



Modern Slavery Statement 2025



Image: Lenswood Apples

Acknowledgement of Country

ALDI Australia acknowledges and respects Australia's First Nations peoples (Aboriginal and Torres Strait Islander peoples) as the Traditional Custodians of the Land upon which we operate our stores, distribution centres, regional offices, and the national office. We also extend our respect to First Nations ALDI team members, contractors, business partners and customers.



▲
Artwork image and footnote: 'Tracking' is an artwork commissioned by ALDI Australia and created by First Nations artist Amy Kilby, a proud Wiradjuri woman from the Riverina region in NSW.

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A word from our CEO

Throughout our business, people are at the heart of everything we do - our employees, customers, business partners and those across our supply chain. ALDI has a responsibility towards these people, and to consider how our actions and decisions might impact their wellbeing.

Since entering the Australian market in 2001 we have grown to operate more than 600 stores across six Australian states and territories. Our price promise consistently delivers shoppers with the highest quality groceries at the lowest prices, whilst continuing to uphold our commitments to respect human rights and the environment within our supply chains.

We recognise that modern slavery can and does occur within local and international supply chains. We acknowledge and understand the importance of our impact and our responsibility towards protecting human rights. We continually evolve our processes to identify, address, and manage risks to the people across our business and supply chains.



I am proud to report our business has made encouraging progress throughout 2025, as detailed in this Modern Slavery Statement.

Key achievements in our activities during the year have included:

- We have reviewed and assessed grievance mechanisms and worker voice solutions for our fresh produce supply chains. We are now using the evaluations to consider the feasibility of these programs in the future.
- We investigated the potential expansion of our Fresh Social Monitoring Program (SMP) into the fresh meat and seafood category. This expansion of scope is currently not required due to the risk within the category being assessed as well managed.

- Our Social Monitoring team collaborated with Buying teams by joining their commercial review meetings, strengthening our risk management and enabling more effective dialogue with business partners.
- We have designed and implemented an updated human rights training program for our Buying teams, delivering the training to a total of 92 employees. This training has strengthened the knowledge and confidence of attendees to be equipped in identifying and reporting modern slavery risks.
- We have improved due diligence in our Goods Not for Resale (GNFR) categories including a review and refresh of our GNFR risk assessment processes. We have also updated Real Estate contracts to include dedicated modern slavery clauses.

We have always been clear that modern slavery and exploitation is not tolerated at ALDI Australia. Our Business Partner Sustainability Standards (BPSS) continue to represent our minimum requirements for our supply chain, including both merchandise and Goods Not For Resale. We remain committed to upholding these standards in our supply chain.

As a business with 'Responsibility' as a core value, eradicating modern slavery is an ongoing priority for us. By continuously improving how we manage risks and uphold human rights, we ensure that doing the right thing remains the standard for our business and supply chains, today and into the future.

Anna McGrath
Chief Executive Officer



Our business structure, operations, and supply chain

ALDI Australia operations

This Statement was prepared by ALDI Stores (A Limited Partnership) ABN 90 196 565 019 and covers the reporting period of 1 January to 31 December 2025.

ALDI Australia is a grocery retailer which offers approximately 1,800 everyday food and household products. We also offer twice weekly 'Special Buys' which range from home and garden appliances to clothing and outdoor equipment.

Although part of a global organisation, ALDI Australia operates its business locally in order to cater to local consumer tastes and market expectations.



605
stores



>17,000
employees



10
distribution centres



>1,000
Australia-based
business partners¹

Focus on sustainability

ALDI's broader focus on a range of sustainability topics demonstrates our commitment to people and planet.



Australia-first
sourcing approach



Operations powered
by 100% renewable
electricity²



Raised and donated
over \$9.5 million for
Camp Quality since
2020, impacting the
lives of 11,515 kids.



91.9% of our
packaging was
recyclable, reusable,
or compostable



Donated the
equivalent of 24
million meals to food
rescue organisations

ALDI SOUTH Group

ALDI Australia is part of the ALDI SOUTH Group, with a rapidly growing network of more than 7,000 stores in 11 countries, serving millions of customers across four continents.

The ALDI SOUTH Group consists of international operations in Austria and Germany, and national operations in Austria, Australia, China, Germany, Hungary, Italy, Slovenia, Switzerland, UK and Ireland, and the USA. As part of the ALDI SOUTH Group, we collaborate, support, and align our activities globally. Across this international network we operate with a shared purpose to shape and drive ALDI's sustainability goals and outcomes globally and within each national market.

In addition to our international and national operations, the ALDI SOUTH Group (in a joint venture with ALDI Nord) also has Corporate Responsibility (CR) Units in Hong Kong and Bangladesh which support the implementation of sustainability goals and activities across key sourcing countries.

Please visit the ALDI SOUTH Group [International Sustainability website](#) for more information relating to the activities of the ALDI SOUTH Group.

1. >1,800 total business partners

2. 100% onsite and/or offsetting renewable electricity acquired from wind farms. Visit aldi.com.au/sustainability for more details.

Sustainability strategy

The world around us is changing faster than ever before. Global challenges are shaping how we operate, what our customers expect, and how businesses are being held accountable. The challenges we face are complex and significant, and we know we cannot solve everything at once, or do it alone. This is why ALDI is focusing its efforts where we can have the greatest impact, investing in areas that drive meaningful change and deliver measurable results.

Our strategy builds on ALDI’s legacy of making high-quality everyday essentials affordable and accessible.

Throughout 2025, ALDI’s sustainability teams have worked to bring our new strategy to life and build the new sustainability pillar of our global business strategy.

This strategy focuses our efforts on the challenges we choose to address, ensuring we act purposefully and effectively.

In addition to foundational activities of compliance-related activities that stretch across every aspect of our business, we will go beyond compliance in key supply chains to advance systems change. We recognise that as a grocery business, our greatest opportunities for systems change lie in the supply chains of the food we source.



Image: cocoa fruit (Adobe Stock)

We will focus on the following commodity groups over the next five years:



Cocoa



Coffee



Fruits and vegetables



Dairy (including plant-based alternatives)



Beef (including plant-based alternatives)

Our new strategy will be launched in 2026.





Image: front of an ALDI store

Our approach to sustainability governance

We recognise that strong governance is essential for managing modern slavery risk and delivering effective performance.

Within the ALDI SOUTH Group, the International Commercial Officers (ICOs) and National Chief Commercial Officers (NCCOs) are responsible for supervising the implementation of the sustainability strategy and compliance. They make final decisions on ALDI's sustainability standards, approve ambitions and actions, and monitor progress across the global business.

In 2025, ALDI implemented structural changes as part of our global strategy. Each country has appointed National Boards with specialised functions to lead each country, support decision making and streamline our processes and ways of working. For ALDI Australia, our National Board consists of our Chief Executive Officer (CEO) Anna McGrath, Chief Financial Officer (CFO) Lorna Raine, Chief Commercial Officer (CCO) Jordan Lack, and Chief Operating Officer (COO) Stefan Kopp.

ALDI Australia's National Sustainability team and relevant business units are responsible for executing our sustainability strategy and actions, including human rights, at national level. Our CCO has direct line of sight over our Buying and Sustainability functions.

Working groups

The ALDI SOUTH Group has a Human Rights Working Group, consisting of representatives from the International Sustainability team and the Human Rights teams of each national operation. This working group supports the delivery of human rights activities across the global organisation and provides a forum for collaboration and information sharing.

During the year, the working group oversaw plans regarding the updated global strategy and risk assessments as well as updates to programs including the Corporate Responsibility Supplier Evaluations (CRSE).

Our supply chains

Our product range is diverse, from high-quality groceries to unique Special Buys in varied product categories. Our supply chain consists of:

- ALDI exclusive brand products
- Vendor branded products (food and non-food)
- Goods not for resale (including goods and services needed to support ALDI’s operations)

Throughout this Statement you will see the work ALDI Australia is undertaking to identify, address, and mitigate modern slavery risks within these supply chains.

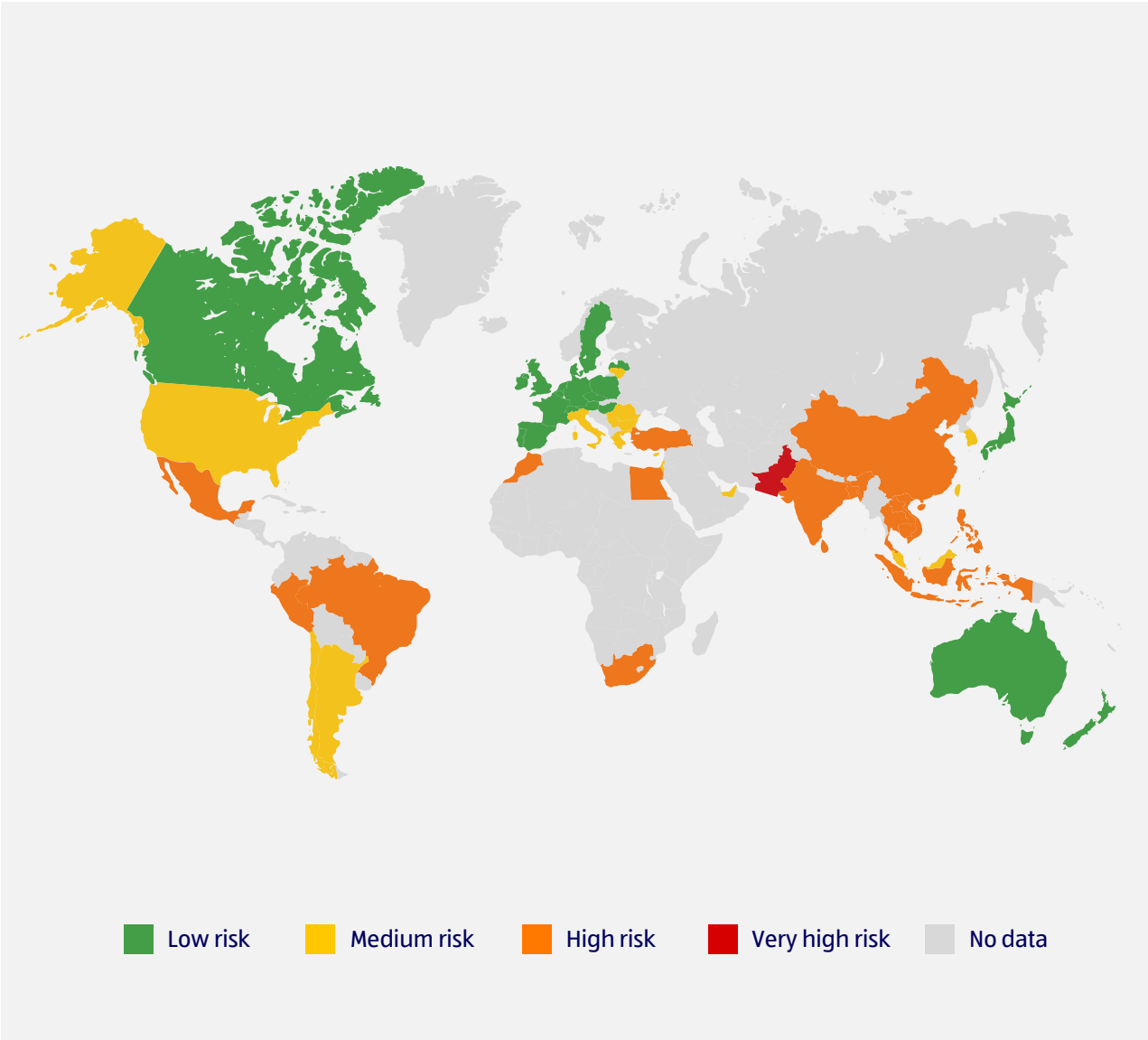
The map below details ALDI Australia’s sourcing countries for our merchandise products in 2025, and their forced labour risk rating according to amfori's ESG Risk Compass³. ALDI Australia conducts its risk assessments based on the Australian context, and does not reflect the risk assessments of any other ALDI country.



56
sourcing
countries



>1,800
total business
partners



3. amfori's ESG Risk Compass provides insights into potential environmental, social and governance risks derived from publicly available, online databases and internal amfori data.

Identifying our modern slavery risks

According to the United Nations Guiding Principles on Business and Human Rights (UNGPs), companies should identify actual and potential impacts on human rights, prevent and mitigate adverse impacts, control the effectiveness of measures, and ensure active engagement in remediation.

The UNGPs recognise that not all impacts can be addressed at the same time and that priority setting is necessary. Companies should prioritise impacts, supply chains, and tiers based on their human rights risk and impact analyses.

To align with this approach, ALDI recognises it is critical that the scope of any measures should be based on the following three factors:



The severity of the impact;



The level of company involvement in posing a risk to human rights;



The ability of the company to prevent or address the impact.

There are different layers of responsibilities. A company’s involvement in adverse human rights impacts can be classified into three categories: ‘cause’, ‘contribute to’ and ‘directly linked’.

- **Cause:**
A business can cause adverse human rights impact where its actions or omissions directly result in the impact occurring.
- **Contribute to:**
A business can contribute to adverse human rights impact where its actions or omissions have contributed to the impact occurring.
- **Directly linked:**
A business can be directly linked to adverse human rights impact through operational relationships, products or services, including through its extended supply chain.

Risk area	Cause	Contribute	Directly linked
Our employees	Potential to cause adverse impact		
Sourcing products in our merchandise categories (food and non-food)		Potential to contribute to or be directly linked to adverse impacts	
Fresh produce in Australia		Potential to contribute to or be directly linked to adverse impacts	
Services and goods not for resale		Potential to contribute to or be directly linked to adverse impacts	

ALDI Australia operations

We respect the rights of our people and are committed to being an inclusive and fair workplace. When evaluating ALDI Australia’s local operations we consider the risk of modern slavery for our employees as low due to aspects such as adherence to the Fair Work Act (2009), which ensures fair pay and entitlements at Award level, and good working conditions.

Australia is inherently deemed low risk in the global context of human rights. This is in part due to a strong government response to addressing modern slavery, including the implementation of the Modern Slavery Act (2018) and mandatory company reporting on efforts to address and tackle modern slavery.

Our supply chain

As an international business with global supply chains, ALDI is committed to respecting human rights and the environment in its own activities and throughout its supply chains, in line with international standards. ALDI believes that long-term business success can only be ensured if responsibilities towards human rights and the environment are acknowledged.

We continually assess the actual and potential human rights and environmental impacts of our business actions throughout our diverse supply chains. This process includes sustainability risk analyses, including both human rights and environmental risks, for ALDI supply chains. It also includes ad hoc risk analyses where needed, and assessments relevant to specific products and components. These assessments provide a deeper understanding of the impacts and risks related to the various stages of production in individual supply chains.

ALDI’s overall sustainability risk analysis considers products and components from a human rights and environmental point of view. Risk is calculated based on factors such as the country of origin, industrial and agricultural processes involved in manufacturing, raw materials used, and buying volumes. The country and product specific risk scores for human rights and environmental aspects are based on publicly available indices, audit data and grievances received, as well as internal company data.

Image: worker on farm (Ashbern Farms)



Our risk analyses have identified the following human rights and environmental risks as salient to our diverse supply chains. In response we have integrated these risks into our wider policies and management systems:

- | | |
|--|--|
|  Discrimination |  Freedom of association |
|  Forced labour |  Gender-based violence and harassment |
|  Child labour |  Work health and safety |
|  Wages and income |  Deforestation and land rights |
|  Water availability and pollution |  Biodiversity loss and soil depletion |

Setting requirements through policies

We set out requirements for our people and business partners through transparent policies. We acknowledge it is necessary to regularly evaluate how to improve our approach to addressing human rights and environmental issues, which includes conducting periodic reviews of our standards and policies.

In 2025, the ALDI SOUTH Group published its updated Child Labour Policy. Key changes include restructuring and updating language to provide greater clarity around the scope and definition of this policy and aligning with the ALDI Human Rights and Environmental Due Diligence Policy.



ALDI requires business partners to comply with all applicable laws in the countries and regions in which they operate. The ALDI Business Partner Sustainability Standards lay out the key sustainability expectations of all our business partners and are part of contractual agreements.

Where applicable laws and/or ALDI requirements set a different standard of protection to international standards, such as applicable United Nations (UN) treaties and International Labour Organization (ILO) Conventions, ALDI and our business partners are to abide by the principles that provide the highest protection to potentially affected rightsholders such as workers and communities, and to the environment, to the extent permitted by applicable law.

We strongly believe that collaboration is key to successfully mitigating human rights impacts and expect our business partners to be proactive in cascading these requirements throughout their own supply chains.

For ALDI Australia, the operational responsibility for executing our sustainability policies sits within our National Sustainability team, relevant business units, and with our senior management.

Collectively, we are all responsible for upholding our standards and requirements in our business and within our supply chain.



Image: strawberries (Pinata Farms)

Our standards, policies, and position statements

Our standards, policies, and position statements are available externally via the ALDI SOUTH Group International Sustainability [website](#).

Title	Description and importance
ALDI Business Partner Sustainability Standards	The ALDI Business Partner Sustainability Standards represent our minimum requirements for business partner due diligence across their supply chains. They reflect ALDI's commitment to human rights and the environment and include the requirement for business partners to abide by such standards as the right to freedom of association, payment of minimum wages, non-tolerance for discrimination, child labour and forced labour. For ALDI Australia, these Standards are included in Terms & Conditions for our national business partners.
ALDI Human Rights and Environmental Due Diligence Policy	ALDI's Human Rights and Environmental Due Diligence Policy details our approach governing all policies, requirements, and processes affecting human rights and the environment in its supply chains. ALDI's due diligence approach is implemented to ensure that its commitments towards human rights and the environment are met.
ALDI Child Labour Policy	We are committed to the prevention, identification, and remediation of child labour in all areas of our operations, including our supply chains. Our Child Labour Policy explains our understanding of child labour in accordance with international standards. In line with ALDI's Business Partner Sustainability Standards, ALDI does not tolerate child labour in ALDI's business operations and supply chains. This policy describes the actions ALDI, together with expert child rights organisations and our business partners, will take if child labour is found at a production site, and the steps we take to prevent child labour occurring. In 2025, ALDI published its updated Child Labour Policy.
International Policy on Forced Labour	Our International Policy on Forced Labour expands on ALDI's existing commitments to human rights and underlines our stance that any forms of servitude or slavery, or forced, bonded, indentured, trafficked, or non-voluntary labour are unacceptable throughout ALDI's supply chains. This concerns all relevant stakeholders, including all business partners, production facilities, service providers and contractors.

Our standards, policies, and position statements

Title	Description and importance
International Policy on Gender Equality in ALDI's Supply Chains	All workers should be treated fairly. ALDI does not tolerate any form of discrimination and strives for gender equality within our supply chains. Our International Policy on Gender Equality in ALDI's Supply Chains focuses specifically on women in supply chains, as a particularly vulnerable group who have traditionally been overlooked. We believe that by addressing the challenges women face in supply chains and supporting gender equality, we can promote greater diversity overall and support safer and more inclusive supply chains.
International Position Statement on Living Wages and Living Incomes	Everybody has the right to afford a decent standard of living. We strive to create lasting change in the global supply chain and do our part to ensure a decent standard of living for people within our food and non-food supply chains, especially for vulnerable groups, including migrant workers and women. In global supply chains, low wages and incomes often coincide with other human rights related issues such as discrimination, gender inequality, excessive overtime, child labour or forced labour. Addressing poverty is a complex and systemic challenge that requires intense collaboration between multiple stakeholders. Our International Position Statement on Living Wages and Living Incomes demonstrates our commitment towards living wages and living incomes in our supply chains.
International Position Statement on Mandatory Human Rights Due Diligence Legislation	ALDI is aware of our responsibility to respect human rights, these rights are non-negotiable and apply equally to each of us. Human rights issues are complex and we are convinced that the best way to create change is for business, governments, and society to be committed to working together to find a better way. Our International Position Statement on Mandatory Human Rights Due Diligence Legislation demonstrates our support as a global business to enable the development of mandatory legislation that delivers impact-focused due diligence.

Due diligence

ALDI's due diligence approach is implemented to ensure that our commitments towards human rights and the environment are met. This commitment covers all adverse impacts that may be caused by, contributed to, or directly linked to our business operations, as well as those of our business partners.

We require ALDI employees, and our direct and indirect business partners throughout our supply chains, to respect human rights and environmental standards in line with our Human Rights and Environmental Due Diligence Policy, and with any applicable laws. ALDI employees and business partners are to ensure that all business activities comply with our commitment.

While our goal is to prevent and mitigate risks, we commit to remedial measures where ALDI's actions have caused rights to be violated. If we identify that our business activities cause or contribute to human rights and environmental risks, we will take appropriate remedial action. Where ALDI is indirectly linked to risks and adverse impacts, ALDI will seek to engage with its business partners to address identified actual adverse impacts.

Our approach to due diligence comprises the following actions:

- Desk-based research of our supply chains, including conducting risk assessments;
- Maintaining, reviewing, and updating our standards and policies as needed;
- Governance through cross-functional working groups;
- Consideration of audit program, internal assessment, and onsite assessment data as part of buying decisions;
- Working closely with our business partners to take appropriate remedial action on identified risks;
- Establishing grievance channels that are available across our supply chains;
- Stakeholder engagement including training of employees and business partners;
- Discussions and collaboration with expert partners.



Australian Fresh Produce Social Monitoring Program

We have an Australia-first sourcing approach for our fresh produce which means we aim to prioritise local growers unless stock is not available. We recognise that workers in the Australian fresh produce industry face heightened risks of exploitation and modern slavery.

Some factors that contribute to these risks include:

- Vulnerability of migrant workers;
- Fluctuations in workforce due to seasonality;
- Worker isolation due to the remoteness of rural production facilities;
- Poor business practices by some Labour Hire Providers (LHP).

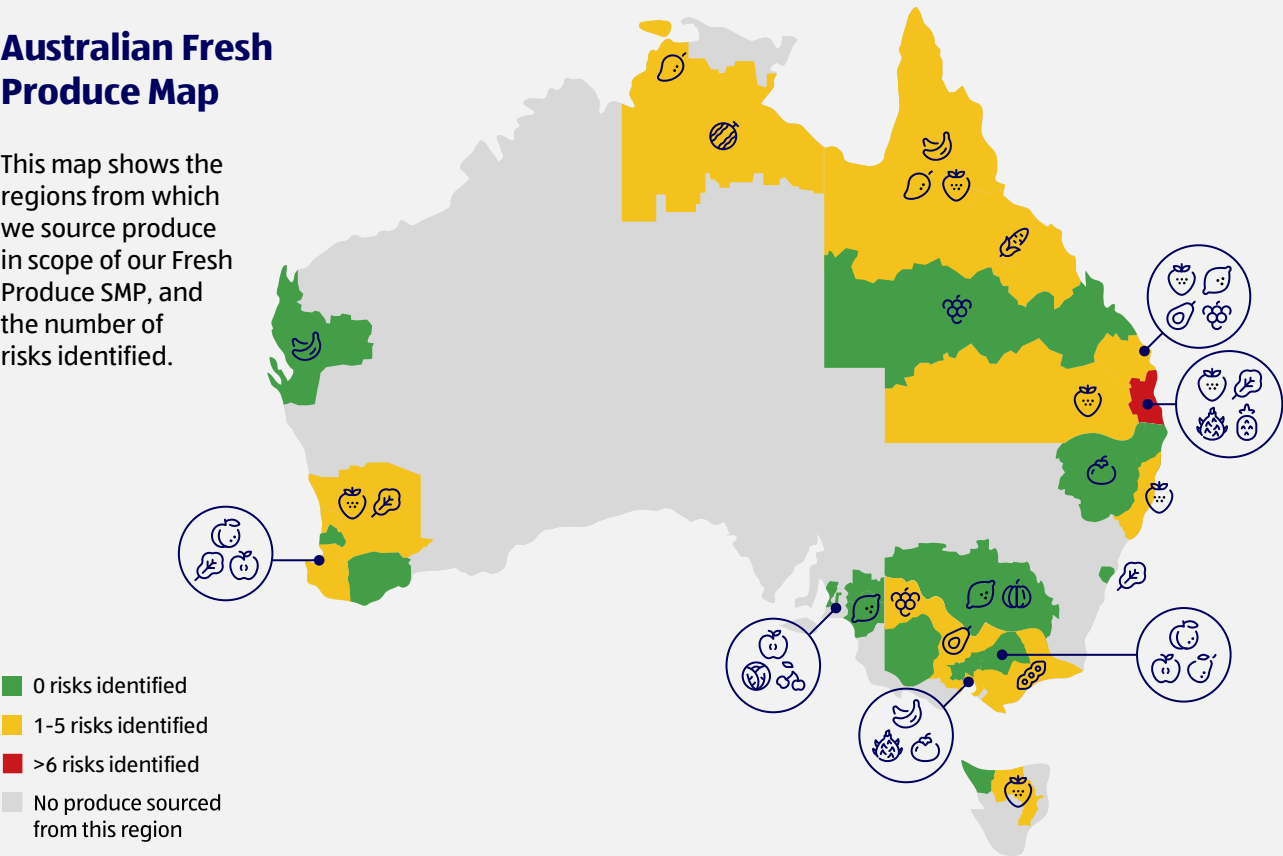
We work with our business partners to monitor compliance to our requirements through our Fresh Produce Social Monitoring Program (Fresh Produce SMP) and have a continuous improvement approach to social standards.

The scope of our Fresh Produce SMP covers all fresh produce sourced from Australia excluding pre-packaged salads and kits, and fresh flowers. In 2025, we reviewed the program’s scope and have extended it to fresh herbs. All business partners were successfully onboarded to the program.

In 2026 we plan to conduct a full review of our Fresh Produce SMP in order to make sure it is relevant to changes in industry. This review will identify the specific adjustments and improvements needed to further enhance this program.

Australian Fresh Produce Map

This map shows the regions from which we source produce in scope of our Fresh Produce SMP, and the number of risks identified.



Our Fresh Produce SMP requires in-scope fresh produce business partners to have third-party social audits conducted on final processing facilities.

We accept both Fair Farms and Sedex Members Ethical Trade Audit (SMETA) social audits (further information on these organisations can be found in ALDI Australia's collaborations and partnerships on page 27). The final processing facility is defined as the last facility at which produce goes through the majority of labour, which is often where produce is packed. For grower-packers, this is the farm site and for aggregator-packers, this is the packing house. A distribution only site is not considered a final processing facility unless the product is repacked into new packaging. Business partners which fall

into scope of the Fresh Produce SMP must provide a valid third-party social audit to supply ALDI Australia.

We review audit reports supplied by independent auditing bodies. Where a risk is identified in a social audit, we work closely with the business partner to validate the risk, and where confirmed we ensure satisfactory remediation, preventative measures, and continuous improvement. Corrective actions are verified by the same auditing body.

If a risk is identified and not remediated to a satisfactory level, or in a timely manner, we may block the site from supplying to us and continue to work towards satisfactory remediation.



Case study: maintaining audit quality

In 2025, we responded to concerns from a third-party regarding the activities of a fresh produce business partner.

In our investigation, we identified that the site had completed their social audit outside of their peak season. Due to the seasonality of fresh produce in Australia it is important that social audits are conducted in peak season. This ensures the audit can identify and remediate the following risks:

- Increased employment of migrant workers, who can often be vulnerable to exploitation.
- Peak production requiring systemic overtime from the workers.
- Gaps in the workforce being filled by LHPs, whose practices may not be effectively monitored.



We engaged directly with the business partner to outline our social standards and were informed by them that the audit booking outside of peak season had been an administrative oversight. As a result, the site will be conducting a new social audit in their 2026 peak production period.

As part of our Fresh Produce SMP in 2025 we reviewed audits for 205 sites. We have improved oversight of our supply chain with increased audit coverage since 2023.

In 2025, we identified 56 risks across 40 sites demonstrating a downward trend in the number of risks identified. This may be indicative of business partners becoming more aware and proactive in maintaining higher standards of compliance for social audits. This also correlates with an improvement in work health and safety standards. We identified 15 risks related to Work Health and Safety (WHS); remediation actions have addressed 13 of the risks, the remaining are in the remediation process.



205
sites reviewed

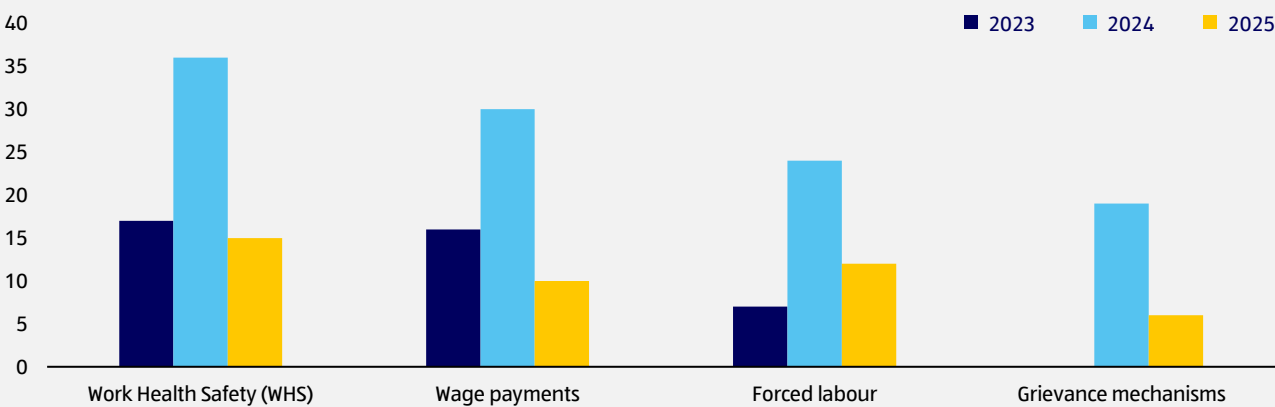


56
risks identified

The number of issues related to wage payments has remained consistent within the proportion of risks identified, with 10 risks identified in 2025. All cases were investigated, and where substantiated, we worked with our business partners to remediate and ensure that processes were implemented to address these types of issues and prevent recurrence.

Remediation efforts addressed 60 percent of these findings, while remaining findings are pending follow-up audits to fully close these cases. Follow-up audits are always required where issues in relation to wage payments have been identified.

Risks identified across the years



Indicators of forced labour represented 21 per cent of risks identified in 2025. Social audits identified 12 findings, of which 10 have been remediated. In 2024, the most common findings within this risk type involved wage deductions without authorisation or contract clauses permitting such deductions without consent. In 2025 the majority of the findings involved workers incurring employment related costs and wage deductions without authorisation. Under the Fair Work Act and Work Health & Safety Regulation, it is stipulated that the employer must provide mandatory personal protective equipment (PPE).

Remediation of these findings involved the provision of PPE often through a communal equipment pool or through reimbursement for existing PPE.

By the end of 2025, all of the findings related to PPE had been remediated.

When a site refuses to undergo a social audit we actively engage with the business partner to explore possibilities for conducting one. If they fail to comply, we block them from supply due to their failure to meet our social standard requirements. When a business partner is blocked, they are unable to supply ALDI Australia temporarily until we confirm sufficient remediation has occurred. Recognising the impact ceasing business relations can have upon a business partner and their workers, we prioritised collaborative remediation in 2025. While we did not block any sites within our fresh produce supply chain, we did block a site pending remediation of risks identified in 2024.

In our 2024 statement we identified eight risks that had not been remediated at the time of publication, with most of the sites having to wait until their 2025 season to close the findings on either the Fair Farms or SMETA audits. These risks were remediated in 2025, except for one site where we had identified findings related to WHS issues and forced labour indicators. Due to inaction from the production facility we have blocked receiving produce until remediation.

Case study: dialogue towards improved social performance

ALDI Australia’s Fresh Produce SMP prioritises continuous improvement and encourages a culture of collaboration with our business partners. In 2024, a fresh produce business partner demonstrated poor social compliance performance. This was due to inconsistent communication by the business partner, the identification of systemic issues including underpayments, and poor audit performance. As a major business partner, we recognised the importance of a continued relationship and in 2025 prioritised increased collaboration.

Consequently, we initiated monthly performance reviews to discuss audit scheduling, remediation practices, and to discuss any challenges faced by the business partner. Throughout the year we identified a trend of notable improvement in audit bookings and remediation practices.

The frequent reviews facilitated a more effective dialogue with the business partner and their smaller producers allowing additional opportunities to share feedback on our Fresh Produce SMP. This was a priority for us as we recognise the compliance burden for smaller horticultural producers and are endeavouring to support them.



The effectiveness of these reviews and the improved communication supports future roll-out of the program with other business partners in 2026.



Image: tractor on farm (Adobe Stock)

Labour Hire Provider (LHP) monitoring:

Due to higher levels of risk related to the employment practices of Labour Hire Providers (LHPs) we conducted an in-depth review of our Fresh Produce SMP in 2025 to assess LHPs utilised by our fresh produce business partners. This process identified 128 active LHPs across 407 production facilities. These providers were identified utilising the Sedex and Fair Farms platforms, and through direct verification with our business partners.

We assessed the adherence of LHP's to relevant state licensing requirements, applicable for sites based in Queensland, South Australia, and Victoria. We also monitored Pacific Australia Labour Mobility (PALM) scheme employer status and reporting from the Fair Work Ombudsman.

In 2025, we identified 14 LHPs that were not meeting our social standards. Our investigation identified that the majority of these LHPs had already been delisted by our business partners. We partnered with our remaining business partners to support engagement with compliant LHPs.

The Fresh Produce SMP will continue to conduct regular reviews of LHPs utilised within our supply chain. In our review of the Fresh Produce SMP in 2026, we will aim to improve data capture and review our labour hire requirements.



Case study: business partner engagement

ALDI Australia's Fresh Produce SMP prioritises engagement by our social monitoring team with our Buying teams to ensure an effective understanding of modern slavery indicators within our supply chain. Activities include training sessions, monthly meetings with Buying representatives, notifications of identified risks within our supply chain, and escalating risks and/or ongoing issues when Buying support is required.

In 2025, we identified a risk concerning LHP practices where the business partner was unwilling to pursue remediation. This business partner needed to improve their compliance so our Sustainability team attended the business partner's quarterly commercial review held by the Buying team. During the review meeting, we were able to clearly communicate and outline our commercial and social requirements and begin remediating the risks. This collaborative approach successfully secured a follow-up social audit, and the establishment of improved LHP due diligence at the production facility.



We uphold a high standard of communication with our internal and external stakeholders. In 2026, as part of our planned review of our Fresh Produce SMP, we will evaluate including Sustainability team members in commercial review meetings regularly.

Worker voice:

The Fresh Produce SMP primarily utilises social audits to identify and remediate issues at in-scope production facilities. We have identified a need to expand beyond this approach to foster greater engagement with workers in our supply chain.

In 2025, we conducted an evaluation of worker voice programs that could be utilised within the Fresh Produce space for ALDI Australia. These programs would enable engagement through technology platforms to capture worker sentiment in anonymous survey results. Our objectives in deploying worker voice programs within fresh produce include but aren't limited to:



Remediating issues for workers



Enhancing the social auditing process



Improving our data management and due diligence

Pending the results of this evaluation, we will continue to assess the feasibility of the programs for our fresh produce supply chain. If successful, we will consider piloting the chosen technology with select business partners in the future.

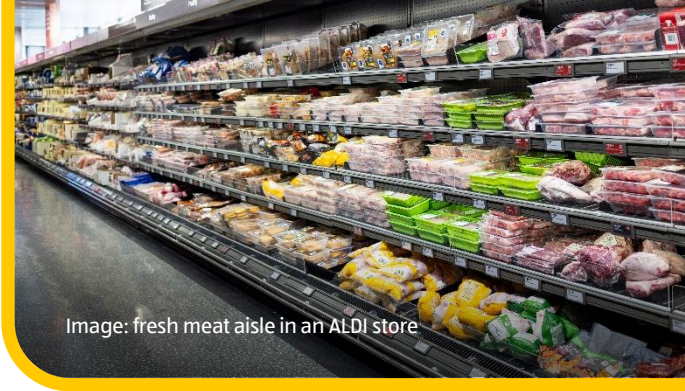


Image: fresh meat aisle in an ALDI store

Fresh meat and seafood:

In 2025, we investigated the feasibility of expanding the Fresh Produce SMP into our fresh meat and seafood supply chains. Initial analysis found 97 per cent of our final processing facilities were already registered on the Sedex platform.

We then consulted with stakeholders including Buying representatives and select business partners. Both groups were presented with an overview of our social standard requirements and shared their feedback. The selected business partners also voluntarily shared their social audit reports with ALDI Australia and no risks were identified.

The objective of our consultation was to determine whether a pilot program was suitable for ALDI Australia and our business partners. The risk within this supply chain is well managed and after further discussion and review it was decided that expansion of our SMP scope was not required at this time.

Global Social Monitoring Program

ALDI works to continuously improve workers' rights, and conditions throughout our international supply chains. Within our Global Social Monitoring Program (Global SMP) we utilise third-party social audits to systematically monitor and assess risks at main production facilities in our supply chains.

On a global level, we recognise social audits and certificates from the following internationally recognised standards:

- amfori BSCI;
- Sedex Members Ethical Trade Audit (SMETA);
- Ethical Supply Chain Program (formerly ICTI Ethical Toy Program);
- SA8000;
- Fair Wear Foundation;
- Responsible Business Alliance (RBA);
- Global Seafood Alliance (GSA) Seafood Processing Standard (SPS).

In 2025, the largest number of risks in our global supply chains were found within the categories of household textiles and garment textiles. Below are some examples of products, followed by common risks identified across these categories.

Category	Product examples
Household textiles	Bathroom and kitchen textiles, bedding, rugs, and non-textile floor mats
Garment textiles	Ladies', men's, children's, and unisex textiles

Common risks across these categories:

- Underpayment of wages;
- Work health and safety;
- Unauthorised subcontracting;
- Non-transparency.

We work closely with our ALDI Corporate Responsibility Unit Asia (CRUA) based in Hong Kong who manage the Global SMP. The CRUA review audits and conduct business partner communication, confirm remediation activities, and reporting. When a risk is identified for a product in ALDI Australia's supply chain, our CRUA team alert our National Sustainability team, which coordinates communication with national stakeholders such as the relevant Buying representatives. This ensures effective and timely communication with our Buying teams.

The scope for our Global SMP includes main production facilities located in high-risk countries according to independent risk ratings, for the following categories:

- All non-food products;
- Internationally sourced food products within:
 - i. Fish and seafood;
 - ii. Processed produce and canned meats;
 - iii. Oils and condiments;
- Store uniforms.

Image: dried fruit and nut products in an ALDI store



Due to identified risks, the scope of ALDI Australia's Global SMP also includes the following categories for any main production facilities located in Thailand:



Alcohol



Rice



Chips, snacks and nuts



Pet food



Nut spreads



Dried fruits



Coffee and cocoa beverage products



Case study: investigating reported grievances

In 2025, we received a complaint from an external party regarding a production facility in ALDI Australia's supply chain, highlighting concerns around working conditions and work health and safety. Desktop and on-site investigations by the National Sustainability and CR Unit Asia teams confirmed some of the allegations.

In response to the identified risk, ALDI engaged the relevant business partner who promptly implemented a Corrective Action Plan (CAP) detailing remedial and preventative measures for each non-compliance. The issues were remediated to our satisfaction.

We undertook a review of our buying practices in this instance to understand whether our practices had directly impacted the operations of the production facility. We confirmed that ALDI had not impacted production.

After closing the investigation, we prioritised monitoring labour conditions at the production facility. We also reviewed our processes for investigating reported grievances from third parties, combining self-assessment with active engagement of key stakeholders through open discussions and written feedback.

Our aim in conducting the review was to evaluate the effectiveness of our investigation, identify actionable improvements, and highlight successful practices that should continue. The review confirmed the investigation successfully met its objectives, but also identified some opportunities for improvement such as enhanced communication with stakeholders. We shared the final review report with relevant internal stakeholders, and implementation of the recommended steps for improvement is ongoing.



Throughout this process we continue to strengthen our ability to conduct thorough and effective investigations across our business.

ALDI Sustainability Assessments

ALDI Sustainability Assessments (ASA) are a key tool used to monitor production sites within our supply chain. Our CRUA teams in Hong Kong and Bangladesh, as well as select third-party auditors trained on ALDI's requirements, conduct assessments on an announced, semi-announced, or unannounced basis. We invite business partners to attend announced ASAs so they understand any changes or remediation that needs to occur at the production site. Whilst our Global SMP provides insight into activities within our supply chain, ASAs provide us with more detailed insight as to what is happening on the ground at production sites.

ASAs are conducted to further investigate a finding raised through the Global SMP, as a key component of the Corporate Responsibility Supplier Evaluation (CRSE) Program, or after receiving information via a third-party such as Non-Government Organisations (NGOs), anonymous contacts, or worker grievance channels.

This year, we conducted 255 ASAs in our global supply chains for the ALDI SOUTH Group. We detected risks at 79 sites and began corrective actions with relevant business partners.

Business partner evaluations

The Corporate Responsibility Supplier Evaluation (CRSE) program focuses on working with business partners to help assess, rate, and raise our business partners' capability to manage the social and environmental compliance components of supply chains based on ALDI's sustainability requirements.

Where relevant, we explore the opportunity for improvements within their existing organisational structure, policies, monitoring, remediation, and capacity building programs.

ALDI Australia participates in the CRSE across the following commodity groups:

- | | | | |
|---|--|---|--------------------|
|  | Garment textiles |  | Household textiles |
|  | ALDI store uniforms |  | Shoes |
|  | Fish and seafood (canned, frozen, fresh and chilled) | | |

We want to continue to use our influence to respect and support human rights. The CRSE program approach goes beyond third-party audits and uses indicators of our business partners' management systems as well as the performance of their production facilities which is verified through on-site assessment by ALDI.

Following assessment, final ratings are assigned to each business partner to evaluate their overall performance. As the results of the CRSE Program are considered as part of the buying process, we encourage business partners to continuously improve their sustainability performance. Our CRSE program is currently being reviewed and updated to assess its effectiveness and to align with industry standards.

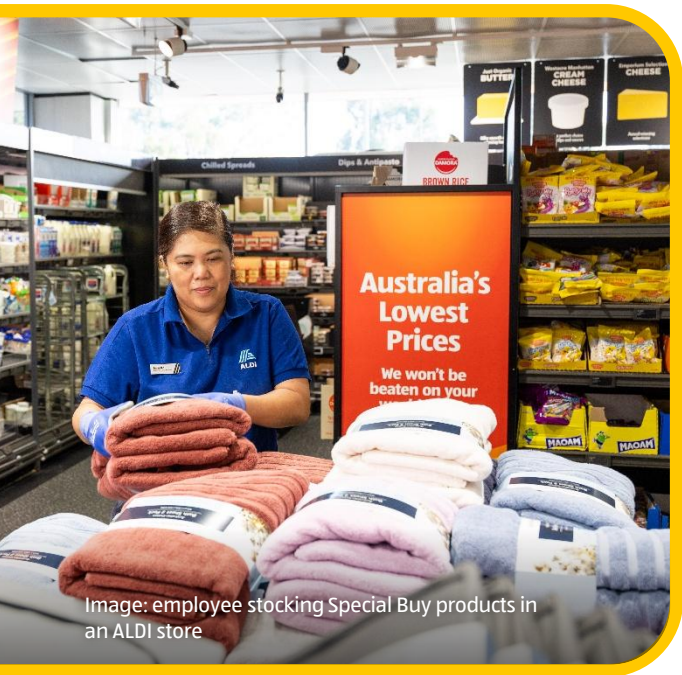


Image: employee stocking Special Buy products in an ALDI store

Remedial measures

We take all instances and allegations of non-compliance seriously, whether reported by ALDI employees, workers at production sites, auditors, business partners, unions, civil society, media, or other stakeholders. If we identify that our business activities cause or contribute to human rights and environmental risks, we will take appropriate remedial action. Where ALDI is indirectly linked to risks and adverse impacts, ALDI will seek to engage with its business partners to address them.

We have defined a variety of measures to address these incidents considering severity of the risk, including the following:

- Development of Corrective Action Plans (CAP) with concrete timelines to address findings and remediate non-compliances;
- Review and update internal processes, such as changes to purchasing practices, additional trainings and audits, and other measures proportionate to the identified risk or impact;
- A rapid response system in collaboration with The Centre for Child Rights and Business that enables us to react immediately and appropriately if child labour is found in our supply chains;
- As a last resort, the exclusion of direct and indirect business partners from doing business with ALDI.



ALDI regularly reviews the effectiveness of its remedial measures and makes adjustments on an ongoing basis where needed.

Image: ALDI distribution centre

Goods Not For Resale

Our Goods Not for Resale (GNFR) supply chains consist of 3,037 business partners⁵ across 270 sub-commodity groups. ALDI Australia requires all GNFR business partners to adhere to the Business Partner Sustainability Standards (BPSS) which establish clear expectations with regards to human rights and modern slavery.

This year, we conducted an internal review to refresh our GNFR risk assessment process to identify where due diligence and controls need to be the strongest, and developed a risk framework to define category-specific risk ratings. Further to this, desktop risk assessments were carried out for high-risk categories.

We understand there are heightened risks within labour hire and labour services such as cleaning, security, and trolley collection. Our National Procurement teams conduct additional due diligence for these categories which includes third-party tender audits and periodic business review meetings with our suppliers. The tender audits are conducted by Procurement teams every three years, or when subcontractor arrangements change. The audits assess subcontracting practices, worker employment status, visa entitlements, and compliance with workplace laws and WHS standards. ALDI Australia reserves the right to undertake additional audits as needed.

Our Procurement teams also have formal procedures in place for investigating grievances reported to ALDI Australia. These procedures are supported by clear investigation templates and guidelines and ensure prompt investigation of grievances or non-compliances raised. In 2025, we began reviewing these existing guidelines and procedures with the aim to enhance governance and reporting. This work will continue into 2026.

The ALDI SOUTH Group also conducts due diligence for our store uniforms via the Global Social Monitoring Program and Corporate Responsibility Supplier Evaluation programs.



5. Number of business partners excludes government organisations.



Real Estate

Following an internal assessment of building and construction services, ALDI Australia has improved its real estate procurement processes to address modern slavery risks. Contracts with real estate and related service providers have been updated to include dedicated modern slavery clauses, as well as formal acknowledgement of ALDI's BPSS. This ensures ALDI's minimum requirements regarding human rights and the environment are clearly communicated and embedded within these contracts.

Grievance mechanisms

Access to effective remedy is a core component of the United Nations Guiding Principles on Business and Human Rights. We recognise the importance of establishing and participating in effective multi-stakeholder grievance mechanisms for vulnerable individuals and communities who could be adversely impacted in global supply chains. ALDI SOUTH Group continues to be involved in multiple grievance mechanisms that enable supply chain workers to voice their concerns.



Issara Institute Worker Voice Program:

Since 2021, ALDI SOUTH Group has been a strategic partner of the Issara Institute, an independent NGO that tackles human trafficking and forced labour. We work in partnership to provide workers in Thailand with a channel to have their concerns voiced, acted upon, and remediated.

Thanks to Issara Institute's experience, presence on the ground and trust by workers, we have deepened our knowledge on issues such as recruitment fees and complexities around the recruitment of migrant workers in Thailand. We have also been able to identify and address barriers to accessing grievance mechanisms. Our partnership with Issara will continue to develop.



Image: ALDI distribution centre

amfori Speak for Change

amfori Speak for Change is a supply chain grievance mechanism set up to receive and address complaints to help workers, communities, rightsholders and their representatives access remedies if they have been negatively impacted in our supply chain.



Ready-Made Garment Sustainability Council (RSC) Occupational Safety and Health Complaints Mechanism

Workers and employees at RSC-covered factories in Bangladesh and their representatives can raise health and safety concerns confidentially through the Occupational Health and Safety Complaints Mechanism.

The RSC inherited the Occupational Safety and Health Complaint Mechanism from the Accord Bangladesh. Since 1 June 2020, it has been operated independently by the RSC. Accord brand and union signatories are tasked with ensuring that this mechanism continues to provide workers with access to remedy independently and autonomously. Information on the International Accord can be found in the partnerships section of this report.

ALDI AlertLine

The ALDI AlertLine can be used by business partners and employees to raise concerns or report policy violations. This global independent service staffed by multilingual call handlers is available 24 hours a day, seven days a week.

Raising awareness and training

We consistently raise awareness and provide training to internal and external stakeholders, ensuring our teams and business partners are equipped to identify potential risks within our supply chain.

Internally in 2025, we collaborated with our Buying teams to conduct a targeted training needs assessment, identifying both essential and priority content areas for future training. Drawing on the insights gained, training was designed to equip teams with the knowledge and skills needed to effectively engage with business partners on human rights, ethical sourcing, and social compliance topics, as well as to recognise when to escalate concerns to the National Sustainability team. Further detail on these internal training sessions can be found in the case study on page 26.

In addition to these training sessions, we updated and expanded our general modern slavery awareness program on ALDI Australia's internal e-learning platform in 2025. Access to this training was extended beyond the current scope of Buying teams, to include our National Procurement and National Real Estate teams, broadening our scope from merchandise to include goods and services not for resale. As a result, an additional 190 participants completed the training in 2025, enabling a broader range of employees across critical business functions to effectively recognise and mitigate modern slavery risks.



Business partner training resources are consistently distributed through our business partner portal and official communications. This ensures that all new business partners receive the necessary resources during onboarding and have convenient access to them at any subsequent stage.

Case study: modern slavery training

The responsibility of managing human rights risks sits within our National Sustainability Human Rights team. Our National Buying teams also provide secondary support in flagging potential risks. Due to this, National Sustainability recognised opportunity to increase awareness amongst our General Merchandise and Fresh Produce Buying teams on how to support in identifying risks within our supply chains.

During 2025 we delivered four training sessions for the General Merchandise Buying teams and an additional two sessions specifically for the Fresh Produce Buying team, with content tailored to reflect the relevant Australian context. All six sessions included a mix of department roles and positions, with 92 employees attending overall.

The training sessions featured interactive components, including anonymous question submissions via QR codes to foster engagement throughout.

Pre- and post-surveys were conducted to capture quantitative and qualitative feedback from participants to help inform future training sessions.

The post-training survey showed an increase in both knowledge and confidence in addressing these same issues, with 84% of participants reporting that they now felt “confident” following the training sessions.

In another positive survey insight, 87 per cent of participants agreed that the impact of Buyer’s decisions is “Very Significant” or “Somewhat Significant” on human rights, identifying the connection between buying decisions and human rights within our supply chains.

One participant highlighted the training's practical impact emphasising its value in supporting their role at ALDI Australia, sharing:

“ The modern slavery training increased my awareness and understanding of how to help identify, prevent, and address modern slavery risks in our supply chains.



Training surveys sent out to participants before and after the training sessions included questions asking participants to rate their confidence in engaging in discussions with business partners about human rights issues.

These results highlight the effectiveness of these training sessions and the need to continue engagement and awareness training within our business.

ALDI Australia collaborations and partnerships

Collaborations and partnerships with NGOs and government bodies are vital in tackling human rights and modern slavery issues as well as improving the traceability of our supply chains. No one organisation can tackle these issues alone. Below is a summary of ALDI Australia’s most active collaborations and partnerships. Further information on all ALDI SOUTH Group partnerships is available [here](#).

amfori | Member since 2008

amfori is a global business association for sustainable trade, supporting companies around the world to operate successfully and responsibly by improving the environmental, social, and governance performance of our supply chains.

ALDI SOUTH Group has been a member of amfori since 2008. As part of this membership, we use amfori BSCI (Business Social Compliance Initiative) audits through the amfori Sustainability Platform. amfori BSCI enables us to perform ESG due diligence, increase transparency, and address significant violations of working conditions within international labour rights framework.

ALDI is also actively involved in a number of amfori projects 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.



The Centre for Child Rights and Business | Partner since 2018

The Centre for Child Rights and Business helps companies understand and improve their direct and indirect impact on children. It provides practical solutions that enable companies to mitigate risks while delivering meaningful and lasting improvements for children, youth and families.

ALDI SOUTH Group has partnered with The Centre for Child Rights and Business since 2018 to develop and evaluate strategies to address, prevent and remediate child labour. Their services include preventing and remediating child labour, assessing child rights and human rights risks, connecting youth and other vulnerable groups to decent work and skills development opportunities, creating family-friendly workplaces in supply chains, and providing training for migrant parents.



Fair Farms | Partner since 2019

Fair Farms is an industry-led initiative which offers a benchmarking self-assessment questionnaire, site-specific training, and an independent third-party audit to identify any risks. Fair Farms offers a pathway to certification for fair and ethical employment practices on farms, and we accept Fair Farms as part of our Fresh Produce SMP.

In 2025, ALDI Australia joined the Fair Farms External Stakeholder Reference Group (ESRG). The ESRG includes growers, relevant government bodies, supply chain partners, retailers, audit bodies, and others working together providing expert guidance and feedback. This is an important move for ALDI Australia towards further collaboration and cooperation of industry bodies working towards driving improvements in the Australian horticulture industry.





Tony's Open Chain | Partner since 2020

Tony's Open Chain is an initiative designed to transform the cocoa industry. It helps chocolate brands to become sustainability frontrunners. Together, all participants in Tony's Open Chain are laying the groundwork for industry change by adopting necessary purchasing practices and a sourcing model that facilitates systemic change. Adopting Tony's five Sourcing Principles for cocoa enables ALDI SOUTH Group to take responsibility for the cocoa supply chain.



International Accord | Partner since 2013

ALDI SOUTH Group was one of the first signatories of the Accord on Fire and Building Safety in Bangladesh in 2013. Our continued support and commitment to the Accord can be seen in our signing of the International Accord for Health and Safety in the Garment and Textile Industry in 2021 and 2023.



Issara Institute | Partner since 2021

Issara Institute is an independent non-governmental organisation based in Asia and the United States. It operates on the ground, working with workers and communities, partnering with civil society, businesses and governments to build ethical supply chains. It tackles issues related to human trafficking and forced labour through worker voice, partnership and innovation.

ALDI SOUTH Group has been a strategic partner since 2021 and participates in Issara's Inclusive Labor Monitoring program. This worker voice-centred collaboration supports workers and improves working conditions in ALDI's food and non-food supply chains across Southeast Asia. It provides ongoing real-time data about supply chain labour conditions and labour risks before they escalate. It empowers workers to safely speak up when they have concerns about recruitment conditions or their working environment and enables grievances to be effectively addressed. 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 in a timely manner.



Supplier Ethical Data Exchange (Sedex) | Partner since 2014

Sedex is a global platform for supply chain sustainability solutions. Specialised in data, insights and professional services, it offers accessible tools, services, and a community network to support companies enhance responsible business practices and sustainable sourcing.

We use the Sedex Members Ethical Trade Audit (SMETA) as a standard for auditing production facilities in our Social Monitoring Program. It helps us identify, assess and prioritise environmental and social risks and impacts more effectively across our supply chains.

Effectiveness

ALDI Australia understands that measuring effectiveness is imperative to ensuring we continue to reduce risk, as well as prevent and remediate instances of modern slavery. The ways in which we measure effectiveness is through:

-  Our governance structures
-  Targeted training to increase awareness
-  Consultation with external partners
-  Review and assessment of our systems and processes
-  Learnings from cases found through the monitoring of our supply chains

Throughout 2025 we continued to enhance our internal engagement, delivering specifically designed training sessions to our Buying teams, and expanding the scope of our general modern slavery awareness e-learning module. By continuing to raise awareness on modern slavery and deliver tailored training we ensure that our teams are equipped to recognise potential indicators of modern slavery and know when and how to escalate concerns. The case study on page 26 details how we measured the effectiveness of this training.

Where cases have been found within our supply chain throughout the year, we have conducted reviews to assess our processes and case management, incorporating feedback from the relevant stakeholders involved. The aim of these reviews was to understand the effectiveness of our approach in handling the case and to continually identify any improvements we should make to undertake better case management.

As part of our 2026 agenda, we plan to undertake a full review and update of our Fresh Produce Social Monitoring Program (SMP). Whilst we have made improvements and extended the scope over the years, a comprehensive evaluation of the program is now required to ensure it is effective in identifying risks across our fresh produce supply chain.



Image: employees in an ALDI distribution centre

External assessments

Chocolate Scorecard

In the 6th edition of the Chocolate Scorecard published in 2025 by Be Slavery Free, ALDI SOUTH Group placed 3rd amongst global retailers. The scorecard evaluated retailers based on their contribution towards driving positive change in the chocolate and cocoa industry. This recognition acknowledges ALDI SOUTH Group’s efforts to improve its cocoa supply chain.

Global Child Forum Benchmark Report 2025

ALDI SOUTH Group was assessed in the 2025 Global Child Forum’s Children’s Rights & Business Benchmark. This assessment has evaluated how 1,806 companies across eight sectors address children’s rights within their business practices.

ALDI SOUTH received an overall score of 9.6, ranking us 5th of all global companies and 1st amongst retailers. This reflects our ongoing commitment to prevent child labour throughout our operations and supply chains, and to build supportive communities where children can thrive.

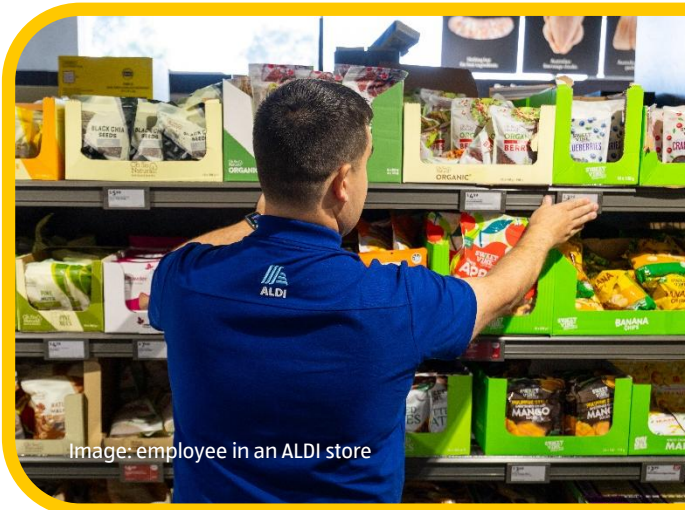


Image: employee in an ALDI store

Consultation

Senior leadership of relevant business units were consulted during the development of this Modern Slavery Statement. ALDI Australia’s ongoing actions and commitment to addressing modern slavery were formally tabled and presented at the National Board Committee Meeting in June 2026.

Relevant information is shared with responsible business units throughout the year. Our Chief Commercial Officer oversees the implementation of our commitments and policies to identify and mitigate human rights risks including modern slavery within our supply chains.

2026 Planned activities

Upcoming activities for ALDI Australia’s National Sustainability team include a comprehensive review and update of the Fresh Produce SMP.

In 2026 a new sustainability pillar of our global business strategy will be launched, bringing new focus to activities across our business and within key supply chains.

Approval

This Modern Slavery Statement was approved by the National Board of ALDI Stores (A Limited Partnership) ABN 90 196 565 019 as defined by the Modern Slavery Act 2018 (Cth) on 9 June 2026.



Appendix

Mandatory reporting criteria		
The following table indicates the page numbers of the statement that addressed each of the mandatory criteria in section 16 of the Modern Slavery Act 2018.		
A	Identify the reporting entity	4
B	Describe the reporting entity's structure, operations and supply chains	4-7
C	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	8-9
D	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	10-28
E	Describe how the reporting entity assesses the effectiveness of these actions	29
F	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	30
G	Any other information that the reporting entity, or the entity giving the statement, considers relevant	31



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