

# STATEMENT OF PRINCIPLES

## on Human Rights

Rhenus SE & Co. KG

STATUS:  
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# HISTORY OF CHANGES

Version	Change to previous version	valid until
V01.1	Revision	

## **I. PREAMBLE:**

Our shareholders, customers and business partners, authorities and the public expect us to act lawfully, competently and responsibly at all times. For us, this means that in all countries in which we conduct our business, without exception, we observe the applicable legal system in force and respect the respective moral concepts. Furthermore, as a company we take responsibility for society and the environment. In addition to absolute integrity, occupational health and safety are indispensable components of our actions. These common principles form the basic framework of our entrepreneurial activity.

As a company, we are committed to the standards resulting from these convictions. In accordance with our understanding of entrepreneurial thinking and local responsibility, in addition to our joint responsibility, each individual employee also has the duty to comply with the legal and company-specific principles in his or her area of activity. To this end, we assure each individual the necessary support and backing in order to be able to fulfil the associated responsibility.

In order to ensure that the requirements of the Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz) (hereinafter: LkSG) are complied with without exception in the companies of the Rhenus Group, Rhenus SE & Co. KG has adopted the following policy statement:

## **II. SCOPE:**

This policy statement applies to the own business division within the meaning of the LkSG of Rhenus SE & Co. KG as the parent company of the Rhenus Group. The Rhenus Group is part of the RETHMANN Group and includes all companies which are directly or indirectly held by Rhenus SE & Co. KG with a share of at least 50.01% of the capital and voting rights or which are controlled by Rhenus SE & Co. KG in any other way (hereinafter: Rhenus Group).

Insofar as this policy statement is not directly binding for the companies of the Rhenus Group, the management of the direct shareholdings of Rhenus SE & Co. KG is hereby instructed to ensure that the policy statement is binding for their company and all sub-shareholdings.

In terms of content, this policy statement concerns all human rights-related risks and environmental risks that are also covered by the LkSG.

## **III. HUMAN RIGHTS AND ENVIRONMENTAL EXPECTATIONS OF EMPLOYEES AND SUPPLIERS**

We expect our employees and suppliers alike to act in accordance with our principles, which we have set out in our Code of Conduct and Supplier Code of Conduct (Code of Conduct available at: <https://www.rhenus.group/rhenus-group/corporate-compliance/>). We do not accept any violation or disregard of the principles formulated in these documents, neither within our own business area nor with external partners. We can only fulfil our corporate responsibility if we do so, if we all unconditionally

comply with the applicable legal, ethical, social and ecological standards and ensure fair and respectful cooperation.

## **IV. RISK MANAGEMENT:**

### **(1) RESPONSIBILITIES**

The responsibilities for risk management according to the LkSG are distributed as follows:

At Group level, the activities are coordinated by the Service Center Corporate Procurement with the support of the business unit coordinators (Single Point of Contact's - SPOC's) per business unit of the Rhenus Group and in cooperation with Corporate Compliance and Service Center Corporate Legal.

### **(2) RISK MANAGEMENT IN OUR OWN BUSINESS DIVISION**

In our own business area, risk management mainly consists of risk analysis, preventive and remedial measures.

#### **a. Risk analysis in own business area**

##### **i. regular risk analysis**

The Rhenus Group has 10 decentrally managed business units, plus Assets & Services. For the Rhenus Group, the risk of a violation of a human rights and environment-related prohibition by its own organisation is generally assessed as low:

- All employees are committed to complying with the Code of Conduct. The Policy statement is a part of the policy that employees agree to comply.
- Labour law, occupational health and safety and environmental protection requirements are complied with and monitored by through appropriate functional areas and organisational process structures.

The regular analysis, also of the LkSG-related, risks in the own business area of Rhenus SE & Co. KG is realised annually via the annual structured compliance questionnaire („Voluntary commitment of the mandate holders of the Rhenus Group and annual compliance questionnaire“).

On the one hand, company-related information is requested and, on the other hand, further information on possible violations of internal guidelines is requested on an ad hoc basis.. The complexity and level of detail of the information requested is to be continuously increased so that a comprehensive and increasingly transparent picture of the supply chain of the companies in their own business area emerges.

## **ii. Event-related risk analysis**

The event-related risk analysis must always be carried out if a significantly expanded risk situation is to be expected, for example due to the introduction of new products, projects, or a new business line. Methodologically, the event-related risk analysis follows the same guidelines as the regular risk analysis according to IV.(2) a.i. of this policy statement.

### **b. Prevention measures in the own business area**

The following preventive measures are anchored in Rhenus SE & Co KG's own business division:

#### **i. Code of Conduct**

The Code of Conduct (see attachment) formulates the binding expectations of the Board of Directors of Rhenus SE & Co KG regarding the conduct of the employees of the Rhenus Group. The document has been adapted to the specific requirements of the LkSG.

#### **ii. E-Learning „Fair Working Conditions in the Supply Chain“**

In order to raise awareness among employees and create a better understanding of possible risks, the mandatory e-learning „Fair Working Conditions - Preventing Modern Slavery in the Supply Chain“ was introduced. It covers in particular content from the areas of fair working conditions, child labour, forced labour, health hazards at workplaces and wage dumping. The training includes a final exam and attendance is documented accordingly.

#### **iii. Further prevention measures**

We assume that the aforementioned preventive measures can prevent the human rights and environmental risks arising from the scope of protection of the LkSG. Should it become apparent that specific risks require further measures, these measures will also be taken outside of the regular review (cf. under (5)).

### **c. Remedial action in own business area**

If we determine that a violation of a human rights-related or environmental obligation within the meaning of the LkSG has already occurred or is imminent in our own business area, the responsible Compliance Officer, in consultation with the locally responsible management (management of the Rhenus Group company concerned), shall immediately take measures to prevent or end the violation or to minimise the extent of the violation.

The management of the company concerned is responsible for implementing remedial measures and may consult with SC Corporate Procurement, the SPOCs, the Human Rights Officer and the Compliance Officer. The measures taken as well as the success of the measures taken are to be monitored and documented.

### **(3) RISK MANAGEMENT FOR DIRECT SUPPLIERS**

#### **a. Risk analysis for direct suppliers**

To carry out the risk analysis of the direct suppliers, they are analysed on the basis of several criteria.

The assessment is made according to the specific risk in the country and industry in which the supplier operates and compares this with an internationally recognised index. Based on this index, the direct suppliers are divided into three classes. Furthermore, the turnover generated with the respective supplier and, in the future, the supplier's systemic relevance for the company are included in the assessment.

The "LkSGTeam" coordinates the risk analysis of the direct suppliers. The managing directors of the decentralised units are responsible for ensuring that the risk analysis is carried out annually and on an ad hoc basis.

In the first step, the risk analysis is to be completed as quickly as possible and then carried out annually. In order to make this possible in terms of time, a prioritisation of suppliers in the respective risk classes is carried out during the initial risk analysis, on the basis of which the focus suppliers were selected. This was also expanded to include suppliers from certain industries that were classified as high-risk, hereafter focus industries. This scope will be expanded in subsequent risk analyses.

#### **b. Prevention measures at direct suppliers**

In the first step, preventive measures are taken with those suppliers who have been selected based on the risk analysis described above on the basis of their origin and/or turnover. These are referred to in the following as „focus suppliers“.

The following measures are taken with these suppliers:

##### **i. Supplier Code of Conduct**

Among other things, the Rhenus Group has set out the human rights-related and environmental expectations of its suppliers in its Supplier Code of Conduct and Declaration of Commitment. The focus suppliers are obliged to accept these values by countersigning the declaration of commitment and to complete and accept the Supplier Code of Conduct when concluding new contractual relationships.

##### **ii. Contractual assurance**

In order to ensure that, in addition to the expectations of the Rhenus Group, the direct suppliers of the Rhenus Group also know and comply with the explicit requirements of the LkSG and also ensure compliance with these requirements along their own supply chain, contractual obligations are to be demanded of the risk suppliers in this regard.

##### **iii. Implementation of online platforms**

To document the confirmations received from suppliers and as a central contact point for suppliers, an internet based Rhenus supply chain platform was specially created where suppliers can maintain

their master data, deposit certificates, submit their declaration of commitment and access training opportunities. The already existing carrier portal („Rhe-X“) was supplemented by the submission of the declaration of commitment as defined by the LkSG and online training opportunities.

#### **iv. Offer training measures**

In order to support the focus suppliers in implementing the contractual assurances in the best possible way, the focus suppliers are offered training measures. This includes participation in the e-learning „Fair working conditions - preventing modern slavery in the supply chain“ by employees of the focus suppliers, which is also used as a preventative measure in their own business area. On-site training measures by employees of the Rhenus Group are also conceivable if necessary.

#### **v. Agreement on appropriate contractual control mechanisms**

In order to be able to determine on a risk basis whether the focus suppliers have taken suitable measures to also implement the contractual assurances (see above), the Rhenus Group contractually reserves the right to carry out control measures, for example, through targeted approaches or audits.

#### **c. Remedial action with direct suppliers**

If we discover that a violation of a human rights-related or environmental obligation has already occurred or is imminent at one of our direct suppliers, we immediately take the following measures: Where possible, efforts shall be made to bring the violation to an end without delay.

If this is not possible due to the nature of the breach of duty, a concept for ending or minimising the breach must be drawn up and implemented immediately with the supplier concerned. The responsible managing director shall decide in consultation with the Human Rights Officer which specific measures are to be taken. The following measures can be considered:

- The joint development and implementation of a plan to end or minimise the violation with the violator,
- Joining forces with other companies within the framework of industry initiatives and industry standards to increase the ability to influence the polluter,
- A temporary suspension of the business relationship during one of the aforementioned measures;
- The termination of the business relationship (as ultima ratio)

Any such incident shall be reported immediately to the Human Rights Officer in charge. The measures taken shall be documented and the documentation shall be made available to the Human Rights Officer. The success of the measures taken shall be monitored, documented and the documentation made available to the Human Rights Officer.

## **(4) INDIRECT SUPPLIERS**

The Rhenus Group will take action if it becomes aware of any factual indications that suggest that an indirect supplier may be in breach of a duty relating to human rights or the environment.

A risk analysis of the indirect supplier concerned is then carried out and, if necessary, appropriate

control and remedial measures are taken. The procedure is similar to that for direct suppliers.

## **(5) REVIEW OF THE EFFECTIVENESS OF THE MEASURES TAKEN**

The effectiveness of the risk management measures is regularly reviewed. For this purpose, an interdisciplinary working group, the “LkSG-Team”, holds regular meetings in which individual measures and concepts are discussed and evaluated. If necessary, changes are planned and implemented.

Compliance with the obligations of the LkSG in the country units of the Rhenus Group is to be monitored on a random basis by the responsible human rights officers. A corresponding concept will be developed and implemented in the course of 2023. This policy statement will then be supplemented.

## **(6) COMPLAINTS PROCEDURE**

The Rhenus Group attaches great importance to the fact that both internal and external parties can provide information about grievances. We have therefore been operating the Rhenus Integrity Line since 2019. This is an externally hosted whistleblowing system that employees, suppliers, other stakeholders or third parties can utilise either anonymously or personally. The Rhenus Integrity Line can be reached internationally at any time at:

<https://rhenus.integrityline.org/>

The Rhenus Group shall ensure that the persons entrusted with the implementation of the complaints procedures offer a guarantee of impartial action. They are not bound by instructions for the implementation of the complaints procedures and are obliged to maintain confidentiality. The handling of the complaints procedure as well as the information received in this regard is laid down in detail in a separate guideline.

## **(7) DOCUMENTATION AND REPORTING**

### **a. Documentation**

It is the responsibility of each human rights officer to properly document the actions taken in relation to this policy statement.

### **b. Reporting**

The Human Rights Officers prepare the annual report based on the questionnaire provided by the „Federal Office of Economics and Export Control and submit it after approval by the Board of Directors.



## **V. PRIORITY HUMAN RIGHTS AND ENVIRONMENTAL RISKS:**

The prioritisation of human rights and environmental risks is carried out after the completion of the risk analysis in the own business unit. The policy statement is then supplemented accordingly.

## **VI. DATA TRANSFER & DATA PROTECTION:**

All activities of the Rhenus Group in connection with this policy statement and the requirements of the LkSG are carried out in compliance with the relevant regulations on data transmission and data protection.

## **VII. CONTACT PERSON:**

### **SC Corporate Procurement**

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