

Policy Statement on the Respect of Human Rights and Environmental Protection

Respecting internationally recognised human rights is an essential part of our understanding of values and our corporate culture. As a leading food retailer in Germany, we are aware that our business activities and our procurement decisions have direct and indirect impacts on people and the environment along global value chains. We explicitly acknowledge this responsibility.

The protection of human rights and compliance with social and environmental standards shape our corporate identity and our actions in our own operations as well as in our supply chains. Long-term partnerships, trust, and security of supply are created when human rights are respected, social and environmental standards are upheld, and fair working conditions are promoted.

With this Policy Statement, we commit to consistently fulfilling our human rights and environmental due diligence obligations. For us, this includes identifying risks at an early stage, taking preventative measures, providing remedies where necessary, and regularly reviewing the effectiveness of our actions. Transparency, dialogue, and cooperation with business partners, affected parties and relevant stakeholders are central success factors for responsible supply chains.

We, an EDEKA Group company, including the companies (hereinafter EDEKA) affiliated with us under stock corporation law that are subject to the LkSG (the German Act on Corporate Due Diligence Obligations in Supply Chains), issue this Policy Statement on the Respect of Human Rights and Environmental Protection. We expressly commit to the principles set out here, bear the responsibility for their implementation within the company, and understand their continuous development as an expression of responsible commercial practice and sustainable corporate governance.

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Our actions are guided by internationally recognised frameworks and principles for the protection of human rights and the environment. These include, but are not limited to:

- Universal Declaration of Human Rights along with the UN International Covenants on Civil and Political Rights, and Economic, Social and Cultural Rights
- Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards, in particular the universally applicable ILO core labour standards on the abolition of child labour, forced labour, and discrimination, and on ensuring freedom of association and the right to collective bargaining
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- Minamata Convention on Mercury
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- Stockholm Convention on Persistent Organic Pollutants (POPs)

In the area of **environmental protection**, we have also been working with numerous international organisations for many years. Cooperation with the World Wide Fund for Nature (WWF) is particularly noteworthy here. As part of this strategic partnership, numerous contractual goals are defined to increase environmental, climate and species protection.

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Expectations of Employees and Business Partners

We expect all our employees, business partners and suppliers in particular to comply with all applicable laws and support our defined values.

To this end, the EDEKA Group companies have defined a Code of Conduct that reflects these expectations and is available via the website [humanrights.edeka](https://www.edeka.de/humanrights). This Code of Conduct is mandatory for our employees and, where necessary, agreed upon with EDEKA suppliers as a binding remedial or preventative measure.

Risk Analysis and Measures for Suppliers

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To fulfil the due diligence obligations under the LkSG, EDEKA has established a joint service for risk analysis and the initiation of measures at suppliers and in our own operations (see section 3).

Acting jointly and uniformly enables a better and deeper understanding of the specific risks and more effective implementation of measures should critical risks be identified at suppliers.

This joint service relies on comprehensive data that is collected from suppliers regarding their product ranges once a year and on an ad hoc basis. In a first step, all suppliers are assessed based on their locations and product ranges, taking into account global databases on human rights and environmental aspects. Suppliers who exhibit higher risks here undergo a more detailed survey, and additional information sources such as press reports are checked. If the risk analysis has identified a higher risk and a supplier has been prioritised accordingly, EDEKA deploys experts who develop measures tailored

to the specifically identified risks for and with the suppliers.

These measures also include requesting the supplier to bindingly acknowledge the Code of Conduct. The successful implementation of the measures is monitored via a separately established system and, if necessary, escalated. Depending on necessity, the purchasing department responsible for the supplier is involved. Systematic recording and tracking ensure that the results of these risk analyses and measures can be taken into account in the future selection of suppliers.

Where there is substantiated knowledge of possible risks or violations at direct and indirect suppliers, the measures described above are carried out on an ad hoc basis. In addition to the criterion of the location (country), the type and scope of the relevant business activity, the severity of the possible violation of the protected legal right according to the degree and number of those affected, its irreversibility, the options for exerting influence and EDEKA's contribution to the cause are also taken into account.

Risk Analysis and Measures for Our Own Operations

The EDEKA Group companies that fall within the scope of the LkSG use an evaluation procedure to assess the human rights and environmental risks mentioned in Section 2 (2) LkSG within their own operations. This procedure runs analogously to the risk analyses for suppliers described in section 2.

The risk analysis, which is carried out separately for each company, allows the locations of the individual subsidiaries (domestic and, where applicable, abroad) as well as company-specific risks to be reviewed in a target manner.

The risk analysis within our own operations is guided not only by the human rights violations and environmental damage listed in the LkSG that must be eradicated; it also incorporates applicable national laws, e.g. on occupational health and safety as well as collective and individual labour law, which are relevant in the context of the human rights and environmental risks stated in Section 2 (2) LkSG.

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If a potential risk or violation is identified in our own operations, appropriate preventative and remedial measures are immediately initiated via the responsible person of the respective company, and their implementation and effectiveness are reviewed.

Priority Risks

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In the area of our business activities, human rights and environmental risks exist particularly in the upstream supply chains, where global procurement structures encounter challenging country- and sector-specific

framework conditions. The focus here is primarily on risks associated with child labour, forced labour, discrimination, and restrictions on freedom of association, as well as risks regarding working conditions, working hours, occupational health and safety, and adequate, living wages.

Furthermore, EDEKA takes into account that additional human rights and environmental risks may occur along complex supply chains, for instance in connection with land use rights or negative impacts on local communities. This can also lead to environmental pollution that adversely affects human health and impairs the availability of clean water and other essential resources on land and in bodies of water for local communities.

These risks are assessed in the context of the respective supply chain structures, raw materials and countries of origin. EDEKA pursues a systematic, risk-based approach that integrates sector-, commodity-, and country-specific findings and is continuously developed further.

On this basis, EDEKA Group companies identify elevated risk situations, particularly in selected product categories of the agricultural and raw materials sector – including fruit and vegetables, coffee, tea, cocoa, cut flowers, palm oil, and soy – as well as in the non-food sector, and strategically align their measures to address the structural causes of human rights violations.

EDEKA does not view the prioritisation of risks as a static observation, but as a continuous steering process: Findings from risk analyses, projects in the countries of origin, and feedback from stakeholders are systematically used to continuously re-evaluate risks and further develop measures. The goal is not merely to avoid or mitigate negative impacts selectively, but to contribute to long-term, structural improvements in the living and working conditions of rights holders along the supply chains.

EDEKA also recognises that certain groups of people – in particular children, women, indigenous communities, as well as migrants and migrant workers – can be affected by negative impacts to a particularly high degree and purposefully incorporates these perspectives into risk assessment and measure development.

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Preventative and Remedial Measures for Suppliers and Product Categories with Particular Risks

Generally, adherence to human rights and applicable laws by suppliers is a prerequisite for supplying EDEKA. Within the framework of the General Terms and Conditions, suppliers are requested to orient themselves to the content of our Code of Conduct or to apply a comparable code of conduct. For further information, see [humanrights.edeka](https://www.edeka.de/humanrights)

As a key preventative measure, we participate in the joint service for risk analysis and the initiation of measures at direct and indirect suppliers described above. Where risks are identified, this also includes concluding a supplementary agreement with the supplier, by which they are bindingly obligated to comply with the Code of Conduct of the EDEKA Group companies, among other things.

In product categories with a high probability of risk, preventative measures are implemented within the framework of certification systems, multi-stakeholder initiatives and projects. If specific audit or certification standards are required, comparable standards can also be recognised. Auditing of production sites is carried out in the non-food (e.g. textiles), dried fruit, and tinned goods product areas via the amfori Business Social Compliance Initiative (BSCI) or comparable organisations or standards (SA8000, SMETA Ethical Trading Initiative, Rainforest Alliance, Fairtrade). Own-brand textiles containing a minimum of 70% cotton must also be certified according to the Global Organic Textile Standard (GOTS). Own-brand cocoa and coffee are only sourced if they bear Rainforest Alliance or Fairtrade certification. In the fruit and vegetable sector, fulfilling the requirements of the Global G.A.P. GRASP standard is considered the minimum

requirement for sourcing by EDEKA. The measures are continuously developed further to achieve a holistic transformation along our value chains.

This level of ambition is also reflected in the contract annex "Sustainability Product Requirements" (Produktanforderung Nachhaltigkeit), which is agreed upon with own-brand suppliers. The annex encompasses further social and environmental requirements; we support suppliers in implementing these, for example, the conversion of our green and black tea product ranges to Fairtrade or Rainforest Alliance, and the certification of flowers and plants by Fairtrade or MPS-Socially Qualified. For regional suppliers, deviating, individual preventative measures can be taken in isolated cases.

In addition, EDEKA Zentrale – simultaneously acting on behalf of all EDEKA Group companies – engages in multi-stakeholder initiatives such as the [Forum on Sustainable Cocoa](#) or the [Forum for Sustainable Palm Oil](#) to jointly address structural challenges with relevant actors along the supply chains and to drive sustainable improvements in the respective raw material sectors.

Within the framework of field projects, we enter into direct discussions with suppliers and producers to uncover and minimise human rights and environmental risks in agricultural cultivation and further processing steps. Representatives from the sustainability department are regularly on site in the project regions. For example, EDEKA Zentrale works with banana farms in Ecuador, Colombia and other countries to establish optimised water management and strengthen local cultivation, among other things. Training courses are firmly anchored in the banana programme's catalogue of measures; these provide education on individuals' own rights as workers and raise awareness of important topics



such as gender equality. Furthermore, farm personnel consolidate their knowledge of the safe handling of agrochemicals, machinery and tools, as well as the use of personal protective equipment. The workforce receives statutory social benefits, access to drinking water, and is employed in regulated employment relationships. Along public paths and infrastructure, the banana programme relies on planting vegetative barriers to protect people from pesticide drift.

In the "Cocoa For Future" cocoa initiative, EDEKA Zentrale focuses on the interlocking of social and environmental aspects. The focus here is on promoting agroforestry, which aims to improve climate resilience and growing conditions for cocoa trees; at the same time, this can open up additional sources of income for

farmers. In cocoa-growing regions with a heightened risk of child labour, established approaches such as the Child Labour Monitoring and Remediation System are used to record possible instances of child labour, promote preventative measures, and, if cases occur, implement concrete remedial measures. In addition, there is a focus on improving access to finance and strengthening gender equality. To this end, community-based savings and loan models, as well as programmes to promote participation and decision-making power at the household level, are implemented.

The effectiveness of our preventative and remedial measures is reviewed by experts on a regular and ad hoc basis. Factors such as findings from risk analyses are taken into account to ensure an appropriate and effective review.

Outline of the Complaints Procedure

EDEKA has established a central complaints service. Via a browser-based reporting platform accessed via the page [humanrights.edeka](https://humanrights.edeka.de), complainants from all stages of the supply chain can submit complaints in various languages, either anonymously or by disclosing their identity. The complaints procedure is outlined in more detail in the rules of procedure accessible via the aforementioned website.

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In addition to our own grievance mechanism, EDEKA Zentrale – simultaneously acting on behalf of all EDEKA Group companies – engages in initiatives to implement cross-company grievance mechanisms such as [amfori Speak for Change](https://amfori.org/). This can help strengthen access to complaints and remediation procedures for those affected along global supply chains.

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Responsibilities

The respective Management Board or Management of the EDEKA Group companies subject to the LkSG is responsible for compliance with the Policy Statement on the Respect of Human Rights and Environmental Protection. The control and monitoring of the procedures by which the company meets its obligations under the LkSG is the responsibility of the LkSG officers of these companies (Section 4 (3) LkSG).



Documentation Obligation and Reporting

Relevant results and activities concerning the due diligence obligations prescribed in the LkSG are continuously recorded and documented. We provide information in accordance with legal requirements as part of CSRD reporting.

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