

Schenker AG Policy Statement on Human Rights and Environmental Due Diligence

Lieferkettensorgfaltspflichtengesetz (LkSG) Grundsatzerklärung

Schenker Aktiengesellschaft (SAG)

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1 Foreword

For us at DB Schenker, sustainability is a central principle of our entrepreneurial actions and is firmly anchored as part of our core values through our commitment to play fair with people and planet. At DB Schenker, we aim to be a socially responsible corporate citizen. We have a holistic ESG approach enabled by 3 strategic dimensions under our commitment to clean logistics, a thriving workplace, and trusted supply chains.

With the adoption of the Act on Corporate Due Diligence Obligations in Supply Chains / Lieferkettensorgfaltspflichtengesetz (LkSG)¹, the German legislature has created a framework to realize our values and commitments promoting human rights, environmental protection and sustainability in global supply chains. DB Schenker is now legally obliged to implement appropriate human rights and environmental due diligence in and management of their own business operations and supply chains. The aim is to improve the protection of human rights and the environment along supply chains, strengthen social and corporate responsibility and create enforcement potential in supply chains.

We know that corporate responsibility goes beyond economic key figures. As a subsidiary of Deutsche Bahn AG (DB) Schenker AG and its global subsidiaries (“DB Schenker”) have committed themselves to upholding the principles of the United Nations Global Compact (UNGC) and are clearly committed to the Universal Declaration of Human Rights (UDHR) of the United Nations. For us, this means taking a stand and safeguarding human rights as well as maintaining high environmental and social standards. This is also in line with the clear commitment of the Board of Management (BoM) to play fair with people and planet.

As an internationally operating logistics company, we are also aware of our great responsibility within our supply chains. It is therefore important to us to ensure responsible and sustainable value creation along our supply chain - in Germany, but also in all other countries in which we operate. We also expect our customers, our suppliers and our other business partners to treat people and the planet with respect as the basis for a reliable partnership. For us, economic success and socially responsible action are not contradictory, but rather mutually dependent. This is important to us in our cooperation with our business partners. We pursue an increase in transparency and strive to maintain high governance standards and practices beyond compliance with our partners.

With around 76,600 employees and 1,850 locations worldwide, millions of loads transported a year in local and long-distance transport, and a large number of business partners in freight transport, we have an important responsibility to walk the talk when it comes to sustainability. It is clear to us that sustainable and responsible corporate governance can only be based on respect for people and the environment.

¹ Supply Chain Act of July 16, 2021 (BGBl. I 2959).

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2 Introduction

As a leading mobility and logistics provider, DB Schenker is active in over 130 countries worldwide and employs around 76,600 people. The focus of our business activities is on logistics internationally, with the majority of our business located in the European market. Our fundamental concern is to unleash logistics for a future in motion through being fair with people and planet, together with partners. To achieve this, we focus on clean logistics, a thriving workplace, and a trusted supply chain.

As a globally active company, we are aware of our great social and environmental responsibility. Our goal is to ensure responsible and sustainable value creation not only Schenker internally but also along our supply chain.

In this policy statement, we express our commitment to respect human rights and environment-related obligations:

- We are committed to **sustainable and responsible corporate governance**.
- We describe the **procedures** we use to implement our due diligence obligations under the LkSG.²
- We address the **human rights and environmental issues** that are particularly relevant in the context of our business activities and that we have identified as priorities on the basis of our risk analysis.
- We define the **expectations** we have of ourselves and of our suppliers and business partners in order to ensure compliance with human rights and environmental obligations.

3 Our commitment to sustainable and responsible corporate governance

We have made sustainability a central part of our business operations and our sustainability ambition, and an integral part of our company strategy. This is a defined key success factor to future-proofing our company. Therefore, we are fully committed to making a positive impact through our operations & services. Fairness and transparency are our key values, hence we are committed to upholding and promoting universal human rights, respecting labour standards and protecting the environment in our business activities. Furthermore, we strive to make a positive contribution to the protection and promotion of human and environmental rights through our actions.

We comply with applicable law in the conduct of our business activities. This is the foundation to also ensure compliance with the LkSG. Our business activities are based in

² Description of the procedure by which we fulfill our obligations under § 4 (1), § 5 (1), § 6 (3) to (5), and §§ 7 to 10 LkSG.

particular on the following internationally recognised human and environmental rights standards:

- the **International Bill of Human Rights**, consisting of the United Nations Universal Declaration of Human Rights (UDHR) as well as the Civil Covenant (International Covenant on Civil and Political Rights, ICCPR) and the Social Covenant (International Covenant on Economic, Social and Cultural Rights, ICESCR),
- the **UN Guiding Principles on Business and Human Rights** (UNGP),
- the **core labour standards of the International Labour Organization** (ILO) with its five fundamental principles on freedom of association and the right to collective bargaining, elimination of forced labour, abolition of child labour, prohibition of discrimination in respect of employment and occupation, and occupational health and safety,
- the ten principles of the **UN Global Compact** (UNGC),
- the UN **Sustainable Development Goals** (SDGs),
- the **Guidelines for Multinational Enterprises** of the Organisation for Economic Co-operation and Development (OECD).

We are taking ambitious actions for a more sustainable future and are committed to growing our business in a sustainable and collaborative manner for our planet and people, together with partners. Our sustainability strategic framework takes a holistic approach to ESG, with a commitment to clean logistics, a thriving workplace, and a trusted supply chain. It is founded on the United Nations Sustainable Development Goals (UN SDGs) and closely aligned with nine of the SDGs, where we want to drive positive impacts within our industry.

Our dedication to taking the necessary steps to reduce the environmental impacts of our products and operations is underscored by our commitment to Driving Climate Action (SDG 13), Managing Resources Effectively (SDG 12), and Pioneering Urban Logistics (SDG 11).

To create a culture of empowerment to unleash our people's full potential, we are committed to Providing Fair Work Opportunities (SDG 8), Protecting Our Employee well-being (SDG 3), and Driving Gender Equality at Work (SDG 5).

Finally, fairness and transparency are our key values. We believe that strong partnerships with our suppliers, customers, and other business partners are the prerequisite for trusted supply chains. To achieve this, we are Partnering for the Goals (SDG 17), Developing Sustainable Solutions (SDG 9), and Fostering Collaborative Learning (SDG 4).

4 Our measures to implement our due diligence obligations

In order to fulfil our human rights and environmental due diligence obligations, we align our business activities with the requirements of the LkSG and implement targeted measures aimed at fulfilment of our due diligence responsibility. We see dealing with human rights and environmental risks as an ongoing process that we are gradually anchoring firmly in our operational structures.

4.1 Comprehensive risk management

Establishing an appropriate and effective risk management system is how we ensure compliance with human rights and environmental due diligence obligations. At the heart of our risk management is a comprehensive and systematic risk analysis in which we identify and assess the potential and actual risks of our business activities on people and the environment. The aim is to prevent, minimize or end these risks.

As part of our annual risk analysis, we consider the following risk areas in particular, both for our own business area and for our direct suppliers:

- Prohibition of **child labour**
- Prohibition of **forced labour** and all forms of **slavery**
- Disregard of **occupational health** and **safety** and work-related health hazards
- **Freedom of association** and right to collective bargaining
- Violation of the prohibition of **unequal treatment in employment**
- Withholding a **fair wage**
- Destruction of the natural basis of life through **environmental pollution**
- Illegal violation of **land rights**
- Commissioning or use of private/public **security forces** without appropriate instruction and control
- Prohibited production, use and/or disposal of **mercury** (Minamata Convention)
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (**POPs**) and non-environmentally sound handling of waste containing POPs
- Prohibited import/export of **hazardous waste** as defined by the Basel Convention

Our annual risk analysis is structured in two stages and begins with an **abstract risk analysis** with regard to the aforementioned risk areas. We take a variety of factors into account when determining an abstract risk value. We check in which countries our companies and direct suppliers are located and to which industry they belong. To create abstract risk profiles of countries and industries, we use publicly available country- and industry-specific information and indices through the assistance of a legally verified risk assessment tool. When determining a risk value, we also take into account the severity of a potential risk violation.

We assign legal entities & suppliers to one of three risk levels: low, medium, and high risk. If a legal entity or supplier has a high risk in any area, they cannot be assigned as low risk. Thus, no risk can be hidden behind a mean value. Given the large number of Schenker legal entities & global suppliers, medium and high risk are therefore used to differentiate between risk concentration.

If increased risks are identified in the abstract risk analysis, they are subjected to a more detailed analysis (so-called **concrete risk analysis**). The aim of the concrete risk analysis is to hone in on the indicative risks identified through the abstract risk analysis to determine the actual, specific risks for human rights and environmental rights violations in own business area of DB Schenker as well as in our supply chain. In order to decide which companies or suppliers to look at in more detail, we take a risk-based approach. In our own business area, due to our heightened responsibility, we include all global subsidiaries for which SAG is a majority shareholder, regardless of a high, medium, or low score in the abstract risk analysis. In our supply chain, we prioritize suppliers for the concrete risk analysis over whom we have the greatest influence through spend and who have high risk scores in the most severe risk areas.

Existing risks can be minimized through appropriate preventive measures (so-called net risks). In order to determine specific risks and identify measures already implemented, we make particular use of standardized questionnaires completed by our companies and suppliers. The aim is to identify (potentially) missing measures for risk reduction and to initiate further risk reduction measures.

If there are actual indications, such as special events, complaints or reports, that point to possible risks or violations of human rights or environmental obligations in our own business or our supply chain, we additionally conduct risk analyses outside the yearly process on an ad-hoc basis. Similarly, the need for an ad hoc risk analysis is indicated if a significantly changed or significantly expanded risk situation is expected – for example as a result of the introduction of new products or entry into new markets.

The LkSG Officer ensures that the results of the risk analysis are communicated internally to the relevant decision-makers. DB Schenker uses the insights gained from regular and ad hoc risk analyses to make sound, sustainable business decisions - be they strategic decisions such as market entries and exits, participation in specific projects, or the anchoring of appropriate preventive and remedial measures. We strive to continuously improve our risk analysis approach by constantly expanding our data base and continuously incorporating the insights we gain from fulfilling our due diligence obligations and through our complaints procedure.

4.2 Preventive and remedial measures

If we identify increased risks - whether on the basis of our risk analysis, as a result of a tip-off from our complaints procedure, or by other means - we immediately take appropriate preventive measures. Here, we also follow a risk-based approach and focus on the areas in which we have identified the greatest human rights and environmental risks. The aim of preventive measures is to avoid any violation of a human rights or environmental obligation by minimizing the risks caused by or contributed to by our business activities.

We take a wide range of measures aimed at reducing risks to people and the environment. This includes the following preventive measures:

- Publication of this policy statement and anchoring within **DB Schenker**
- Definition of clear responsibilities, in particular designation of an LkSG Officer to monitor our risk management

- Further development and implementation of our codes of conduct (internally and for business partners), in particular against the background of the requirements of the LkSG
- Consideration of human rights and environmental requirements in the selection of new suppliers and their contractual assurances
- Adaptation of the General Terms and Conditions of Purchase and Contract as well as the bidder's own declaration to the requirements of the LkSG
- Adaptation of the standard contractual compliance clauses to incorporate the relevant supplier codes of conduct and LkSG requirements
- Implementation of regular as well as ad hoc risk-based control measures, such as audits and regular surveys
- Further training and sensitization of employees and business partners through regular and comprehensive training courses as well as continuous (further) development of training concepts
- Exchange and engagement in industry initiatives (e.g., DSLV)
- Conducting effectiveness tests

If we identify an imminent or actual violation of a human rights or environmental obligation, we take appropriate remedial action without undue delay. These actions are aimed at avoiding or ending injuries or minimizing the extent of the injury if ending is not possible. For this purpose, we develop catalogues of possible remedial measures with regard to the individual risk fields.

In the implementation of preventive and remedial measures, we attach great importance to a cooperative relationships with our business partners. In the event of serious violations, however, we reserve the right to impose appropriate sanctions on the respective business partner or - as a last resort - to terminate a contract or an entire business relationship. In doing so, we are guided by the principles of responsible withdrawal as described in the OECD Guidelines for Multinational Enterprises and take into account the potential adverse effects of our decision.

4.3 Complaints procedure

Another key component of our due diligence processes is the provision of an appropriate and effective complaints procedure. In addition to the possibility to submit via post to the DB postal address in Berlin, in cooperation with our parent company Deutsche Bahn we have developed and continuously expand our [electronic complaint management system](#) "Business Keeper Monitoring System" (BKMS) including incorporation of the requirements of the LkSG.

Whistleblower reports on human rights and environmental risks as well as violations of human rights or environmental obligations can be submitted via BKMS. The system can be used 24/7 and in 22 languages. It is open to all indications of violations of human and environmental rights, regardless of whether they originated in the supply chain or were caused by DB Schenker employees. Protecting people who submit complaints or information from being discriminated against or penalized as a result of whistleblower reports or information they submit is an important part of our complaint process. All

reports are treated strictly confidentially and - on request and where legally allowed - anonymously. Whistleblowers may seek external legal advice before issuing a notice.

Our parent company, Deutsche Bahn AG administers the BKMS system and reviews all whistleblowing reports and tips received to determine whether the facts reported indicate a human rights or environmental risk or a violation of human rights or environmental obligations. If this is the case, when the whistleblowing report is transferred to the appropriate company (in this case DB Schenker) it will include clear indications of the potential human rights and environmental dimensions. If an initial suspicion is confirmed, necessary measures are taken to minimize or end risks or violations. All complaints and information are handled only by a small group of selected and specially trained employees. By implementing our complaints procedure, we have the opportunity to learn about risks or breaches of duty that were previously unknown to us. In addition to the risk analysis, the complaints procedure thus plays a key role in enabling us to continuously improve and develop risk management at DB Schenker. We review the effectiveness of our complaints procedure once a year and on an ad hoc basis as required.

Our rules of procedure of our complaints procedure are [here](#) publicly available.

4.4 Documentation and reporting

Our procedures for complying with statutory due diligence requirements are documented on an ongoing basis. We keep the documents - starting from the time of their creation - for seven years.

In addition to our existing comprehensive reporting activities, in particular integrated reporting, from 2024 we will report annually to the German Federal Office of Economics and Export Control (BAFA) on the fulfilment of our human rights and environmental due diligence obligations in the previous fiscal year. We publish this report on our website and internally on our company intranet. In addition to information on our general strategy and approach to fulfilling our due diligence obligations, the report will provide information on the specific human rights and environmental risks we have identified in our risk analysis, as well as on violations of human rights or environmental obligations. In addition, we will report on preventive and remedial measures we have taken, our complaints procedure, and the development of our risk management.

4.5 Responsibilities and effectiveness control

Responsibility for the effective implementation of the LkSG in our own business area and in our supply chain lies at the highest management level with the Management Board of Schenker AG (BoM). Safeguarding human and environmental rights in its own business operations and along the global supply and value chains is of paramount importance to the BoM. It therefore establishes clear responsibilities to ensure the effective implementation and monitoring of risk management.

The BoM appoints an LkSG Officer to monitor the implementation of the statutory due diligence requirements. It informs itself regularly (at least annually) and on an ad hoc basis about the work of the LkSG Officer. To this end, the LkSG Officer shall provide the BoM with information on the main results of the risk analysis, on preventive and remedial measures taken, and on information from the complaints procedure. He or she also reports on whether the procedures embedded in the operations and the measures taken to implement due diligence are appropriate and effective. This ensures that the BoM always has all the relevant information it needs to fulfil its responsibilities and make sound decisions.

The LkSG Officer is closely involved in the implementation and updating of the risk management system and carries out risk-based control measures to verify compliance with human rights and environmental obligations. The LkSG Officer's other duties include external reporting to the BAFA and releasing the [rules of procedure](#) for the complaints procedure.

The implementation of due diligence is coordinated at DB Schenker by a company-wide project that is monitored by the Sustainability Portfolio Management department in cooperation with operationally responsible departments including People & Organization, Health, Safety, Security & Environment, Real Estate, Land Transport, Air Freight, Ocean Freight, Network Partner Development, Contracts Logistics, and Procurement. These departments receive advisory support by other specialist departments, including Compliance, Contract Risk Management & Legal, and administrative support through its shared service center. This implementation is further aligned with the Deutsche Bahn AG Group-wide project that is the responsibility of and managed by the Sustainability and Environment department. All departments contribute to the implementation of due diligence in their daily work.

5 Our priority human rights and environmental issues

We recognize that our business activities in our own business area and along our global supply and value chains can potentially cause impacts on human rights and the environment. Our risk analysis conducted throughout DB Schenker in 2023 initially revealed abstract risks in all risk fields covered by the LkSG. Following the subsequent concrete risk analysis, we were able to determine that the probability of these risks actually occurring is predominantly low in our own business area due to numerous effective preventive measures already in place. On the supply chain side, we were able to identify low as well as medium and high risks.

In order to (further) reduce our overall risks and act preventively, we are implementing measures relating to all LkSG risk areas. Our focus is in particular on the risks prioritized on the basis of our risk analysis.

5.1 Own business area

For our own business area, our risk analysis has revealed primarily low risks. While we did identify 7 risk areas as medium or high risks, these were concentrated in only very few entities and are indicative of isolated incidents rather than systemic risks. Nevertheless, we prioritize the following risk field here for systemic action:

- Prohibition of unequal treatment in employment (Sec. 2 (2) No. 7 LkSG)

The decision to prioritize this risk for systemic action is based on the fact that we have received a relevant number of reports on this issue via our complaints procedure and take these into account in our annual risk analysis. This prompts us to focus in particular on this area despite existing preventive measures such as our internal Code of Conduct (Group Principles on Ethics), our Social Minimum Standards, our Child Charter, our active diversity management at DB Group-level (Group initiative "Einziganders") and DB Schenker-level (Ignite Women's Network, DBS Pride, Leaders in Conversation, annual Diversity Week, Inclusive Leadership in Leadership Academy, Female Empowerment Measures, and learning courses).

Our risk analysis has also shown that the risks of adverse impacts on people and / or the environment are higher overall in our foreign subsidiaries than in our own domestic

operations. This is due in particular to the fact that higher abstract risks exist at country-specific level in relation to those subsidiaries, and isolated medium and high risks resulting from the concrete risk analysis. In our own business operations abroad, we will focus on individual preventive measures for the following issues which were identified in the risk analysis:

- Prohibition on withholding an adequate living wage (Sec. 2 (2) No. 8 LkSG)
- Prohibition on the use of forced labour and modern slavery (Sec. 2 (2) Nos. 3-4 LkSG)
- Prohibition on the use of child labour (Sec. 2 (2) Nos. 2-3 LkSG)
- Prohibited production and / or use of persistent organic pollutants (POPs) and non-environmentally sound handling of waste containing POPs (Sec. 2 para. 3 Nos. 4-5 LkSG)
- Prohibited import / export of hazardous waste as defined by the Basel Convention (Sec. 2 para. 3 Nos. 6-8 LkSG)
- Prohibition on disregarding the freedom of association (Sec. 2 (2) No. 6 LkSG)
- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)

In particular, due to preventive measures that have been established in the Group for many years (e.g. a wide range of measures in the area of occupational health and safety management, internal code of conduct and Social Minimum Standards ensuring payment of the local minimum wage) these risks are not present outside of isolated incidents. However, we decided to prioritize these issues for individual follow-up because at least 6 of our foreign companies show a relevant risk in this context after completion of the concrete risk analysis or Group policies are not applicable to subsidiaries based outside Germany.

5.2 Immediate suppliers

In our direct supply chain, after conducting the annual risk analysis we identified a high or medium risk in 9 risk areas. Based on severity, we have prioritized the below 5 risks:

- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)
- Prohibition on the use of forced labour and modern slavery (Sec. 2 (2) Nos. 3-4 LkSG)
- Prohibition on the use of child labour (Sec. 2 (2) Nos. 2-3 LkSG)
- Prohibition on misuse of security forces (Sec. 2 (2) Nos. 11-12 LkSG)
- Prohibited production and / or use of persistent organic pollutants (POPs) and non-environmentally sound handling of waste containing POPs (Sec. 2 para. 3 Nos. 4-5 LkSG)

For all of the aforementioned topics, the DB Code of Conduct for Business Partners and our Standards of Business Conduct already contain requirements that are verified through risk-based queries.

With regard to the identified and priority risks, we conduct awareness-raising workshops with the relevant decision-makers both in our own business and in the supplier area. Based on these workshops, we then take further measures, such as adjusting our procurement practices. We will also update our sourcing process to require ad-hoc concrete risk analyses for any suppliers with a high risk in any of our priority risk areas.

5.3 Indirect suppliers

Our LkSG-relevant risks in the indirect supplier area are based on initial findings from incident-related risk analyses.

Here we have identified potential risks in the area of:

- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)
- Prohibition on the use of forced labour and modern slavery (Sec. 2 (2) Nos. 3-4 LkSG)
- Prohibition on disregarding the freedom of association (Sec. 2 (2) No. 6 LkSG)
- Prohibition on withholding an adequate living wage (Sec. 2 (2) No. 8 LkSG)
- Prohibition on misuse of security forces (Sec. 2 (2) Nos. 11-12 LkSG)

For all of the aforementioned topics, the DB Code of Conduct for Business Partners and our Standards of Business Conduct already contain requirements that our suppliers must in turn pass on to their supply chain. These requirements are verified through risk-based queries.

We will publish any changes to priority risks resulting from future or incident-related risk analyses in the next update of the policy statement.

6 Our expectations of our employees and business partners

When it comes to complying with our human rights and environmental due diligence obligations, we have high expectations of ourselves and our business partners.

We aspire and expect to conduct all our business activities in accordance with the guidelines set out in this policy statement, to act ethically and legally, and to comply with the applicable law and respect internationally recognized human and environmental rights standards. We avoid conflicts of interest and respect the customs, traditions and social values of the countries and cultures in which we operate in alignment with the standards towards which we strive.

Our commitment to respecting human rights and the environment is already reflected in our internal DB Code of Conduct ([Corporate Principles Ethics Code of Conduct](#)) and Social Minimum Standards (Standard Operating Policy GE25), in which we set out binding standards and expectations for our daily conduct. All board members, managing directors, executives and employees worldwide are committed to the principles set out in our internal DB Code of Conduct and Social Minimum Standards. As role models, managers have a special obligation to uphold these principles.

In implementing our legal obligations under the LkSG, we expect our employees to contribute the best possible fulfilment of our human rights and environmental due diligence obligations through their daily decisions.

As an international company, we are aware that we have a responsibility that goes beyond our own actions. We therefore not only set high standards for ourselves, but also demand social and environmental standards from our business partners. We expect them to also conduct their business with integrity, implement appropriate processes to respect human and environmental rights, and take appropriate steps to make our expectations known throughout their supply chain.

We set out our concrete requirements and principles for cooperation with our business partners in our DB Code of Conduct for Business Partners and DB Schenker Standards of Business Conduct. Suppliers and business partners pledge to comply with both codes' requirements.

To ensure that our suppliers meet the same high standards as we do, we work closely with them. We promote transparency and information sharing to ensure that our suppliers understand and meet our expectations. We expect them to act honestly, responsibly, transparently and fairly. Part of our expectation is that our suppliers will provide information on how they comply with our principles when requested to do so. Should our own behavior lead to a situation that makes it difficult for suppliers to comply with our principles, we encourage our business partners to inform us proactively and commit to finding appropriate solutions together.

7 Continuous further development of our due diligence processes

We are aware that the implementation of human rights and environmental due diligence is an ongoing process. We therefore review this policy statement annually as well as on an ad hoc basis and will update it without delay if, for example, we identify changed or expanded risks.

More information is available on our website at: dbschenker.com/global/compliance/german-supply-chain-due-diligence-act and at our parent company's website deutschebahn.com/lksg

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