Describe how you undertake human rights due diligence on suppliers sourcing from these regions:

We published our “[International Position Statement on Mandatory Human Rights Due Diligence Legislation](https://cr.aldisouthgroup.com/sites/default/files/downloads/202009_ASG_Position-statement_Mandatory-Human-Rights-Due-Diligence.pdf)” in order to contribute to realising human rights of all workers along supply chains. ALDI calls for an open dialogue about a mandatory human right due diligence legislation and commits to support the development of future legislation.

1. Our research suggests Aldi is likely to sell fruit and/or vegetables grown in the regions of Almeria and Huelva in southern Spain, and has done so in the past. **Do you source from Almeria and/or Huelva, either directly or via intermediary suppliers?**

Yes, Aldi is buying selected fruit and vegetable products from several Spanish regions, including the region of Almeria.

1. Evidence shows that farms in the regions of Almeria and Huelva are breaking eight out of nine ETI Base Codes on: Employment is [freely](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.eurovia.org%2Fwp-content%2Fuploads%2F2019%2F11%2FEN2.1_lowres.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613486189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=LxVp3tLVwKjbNtxU5rewpZJMto8WVEKw%2BjtTptuNdPQ%3D&reserved=0) [chosen](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.intechopen.com%2Fchapters%2F70042&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613486189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=1i5wFplZfrxKROmU1pQ1VBAmabvzl1jvc7Jq%2BNpKlMs%3D&reserved=0), Freedom of association and [the right to](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ethicalconsumer.org%2Ffood-drink%2Fagricultural-workers-rights-abuses-spain&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613486189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=cAXbOkSpSVhqXuO2sFQgxe9nekUy0PZqMner79mrHCY%3D&reserved=0) collective bargaining [are respected](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fjornalerasenlucha.org%2Fwp-content%2Fuploads%2F2021%2F02%2FInformeJuridicoBrigadaDeObservacion-JornalerasDeHuelvaEnLucha.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613486189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=qA%2B%2FfF5x27XUw356E%2FaSC%2FvYb6qyq90SrY0Ud8KkLhM%3D&reserved=0), Working [conditions](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsocsatalmeria.org%2Fun-fallecimiento-y-un-accidente-laboral-almeria-sat%2F&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613486189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=zkyebcHPa%2BHCB6An1jpUibkmVFbTQBRazJXDi54xikQ%3D&reserved=0) [are safe](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.theguardian.com%2Fglobal-development%2F2019%2Fapr%2F14%2Frape-abuse-claims-spains-strawberry-industry&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=dm3qWT8sPuq%2FIMlF%2BMj6l7bNzKLNogIilRx4R5C84gg%3D&reserved=0) and hygienic, Living [wages](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ethicalconsumer.org%2Ffood-drink%2F500-agricultural-workers-left-homeless-after-fire-almeria-spain&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=3Z%2FQ85Uj2vNl7fDTtN9UyeYRdv6F32VENHQvFuRmdCg%3D&reserved=0) [are](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.womenslinkworldwide.org%2Fen%2Ffiles%2F3118%2Fexecutive-report-moroccan-women-working-in-the-strawberries-farms-of-huelva-province.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=s5V5smzVlicVwUkcwnFkioZMi2kxdtOgMHYwyzH8244%3D&reserved=0) [paid](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.eurovia.org%2Fwp-content%2Fuploads%2F2019%2F11%2FEN2.1_lowres.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=%2FYrwU2iGlXpsCGtUt7BQSJWGf%2BXOoORoJhJyez8%2F2lU%3D&reserved=0), Working hours are [not excessive](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fjornalerasenlucha.org%2Fwp-content%2Fuploads%2F2021%2F02%2FInformeJuridicoBrigadaDeObservacion-JornalerasDeHuelvaEnLucha.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=9zIl941mk7%2FbyfgcJCyV6AcOTpWNoHptWSQ3NEvD5%2FA%3D&reserved=0), No [discrimination](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.theguardian.com%2Fglobal-development%2F2019%2Fjun%2F29%2Ffresh-abuse-claims-from-women-picking-spain-strawberries&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=uvpaWAfY6%2BCBoqtqZqOzAbn5cLIpmqDjI84UTDMt9t8%3D&reserved=0) [is practiced](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.elsaltodiario.com%2Ftemporeros%2Fterra-cha-(i)-surexport-explota-tambien-galicia&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=78lABWmhEfdMbFSgjM2UKkKWW6Nah2aLgAps2ghlEcE%3D&reserved=0), Regular [employment is](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ethicalconsumer.org%2Ffood-drink%2Fspain-salads-uk-supermarkets-new-documentary-exposes-conditions-workers&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=4ezXIFlAY560kNsM63trs1qetGp3k0fmNSFo6vfeKqI%3D&reserved=0) [provided](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.youtube.com%2Fwatch%3Fv%3Dq8UeyXjBFNw&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=mPP4uD7LZM7kRPw4Uvf3r9UNsY15YxhGxxnAruzu0Js%3D&reserved=0), No harsh or [inhumane treatment](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.telecinco.es%2Felprogramadeanarosa%2Fcorazon%2F20220526%2Fisabel-pantoja-buenos-aires-agustin_18_06544613.html&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=103bYXHTIrt47BWdptCwFaWKx1pQOLSHeivjpH6hc2s%3D&reserved=0) [is allowed](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.womenslinkworldwide.org%2Fen%2Ffiles%2F3118%2Fexecutive-report-moroccan-women-working-in-the-strawberries-farms-of-huelva-province.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=s5V5smzVlicVwUkcwnFkioZMi2kxdtOgMHYwyzH8244%3D&reserved=0). **Are you aware of violations of the ETI Base Code on farms in Almeria and Huelva? Would you like to comment on these findings? Have you identified violations on farms from which you source either directly or via intermediaries?**

We are not aware of specific ETI base code violations on salad vegetable and soft fruit farms in Almeria and Huelva supplying to Aldi and we would welcome any information on allegations about specific farms, so that we are able to investigate them. We recognise there are human rights issues in the agri-food sector and we are working collaboratively with other retailers as part of the Spanish Ethical Trade Forum. To increase transparency, we also conduct our own [Aldi assessments](https://cr.aldisouthgroup.com/en/responsibility/our-work-action/supply-chain#acc-871893162-aldi-social-assessments-asas-aldi-producer-assessments-apas) on farms to evaluate the processes and management systems that are in place in support of human rights and environmental protection and human rights.

1. The report suggests that “Supermarkets should treat the abuses outlined in this report as endemic and pervasive and assume that they are present within their supply chains.” It finds that it is highly likely that UK supermarkets are connected to these issues through their fruit and vegetable supply chains, given the [widespread](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fspcommreports.ohchr.org%2FTMResultsBase%2FDownLoadPublicCommunicationFile%3FgId%3D25358&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=tTAqJ7Tic2HG%2FlRFrzCJuHiCna1kitII7nl34xx5OO8%3D&reserved=0) and [endemic](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fjornalerasenlucha.org%2Fwp-content%2Fuploads%2F2021%2F02%2FInformeJuridicoBrigadaDeObservacion-JornalerasDeHuelvaEnLucha.pdf&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=9zIl941mk7%2FbyfgcJCyV6AcOTpWNoHptWSQ3NEvD5%2FA%3D&reserved=0) nature of the abuses identified and the importance of [both](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fliveandstream.com%2Frecords-soft-fruits%2F&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=vEbt80o%2F%2FqRNrXbKmSjFJyGt8knVFfAMHqYp8GUbv6k%3D&reserved=0) [regions](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.tridge.com%2Fnews%2Fpeppers-most-exported-vegetable-in-almeria&data=05%7C01%7CLizzie.Roberts%40citypress.co.uk%7C375507087ea44e9ac50908daf5784ecb%7Cde7b31aa5df545528da7af3278edfccd%7C0%7C0%7C638092195613642412%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=8tutlElfLTN08PGxYwydKxYLfeDv46wtE5LVcyw5jw4%3D&reserved=0) for UK supply chains. **Would you like to comment on these findings?**

We consider an industry-wide collaboration crucial and are committed to supporting long-term partnerships and impact-led collaborations to improve the livelihoods and working conditions for producers along our high-priority supply chains.

Retailer-specific questions - In addition to the above questions:

1. **The report notes that Aldi has been linked, through their supply chains, to at least one accusation outlined in this report. Would you like to comment?**

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As the report does not mention specific farms, we would request that Ethical Consumer shares any information it has from the report so that we can carry out a thorough investigation.

1. **The report notes that Aldi does not publicly state that its Code of Conduct applies to suppliers beyond tier 1. Yet, we note that you consider Spanish produce amongst the “product groups which present a high risk of adverse impacts on the enjoyment of human rights and are considered most important to the ALDI SOUTH Group.” Would you like to comment? Does your Code of Conduct apply to Spanish produce as a high risk product?**

Our ‘[Social Standards in Production](https://cr.aldisouthgroup.com/en/downloads/aldi-social-standards-in-production)’ outlines the requirements for our suppliers regarding human rights and fair labour standards.

This is a contractually binding agreement for all suppliers and business partners we work with, outlining the necessary due diligence, management systems, policies and procedures needed to implement fair working standards. Our suppliers and business partners are expected to apply these standards to all sub-suppliers throughout the entire production process. In addition, our [international policy on forced labour](https://cr.aldisouthgroup.com/en/downloads/international-policy-forced-labour) and our [international policy statement for human rights](https://cr.aldisouthgroup.com/en/download/international-policy-statement-human-rights) outline our requirements and our commitment to human rights in our supply chains.

1. **The report notes that Aldi does not publicly commit to routine auditing of all suppliers beyond the first tier of its supply chain. Do you routinely audit all suppliers beyond tier one? Do you audit all suppliers for Spanish produce, as a high risk product?**

The fresh produce Aldi sources from Spain forms part of our high priority supply chains. We implement specific measures to address any impact on human rights for those workers.

One of such measures is our [CR Supplier Evaluation (CRSE)](https://cr.aldisouthgroup.com/en/responsibility/our-work-action/supply-chain#acc-1965706021-corporate-responsibility-supplier-evaluation-crse), which reviews the performance of suppliers beyond certification or audits. As part of this process, we conduct our own [risk assessments on farms](https://cr.aldisouthgroup.com/en/responsibility/our-work-action/supply-chain#acc-871893162-aldi-social-assessments-asas-aldi-producer-assessments-apas) to assess how human rights of workers are maintained and protected, and how our requirements are met.

We also evaluate the level of support our business partners give to producers in this process. To incentivise our business partners to improve their performance regarding human rights, we have publicly committed to [sourcing 80% of our buying volume in high-risk supply chains from suppliers with a good CRSE rating](https://cr.aldisouthgroup.com/en/responsibility/simply-responsible/objectives-performance/human-rights#acc-466773796-sourcing-80-of-buying-volume-from-responsible-suppliers-by-2030). A good rating would also demonstrate access to effective and transparent processes around grievances for all workers.

In 2023, we have already conducted several assessments for our Spanish fresh produce suppliers and aim to increase coverage.

1. **The report notes that Aldi does not have a complaints helpline that is available to all supply chain workers, in their own language, anonymous and free of charge.**

As an active sponsor and member of the Spanish Ethical Trade Forum, Aldi is in discussions with other members to create an independent and central helpline for workers to report grievances. This would be free of charge for workers to report their concerns anonymously, available in multiple languages and independently managed by the Ethical Trade Forum.

We are also taking part in additional cross-industry initiatives aiming at establishing an independent grievance mechanism in the produce sector in Spain to reduce exploitation of workers in agriculture.