

ALDI
UK/Ireland **Code**
of Conduct



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Code of Conduct

July 2017

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Introduction



Dear Employees,

At ALDI we value our business ethics and understand the high standards of Corporate Responsibility that are expected of us.

We take great pride in upholding our reputation which has gained us the trust of our customers, business partners, employees and society as a whole.

We all have a responsibility to help maintain the reputation of the Company. Inappropriate behaviour of any individual could severely damage our reputation and for this reason we have developed an ALDI Code of Conduct.

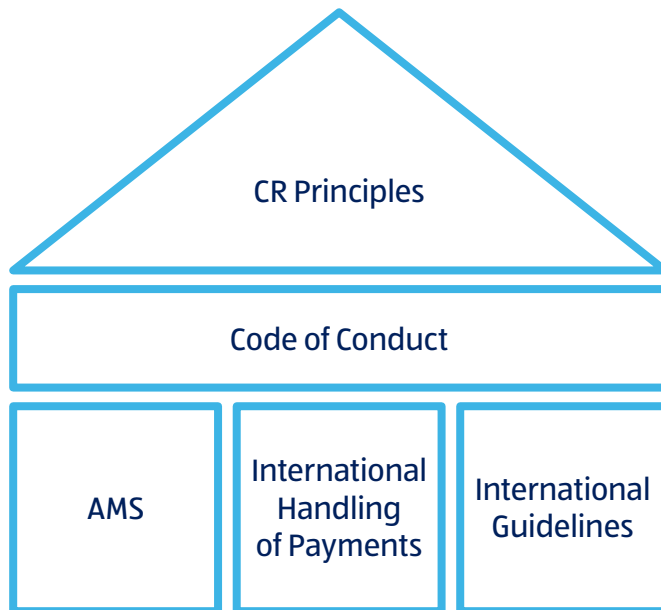
The ALDI Code of Conduct is a policy which applies to all employees. It contains the guiding principles which should be applied throughout your employment with ALDI.

6 CR Principles, Code of Conduct, and International Guidelines

Our business ethics and values are defined in the Corporate Responsibility (CR) Principles.

The Code of Conduct has been developed from these CR Principles to define the basic standards of behaviour we expect of our employees and these basic standards are explained on the following pages.

The Code of Conduct however is just the starting point; it defines how we should behave in general. Further details of how we should behave in every work situation are provided in International Guidelines, such as the ALDI Management System (AMS), International Handling of Payments and National Policies.



General Principles of the Code of Conduct

All employees and our business partners are personally responsible for complying with the law and the ALDI Code of Conduct.

Management must act as role models for their employees by complying fully with the high standards specified in the Code of Conduct.

Employees are required to report any breaches of law or violation of the Code of Conduct or other applicable policies to their direct leader, or, if not appropriate, to the next management level up or to the ALDI AlertLine.

Employees reporting an offence in good faith must not be discriminated against. Any investigation of reported violations will be conducted with utmost confidentiality. Details of the informant will only be forwarded if the informant agrees, or if absolutely necessary to clarify the situation.

Disciplinary action up to and including termination of employment may be taken against any employee who breaches the Code of Conduct.



Conflict of Interests and Acceptance of Benefits

Employees must keep their private dealings separate from any company dealings so that unbiased decisions in the company's best interest are not compromised.

Employees are not permitted to have any personal interests or business relationships with ALDI business partners or competitors if there is a risk of any conflict of interest. Employees must not gain private benefits from business partners or competitors.

Goods or services obtained from business partners on a private basis must have the approval of the employee's direct leader. In such cases the goods or services must not be obtained at terms better than the company's own terms, and any invoices must be directly addressed to the employee.

Invitations to lunch or dinner may only be accepted if they are considered reasonable with the normal course of business and could not be viewed as an attempt to influence the employee's business decisions.

Gifts should not be accepted. The only exception is if they are of low value and if not accepting would be considered offensive. It is not allowed under any circumstances to accept cash or equivalents (e.g. vouchers).

Employees must disclose any possible conflicts of interests to their direct leader and agree how such conflicts are to be avoided.



Bribery

ALDI does not, under any circumstances, tolerate acts of bribery. Employees must not accept or offer any form of favour that could be viewed as an attempt to gain influence. The relationships between ALDI and public officials, companies and private parties must be managed in a way that avoids any suspicion of corruption. These rules may not be bypassed by using third parties (e.g. consultants, brokers or middlemen).

Business partners of ALDI will not be offered, promised or granted free benefits. Business meals constitute the only exceptions from this rule.



Donations and Sponsoring

Any donations made by ALDI must be for a socially good cause and on a voluntary basis without expecting any service in return. The purpose of the donation, who receives it and the donation receipt, should be documented in order to ensure transparency.

ALDI does not make any direct or indirect donations to political organisations, parties or individual politicians.

ALDI may receive public relations or promotional services in return for its sponsorship.

All sponsoring activities must be based on a written agreement and be appropriate for the promotional services received. Sponsoring may not be used to bypass the rules regarding donations.



Fair Competition

All employees must comply with national competition laws and must not be involved in any illegal exchange of information, price fixing or market sharing agreements with competitors or suppliers. Illegal methods to gain information on competitors or their business activities is also forbidden.

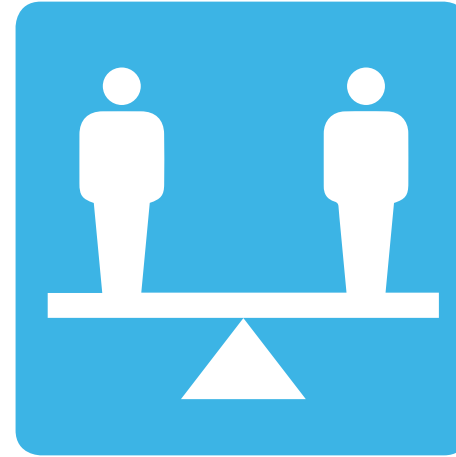


Customer Focus

We always aim to provide our customers the best value; high quality products at the lowest prices. Quality assurance is key to our business and our product safety and quality standards.

Where we need to either remove a product from sale or to recall a product, employees responsible must take the greatest care to ensure our procedures are followed correctly to protect our customers.

We should respond to any customer enquiries in as positive a manner as possible and always aim to find a solution acceptable to our customers.



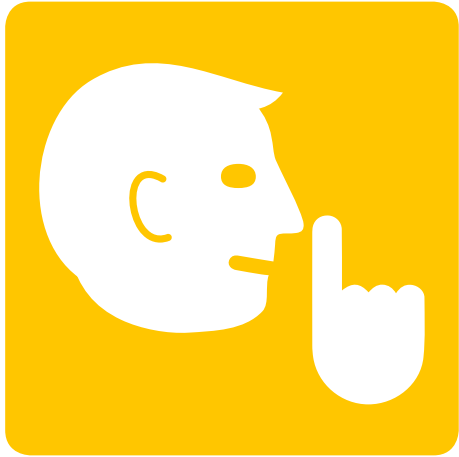
Employee Welfare

Our AMS provides the guidelines for the management and development of employees ensuring a fair and cooperative working environment.

Employees must follow our safe working arrangements at all times and immediately report and/or fix any failings within their area of responsibility. Managerial staff need to support their employees in complying with these requirements.

ALDI recognises and considers itself to be bound by all National employment law in the jurisdiction in which it operates.

Human Rights and equal opportunities must be respected by all employees. Any form of unlawful discrimination and harassment is forbidden.



Protection of Business Information

Business information must be treated as confidential. Sensitive information cannot be used to pursue personal interests, or be disclosed to third parties. Sensitive company information must be secured at all times.

Information received from our business partners must also be handled with the same level of confidentiality.

Public communication and media requests are managed exclusively by nominated employees.



Data Protection

Personal data is only collected, stored or processed if required for predefined purposes, as the law permits.

Personal data must be secured at all times. Employees must follow any data protection rules that apply to their area of responsibility.



Company Property

Company property must be treated with care. Company resources must be used economically, carefully and appropriately.



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