

Date: January 29, 2024

Subject: Albert Heijn's response to the Business and Human Rights Resource Centre

In response to the Business and Human Rights Resource Centre's questions pertaining to Oxfam's report on meaningful human rights impact assessments:

At Albert Heijn we want customers to be able to shop with peace of mind. Based on our purpose '*Together we make eating better the easy choice. For everyone.*', we are constantly taking big and small steps to leave behind a better world for future generations. The foundation of our commitment to human rights is our dedication to doing what is right. The impact of global developments, both positive and negative, affect our associates, customers, the communities we serve, and the people who work throughout our supply chains. It is our responsibility to respect human rights and do what is right to confront these global challenges, every day. By stepping up, we aim to contribute to a more equitable society that recognizes and respects human rights. We recognize and support the need for European due diligence legislation, see also our statement in the Dutch newspaper [Trouw](#).

Our commitment to human rights is reflected in our [due diligence approach](#). We understand our supply chain responsibility and since the introduction of this approach in 2019 we have made considerable progress on human rights. The human rights impact assessments (HRIA's) that we've carried out have contributed to this. Our ambition earlier communicated is to perform 3-6 HRIA's per year. We aim to be as transparent as possible, but at the same time, we have a responsibility to minimize potential (unintended) consequences for our suppliers, who often operate in countries with a different culture and context. During this process, we have learned that within the meaningful and respectful relationships with our suppliers it is important to be mindful of their interests, as well as those of the rightsholders and other stakeholders, in order to improve on the findings.

Our HRIA's are always performed by an independent third party with local experts that speak local languages, and address internationally recognized human rights. Within the cultural context, we aim to apply a gender-responsive approach. Report findings are not based on a single source, evidence of impact is based on consultation of multiple rightsholders and stakeholders. This consultation takes place in an anonymous and safe environment. In our HRIA's, both negative and positive impacts are identified, but the priority is on identifying possible negative impacts.

We started with HRIA's in 2020, which was a challenging time to implement such assessments due to the many restrictions during the pandemic, especially on engaging with rightsholders, and we were unable to fulfil our commitment of 3 to 6 HRIA's during these years. In the meantime, we have built up our experience with performing HRIA's in high-risk supply chains and have concluded that in the current way of working performing 6 HRIA's per year is a significant challenge, and not particularly scalable. We also found that publishing meaningful action plans based on the results of an HRIA within 6 months is unrealistic, considering the complexity of those results. It requires specific expertise, coordination with

many internal and external stakeholders, and therefore time to set up meaningful action plans. Our suppliers are key partners in the development and implementation of those action plans, and therefore we can only publish the HRIA's and action plans with their approval and full support. Oxfam does not recognize the action plans we have published so far, because part of the actions were already implemented, and we did not publish the action plans within the Oxfam mandated timeframe of 6 months. From our point of view, this fixed time frame is not realistic, and contributes little to the end goal of improving the situation for workers and communities on the ground. We believe in our approach and prefer to work constructively in collaboration with our suppliers and relevant rightsholders and stakeholders to find and implement meaningful solutions to issues identified within the HRIA's.

Our experience with the implementation of HRIA's so far has taught us that the implementation of HRIA's in their current form is not a particularly scalable solution for the longer term. With more than 10.000 own brand products on our shelves, scalability is an important aspect to drive broader impact. This year, we plan to review and evaluate our ambitions and our approach to performing HRIA's.

Although we do not agree with all of Oxfam's conclusions, we appreciate the feedback and the best practices shared in the report, and we hope that you recognize the tremendous effort behind the implementation and publication of the seven Human Rights Impact Assessments to date.

As our journey progresses, we will continue to learn and grow so that we can make meaningful contributions to human rights. There are still many challenges ahead of us, and we will continue to assess where we can strengthen our due diligence and focus our efforts on developing programs and partnerships that effectively mitigate our salient impacts.