



Dear Kate Jelly,

Thank you for your message and the opportunity to comment.

As EDEKA, we take our social responsibility very seriously and are committed to the protection and observance of human rights in our supply chains. It is important to the EDEKA Group that the products we trade in are manufactured under ecologically and socially favourable conditions.

We are not idle when it comes to risk analyses and would therefore like to provide you with the following additional information:

Before risks to human and labour rights can be minimised, they must be identified and prioritised. For this reason, EDEKA carried out a comprehensive risk analysis in cooperation with external experts in 2020. The clear objective was to identify the greatest risks in the area of social compliance at EDEKA's own brands with the help of a quantitative and qualitative evaluation and to derive recommendations for safeguarding. We then examined which measures, such as certifications, already exist for the risks identified and where further remedial action is required. To do this, we always rely on a mix of various activities such as social audits, standards and certification systems. We also regularly initiate important dialogue with our suppliers and producers or drive forward corresponding industry initiatives or our own projects.

Below you will find selected examples of individual product groups that provide brief insights into the measures derived from the findings of the analysis:

- Chocolate / cocoa (especially Ghana and Côte d'Ivoire) carries a high risk of child labour →
 measure: set up a separate cocoa programme in 2022 with a focus on strengthening
 communities to counteract child labour
- Fruit & vegetables (focus country Spain) harbours a risk of violations of labour and social standards → measure: 2023 participation in the set-up phase for the industry-wide complaints mechanism appellando, which is to be successively expanded from Spain to other countries
- Banana: The results of the social risk assessment from the joint WWF-EDEKA banana project supplement our risk analysis. The risk assessment was carried out on project farms in Ecuador, Colombia and Costa Rica. Based on the results, the catalogue of project measures was adapted, for example in the area of gender equality, which was identified as a risk issue. A social risk assessment when taking on new suppliers or expanding into new project countries or regions is anchored in the existing project processes of the banana project. In future, we would like to expand the existing methodology to include the criteria of an HRIA and are looking into publishing the results and action plans.
- General: Continuous demand for standards and certifications in the sustainability product requirements based on the recommendations and findings of the sustainability consultation

For more information, please visit our website at humanrights.edeka.



Our findings from the risk analysis are, of course, continuously supplemented and updated by, among other things, the annual and event-driven risk analyses of the The Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG) applicable in Germany as well as by specific cases of substantiated knowledge, e.g. from our own complaint management system. Following the initial focus on own brands, we also include third-party brands in our analyses in accordance with the LkSG.

Finally, we would like to point out that we are committed to improvements in our supply chains on a daily basis and recognise that we have some challenges to overcome. But just because we do not communicate something on our website does not mean that we are not working on it, as the Oxfam report implies. Thank you for your understanding!

Kind regards,

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