

REWE's response to BHRRC's request for a response to Oxfam's analysis of supermarket HRIAs and commitments

Among various other measures that we use to fulfill our human rights due diligence, we use HRIA very selectively and see it as a tool to implement continuous improvements into supply chains. However, we have not committed publicly to a fixed number of HRIA per year like other competitors, because we do not see the benefit of public pressure in this regard. We cannot foresee over the years, how many HRIA are useful for us to conduct. In addition, we do not per se want to publish the results as public pressure might influence internal as well as supply chain transparency during the conduction of a HRIA.

In our [Fairness Guideline](#), we outline our risk analysis approach: As part of its sustainability strategy process, REWE Group updates its risk assessments annually and records the negative impacts of its business activities in its supply chains. It analyses the impact of its supply chains on human rights, both across product ranges and on a commodity-specific basis. These analyses include human rights risks such as child labour, forced labour, discrimination, prohibitions of association and a lack of right to collective bargaining, poor occupational safety, overtime as well as no living income. These assessments are based on risk analyses of product areas, specific products or raw material supply chains prepared by external experts specifically for REWE Group. In addition, the expertise and experience of the responsible employees, who are in constant contact with the suppliers and civil society organisations, are included. The assessment of the external stakeholder advisory board for sustainability is also obtained. REWE Group thus combines quantitative and qualitative data in order to identify and evaluate the risks in its supply chains. It considers factors such as the nature of the human rights impact, the country of manufacture, the sector and the stage in the supply chain. The Group combines these analyses with its purchasing data, prioritises the impacts according to the probability of their occurrence in its supply chains and the severity of the risk, and assesses its ability to influence them.