

GUIDELINE FOR THE

Prevention of Child Labour



REWE Group sources a large number of products via complex global supply chains. This also entails the risk of child labour. REWE Group works closely with suppliers, standard organisations and NGOs to identify, prevent and combat child labour.



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I. UNDERSTANDING AND SCOPE

As a leading international trade and tourism group, REWE Group is aware of its special role as an intermediary between manufacturers, service providers and consumers. The production of REWE Group private label products has an impact on people, animals and the environment. REWE Group's customers expect and should be able to trust that REWE Group, as a trading company, is aware of its responsibility in the supply chains of its private labels and addresses the effects.

REWE Group predominately sources a large number of products via complex global supply chains. Hence, this also entails a risk of child labour. In order to protect children in an effective manner, governments are primarily called upon to adopt and effectively enforce laws and prohibitions against child labour, as well as to improve the living conditions of parents and children, which are often a root cause of child labour. At the same time, REWE Group works closely with its partners in the supply chain to identify, prevent and combat child labour.

In its "Guideline for Sustainable Business Practices", REWE Group acknowledges its environmental and social corporate responsibility. The values described therein form the foundation for the responsible actions of the company (REWE Group 2011).

In the present guideline, REWE Group specifies its requirements and measures focusing on preventing and eliminating child labour while defining a binding framework for business partners. It is therefore part of REWE Group's comprehensive fairness strategy and based on the requirements of previous guidelines.

Based on this guideline, REWE Group has also created a toolkit to support its business partners and production sites in implementing the requirements for preventing and combating child labour.

The scope of the guideline covers all private labels of REWE Group, which are sold in Germany by REWE, PENNY and toom Baumarkt DIY stores.

II. DEFINITIONS

The International Labour Organization (ILO) defines **child labour** as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development (ILO 2019b). Convention No. 138 on the minimum age for admission to employment and work stipulates that the minimum age for admission to employment shall not be less than the age of completion of compulsory schooling and in no case less than 15 years (ILO 1976).

The **worst forms of child labour** are considered to be

- all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflicts;
- the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

These worst forms of child labour must be combated effectively and sustainably (ILO 1999).



Hazardous labour is work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children. This includes work underground, underwater, at dangerous heights or in confined spaces and work with dangerous machinery, equipment and tools and hazardous substances (ILO 2019b). According to the ILO, the minimum age for hazardous work is 18 years.

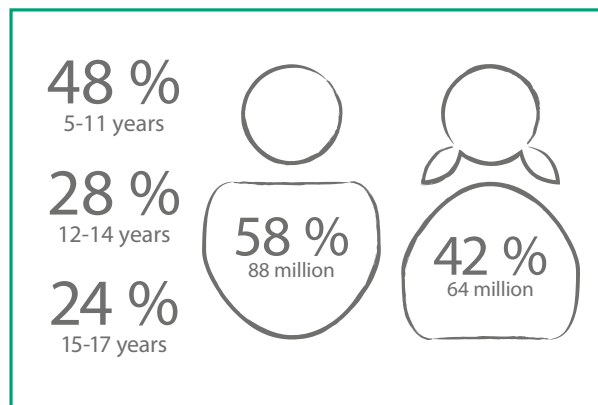
Juvenile worker refers to a worker who has reached the minimum working age but is not yet 18 years old. Juvenile workers enjoy basic labour rights as laid down in the relevant laws and regulations – for example, they are not allowed to perform any dangerous or morally impairing work (ILO 1976).

However, work done by children is not always classified as child labour, for example when children and juvenile workers are involved in work that does not affect their health, personal development and education (ILO 2019b). This **light work** comprises, for instance, supporting parents in the household or family business and earning pocket money outside school hours or during school holidays (amfori BSCI 2018). The ILO has stipulated that children aged 13 and over are allowed to carry out this light work (ILO 1976).

III. ISSUES IN THE VALUE CHAIN

Child labour is still widespread throughout the world, even though the number of working children has been declining for years. In 2016, more than 150 million children globally between the ages of 5 and 17 were in child labour - that corresponds to one in ten children. Almost half (73 million children) were affected by the worst forms of child labour. More than four million children were affected by forced labour in 2016.

This exploitation often has serious consequences for the physical, mental and social development of these children (ILO 2017).



Source: ILO 2017

3.1 Causes of Child Labour

Child labour has many root causes. One of the main reasons, but also a consequence of child labour, is poverty. Most children work because their survival and that of their families depends on it. As a result, many children enter the unskilled labour market at an early age, are often illiterate and have no opportunity to access education. These children without school education in turn have a lower chance of finding better paid jobs (ILO 2019a).

Moreover, many migrant workers take their children with them when they temporarily move to another region in search for new job opportunities – the children are often not registered in state schools during this period and instead support their parents (Terre des Hommes, not dated).

In addition to these factors, cultural traditions and attitudes also play an important role. For example, some cultures or regions perceive work to be conducive to children's character and skills development.

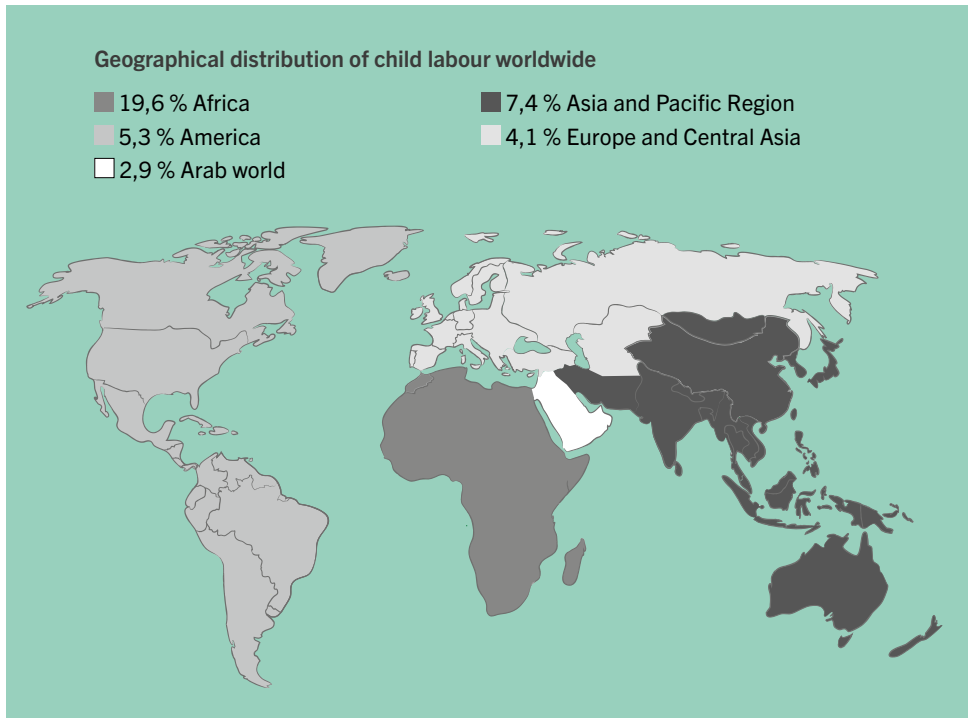
3.2 Countries

According to the ILO, combating child labour remains a major challenge for many countries. A study conducted in 2017 in 132 countries by the Bureau of International Labor Affairs, which is part of the U. S. Department of Labor revealed that national laws are partly inadequate. At that time, one third had not defined a minimum age for admission to work that corresponds to the international standard (Bureau of International Labor Affairs 2018a). Countries which have clear laws on child labour and a defined minimum age, often have no capacity and opportunity to enforce and control the law – especially if the children earn their living on the street (Terre des Hommes 2019). The quality of education systems also plays a role. For example, many developing countries have weak education systems, not enough schools or offer poor quality education. If educational offers do exist, they are often not affordable for many families (ILO 2019a).

In 2018, 76 countries had known cases of child labor (Bureau of International Labor Affairs 2018b). In particular, child labour is most widespread in low-income countries (ILO 2017). In the world's poorest countries, about one in four children between the ages of 5 and 17 performs work that is considered harmful to their health and development (UNICEF 2017).



A look at the statistics also reveals a correlation between child labour and the prevailing conflicts in the respective country. The incidence of child labour in the countries affected by armed conflicts is 77 per cent above the global average (ILO 2017).



Source: ILO 2017

3.3 Sectors

Child labour is found in all sectors of the world economy (Bureau of International Labor Affairs 2018a). Most cases of child labour, however, occur within the family: More than two thirds of all working children work in family businesses. Paid work accounts for 27 per cent, four per cent of children in child labour are self-employed. Consequently, the majority of children are not employed by an external employer (ILO 2017).

With around 108 million children, the agricultural sector accounts by far for the largest share, with most of the children, namely around two thirds, working in family businesses – i.e. for self-sufficiency. But children also work in commercial agriculture. Children of migrant workers are disproportionately often affected by child labour.

Depending on the activity, work in the agricultural sector can be classified as dangerous, for example, if children are exposed to high levels of physical strain and come into contact with harmful pesticides.

Child labour is less common in the service and industrial sector. However, these sectors are forecast to become more important in the future as families move from rural to urban areas as a consequence of climate change (ILO 2017).

Overview of Child Labour by Economic Sector



Source: ILO 2017



IV. APPROACH OF REWE GROUP FOR CREATING MORE RESPONSIBLE SUPPLY CHAINS

Through a clear strategic commitment and appropriate measures, REWE Group aims to actively contribute to reducing and resolving negative social and ecological impacts.

Sustainability is firmly anchored in REWE Group's corporate strategy. For REWE Group this means: Promoting more sustainable product ranges and ensuring fair treatment of partners and suppliers, acting in an environmentally and climate-conscious manner, assuming responsibility for its employees and taking responsibility for contributing to a sustainable society.

The “Green Products” pillar bundles all activities aimed at making purchasing and production processes more sustainable and thus expanding more sustainable product ranges. The activities of REWE Group are broken down into three fields of activity:

- People
- Animals
- Environment

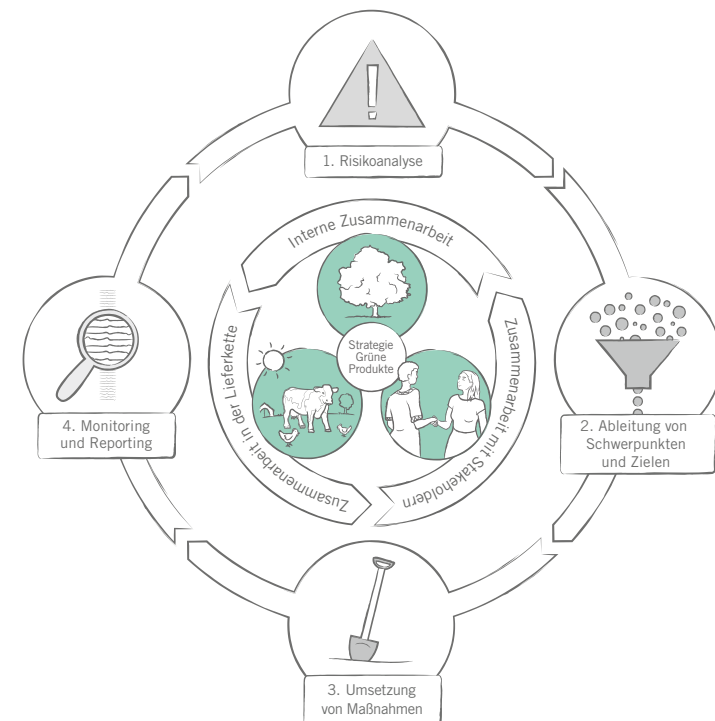
REWE Group has developed an approach for responsible supply chains in order to identify, evaluate and handle the effects of private label products on people, animals and the environment:

1. Risk analyses: REWE Group continuously assesses opportunities and risks in the area of sustainability. On the one hand, these assessments are based on external analyses of product lines, specific products or raw material supply chains. On the other hand, the assessment and experience of an external NGO advisory board for sustainability as well as other stakeholders such as producers, suppliers and also employees are included.

2. Derivation of focus topics and goals: Based on the conducted risk analyses, focus raw materials and focus topics as well as goals and measures were defined, which are continuously adapted and scrutinised when new results or findings emerge.

3. Definition and implementation of measures: Measures to achieve the goals and handling of the focus raw materials and focus topics are implemented on three different levels of cooperation.

3.1. Internal cooperation By raising internal awareness and providing training, continuously analysing opportunities and risks and formulating strategies and goals, REWE Group continues to integrate sustainable procurement into its purchasing processes with the aim of taking sustainability aspects into account in every supplier and/or product decision.



3.2. Cooperation within the supply chain: REWE Group follows a three-step approach in its cooperation with parties involved in the supply chain, which includes the definition of requirements, monitoring and development of the parties involved.

Business partners in the supply chains of private labels are obliged to indicate the production sites in which the products are manufactured for REWE Group.

By raising the contract partners' awareness and holding them accountable, concrete rules are created to implement sustainability throughout the supply chain.

Training courses support suppliers and producers in implementing REWE Group's requirements and continuously improving their performance. In various projects, REWE Group works directly with raw material producers to meet the challenges.

In addition, transparency and the integration of sustainability are promoted as part of the supplier evaluation. Work in the supply chain also includes the establishment of an effective grievance mechanism.

3.3. Cooperation with stakeholders In the long term, sustainability along the supply chain can only be achieved through cooperation with all relevant stakeholders. REWE Group is in ongoing contact with a large number of stakeholders and is involved in various national and international initiatives, alliances and forums. Key elements include participation in external events, industry initiatives, partnerships, commitment to further develop sustainability standards and the monitoring of relevant developments at political and regulatory level.

REWE Group has been a member of the Center for Child Rights and Corporate Social Responsibility (CCR CSR) since 2018. The children's rights organisation supports its member companies in implementing children's rights strategies.

4. Monitoring and reporting: The implemented activities are monitored and evaluated. The findings of the monitoring are incorporated into the ensuing development of the measures.

V. REQUIREMENTS AND MEASURES

REWE Group establishes its responsibility to strengthen human rights and prevent human rights violations in its Declaration of Principles on Human Rights (REWE Group 2019a). In its Guideline for Fairness (REWE Group 2019b), the company commits itself to improving working conditions within the supply chains of all private label products and to preventing child labour.

The company established basic values that apply to all business relationships with REWE Group's contractual partners in its Guideline for Sustainable Business Practices (REWE Group 2011). The business partners of REWE Group are contractually obliged to comply with the minimum requirements of both internationally and nationally applicable laws as well as the core labour standards of the ILO. Moreover, the company is guided by the UN Convention on the Rights of the Child. REWE Group considers its business partners to be responsible for ensuring compliance with the following requirements at all times.

5.1 Requirements and Measures for the Prevention of Child Labour

At the beginning of 2017, REWE Group conducted an extensive risk analysis. As a result, the supply chain steps of raw material production and processing have been identified as being particularly relevant. Raw materials such as cocoa, coffee and cotton are focus raw materials as they are associated with an increased risk of child labour, as is the fruit and vegetables segment. There is also an increased risk of child labour in the processing of textiles – especially with home-based work – and natural stones.

5.1.1. Measures for the Prevention of Child Labour in Raw Material Production

In order to prevent child labour, REWE Group sources its focus raw materials such as coffee, cocoa and cotton by purchasing certified raw materials, e.g. Fairtrade, Rainforest Alliance/UTZ, Naturland, GOTS and Cotton Made in Africa. All certification schemes have requirements for the prevention of child labour, which are verified during audits. REWE Group also works with certification schemes such as Fairtrade and Rainforest Alliance, to further advance the issue of living wages.

In the **fruit and vegetables** segment, all suppliers need to prove compliance with the core labour standards of ILO through an audit (e.g. Rainforest Alliance) or risk assessment (e.g. GRASP). At the same time, we continuously improve our audit processes to address social risks such as child labour in our supply chains.

REWE Group also supports a number of projects aimed at improving the living conditions of growers and their children and thus counteracting one of the main causes of child labour. For example, REWE Group supports the Central America Fund and projects with farmers' cooperatives for orange juice, cocoa, coffee and cotton.

5.1.2. Measures taken by REWE Group in Processing

For the **processing** step in the supply chain, REWE Group has initiated the Social Improvement Program. All first-tier production sites from defined high-risk countries will be integrated into the program by 2020. It consists of the following three steps:

Step 1: New suppliers and production sites of REWE Group are informed about the requirements and, if a social audit is not yet available, they are supported in the preparation of the first audit.

Step 2: All production sites in high-risk countries are required to provide audits of recognised certification or verification systems. These audits are carried out – both announced and unannounced – by independent third parties. Recognised social audits include audits of the amfori BSCI standard, the SA8000 standard as well as SMETA 4-pillar audits of the Supplier Ethical Data Exchange or G.O.T.S. in the textiles segment. In the natural stone segment, REWE Group cooperates with Xertifix.

Step 3: If the audits reveal that requirements are not being met, REWE Group will ask the production sites to participate in training courses. If production sites are not willing to achieve improvements, the business relationship is terminated.

5.1.3 Further Prevention Requirements for Production Sites and Growers

In order to prevent the risk of child labour, REWE Group has further detailed its requirements and measures for the prevention of child labour for its business partners and their upstream production sites or, in the fruit and vegetable segment, for upstream growers. Moreover, REWE Group defined a process for addressing cases of child labour while keeping the best interests of the child in mind.

Business relationships with business partners who violate these requirements and do not take the necessary measures to avoid child labour or, if child labour is detected, to take corrective measure, will be terminated.

- All business partners of REWE Group and their production sites/growers are requested to check the suitability and completeness of their systems for the prevention of child labour.
- All business partners of REWE Group and their production sites have established a policy on child labour and its contents are in line with this guideline.
- All business partners of REWE Group and their production sites/growers must designate a responsible person from their management who administers and monitors the measures to prevent and eliminate child labour at their own sites and facilities. Production sites must include the subcontractors as well.
- REWE Group expects its business partners to inform all production sites/growers and employees about the issue relating to child labour and to train them accordingly.



- All production sites/growers of REWE Group business partners are expected to have trained staff checking the age of their employees before, during and after recruitment - regardless of whether a labour contractor was involved or not.
- All business partners of our production sites are obliged to inform the responsible contact person at REWE Group about the involvement of subcontractors prior to start of production. The subcontractors need to be first checked and approved by REWE Group.
- The business partners of REWE Group must implement necessary control mechanisms to ensure compliance with the requirements for child labour. The control mechanisms for the prevention and remediation of child labour are described in more detail in the toolkit.

In the absence of stricter laws, persons under the age of 15 (or under 14 in countries where the economy and educational facilities are inadequately developed) may not be employed by REWE Group's business partners or in the entire supply chain. Furthermore, no person under the compulsory schooling age may be employed, even if they are 15 years and above. Exceptions are only admissible under specific conditions and after consultation.

Overview of the age requirements of REWE Group, in accordance with the ILO, for admission to employment when no stricter laws are applicable:

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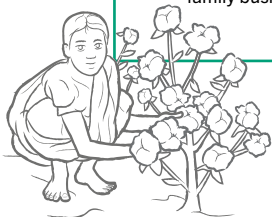
Light Work
to support the
family business

15

Starting Age for Work
in accordance with
special requirements

18

**Starting Age for
Hazardous Work**
in compliance with legal health
and safety requirements



5.1.4 Specific Requirements: Children under 15 Years

In addition to the general requirements regarding the prevention of child labour, REWE Group has defined specific requirements for children under the age of 15:

In accordance with the ILO conventions, the UN Convention on the Rights of the Child, national laws and regulations and taking into account the structure of family businesses or small farmers, REWE Group allows children of employers who live in the same household and are between 13 and 15 years old (or 12 to 14 years in countries where economic and educational facilities are insufficiently developed and in accordance with ILO and national laws) to support the family business or work in the family business. Prerequisite: The work must fall into the defined category of light work, and in addition, the following criteria must be met:

- age-appropriate work, which does not threaten the health and development of the child
- No negative impact on the education of the child (no impairment of their attendance at school or time dedicated to homework, playtime and sleeping time, their participation in vocational orientation or training programmes)
- No continuous work (e. g. only after school or during holidays)
- No exploitative conditions
- Supervision by either parents or any other legal guardian who can ensure the above mentioned criteria are fulfilled

5.1.5 Specific Requirements: Juvenile Workers

REWE Group has defined concrete requirements for juvenile workers who have reached the legal minimum age for employment but are still under 18 years:

- REWE Group respects the right of juvenile workers to employment. The company and its business partners may not exclude juvenile workers from work solely on the basis of their age.
- The business partners of REWE Group and their production sites must comply with all statutory requirements for the employment of juvenile workers and keep a list of all juvenile workers. It is also necessary to define precisely, which activities may and may not be carried out by juvenile workers.

- Juvenile workers must not work in night shifts or be employed in work, which poses a threat to their health, safety or social development. In addition, juvenile workers must not work overtime.
- Working time, school time and commuting time together must not exceed 10 hours per day if the juvenile workers are enrolled in compulsory schools or participate in vocational training programmes.
- Juvenile workers should receive training on occupational health and safety and regular medical check-ups.
- Access to an effective grievance mechanism must be ensured.

5.2 Corrective Measures for Cases of Child Labour

If a case of potential child labour becomes apparent among REWE Group's business partners, REWE Group will take a systematic approach to remediate child labour by clarifying the situation and applying timely and comprehensive solutions, while putting the interests of the child in the foreground.

The approach also comprises solutions for the internal management systems of the affected business partner to ensure that cases of child labour are prevented in the future. To this end, REWE Group cooperates with the children's rights organisation CCR CSR or with a comparable local organisation that is involved in the process from beginning to the end. Specific adaptations to the process may be made in cooperation with REWE Group to accommodate, in particular for less formal structures such as family businesses or smallholder farmers.

If a case of child labour is identified at a production site/grower of business partners of REWE Group, the following measures must be taken:

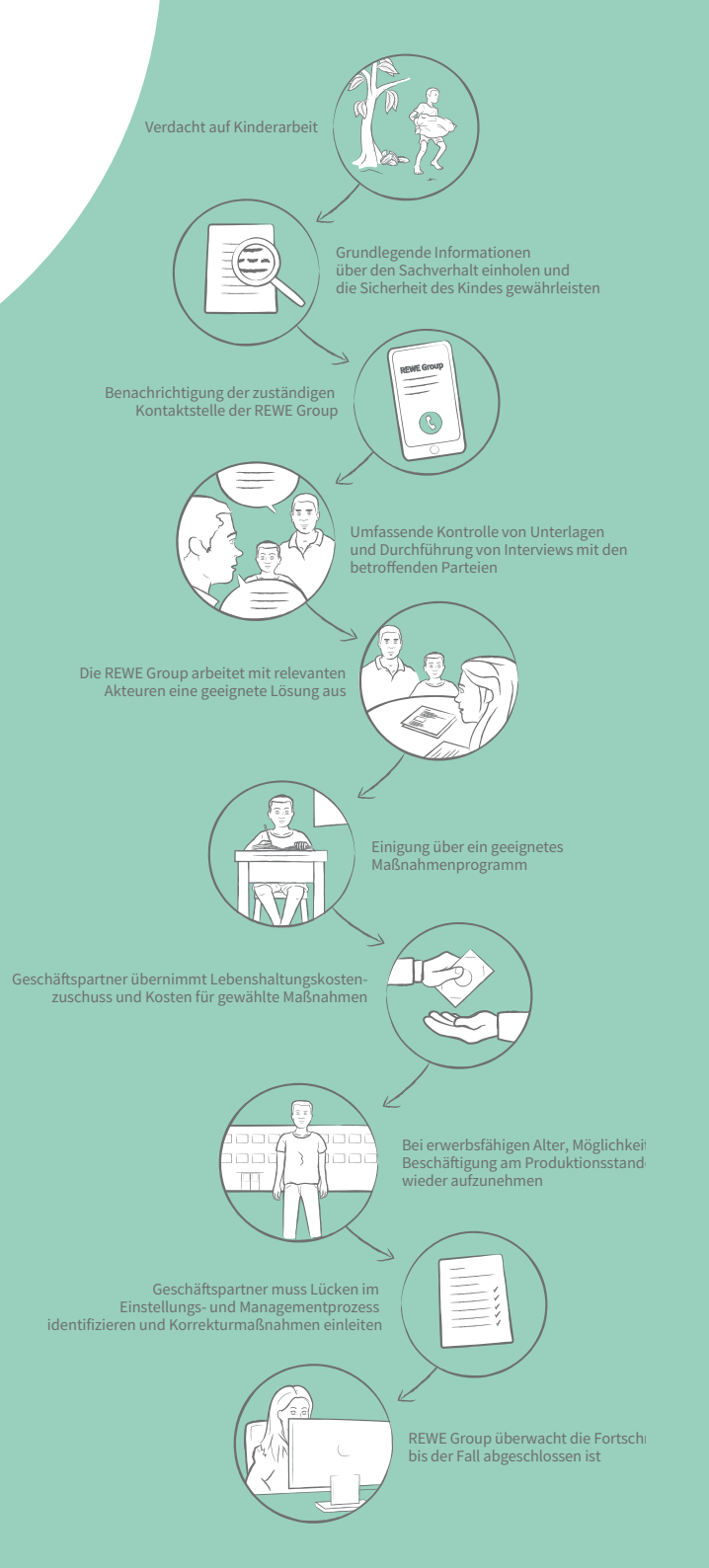
- The person suspecting child labour should collect initial information, ensure the safety of the child and check whether other children are affected or whether juvenile workers perform hazardous work. The responsible REWE Group contact person must then be informed immediately.
- After an initial assessment, REWE Group, in cooperation with the children's rights organisation, checks whether the child's age is below the minimum age by inspecting all relevant documents. In addition, the child's physical and mental condition is determined and various interviews are conducted in order to assess the child's current situation.

- Together with the children's rights organisation, the child and his or her family or legal guardian, suitable solutions are identified. If necessary, the child can be enrolled in a school or other suitable programme.
- Where educational programmes or other appropriate measures are available, which serve the wellbeing of the child, the concerned business partner is obliged to ensure adequate financial support. The child should be given the opportunity to remain in the agreed remediation programme until it has reached the minimum working age. In addition, the business partner must guarantee a cost-of-living allowance equal to the minimum cost of living or the minimum wage of the region concerned until the child reaches the minimum working age. Whenever the need arises to send the child home, the concerned business partner must also bear the travel costs for the child and its family.
- When the child reaches the statutory minimum age for admission to work, it should be given the opportunity to resume employment at the production site of the business partner of REWE Group or its production site/grower.
- REWE Group requests the affected business partner or its production site/grower to identify gaps in their recruitment and internal management system and to start implementing corrective measures within 30 working days.

REWE Group monitors the concerned business partner and the production site with the support of the children's rights organisation until the case is closed. In the meantime, the existing business relations are not affected as long as the business partner or his production site/grower is committed to achieve improvement and implements the agreed measures in a timely manner.



Process for Child Labour Remediation at REWE Group



REWE Group expects its business partners or their production sites/growers to remediate cases of child labour in a timely and transparent manner. All costs in connection with the agreed measures must be borne by the business partner and/or the party where the child worked. REWE Group shall bear the costs for the evaluation of the situation and the development of proposed solutions by CCR-CSR. The company reserves the right to postpone orders to its business partners and their production sites/growers until all parties have agreed on corrective measures and all costs have been paid. If the concerned business partner does not take the necessary measures, REWE Group will terminate the business relationship.

V. OBJECTIVES

REWE Group's objectives for combating child labour give its commitment a clear orientation and are subject to continuous progress monitoring.

Objective 1: Communication. REWE Group will distribute this guideline and the supplementary toolkit for the prevention and remediation of child labour to all existing or new business partners and require that they be forwarded to their production sites before production starts.

Objective 2: Training. As part of its Social Improvement Program, REWE Group will train all relevant production sites of its strategically important suppliers by 2030. Relevant content for the prevention and remediation of child labour will be included in the Capacity Building Program.

Objective 3: Complaint mechanism. REWE Group has set itself the objective of establishing a complaint mechanism system for relevant supply chains by 2025. Particular attention is paid to measures which address child labour.

Objective 4: Unauthorised subcontractors. As part of its Social Improvement Program and through internal procedures, REWE Group will pay more attention to unauthorised subcontractors.

Objective 5: REWE Group aims to work towards living wages in dialogue with other companies and stakeholders. When setting up projects for raw materials, REWE Group will examine the planned measures with regard to their contribution to living wages.

VI. REPORTING AND COMMUNICATION

REWE Group is convinced that transparency and the provision of comprehensive information are key components of its due diligence obligations in the area of human rights. Through its Declaration of Principles on Human Rights, REWE Group shows a clear commitment to the protection of human rights. REWE Group promotes the respect of and adherence to human rights. REWE Group reports both regularly and publicly on progress and obstacles in the implementation of the measures and the attainment of the aspired goals. This is done in the form of press releases, via the REWE Group website or via the Group's sustainability report.



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The dialogue on the topic of child labour is of great importance to us. Please contact us with suggestions and questions at: nachhaltigkeit@rewe-group.com

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