

## Survey on fashion brands and retailers' approach to human rights due diligence in Myanmar

*Business & Human Rights Resource Centre (BHRRC) is collecting information on fashion brands and retailers' approaches to heightened due diligence in Myanmar as a sourcing country.*

*This survey provides you with the opportunity to detail your approach to human rights due diligence beyond any responses you have made to BHRRC's Myanmar Allegation [Tracker](#). Your answers will be analysed for our upcoming report on how brands have adapted operational strategies in Myanmar after the military takeover as well as their impacts on garment workers.*

*Please feel free to provide any supporting information on your practices in any of the questions below (including tick box questions).*

*The survey will take 15 minutes and will be open for 3 weeks, from the 6th April to the 27th April 2023.*

*We thank you for your time and cooperation!*

### Part I: General information

1. Company name: Lidl Stiftung & Co. KG
2. Your name: Stefan Göbel
3. Your role: Group Lead
4. Your department: CSR Compliance & Processes (Purchasing International)

### Part II: Operation history in Myanmar

5. When did your company start sourcing from Myanmar?  
*As per the data records definitely since 2013.*
6. Do you still source from Myanmar, as of the 6th April 2023?

Yes

Yes, but we have announced that we plan to stop sourcing from Myanmar

No, we have now left and no longer have any ongoing production in Myanmar

### Part III: Heightened human rights due diligence approach in Myanmar

*This section will explore your approach and practices to human rights due diligence in the high-risk context of Myanmar.*

7. Which of the below mechanisms do you currently utilise in the context of Myanmar?\*

	Yes	No	Not sure
Human rights due diligence	X <a href="#">Human Rights &amp; Ethical Trade - Lidl Great Britain</a>		

	Yes	No	Not sure
guideline in conflict-affected contexts like Myanmar			
Public disclosure of an up-to-date list of direct and indirect suppliers in Myanmar	X <a href="#">Supply Chain Transparency - Lidl Great Britain</a>		
Requirement for suppliers' to undertake a human rights self-assessment questionnaire (SAQ)	x Rather, all direct suppliers / importers (direct business partners of lidl) are audited according to the Ecovadis audit, which includes the deeper supply chain. Ecovadis is not a SAQ rather an Audit.		
Supplier code of conduct that includes human rights	x <a href="#">Code of Conduct (gruppe.schwarz)</a>		
Your company has its own field office in Myanmar		x	
Regular field visits/inspection to your suppliers in Myanmar	X Regular field visits through sourcing intermediaries / importers (direct business partners of lidl). Lidl is planning own field visits.		
Requirement that third-party audit to be undertaken across your Myanmar suppliers	x		
Involvement of the Factories and General Labour Laws Inspection Department			The question is not clear

	Yes	No	Not sure
Institution of remediation and grievance mechanisms at each supplier site	X <a href="https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=12ldl12&amp;c=ch&amp;language=ger">https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=12ldl12&amp;c=ch&amp;language=ger</a>		
Training for suppliers on human rights	x		

*\*Please feel free to add any further comments*

8. How often do you undertake field visits/inspection to your suppliers in Myanmar? Please tick as many as apply.

- Annually
- Regularly (more than once per year)
- In case of reported allegations
- Never
- Not sure

*Please feel free to provide any further information on how you undertake field visits/inspection to your suppliers in Myanmar:*

*We organize our sourcing relationships through sourcing intermediaries, which have local staff in Myanmar and undertake regular visits as per contractual requirement by Lidl. As of 2023 Lidl is planning own field visits.*

9. How often do you have a third-party factory audit in Myanmar? Please tick as many as apply.

- Annually
- Regularly (more than once per year)
- In case of reported allegations
- Never
- Not sure

*Please feel free to provide any further information on third-party auditing in Myanmar*

*All our non-food suppliers are contractually obliged to submit a valid BSCI audit, SA8000 or Better Work certificate for all factories in risk countries (incl. Myanmar).*

*If there are indications of violations of our requirements, we investigate this immediately and implement the necessary remediation measures.*

10. Which stakeholders do you engage in your due diligence process? Please tick as many as apply.

- Workers
- Trade unions in Myanmar
- Workplace Coordinating Committee (WCC)
- Global union federations (eg IndustriALL Global Union)
- Multi-stakeholder initiatives (MSIs)
- Civil society organisations
- SMART Myanmar
- MADE in Myanmar
- Other. Please specify: [Suppliers / Importers \(direct business partners of lidl\)](#)

*Please detail how you engage with the above stakeholders:*

11. Do you have a grievance mechanism that workers in Myanmar can access? Please tick as many as apply.

- Yes, through our company's grievance mechanism
- Yes, through Myanmar's Dispute Resolution system
- Yes, through multi-stakeholder grievance mechanisms
- No
- Not sure
- Other. Please specify:

*Please provide further details on how the grievance mechanism (if any) is communicated with workers:*

*The grievance-mechanism is communicated by means of printed posters in 60 languages to be distributed and put up at places frequented by workers in the workplace. Worker interviews verify awareness about the grievance mechanism and get access in their country language.*

*Additional grievance-mechanism will be implemented.*

12. How are you made aware of human rights concerns in your supply chain? Please tick as many as apply.

- Through factory owners
- Through existing grievance mechanism
- Through civil society organisations
- Through trade unions
- Through Workplace Coordinating Committee (WCC)

Other. Please specify: [Importers / suppliers \(direct business partners of lidl\)](#)

13. When an allegation is raised, what is your standard procedure to address the issue? [See link: https://info.lidl/en/compliance](https://info.lidl/en/compliance)
14. Please feel free to provide any further information on how you undertake human rights due diligence that you would like us to know.
1. [Region-specific blocking of factories with reference to military connection](#)
  2. [Legal due diligence for new factories to check any military connections](#)
  3. [Implementation of an additional grievance mechanism \(especially for Myanmar\) in addition to already existing grievance channel 'Lidl BKMS' in all factories](#)
  4. [Implementation of a worker survey in all Myanmar factories \(at least half-yearly\)](#)
  5. [Seek to establish a democratically elected Workers Council Committee \(WCC\) in all factories](#)
  6. [On-site visits per factory \(at least half-yearly\) by importers / suppliers \(direct business partners of lidl\) accompanied by Lidl if necessary](#)

#### Part IV: Business decision in Myanmar

15. We understand that the decision as to whether to remain or to discontinue sourcing from Myanmar is complex. Please provide any information on how your company has reached its current business decision in Myanmar. Ethics, product range and sourcing volume

[We continue to source some of our goods from Myanmar. We are implementing additional measures \(see question #14\) to improve and ensure safe working conditions of the workers, since we see it as our ethical responsibility together with our suppliers.](#)

#### Part V: Responsible exit from Myanmar [not relevant, because no exit from Myanmar by Lidl](#)

*We are asking brands to answer this section if you have either already stopped sourcing from Myanmar, or have announced that you will stop sourcing from Myanmar in the future. **If you plan to continue to sourcing from Myanmar, please skip this section.***

16. Final order placement and final shipment dates (Anticipated if you are planning your exit)
17. Total number of workers being laid off in all suppliers (Anticipated if you are planning your exit)
18. How long in advance have you let your suppliers know about the exit before stopping your orders?
19. Which stakeholders do you engage in your decision and preparation of the exit? Please tick as many as apply.

- Workers
- Trade unions in Myanmar
- Workplace Coordinating Committee (WCC)
- Global union federations (eg IndustriALL Global Union)
- Multi-stakeholder initiatives (MSIs)
- Civil society organisations

- SMART Myanmar
- MADE in Myanmar
- Other. Please specify:.....

20. How do/did you mitigate the impacts of the exit on workers? Please tick as many as apply.

- Maintain open lines of communication with relevant supply chain partners
- Require suppliers to report their plans for terminations in advance to review these in line with your Codes of Conduct
- Seek evidence of payment of workers at the end of the exit plans, including all severance and benefits payable for those affected
- Other. Please specify:.....

Thank you for your continued engagement with BHRRC on our work in Myanmar!

Please contact Hanh Nguyen - Senior Labour Rights Researcher at [nguyen@business-humanrights.org](mailto:nguyen@business-humanrights.org) and Natalie Swan - Head of Labour Rights Programme at [swan@business-humanrights.org](mailto:swan@business-humanrights.org) if you have any questions following this survey.