

Companies' comments submitted to EarthSight in response to our report's findings

Companies in Germany:

ANIMONDA PETCARE

- How does your company ensure the traceability of the products used in its brands back to the origin (e.g. to the farm of origin for soy used in animal feed)? How are your company's traceability practices monitored and evaluated (e.g. third party audits, internal reviews, etc.)?

All materials used in the production of petfood are recorded in the inventory management system of the production companies. With the corresponding batch number of each material, the reference to the direct upstream supplier is established. If necessary, e.g. in the event of a crisis, we receive further information from the supplier about their respective upstream suppliers. As part of our risk assessment, we conduct supplier audits or explicit batch traceability tests.

All these measures are part of the IFS certification, according to which our production sites have been certified for years.

Our intermediary is IFS Broker certified, which means that our requirements are passed on in the supply chain. The supplier in Brazil has BRC (analog IFS) and SMETA certification.

- Does your company have a policy on human rights or indigenous rights? How is this policy implemented, monitored and evaluated?

We have a Code of Conduct based on the International Labour Organisation (ILO) standards on human rights. Compliance with this Code of Conduct is required in the general terms and conditions and is signed by our suppliers. SMETA-certified companies are taken into account in the supplier qualification process.

- What action does your company take when it finds evidence of violations of indigenous peoples' rights in its supply chains?

In cases of proven human rights violations, consequences are derived that also lead to the termination of supplier relationships.

- Has your company ever blocked a supplier associated with Brazilian chicken because of concerns about violations of indigenous peoples' rights? Can you provide details?

To date, there has been no evidence in this regard that would have resulted in a supplier being blocked.

- What is your company's view on the need for legally binding regulations in the EU to ban goods and derived products that are linked to violations of indigenous people's rights?

In our company policy, we are committed to complying with all legal regulations relevant to us, including social and ethical aspects.

SATURN PETCARE

We take information of this kind very seriously. Consequently, after receiving your letter we have immediately started investigations and have contacted our suppliers. Our suppliers have confirmed that the soybeans grown in the area in question are not used for the production of animal feed. We can therefore with certainty exclude any connection to our products.

We would nevertheless like to give you some information about our traceability system and our supplier requirements.

All raw materials that we use to produce pet food are recorded in our inventory control system. This guarantees that each raw material can be linked directly to the upstream supplier. In the context of our risk assessment we carry out supplier audits or conduct explicit traceability tests to check traceability through the supply chain. All these measures form part of the globally accepted IFS certification by which our company has been certified for years. Our agent is an IFS-certified broker, which ensures that our requirements are also passed down through the supply chain. The supplier in Brazil is certified by BRC (comparable to IFS) and SMETA.

Our company's Code of Conduct is based on the standards of the International Labor Organization (ILO) for human rights. We require our suppliers to sign and comply with this Code of Conduct by their agreement to our general terms and conditions. In cases of proven violation of human rights we take steps that may also lead to blocking a supplier. So far, there have been no indications in this regard that might have led to the disqualification of a supplier. With our company policy, we commit to complying with all relevant legal requirements, which also includes social and ethical aspects.

EDEKA

The EDEKA Group is aware of its responsibility as a food retail enterprise and as an active part of society at all levels. Our top priority is thus assigned to the protection of human rights and compliance with applicable laws by suppliers, for instance as regards protection against land grabbing. We are therefore very interested in any cases of abuse or irregularities being brought to our attention so that we can investigate them in depth.

After all, part of a sustainable product range policy is to ensure that the products we carry have also been manufactured under socially and ecologically responsible conditions. EDEKA calls for strict compliance with minimum social standards from its business associates – this requirement is part of its general business terms and conditions. Further certification systems as well as standards and product parameters feature as additional requirements from time to time. The contractual terms and conditions hence also include specific requirements for environmental sustainability and social responsibility. In product questionnaires and contract annexes, we call upon our suppliers to disclose e.g., the exact countries of origin for all raw materials, production conditions and social standards.

Moreover, compliance with our requirements and criteria is monitored within the scope of the applicable certification systems, partly also unannounced, as well as during random visits by EDEKA employees or external service providers. In the event of any violations, audits generally provide for the preparation of action plans, their implementation and subsequent re-inspection. In the event of continued non-compliance or particularly severe violations ("zero tolerance"), suppliers must expect loss of certification all the way through to being suspended or banned.

The relevance of traceability and the implementation of additional criteria for careful use of resources and protection of human rights along the supply chain are addressed in the course of

supplier dialogues. We assign priority to those suppliers who are already working on implementing the additional criteria or have delivered proof of compliance with these. Furthermore, in the event of suspicious circumstances and/or intensified need for information, we can always ensure traceability for all raw materials or commodities used. In the case of soya, EDEKA is meanwhile working on a pilot project with ftrace to backtrack the soya feed supply chain (see current article in a major German trade publication: <https://www.lebensmittelzeitung.net/tech-logistik/nachrichten/f-trace-transparency-lidl-und-edeka-pilotieren-transparenz-tool-fuer-lieferketten-163964>)

On the environmental front, the EDEKA Group has been cooperating with the WWF for years to significantly reduce its environmental footprint – primarily by extending its range of more sustainable products and conserving natural resources. This includes the objective of implementing supply chains in conformity with the Accountability Framework Initiative (AFI) guidelines. This is to ensure ethically responsible, deforestation- and conversion-free supply chains in the future, especially for forest-risk raw materials such as soya, for instance.

We also exchange views with market participants and NGOs and, within the ambit of our possibilities as a food retailer, also approach policymakers.

- We are actively involved in various initiatives/standards (as regards deforestation, including FONAP, FONEI, RSPO). To some extent, human rights criteria are also partially integrated in this regard.
- The application of the principle of “Free, Prior and Informed Consent” (FPIC) e.g., in relation to indigenous peoples in advance of any activities that may impair their rights or resources is also an element and commitment in our standard systems in use.
- In many cases, global deforestation is also associated with human rights abuses and violations of the rights of indigenous peoples. This is another reason why we have been committed to zero-conversion and zero-deforestation supply chains since the end of 2021, with the objective of meeting the AFI requirements. Besides, we also take a public stand against over-exploitation of rainforests and have, for instance – along with 40 other European companies – called for strict EU legislation to stop global deforestation and to encourage deforestation-free supply chains. Please refer to: <https://verbund.edeka/verbund/statement-of-support-from-businesses-for-an-effective-eu-law-to-halt-the-trade-in-commodities-and-products-linked-to-deforestation-and-conversion.pdf>

The EDEKA Group as a whole is therefore committed to developing ecologically and socially responsible actions and campaigns along the entire supply chain, introducing standards and promoting structures that also monitor these endeavours. And, in doing so, it goes without saying that we refer to applicable case law and regulations.

NETTO MARKEN-DISCOUNT

Netto Marken-Discount is aware of its responsibility as a food retail enterprise and as an active part of society at all levels. Objectives such as protection of human rights and compliance with applicable legislation by suppliers, for instance as regards prevention of land grabbing, therefore enjoy high priority for us. We are very interested in any cases of abuse or irregularities being brought to our attention so that they can be investigated.

Part of a sustainable product range policy is ensuring that products we carry have also been manufactured under socially and ecologically responsible conditions. We call for our business associates to firmly comply with minimum social standards – this requirement is part of our general business terms and conditions. Additional requirements include further certification systems as well as standards and product requirements. Accordingly, our contractual terms and conditions also feature specific requirements for environmental sustainability and social responsibility. We call upon

our suppliers to use our product questionnaires and contract annexes to disclose e.g., the exact countries of origin for all raw materials, production conditions and social standards.

Moreover, compliance with our requirements is generally monitored by external service providers, in some cases unannounced, within the scope of the applicable certification systems. In the event of any violations, audits generally provide for the preparation of action plans, their implementation and subsequent re-inspection. In the event of continued non-compliance or particularly severe violations (“zero tolerance”), suppliers must expect loss of certification all the way through to being suspended or banned. The relevance of traceability and the implementation of additional criteria along the supply chain are addressed within the framework of supplier dialogues. Netto assigns priority to suppliers who are already working on implementing the additional criteria or have delivered proof of compliance with these.

Furthermore, we proactively pursue the objective of further reducing our environmental footprint – above all by expanding our range of more sustainable articles and conserving natural resources. In order to underpin this with external expertise, we have been working with our strategic sustainability partner WWF for over ten years now. This includes the objective of implementing supply chains in accordance with the Accountability Framework Initiative (AFI) guidelines. In the future, this is to ensure ethically responsible, deforestation- and conversion-free supply chains, especially for forest-risk commodities such as soya. As part of our group of companies^[1] Netto Marken-Discount additionally exchanges views with market participants and NGOs and, within the ambit of our possibilities as a food retailer, we also approach policymakers.

- The company is proactively engaged in various initiatives/standards (as regards deforestation, including FONAP, FONEI, RSPO). Human rights criteria are also partially integrated here.
- The application of the principle of “Free, Prior and Informed Consent” (FPIC) e.g., in relation to indigenous peoples in advance of any activities that may impair their rights or resources is also an element and commitment in our standard systems in use.
- In many cases, global deforestation is also associated with human rights abuses and violations of the rights of indigenous peoples. This is one of the reasons why Netto Marken-Discount has been committed to conversion- and deforestation-free supply chains since the end of 2021. We therefore have the goal of meeting the AFI requirements. Besides, a public stand is also taken against over-exploitation of rainforests and, for instance – jointly with 40 other European companies – strict EU legislation has been demanded to stop global deforestation and to encourage deforestation-free supply chains. Please refer to: [Press release calling for EU legislation](#)

Netto Marken-Discount as a whole is therefore committed to developing ecologically and socially responsible actions and campaigns along the entire supply chain, introducing standards and promoting structures that also monitor these activities. And, in doing so, we refer to applicable case law and regulations.

LIDL

Lidl takes its corporate due diligence extremely seriously. We have specified our requirements for social and ecological standards, such as the protection of forests and ecosystems, in our purchasing policy to work towards supply chains that are free of deforestation and conversion (the English version from our Lidl GB colleagues, but which is still applicable to Lidl in general can be found [here](#)). In doing so, we follow the guidelines of the Accountability Framework Initiative (AFI) which includes acting in accordance with the UN Declaration of the Rights of Indigenous Peoples.

To understand and increase the transparency and traceability in our soy supply chains, we regularly carry out soy mappings with external service providers. The soy quantities and their distribution among the various animal products in our own label range are recorded. In addition, the certifications are evaluated.

Further Lidl established a broader, publicly available due diligence policy in 2019 (the English version from our Lidl GB colleagues, but which is still applicable to Lidl in general can be found [here](#)) as well as a dedicated human rights policy in 2021 (the English version from our Lidl GB colleagues, but which is still applicable to Lidl in general can be found [here](#)). Implementation and monitoring of both policies rests on a range of actions including strengthening supplier policies and supplier capacity, enhanced risk analyses including Human Rights Impact Assessments, auditing and certification (Ecovadis, Sedex/SMETA, Fairtrade, Danube Soy, RTRS) as well as industry-wide projects aiming to address identified adverse human rights impacts. Lidl also advocates for an ambitious European supply chain law that covers both material human rights and environmental concerns.

We are aware of the social and environmental impact of soy farming. With this in mind, we have committed to making the sourcing of soy in our supply chains sustainable by the end of 2022. As part of our international soy strategy, we are working to reduce the use of soy in the long term by trialling alternative feed sources with our suppliers such as rapeseed scrap. If the soy content cannot be replaced by alternatives, for example due to a lower protein content, we aim to source soy from the European Union. To this end, we have entered into a close and distinctive protein partnership with Donau-Soja in order to compensate the entire Lidl soy footprint in the DACH region with an equivalent amount of European and sustainable soy. This represents an important first step towards achieving the long-term goal of segregated flows of goods. As long as there is a need to import soy, we are also committed to increasing the proportion of certified, non-GMO and more sustainable soy.

We are therefore promoting sustainably grown soy through certification and driving change towards sustainable soy cultivation through projects and initiatives. For this purpose, we also compensate in other Lidl countries outside of the DACH region soy quantities in animal feed with RTRS that come from the regions of Maranhão and Piauí in Brazil.

ALDI SÜD

We can immediately assure you that Aldi takes any allegations of this kind very seriously and will investigate the matter further with our supplier. We are committed to respecting human rights and improving living and working conditions throughout our supply chains. We expect our business partners and other suppliers to also respect human rights and ensure that business activities comply with our human rights and environmental standards and policies.

We are aware that the violation of indigenous rights and deforestation in Brazil - especially under the current government - is a pressing issue. We are committed to respecting human rights and improving living and working conditions throughout our supply chains. We describe our approach in our [International Policy Statement for Human Rights](#). Respecting the rights of indigenous people is one of the aspects of human rights that we consider salient in this context as our actions could have a stronger impact on these.

In addition to our commitment to source 100 percent sustainable soy by 2025, we support strict legal requirements that go beyond our own supply chains:

- To counter the Brazilian government's plan to shrink existing protected areas and restrict indigenous peoples' rights, we supported a public letter to the Brazilian government in [2020](#) and [2021](#).

- In addition, we have been publicly advocating for the introduction of a robust and impact-oriented [European legislative framework to protect human rights](#) since 2020. We believe the introduction of corporate mandatory due diligence into legislation is an important building block for the realisation of human rights along international supply chains. Mandatory legislation creates a level playing field and makes human rights along supply chains non-negotiable. We are convinced that legislation can only effectively contribute to realising human rights, if we engage in real collaboration, align the scope of due diligence with the UNGP, ensure practicality, and strive for harmonization of requirements. We describe our position on mandatory human rights due diligence legislation in our [Position Statement](#).

Since 2010, the [ALDI Social Standards](#) in Production are our definitive standard for cooperation with business partners for our food and non-food products. These standards are contractually binding and prohibit human rights infringements such as forced labour and child labour as well as discrimination in any form.

We constantly assess our actual and potential impacts on human rights in order to prevent or mitigate the adverse impacts of our business or remediate where necessary. Based on our assessments we develop strategies and continually improve our processes and practices. To date, soy production for animal feed was not identified as a priority for our human rights activities. The supply chains for soy in animal feed are very complex and it is very difficult to trace the soy back to the origin. In Europe, we have been working since 2018 through the so-called Collective Soy Reporting together with other retailers and our suppliers on processes to build knowledge and traceability about the origin of animal feed. This process is conducted and verified by an external service provider. However, due to the very complex soy supply chains, this is a difficult process for us and our direct suppliers. Our goal to source 100 percent sustainable soy by 2025, meaning either from certified sources or from low risk regions such as Europe, supports the protection of human rights in our soy supply chain.

ALDI NORD

Thank you for your letter regarding alleged indigenous rights violations in Brazil. We thank you for bringing this matter to our attention.

We can immediately assure you that ALDI takes any allegations of this kind very seriously and will investigate the matter further with our supplier. We are committed to respecting human rights and improving living and working conditions throughout our supply chains. We expect our business partners and other suppliers to also respect human rights and ensure that business activities comply with our human rights and environmental standards and policies.

We are aware that the violation of indigenous rights and deforestation in Brazil - especially under the current government - is a pressing issue. We are committed to respecting human rights and improving living and working conditions throughout our supply chains. We describe our approach in our [International Policy Statement for Human Rights](#). Respecting the rights of indigenous people is one of the aspects of human rights that we consider salient in this context as our actions could have a stronger impact on these.

In addition to our commitment to source 100 percent sustainable soy by 2025, we support strict legal requirements that go beyond our own supply chains:

- To counter the Brazilian government's plan to shrink existing protected areas and restrict indigenous peoples' rights, we supported a public letter to the Brazilian government in [2021](#).
- In addition, we have been publicly advocating for the introduction of a robust and impact-oriented [European legislative framework to protect human rights](#) since 2020. We believe the introduction of corporate mandatory due diligence into legislation is an important building block for the realisation of human rights along international supply chains. Mandatory legislation creates a level playing field and makes human rights along supply chains non-negotiable. We are convinced that legislation can only effectively contribute to realising human rights, if we engage in real collaboration, align the scope of due diligence with the UNGP, ensure practicality, and strive for harmonization of requirements. We describe our position on mandatory human rights due diligence legislation in our [Position Statement](#).

Moreover, the [BSCI Code of Conduct](#) in its current version is the definitive standard for cooperation with business partners for our food and non-food products. These standards outlined in the CoC are contractually binding and prohibit human rights infringements such as forced labour and child labour as well as discrimination in any form.

We constantly assess our actual and potential impacts on human rights in order to prevent or mitigate the adverse impacts of our business or remediate where necessary. Based on our assessments we develop strategies and continually improve our processes and practices. As we have to prioritize based on our conducted risk assessment, soy production for animal feed was not identified as a priority up to now. The supply chains for soy in animal feed are very complex and it is very difficult to trace the soy back to the origin. In Europe, we have been working since 2021 through the so-called Collective Soy Reporting together with other retailers and our suppliers on processes to build knowledge and traceability about the origin of animal feed. This process is conducted and verified by an external service provider. However, due to the very complex soy supply chains, this is a difficult process for us and our direct suppliers. Our goal to source 100 percent sustainable soy by 2025, meaning either from certified sources or from low risk regions such as Europe, supports the protection of human rights in our soy supply chain.

FRESSNAPF

For our suppliers, our comprehensive Code of Conduct is part of the contract and is signed as such. The Code of Conduct is based on the standards of the International Labor Organization (ILO) for human rights. It explicitly stipulates that our suppliers undertake to protect the interests of indigenous people in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

Our suppliers also commit to ensure that these requirements are also met by their subcontractors. Any allegation of a breach of this commitment will be fully investigated. In this context, it is irrelevant to us whether we receive such reports via contractual partners or, for example, our complaints office. If we become aware that a supplier or sub-supplier is in breach of our requirements, we will immediately demand and support measures to rectify the situation. If the violations are still not remedied and are of a corresponding severity, as is the case with human rights violations, we immediately terminate the business relationship with our suppliers.

So far, we have not received any information regarding the violation of the rights of indigenous people, so that we will now comprehensively examine the facts in our company as described by you.

ZOOPLUS

Respecting human rights is a core value of our company. Based on this, zooplus is strongly committed to conducting its business relationships as well as sourcing of quality merchandise and services in a manner that reflects our ethical, moral and social values.

All our contracts contain a Supplier Code of Conduct which sets out our requirements and expectations that all suppliers and their affiliated organizations – including suppliers, factories, and authorized subcontractors – must comply with, in order to conduct business with zooplus and its related businesses. This also applies to the contract with our supplier Animonda Petcare, who has committed itself to this Code of Conduct in the course of concluding the contract.

As we take the findings of your report very seriously, we have double-checked with our supplier Animonda. Correspondent to the information available to us, the IFS certification of Animonda, according to which the Animonda production sites have been certified for years, remains valid. Pursuant to Animonda, the same applies for their supplier in Brazil, which is certified in accordance with the BRC Global Standard for Food Safety and the SMETA Ethical Audit.

Please find below our answers to your questions.

How does your company ensure traceability of the products used in the petfood it sells back to origin (for example, the farm of origin for the soy used in animal feed)? How are your company's traceability practices monitored and assessed (for example, third party audits, internal reviews, etc.)?

Our suppliers are required to record all materials used in the production of petfood in an inventory management system. With the corresponding batch number of each product or raw material, the supply chain becomes transparent. If necessary, we receive further information from the supplier about their respective suppliers.

Does your company have a human rights or indigenous rights policy in place? How is this policy implemented, monitored and assessed?

At zooplus, we have a [Company Code of Conduct](#), applicable to all companies and locations of the zooplus Group, as well as a [Supplier Code of Conduct](#) in place.

The Supplier Code of Conduct sets out our requirements and expectations that all our suppliers and their affiliated organizations – including suppliers, factories and authorized subcontractors – must comply with, in order to conduct business with zooplus and its related businesses. This is a fundamental part of all our contracts.

Suppliers and their affiliated organizations must ensure that they are not complicit in human rights abuses, ensure workers are treated with dignity and respect, and avoid any type of harassment. In addition, they must actively maintain the protection of human rights as detailed in the UN Universal Declaration of Human Rights.

Furthermore, zooplus is strongly committed to respecting human rights, including the identification and elimination of modern slavery and human trafficking. Although zooplus has never been linked to any types of human rights violations, the company is aware of its responsibility along its entire value chain and endorse the transparency that the UK Modern Slavery Act 2015 encourages. Therefore, we act according to our [Modern Slavery Act – Transparency Statement](#) and comply with the

requirements set out in section 54 of the UK Modern Slavery Act 2015. We disclose annually our activities related to the protection of human rights and social standards in our business and supply chain.

We have implemented a supplier screening and risk monitoring tool which continuously monitors the so-called PESTEL risk factors (political, economic, sociocultural, technological, environmental, legal) in thousands of international sources (e.g., press, legal information, databases). With its help we check our suppliers before concluding a contract and continuously during the contractual relationship following a risk-based approach.

In addition, we monitor compliance with our Code of Conduct following a risk-based approach and undertake social audits with or without notice at the supplier's premises to verify compliance with our principles.

What actions does your company take when it finds evidence of indigenous rights violations in its supply chains?

We expect all our suppliers to comply with the regulations and principles contained in our Supplier Code of Conduct and to similarly commit their affiliated companies, including suppliers, manufacturers and approved subcontractors, to comparable principles. If our expectations are proven not to be met, we reserve the right to terminate the current business relationships.

Has your company ever blocked any supplier linked to Brazilian chicken due to concerns over indigenous rights violations? Can you provide details?

To date, there has been no such situation that would have resulted in zooplus blocking a supplier.

What are your company's views on the need for legally binding regulations in the EU to ban commodities and derived products linked to indigenous rights violations from being imported to the single market?

In our Company Code of Conduct, our Supplier Code of Conduct and our Modern Slavery Act – Transparency Statement, we are committed to complying with all legal regulations relevant to us, including social and ethical aspects.

We very much welcome the initiatives on the part of German and European legislators to make legally binding and, above all, uniform requirements for business in order to contribute to improving the human rights situation in the world.

REWE MARKT

Referring to your request, we checked our entire supply chain and interviewed all our suppliers. According to the supplier (LAR Cooperativa Agroindustrial), the soybeans obtained from the affected area are intended exclusively for sale in kind and are under no circumstances used for animal feed respectively for the production of petfood. In this respect, there is expressly no connection to our products neither for our petfood products ZooRoyal nor for ja!.

DM-DROGERIE MARKT

Kerstin Erbe: "We do not use any raw materials that originate from the Brasilia do Sul soy farm in Brazil for the products of our Dein Bestes brand. At dm, we select the suppliers for our dm-branded

products in a responsible and environmentally conscious way. We have contractually agreed on the adherence to extensive social and environmental standards with our suppliers, also with regard to the upstream supply chain. We only work with suppliers who have incorporated social responsibility along the supply chain in their terms of business, actively implement it and ensure compliance through regular on-site audits and inspections. Furthermore, we signed a voluntary commitment and a declaration to promote living incomes and wages in the global agricultural supply chains relevant for our dm-branded products in January 2020. We are committed to fair trade and due diligence in supply chains in order to identify possible gaps and initiate the necessary adjustments. This way, we want to honor our social and environmental responsibility even further in the future.”

ROSSMAN

How does your company ensure traceability of the products used in its brands back to origin (for example, the farm of origin for the soy used in animal feed)? How are your company’s traceability practices monitored and assessed (for example, third party audits, internal reviews, etc.)?

Dirk Rossmann GmbH (hereinafter referred to as ROSSMANN) contractually commits its suppliers to use a traceability system organised by lot/batch numbers or codes or other specific design features, allowing traceability right back to the raw material manufacturer. Further measures are taken to ensure that the raw materials supplied by raw material manufacturers can be assigned to precise batches by means of supplier management and that each raw material has been checked with regard to its origin and manufacturing conditions prior to ‘initial approval’ for production. Random checks are carried out at our manufacturers to ensure that such provisions are working and are being observed. Such checks also include audits, but primarily queries and controls stemming from the analytical quality assurance tests, where the focus is on individual raw materials in particular. Safeguarding via certified supply chains – as in the case of organic products, for example – is also taken into account.

Feed producer Saturn Petcare GmbH has also confirmed to ROSSMANN that these requirements have been met. After our explicit traceability request, Saturn Petcare GmbH reported back to our company with the following statement:

All materials used in the manufacture of pet food are entered in the enterprise resource planning system. The corresponding batch number of each material establishes a link to the direct upstream supplier. If necessary – in the event of a crisis, for example – we obtain further information from the supplier about their respective upstream suppliers. As part of our risk assessment process, we conduct supplier audits or explicitly carry out batch traceability tests. All of these measures are part of the IFS certification programme, in accordance with which our company has been certified for a number of years. Our intermediate agent has IFS broker certification, which means that our requirements are passed on within the supply chain. The supplier in Brazil is certified in accordance with BRC (equivalent to IFS) and SMETA.

Following demands from Saturn Petcare GmbH customers such as ROSSMANN and the request from Earthsight, measures were once again taken to trace the supply chain of the soya used. According to the supplier (LAR Cooperativa Agroindustrial), the tracing process revealed that the soya beans sourced from the affected area are intended solely for sale in Natura and are not used for animal feed. As such, there is absolutely no connection to ROSSMANN branded products. According to the supplier LAR Cooperativa Agroindustrial, the source of the soy used for the animal feed is the country of Paraguay.

Does your company have a human rights or indigenous rights policy in place? How is this policy implemented, monitored and assessed?

ROSSMANN is absolutely committed to protecting human rights. In order to live up to this commitment, ROSSMANN has produced a code of conduct for the above measures. It forms the basis for every order involving ROSSMANN branded products and non-food articles. The ROSSMANN code of conduct is based on various principles, such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the ILO's core labour standards. This code of conduct applies not only to suppliers and production facilities themselves, but is also binding for upstream businesses, such as weavers and dyeing plants in the textile sector. Acceptance of the supplier code of conduct is a requirement for cooperation with ROSSMANN. The code of conduct is regarded as a tool that clearly defines the importance of human rights and environmental standards as the basis for cooperation – also as an obligation in respect of our suppliers.

Saturn Petcare GmbH also uses a code of conduct. According to the company, this is based on the standards of the International Labour Organization (ILO) for human rights. Compliance with this code of conduct is demanded by Saturn Petcare GmbH through its general terms and conditions, which its suppliers are required to sign. SMETA-certified companies form the basis of all considerations relating to supplier qualification.

Commitment to various social projects also shows that ROSSMANN attaches considerable importance to the right to self-determination and the right to live life in freedom and peace. <https://unternehmen.rossmann.de/nachhaltigkeit/soziale-verantwortung.html>

What actions does your company take when it finds evidence of indigenous rights violations in its supply chains?

If ROSSMANN is notified of such violations, an internal process is launched to establish the facts. To this end, all obtainable data concerning any allegations is gathered and affected suppliers are contacted along with other involved parties, where practical or necessary.

There may also be discussions with certification or consulting companies, depending on the nature of the allegations and the data available. Measures are then agreed and implemented on the basis of an overall assessment of the situation. In this context, ROSSMANN also relies on the responsibility to improve existing situations and, in the event of violations, to find the most sensible solution possible with the suppliers involved. Termination of the supplier relationship is also not ruled out. Saturn Petcare GmbH has confirmed to ROSSMANN that it takes such human rights violations very seriously and, if proven, will take appropriate measures up to and including the possible termination of supplier relationships.

Has your company ever blocked any supplier linked to Brazilian chicken due to concerns over indigenous rights violations? Can you provide details?

There has not yet been a case involving Brazilian chicken meat in connection with concerns about violations of the rights of indigenous peoples in relations with ROSSMANN suppliers. In the case cited by Earthsight, ROSSMANN has already initiated the above-mentioned review process together with the supplier Saturn Petcare GmbH and will continue to work on it as stated. In this regard, we would like to express our sincere thanks to you for providing the data and background information on this case.

What are your company's views on the need for legally binding regulations in the EU to ban commodities and derived products linked to indigenous rights violations from being imported to the single market?

ROSSMANN expressly welcomes the safeguarding of human rights and thus also the safeguarding of the rights of indigenous peoples. The UN Declaration on the Rights of Indigenous Peoples from 2007 also states the right of peoples to control the natural resources in their territories, reaffirming in particular that indigenous peoples are entitled to compensation for occupied, appropriated or damaged lands, resources and territories.

Even though this declaration was aimed at states, it makes sense to apply it to corporate activities. ROSSMANN is therefore using the German government's so-called NAP (National Action Plan) for Business and Human Rights from 2011 as a basis for implementing the UN Guiding Principles on Business and Human Rights (United Nations Guiding Principles on Human Rights). It should be emphasized here that the NAP has explicitly classified indigenous peoples as particularly vulnerable groups and that special attention must be paid to protecting them. ROSSMANN advocates legal regulations that define equal responsibility for supply chains for all parties involved in the consumer goods trade. ROSSMANN views the challenges of the German Supply Chain Act (*Lieferkettensorgfaltspflichtengesetz*) as supplementary to its own aforementioned tools and measures being used to fulfil its responsibility in the context of global trade and reinforce compliance with ILO Convention 169 on the protection of indigenous peoples.

Furthermore, ROSSMANN is continuing to engage in dialogue with its suppliers. Besides ROSSMANN's corporate policy on social commitment, relevant legal developments on social, environmental and sustainability requirements are also being discussed. This is often the case when corresponding laws are only available in draft form. ROSSMANN also wishes to use this information policy to make foreign suppliers aware of the implementation of corresponding laws and engage in dialogue with them during the implementation of such laws.

Companies in the UK:

ALDI (UK)

Can I immediately assure you that Aldi takes any allegations of this kind very seriously and will investigate the matter further with our supplier. Westbridge Food Group confirmed that there is no link to Aldi from Brasília do Sul Farm. We are committed to respecting human rights and improving living and working conditions throughout our supply chains. We expect our business partners and other suppliers to also respect human rights and ensure that business activities comply with our human rights and environmental standards and policies.

As you may already know, Aldi has strict policies around how our suppliers use soy. Aldi accepts a range of certifications for deforestation-free soy feed benchmarked to the FEFAC guidelines, which has clear requirements on using land that has proven ownership with no unresolved claims with indigenous peoples. We are also a member of the Global Roundtable on Responsible Soy (RTRS), which works to promote responsible soy production.

Furthermore, we recognise the potential impacts that our sourcing can have and continue to work hard to protect the rights of everyone who takes part or is affected by our sourcing. Based on our assessments, we develop strategies and continually improve our processes and practices.

Answer to follow up questions requesting evidence on the statements made on first reply:

To ensure product safety and legality, all own label food supplier manufacturing and supplying sites must have a Global Food Safety Initiative (GFSI) certification.

ASDA

I can confirm that no Asda products which are supplied to us via Westbridge originate on this continent.

We have robust criteria which all of our suppliers must follow to ensure all of our products are sourced responsibly, and details of those criteria can be found here: <https://www.asdasupplier.com/responsible-sourcing-supplier-standards>

We also have specific targets relating to the sustainable farming of Soya, you can see our commitments here: <https://www.asda.com/creating-change-for-better/better-planet/farming-and-nature#soy>

If you have any evidence suggesting that Asda products may be sourced from this region please do share that with me and I can look to investigate this with Westbridge.

Answer to follow up questions requesting evidence on the statements made on first reply:

We have traceability for all Westbridge products in our supply chain and every year Asda and Global Food Safety Initiative (GFSI) carry out own and third party audits on every supplier.

SAINSBURY'S

We have investigated this report and can confirm that none of our own brand chicken is sourced from LAR Cooperativa Agroindustrial in Brazil.

Sourcing products ethically and sustainably is important to us – this includes working to ensure our own brand products do not contribute to deforestation.

We have strict standards that all our suppliers have to meet, and we work with them to ensure that the products we sell are sustainably and ethically sourced. We want to treat people fairly throughout our business and supply chains and we remain committed to championing human rights.

Our [Supplier Policy on Sustainable Sourcing](#) outlines the employment practices and standards we expect from our suppliers, wherever in the world they may be. The policy is based on the Ethical Trading Initiative's (ETI) Base Code, the International Labour Organisation (ILO) core conventions and the Universal Declaration of Human Rights. Our aim is for the policy to be adopted as a minimum standard and to see suppliers' performance continuously improving. We are committed to respecting human rights across our value chain, by providing training, sharing our knowledge, and engaging in collaborative industry initiatives.

Answer to follow up questions requesting evidence on the statements made on first reply:

Westbridge does not source any of our own brand chicken from Brazil.

As Valley Foods is a branded product you would need to speak to the manufacturer. But I can say that we are in contact with them about this report.

Companies that did not reply to Earthsight's requests for comment:

Paulsen Food (Germany)

Westbridge Foods (UK)

KFC (UK)

Iceland (UK)

Lar Cooperativa Agroindustrial (Brazil)

Coamo Agroindustrial Cooperativa (Brazil)

Onlinepets (owner of Vetsend and Medpets)

The Jacintho family also did not reply to Earthsight's request for comment