

International Policy

Child Labour

Version: 2025

INTRODUCTION

The ALDI Nord Group of Companies (ALDI) is committed to respecting human rights in its own activities and throughout its business operations and supply chains. This commitment extends to upholding the rights of children, further outlined in the **ALDI Nord Policy Statement**.

Along with other international standards, which are cited in **ALDI Nord Policy Statement**, this document has been developed in alignment with the following standards and documents:

- **United Nations Convention on the Rights of the Child (UNCRC)**
- International Labour Organization (ILO) Conventions **No. 138 (Minimum Age)** and **No. 182 (Worst Forms of Child Labour)**
- **Children's Rights and Business Principles (CRBP)**
- **ILO-IOE Child Labour Guidance Tool for Business**
- **ILO Supplier Guidance on Preventing, Identifying and Addressing Child Labour**

ALDI's Child Labour Policy outlines the specific risks that apply in relation to child labour in upstream supply chains, and by what means ALDI seeks to identify, prevent, mitigate and monitor these risks and provide remediation for child labour cases. This policy is to be seen within the wider context of ALDI's commitment towards respecting the rights of children in its supply chains, in line with the UNCRC.

The requirements and processes outlined in this policy are enacted through contractual requirements with business partners, including the **ALDI Nord Business Partner Code of Conduct**.

ALDI will review and update this policy at regular intervals to ensure compliance with changing laws and regulations.

Scope

The scope of the Child Labour Policy is aligned with ALDI's **ALDI Nord Policy Statement**. ALDI's commitment covers all adverse impacts caused by and contributed to, as well as directly linked to its own business operations, and those of its direct and indirect business partners. This includes all enterprises that have a business relationship with ALDI by supplying services or goods, including both merchandise and goods not for resale.

Definitions

The UNCRC defines every human being below the age of eighteen years as a child, unless under the law applicable to the child, majority is attained earlier (Source: **UNCRC**).
Children have the right to be free of child labour, defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development (CRBP).

Relevance and Risks

Multiple potential risks to children's rights exist within wider communities affected by ALDI's supply chains, including lack of access to education, childcare and healthcare, poor living conditions, sexual exploitation and abuse, and negative environmental impacts. All these risks frequently intersect with, and are caused or exacerbated by, underlying issues such as poverty in families and communities.

After consultations with expert partner organisations, ALDI has concluded that the key salient risk to children's rights within ALDI's supply chains is that of child labour, with the potential to affect both the production and the sourcing of raw materials. Child Labour has likewise been identified as a salient risk per our risk assessment, as laid out in the **ALDI Nord Policy Statement**.

COMMITMENTS AND REQUIREMENTS

In accordance with the **ALDI Nord Business Partner Code of Conduct**, ALDI does not tolerate child labour, including the worst forms of child labour, in its supply chains or any exposure of children to hazardous conditions at production sites. ALDI is committed to identifying, preventing, mitigating, and monitoring child labour risks and, where necessary, remediating identified child labour cases. ALDI's specific requirements are outlined as follows:

Compliance with minimum working age

No child may be employed under the age at which compulsory schooling is completed and, in any case, not less than 15 years, except where the law of the place of employment so provides in accordance with Article 2 (4) and Articles 4 to 8 of the International Labour Organization Minimum Age Convention, 1973 (No. 138).

Young Workers

It is not permitted to exclude young workers – over the age at which compulsory schooling is completed, but under the age of 18 – from safe employment based solely on their age, thereby barring them from access to suitable employment and training.
The employment conditions for young workers must be age-appropriate, not interfere with compulsory education and not be hazardous or prejudicial to their health, safety, morals and development. Such hazardous work includes, but is not limited to: night shifts, overtime, moving heavy objects, exposure to extreme temperatures, noise and hazardous substances, and handling dangerous machinery, equipment and tools (CRBP).
Employers must comply with applicable legislation, regulations and guidance governing suitable working conditions for young workers, including those on working hours, health and safety, wage and equal treatment.

Light Work

In line with applicable legislation and regulations, children over the age of 13 may perform age-appropriate light work on a family farm or for a family business outside of school hours[1]. Such light work is defined as work which:

- is not likely to be harmful to their health or development, and
- is not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes, or their capacity to benefit from the instruction received.

Minimum age for different types of work



ACTIONS AND MEASURES

ALDI regularly assesses the actual and potential impacts of its operations on human rights and the environment with respect to its direct suppliers and along its supply chains. ALDI also conducts ad hoc risk assessments as needed. ALDI's full due diligence process can be found in the **ALDI Nord Policy Statement**. The following sections describe specific measures to address risks to children within and in addition to the broader human rights due diligence measures.

Policy

The **ALDI Nord Business Partner Code of Conduct** lays out ALDI's requirements for business partners to conduct due diligence, in compliance with applicable legislation and at a level appropriate to the scale and nature of their business operations and identified salient risks. The **ALDI Nord Business Partner Code of Conduct** also lays out a non-tolerance for all forms of child labour in ALDI's business operations and supply chains.

[1] If national legislation has set 14 as the minimum working age in a manner compliant with ILO C138 Article 2, paragraphs 4 and 5, then the minimum age for light work is lowered to 12.

Risk Assessment

Child labour risks are evaluated as part of ALDI's sustainability risk assessment. The rights of children and risks to their wellbeing, including the risk of child labour, are also considered when ALDI conducts human rights impact assessments in high priority supply chains and are addressed in action plans developed from these assessments.

Preventative and Remedial Actions

Where child labour and other violations of children's rights have been identified as salient risks in a particular supply chain, ALDI and its business partners will seek to prevent, mitigate and remediate them in collaboration with remediation partners, affected individuals and communities, governmental and non-governmental organisations and other companies.

In alignment with the **ILO Supplier Guidance on Preventing, Identifying and Addressing Child Labour**, ALDI has defined the following specific processes and requirements for its business partners:

1. Prevention of child labour

As a preventative measure against child labour, ALDI provides guidance materials for suppliers, laying out expectations around child labour prevention measures to be implemented at workplaces in the supply chain, such as:

- An employment policy as a basis for hiring decisions at all levels, which explicitly states the minimum age for work and fully respects the rights of young workers at work. This policy should be approved by senior management and communicated to all employees and managers.
- A robust age verification mechanism integrated into the recruitment process and conducted at various stages, including interviews with applicants and review of relevant identification documents.
- Thorough record-keeping and documentation, including copies of workers' proof of age, previously identified cases of child labour and remedial action taken, training and communication on employment policies and guidelines, and relevant consent forms and licences for young workers.
- A list of age-appropriate jobs and requirements for young workers. Apprenticeships and traineeships must be managed in accordance with local law.
- A register of young workers' names, dates of birth and current job positions.

Further preventative actions to address child labour risks include ALDI's audit and certification requirements, in line with the **ALDI Nord Policy Statement**, and partnerships and on-the-ground projects in high-priority supply chains.

2. Remediation process for child labour cases

ALDI implements systems for monitoring high-risk supply chains, addressing grievances and remediating adverse impacts in line with its **ALDI Nord Policy Statement**.

If child labour is found at a production site in ALDI's supply chain, ALDI will work with expert child rights organisations and its business partners to find a solution that is in the best interests of the child and their family.

If the child is below the minimum working age, immediate remediation usually includes:

- Removing the child from the workplace and arranging a safe place, calmly explaining why they cannot work, contacting the child's parents or guardians and explaining the situation to them.
- Ensuring that the child has been paid for the time worked.

Further steps to be taken will be incorporated into a remediation plan that responds to the needs of the child and the scale and severity of the case. The plan will be agreed by all relevant stakeholders, including the child, their parents or guardians and the business partners affected. The remediation plan will be implemented and monitored in collaboration with expert child rights organisations and business partners. Steps taken may include:

- Supporting the child's enrollment in an educational or vocational programme.
- Providing the child with a living allowance in line with the minimum cost of living or minimum wage in the respective region.
- Monitoring the case to ensure that the child does not return to work before reaching the minimum working age.
- Documenting and keeping records of the child labour case.

If a young worker is found to be performing hazardous work, remediation usually includes:

- Removing the young worker from the hazards.
- Providing the young worker with an age-appropriate position, without reducing salary or benefits.
- Arranging for health checks and ensuring that any necessary treatment is provided.
- Regularly monitoring the young worker's situation to ensure that they do not gradually shift back to high-risk activities.

Further corrective actions include measures to prevent the recurrence of child labour, including the implementation and/or improvement of policies and management systems, and the provision of training to relevant staff. Where necessary, companies may be blocked from further business with ALDI until these corrective actions have been satisfactorily implemented.

3. Further actions

For a general overview of all preventative and remedial actions taken towards human rights risks in ALDI's supply chains, including child labour, please refer to ALDI's **ALDI Nord Policy Statement**.

Partner

ALDI collaborates with the **Centre for Child Rights and Business (The Centre)**, an international organisation specialising in children's rights in global supply chains. The collaboration aims to develop and evaluate strategies to combat child labour, remediate cases of child labour found in ALDI's supply chain, and implement on-the-ground projects to prevent the occurrence of child labour.

Structure and Responsibilities

Responsibilities for the implementation of the Child Labour Policy, along with all other aspects of human rights and environmental due diligence, are laid out in the ALDI Nord Group's **ALDI Nord Policy Statement**.

Published by:

ALDI Einkauf SE & Co. oHG
Eckenbergstraße 16A
45307 Essen

© ALDI Einkauf SE & Co. oHG | 2025