Edeka's response to Earthsight's findings in Secret Ingredient

Dear Rubens Carvalho,

Thank you for your letter, to which we would like to comment as follows.

As Germany's leading food retailer, we take our social responsibility very seriously and are committed to the protection and observance of human rights in our supply chains worldwide. It is important to EDEKA that the products we trade are made under ecologically and socially favourable conditions. Compliance with human rights and applicable laws by suppliers, for example with regard to working conditions or remuneration, is a fundamental prerequisite for supplying EDEKA.

The ILO core labour standards, for example, are anchored in our contractual conditions. The EDEKA Group is also committed to promoting structures along the entire supply chain in order to introduce and monitor social standards. This is done primarily through recognised certification systems and seals as well as strict product requirements.

We at EDEKA have firmly established all the necessary processes and structures within our Group of companies in order to meet the high requirements of the Supply Chain Due Diligence Act (LkSG), which has been in force in Germany since 2023. As required by law, we implement due diligence obligations such as risk management with preventive and remedial measures and monitor these via internal reporting. We have also set up our own complaints procedure. People at all stages of the value chain can use a digital platform to report (possible) violations of human rights and environmental due diligence obligations anonymously or by disclosing their identity. We take such reports very seriously and process them accordingly. Our humanrights edeka page also contains the current EDEKA policies such as our Declaration of Principles for Human Rights and the Code of Conduct.

Overall, EDEKA has long been committed to a responsible approach to nature and the environment. The aim is to significantly reduce EDEKA's ecological footprint by conserving natural resources, among other things. In the following, we would like to give you a brief overview of our commitment in the area of deforestation. Of course, we will also comply with all the requirements of the EU deforestation regulation.

EDEKA ZENTRALE Stiftung & Co. KG has made a commitment to deforestation- and conversion-free supply chains by 2025 with a cut-off date of 1 January 2020. In addition to soya, our ambitious voluntary commitment includes other raw materials relevant to deforestation and land conversion. In implementing our voluntary commitment, we are guided by the framework of the Accountability Framework Initiative (AFi) and thus go well beyond the upcoming legal requirements. For example, we not only set a more ambitious cut-off date, but also include the conversion of other natural ecosystems in addition to deforestation.

In order to anchor the implementation of our voluntary commitment within the company, EDEKA is working with its sustainability partner, the WWF, to develop a strategy along the lines of the Accountability Framework (AFI), which will be implemented by the end of 2024. From 2025, we will apply all mechanisms of the Accountability Framework relevant to our company in order to successively ensure deforestation-free and conversion-free supply chains for the raw materials concerned. By regularly analysing the affected supply chains, taking and adapting

measures and reporting accordingly, we want to ensure that the goals are supported by all actors in the supply chain, that EDEKA is aware of the origin of the raw materials and that compliance with the requirements and the risk are continuously assessed. Non-compliant suppliers are constructively and successively supported on a path towards full compliance with ethical and environmental supply chain requirements. More information in our published voluntary commitment (in

German): https://verbund.edeka/verantwortung/handlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldung.html#:~:text=Die%20Selbstverpflichtung%20umfasst%20vor%20allem,und%20umwandlungsfelder/umwelt/commitment_entwaldungsfelder/umwelt/commitment_entwaldungsfelder/umwelt/commitmentwaldungsfelder/umwelt/commit

The goal of more sustainable livestock feed is also being pursued as part of the strategy for deforestation- and conversion-free supply chains. In this way, we are helping to reduce the environmental impact of soya cultivation for animal feed and aim to expand this further in the future. This includes, among other things, the expansion of certified feed (RTRS+GMO-free, soya according to "Pro Terra" guidelines, Donau Soja, Europe Soja) in pig, cattle and poultry nutrition as well as the orientation towards increased domestic/European feed for which no rainforest was cut down or other ecosystems were converted.

EDEKA continues to be strongly committed to maintaining the targets achieved to date. These can be found in the current progress report for 2022 as well as some examples below: https://verbund.edeka/verbund/progress-report-edeka-wwf-2022.pdf

- The challenging transition to more sustainable feeding was achieved as part of regional EDEKA
 projects such as the Hofglück programme in cooperation with the Southwest region, the
 Gutfleisch programme in the North region and the start-up projects for frozen broilers, national
 hay milk and barn eggs. Today, 98 per cent of GUT&GÜNSTIG eggs come from hens that have
 been sustainably fed.
- Our aim is also to offer customers a wider range of more sustainable products, such as
 organic products or meat-free alternatives. Organic farms only source feed from GMO-free
 sources and generally obtain their feed from local or European production and not from
 overseas. Meatless substitute products conserve soya resources from overseas. Both areas
 were expanded: the number of vegan/vegetarian substitute products (e.g. tofu, vegan cold
 cuts or vegan mince) increased by just over 33 per cent compared to the previous year (2021).
 The number of certified organic meat and sausage products was also increased by 21 per
 cent.

Work in projects:

- EDEKA also works on projects within its group of companies to ensure deforestation-free supply chains. For example, EDEKA supported the ProTerra Foundation and the MRV system (monitoring and verification system) developed to reduce the risk of importing raw materials that may be associated with deforestation. Under EDEKA funding, ProTerra has started working with farmers in Brazil to support them in achieving deforestation-free soya production to be exported to the EU and to reintegrate farms back into the exporters' supply chain as deforestation-free farms. Further information in German on the project can be found here.
- EDEKA is also an active member of the "QS Soya Plus" working group, in which an additional module for deforestation-free soya has been developed and is constantly being refined. Basic ecological and social criteria are taken into account within this additional module.

We hope we have been able to give you a deeper insight into our activities.

Kind regards,

Your EDEKA Press Team

i.A. Miriam Heimberg
EDEKA ZENTRALE Stiftung & Co. KG