



Lidl GB Limited
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23 December, 2020

Dear Dame Sara Thornton DBE QPM,

Thank you for your recent letter to our CEO Mr Christian Härtnagel, regarding Operation Fort and the activities and learnings in the last year since this case. As the business lead for responsible sourcing, he has respectfully asked me to respond on behalf of Lidl Great Britain.

At Lidl, we recognise the severity and extraordinary importance of the Operation Fort case and we would like to reassure you that we are committed to taking an active role in ongoing due diligence of our supply base. We welcome further engagement with you and your team to ensure we continue to do all we can to address actual and potential modern slavery risks linked to our business operations and as part of our wider supply chains.

We would like to thank you for developing the Maturity Framework, which we have been able to use as a benchmark to assess our work within our direct business operations and business supply chains. We consider our approach to modern slavery to meet the criteria for 'Leading on human rights innovation'.

In the last year we have published an updated version of our Human Rights and Environmental Due Diligence Policy (downloadable [online](#)). This policy was approved by the Lidl Board of Directors and outlines our commitment to addressing the impacts of our operations, securing our business for the future and ensuring we have a positive impact on the planet and the lives of the people we interact with. This new policy outlines many new commitments for the coming years, one of which is to publish three Human Rights Impact Assessments (HRIAs) a year, until 2025. We are pleased to share our first HRIA report, based on our Kenyan tea supply chain, which is available to review [online](#). This HRIA and all the projects we continue to implement, start with an annual risk assessment which takes into account multiple human rights resources and data gathering, including Sedex, the Global Slavery Index and National intelligence from partners including Stronger Together and the GLAA.

Over the past year we have continued to increase the transparency of our supply chains beyond tier one, working closely with our suppliers to help better understand the risk of modern slavery in sourcing communities around the world. Since 2019, we have continued to develop our transparency approach and published supply chain information across our tier one food and non-food supply chains. We will continue to build on the information we share in our supply chains in the coming years and use this information to identify potential risks.

When it comes to our direct business in the UK, we underpin our operations with strong, long-term relationships, making sure that we work with our suppliers to address systemic challenges such as

modern slavery. To deliver impact in collaboration with key suppliers, we have developed joint CSR business plans that are agreed as part of our buying processes. We continue to develop these plans and roll-out joint actions as part of our commitment to tackle modern day slavery. Our key supplier for pork, Pilgrims, have partnered with the organisation Bright Future, a program which offers individuals who have been rescued from modern slavery an opportunity of a paid work placement and subsequently a permanent job within the retail industry. Without new prospects such as the Bright Future programme, individuals could fall back into vulnerability and be at further risk of exploitation.

We recognise that the knowledge, responsibility and conduct of our colleagues plays an important role in mitigating the risk of slavery and human trafficking within our organisation. Despite the challenges we have faced this year due to the coronavirus pandemic, we are pleased to share that our training program in our Regional Distribution Centres (RDCs) specifically focussed on identifying and mitigating risks of modern slavery, has been rolled out to all Employee Relations Consultants (ERCs) and we are pleased with the continued engagement and passion of our colleagues on this topic. In addition to this, we continue to update and refresh the training given to our food buying colleagues on the topic of human rights and ethical trade. While our tier one food suppliers are required to attend third-party training with our expert partners Stronger Together, as part of our contractual business agreement.

We know that there is no option to be complacent and we are continuing to push forward with our modern slavery strategy into 2021, with key objectives planned including, developing the modern slavery training carried out as part of our ongoing store construction, inclusive of Lidl employees and Lidl contractors. We have published a mitigation plan following our first HRIA, and we look forward to implementing our next steps and collaborating with the industry on this. In addition to this, as of 1st March 2021, for the sixth year running, we will once again be increasing the wages of all our hourly-paid employees. Since 2015, we have been committed to paying our employees industry leading wage rates and believe that good pay can also reduce the need for employees to seek out extra, often more precarious, work. As part of our new Human Rights and Environmental Due Diligence Policy, we have also made the commitment to work towards achieving living incomes and living wages within our global supply chains, thereby closing existing income and wage gaps. We will continue to focus our efforts in prioritised supply chains, including textiles, bananas, cocoa and orange juice.

As your letter outlines, we fully understand the additional risk in our supply chain from COVID-19 and we have factored in new risks following the new rules surrounding Brexit and updated procedures to international recruitment, all of which we will continue to address as part of our modern slavery strategy going forward.

Thank you again for your latest correspondence. Although we have assessed ourselves at the top end of the Maturity Framework, we remain committed to continued improvements across both our direct business operations and global food supply chains. To this end, we welcome further collaboration with your team and the wider food retail sector towards our joint objectives.

Yours Sincerely,



Amali Bunter
Senior Responsible Sourcing Manager
Lidl Great Britain Limited