable recommendations, and we follow up to ensure improvements are implemented and sustained. Where issues are identified, we work directly with suppliers to investigate and remediate, supporting long-term improvements in their systems and practices.

Through this targeted and collaborative approach, we continue to strengthen our ability to identify, assess and mitigate modern slavery risks across our supply chains and internal operations.

Corporate Responsibility Supplier Evaluation (CRSE)

Our CRSE programme is an annual evaluation that we conduct with suppliers from prioritised high-risk supply chains to assess, monitor and support them in strengthening their sustainability management capabilities.

The CRSE programme is designed to strengthen long-term relationships with business partners demonstrating strong sustainability performance while driving continuous improvement across the supply chain. This approach goes beyond traditional audits, using a range of indicators to assess business partners' social and environmental compliance management systems, as well as conditions at production sites.

In 2025, the CRSE process covered key commodity groups, including fish and seafood, selected fresh produce (avocados, bananas, citrus and pineapples), textiles, store uniforms, shoes and household textiles, ensuring robust oversight across prioritised high-risk supply chains.

Case Study

Proactive Assessments – Store Maintenance Risk Assessments

At Aldi, we maintain high standards for our external suppliers and supply chains, whilst also ensuring that we uphold the same standards internally. That's why, in 2025, we conducted a series of risk assessments on our national maintenance providers. These suppliers deliver crucial services to maintain and resolve issues across our stores and warehouses throughout the UK.

We chose to focus on this area because the construction industry is the second-highest sector for exploitation in the UK, according to the Unseen Helpline Annual Assessment 2024.

In partnership with SFA, we conducted these assessments by selecting three of our largest suppliers, who employ a mix of highly skilled and low-skilled labour, to capture a broad representation of workers within the sector. The assessments included a review of policies and documents with one of SFA's consultants to evaluate each supplier's progress in implementing ethical business practices.

Overall, the final reports consistently highlighted the following areas for improvement:

- Lack of whistleblowing helplines
- Absence of employee-facing modern slavery policies
- Minimal training on modern slavery awareness

After sharing the reports and recommendations with the suppliers, we engaged in discussions on how best to implement these changes within their businesses. Thanks to the suppliers' dedication and hard work, all have begun addressing these recommendations. This includes developing bespoke in-person training on modern slavery, ensuring their policies are employee-facing, and clearly signposting internal whistleblowing lines within relevant documents.

This process has not only strengthened our relationships with our suppliers but also enables us to mitigate risks within the highest-risk sectors of our supply chains.



Our Approach to Due Diligence continued

Aldi Sustainability Assessments (ASAs)

Aldi Sustainability Assessments (ASAs) are a key component of our due diligence approach, and CRSE programme, enabling us to gain deeper insights into production site-level risks as well as the effectiveness of our suppliers' sustainability management systems. Our internal teams, as well as select third-party auditors trained on our requirements, conduct targeted assessments on an announced, semi-announced, or unannounced basis at selected production sites, with a focus on higher-risk products and sourcing regions.

These assessments include a detailed review of manufacturing practices, worker engagement and documentation to verify compliance with our standards. This proactive approach allows us to identify and address risks at an early stage, while supporting suppliers in strengthening their own systems and processes.

Where issues are identified, we work closely with suppliers to ensure that the corrective actions are taken at the production sites. Follow-up assessments are conducted to verify that all issues have been fully resolved before any restrictions are lifted. In 2026, we will continue to strengthen and refine this approach to further enhance its effectiveness and impact.

In 2025, we performed ASAs in 26 countries.

Albania, Bangladesh, Brazil, Cambodia, Chile, China, Costa Rica, Ecuador, Egypt, El Salvador, Greece, Guatemala, India, Indonesia, Italy, Ivory Coast, Mexico, Morocco, Pakistan, Peru, South Africa, Spain, Sri Lanka, Turkey, United Kingdom, Vietnam





Our Approach to Due Diligence continued

Onboarding Suppliers

Our ethical and sustainability standards are embedded from the outset of every supplier relationship. Our onboarding process is designed to ensure that all suppliers clearly understand our expectations before entering into a commercial agreement.

We regularly review and update our tendering processes to reinforce these expectations, ensuring that ethical considerations are fully integrated into supplier selection. All supplier contracts include specific provisions on sustainability and ethical requirements, making compliance a fundamental condition of doing business with Aldi.

In 2025, we strengthened this approach by ensuring that all contracts incorporate our Business Partner Sustainability Standards, which provide a clear framework for responsible sourcing across our supply chains.

Global Social Monitoring Programme

For production sites for selected commodities located in higher-risk countries, as per the amfori BSCI country risk classification, we require suppliers to ensure each production site has a valid third-party social audit in place. These are monitored and validated through our Global Social Monitoring Programme (SMP).

Accepted audit standards include amfori BSCI, Sedex/SMETA, SA8000, as well as other recognised industry-specific frameworks. This programme provides an additional layer of oversight, helping to ensure that labour standards are consistently assessed and maintained across high-risk supply chains.

Grievance Mechanisms

Effective grievance mechanisms are essential for identifying and addressing modern slavery risks. We work with a range of partners, platforms and initiatives to strengthen oversight, enable worker voice and support remediation.

amfori Speak for Change

We are also actively focusing on different areas of the global supply chain. amfori Speak for Change, for example, is a supply chain grievance mechanism that helps us identify, address, and resolve social issues raised by workers and other stakeholders in our supply chain. It enables us to perform ESG due diligence, increase transparency and address significant violations of working conditions within the international labour rights framework.

Aldi AlertLine

We operate a dedicated whistleblowing helpline, Aldi AlertLine. Any reports are investigated thoroughly, with a strong focus on protecting workers and ensuring appropriate remediation. We actively promote this channel across our business and supplier base to strengthen transparency and accountability.

Unseen

We have partnered with Unseen, which operates the UK Modern Slavery & Exploitation Helpline and Business Portal. Through this partnership, anonymised intelligence relating to our supply chains is shared, enabling timely identification of risks. Unseen also facilitates collaboration between stakeholders, including retailers, suppliers and law enforcement, to support effective investigation and remediation. In 2025, we extended this coverage to include all service provider companies.

Issara Institute

Aldi South Group has been a strategic partner since 2021 and participates in Issara's Inclusive Labor Monitoring. This worker voice-centred collaboration supports workers and improves working conditions in our food and non-food supply chains across Southeast Asia. It empowers workers to speak up when they have concerns about recruitment conditions or their working environment and to address their grievances. In line with the requirements of an effective grievance mechanism, it ensures that workers feel comfortable sharing their concerns, but also that companies respond to those concerns.

Appellando

Appellando is a multi-stakeholder framework that aims to harmonise grievance mechanisms worldwide and organise solutions with partners to better protect human rights and the environment in supply chains. Appellando's mission is to ensure that every worker and rightsholder can access help through trusted channels. Aldi South Group joined the newly established alliance in 2023.

Incidents of Modern Slavery

We take a rigorous and transparent approach to identifying and addressing modern slavery risks. We record and fully investigate all reported cases, working closely with expert partners including SFA and Unseen, as well as collaborating with other retailers where issues arise within shared supply chains.

Where incidents are identified, we engage directly with the suppliers involved, maintaining open and constructive dialogue to ensure issues are addressed quickly and effectively. Our focus is on remediation and long-term improvement, with clear actions put in place to prevent recurrence. We also carry out follow-up activity to ensure these measures are fully implemented and sustained over time.



Modern Slavery Training



Training for colleagues
Building awareness and capability across the business is a key part of our approach to tackling modern slavery. In 2025, we updated our internal modern slavery e-learning programme to further strengthen colleagues' understanding of modern slavery risks and responsibilities.

A total of 3,987 colleagues completed the training in 2025, including all office-based colleagues up to Group Director level, as well as senior management across warehouses and stores. This training is now mandatory on an annual basis, ensuring consistent and ongoing awareness across the business.

Targeted training was also delivered to key functions. A Modern Slavery Awareness course for the Fresh Produce Buying Team was attended by 28 colleagues, from Assistants through to Directors, equipping those with direct supplier engagement with a deeper understanding of risks within high-risk supply chains.

In addition, we developed a new training programme in partnership with Stronger Together, designed specifically for colleagues who visit supplier sites. This training focuses on identifying indicators of modern slavery and strengthening colleagues' confidence to act where concerns arise.

To support effective action, we have embedded a clear Modern Slavery Escalation Process across the business. Developed in collaboration with SFA in 2023, the process was incorporated into the Employee Handbook in 2024 and communicated to all colleagues across offices, stores and warehouses in both 2024 and 2025. It provides clear guidance on how to recognise and report concerns, ensuring a consistent and structured response across all areas of the business.

Training for suppliers

We continue to work closely with suppliers to strengthen their understanding of modern slavery risks and build capability to address them effectively across their operations and supply chains.

Throughout 2025, we encouraged our UK and Ireland based suppliers to participate in Stronger Together training programmes. A total of 523 delegates from 287 Aldi suppliers completed the *Tackling Modern Slavery in Business – UK and Ireland* foundation workshop, while 50 delegates from 41 suppliers completed the advanced training course. These programmes provide practical, step-by-step guidance to help suppliers identify risks, implement effective controls and minimise the risk of forced labour.

Through our sponsorship of the Responsible Recruitment workstream within Stronger Together's Consumer Goods Programme, we also support suppliers and their labour providers with access to specialist tools and training on ethical recruitment. In 2025, 141 individuals from 101 suppliers completed one or more of the responsible recruitment training courses, and 35 new suppliers subscribed to the online toolkit, bringing the total number of our supplier subscribers to 285.

Modern Slavery Resource Packs

In collaboration with Stronger Together, we updated the Modern Slavery Resource Packs in 2025 and redistributed them across our supply base. These packs provide practical guidance to support the identification and mitigation of risks within higher-risk operations.

Targeted training was delivered to higher-risk areas of the business. This included a Modern Slavery Resource Pack refresher course for 11 Construction Management Company (CMC) Managers, alongside four Modern Slavery Awareness training sessions for CMC Site Managers, attended by 29 individuals.

We also delivered two refresher courses for our National Supply Chain Management Hubs and Area Forwarders, attended by 34 individuals. As a result, nearly all Hubs are now compliant with the Resource Pack requirements, improving visibility of risks and strengthening mitigation across our supply chain operations.

Recognising that risks present in UK construction and logistics supply chains are also prevalent in the Irish market, we made the decision in 2025 to further expand our Modern Slavery Resource Pack initiative to our suppliers in these two sectors in Ireland. In partnership with Stronger Together, the Resource Packs were updated to align with Irish legislation and local requirements before being rolled out to suppliers in September 2025. This expansion has strengthened consistency in our approach across the UK and Ireland and supported our suppliers in identifying and mitigating modern slavery risks within their operations.



Measuring Progress Against 2025 Objectives

In 2025, we continued to strengthen our approach to tackling modern slavery, making measurable progress against the objectives set out in last year's statement across both UK and Ireland and the wider Aldi South Group.

Modern Slavery Awareness Messaging

We began rolling out modern slavery awareness messaging across colleague-facing areas, including stores, offices and Regional Distribution Centres (RDCs), helping to increase visibility and understanding of risks across the business.

Mitigating Modern Slavery Risks

We continued to target high-risk areas, including construction, logistics and key Goods Not For Resale (GNFR) suppliers, with updated Modern Slavery Resource Packs and targeted risk assessments. Resource Packs were refreshed and redistributed to UK suppliers and introduced for the first time to construction and logistics suppliers in Ireland. Risk assessments were also carried out across store maintenance suppliers, strengthening oversight in higher-risk operations.

Driving Internal Capability

We expanded targeted training in high-risk areas, including Modern Slavery training for Fresh Produce Buying Teams and Supplier Visit Modern Slavery Awareness training for Quality Assurance Teams, enabling colleagues to identify and respond to risks more effectively.

Supplier Awareness and Training

We continued to promote Stronger Together training programmes across our supply base strengthening awareness and capability across our supply chains.

Seasonal Workers Scheme Taskforce

We maintained our active support of the Seasonal Workers Scheme Taskforce, contributing to ongoing efforts to improve the experience and protection of workers within the scheme.

Collaboration with Other Retailers

We continued to work with other UK retailers to align approaches to Collaborative Action Required (CARs) arising from the SMETA 7.0 update, supporting a more consistent and effective response to identified risks.

Activities by Aldi South Group's International Sustainability Team

- Supply Chain Transparency – As of December 2025, we published updated food and non-food sourcing maps on our Transparency and Traceability webpage, significantly enhancing visibility and accountability across global supply chains
- Strengthening Grievance Mechanisms – We continued to enhance access to grievance and remedy mechanisms, working with partners to ensure vulnerable workers have effective channels to raise concerns, including through initiatives such as the Issara Worker Voice Programme and Appellando





Performance Against 2025 Objectives

In 2025, we continued to measure progress against the Modern Slavery key performance indicators (KPIs) established in 2023 for Aldi UK and Ireland. These KPIs enable us to assess effectiveness, drive continuous improvement and strengthen transparency across our business.

The results for 2025 are set out below:

<p>Encourage all UK and Ireland based suppliers, that have not done the training in the three years previous to December 2024, to complete Stronger Together's "Tackling Modern Slavery in Business – UK & ROI"</p> <p>Target: 100%</p>	<p>Result: 67%</p>
<p>Encourage all colleagues in Aldi UK and Ireland to complete our in-house modern slavery e-learning module</p> <p>Target: 100%</p>	<p>Result: 96%</p>
<p>Fully investigate all potential modern slavery or labour abuse cases that come through whistleblowing services</p> <p>Target: 100%</p>	<p>Result: 100%</p>
<p>Ensure 10 modern slavery risk assessments take place in high-risk areas of Aldi UK and Ireland's own operations or supply chains</p> <p>Target: 100%</p>	<p>Result: 100%</p>





Looking Forward



Key Priorities for 2026

In 2026, we will build on the progress made in 2025, focusing on strengthening awareness, deepening risk mitigation, and driving greater consistency across our UK and Ireland operations and supply chains.

Further reduce risk in high-risk sectors

Continue to target construction and logistics across the UK and Ireland, using our Modern Slavery Resource Packs, risk assessments, and supplier engagement to drive year-on-year reductions in risk.

Strengthen internal capability

Develop new tools, including a 'Spotting the Signs of Modern Slavery' animated video, and refresh our internal e-learning modules to ensure training remains relevant, practical and accessible. We will also encourage all relevant colleagues from across the Aldi UK and Ireland operation, including in our stores and warehouses, to complete these modules.

Support vulnerable workers

Continue our active role in the Seasonal Worker Scheme Taskforce, helping to improve protections, working conditions and overall worker experience within the scheme.

Drive collective action across the industry

Work in partnership with other retailers and organisations, including FNET and Unseen, to align approaches, share intelligence and strengthen responses to modern slavery risks in shared supply chains.

We remain committed to a proactive, transparent and collaborative approach, using data, partnerships and practical action to strengthen protections for workers and drive meaningful progress towards the eradication of modern slavery.