



UK Modern Slavery Act Statement

1) Introduction

This statement is made by Deutsche Bahn Group (DB Group) pursuant to section 54 of the UK Modern Slavery Act (MSA) 2015 and covers the financial year ending 31 December 2023. It sets out the steps DB Group is taking to reduce the risk of slavery and human trafficking taking place in its business and supply chain.

In parallel, the following parts of DB Group with larger operations in the United Kingdom have issued individual statements, which are linked to their respective homepages.

DB Schenker: <https://www.dbschenker.com/uk-en>

DB Cargo: <http://www.dbcargo.co.uk>

2) DB Group – at a glance

DB Group is an international provider of mobility and logistics services operating globally in more than 130 countries. Its headquarters are in Berlin, Germany. DB Group has around 300,000 employees, with 24% employed outside Germany.

We design and operate the transport networks of the future. By integrating transport and the rail infrastructure, as well as through the economically and environmentally intelligent linkage of all modes of transport, we move both people and goods.

In passenger transport, we transport more than 6 million people each day on our trains and buses throughout Europe. In rail freight transport, our network carries about 200 million tons of freight each year. The number of shipments by road exceeds 100 million. Our global networks move about 1.1 million tons of freight by air and about 1.8 million TEU by sea. At more than 33,000 km, our rail network in Germany is Europe's longest and we are also one of Germany's largest energy suppliers.

3) General Statement

DB Group places great importance on respecting and promoting human rights and fundamental freedoms. Our overall commitment and dedication to protecting and respecting human rights is expressed in our "Policy Statement on Protecting and Respecting Human Rights". That includes having a zero-tolerance policy approach to all forms of slavery and human trafficking.

DB Group signed up to the UN Global Compact in 2009 and is a founding member of the rail sustainable procurement initiative Railsensible, established in 2015 and further developed ever since. Furthermore, at national level, DB Group is involved with econsense, the Forum for Sustainable Development of German Business and in the sustainability council of the national association for logistics and procurement (BME). Along with this we also have affirmed our commitment to the understanding of sustainability of the Council for Sustainable Development by our declaration of conformity with the German



Sustainability Code. The topic of human rights is also an integral part of DB Group's stakeholder dialogs and supplier contracts based on the Code of Conduct for Business Partners.

4) Policies on Modern Slavery and Human Trafficking

Our commitment to maintaining the highest ethical standards is reflected by our regulations, in particular the DB Code of Conduct and the DB Code of Conduct for Business Partners. Both the DB Code of Conduct and the DB Code of Conduct for Business Partners are continuously evaluated and developed. In June 2021, the German legislature passed the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), hereafter "Supply Chain Act" or "LkSG", which came into force on January 1, 2023. The Act explicitly regulates prohibitions on child labor and prohibitions on modern forms of slavery in § 2 Para. 2 No. 1-4 and refers to the ILO Conventions. In the light of this, we revised our Code of Conducts and specified our regulations. We adamantly reject any engagement with internationally prohibited child labor and strictly adhere to the guidelines set forth by the International Labour Organization (ILO), including Conventions 138 and 182, as well as Recommendation 190. Any exceptions to these standards are only permissible if they align fully with the provisions outlined by the ILO, prioritizing the well-being of children. In addition, it is emphasized especially in our Code of Conduct for Business Partners that we reject slave labor, forced or indentured labor, debt servitude and bondage, human trafficking or involuntary labor, inhuman or degrading treatment, and physical or psychological threats in the workplace. Reference is made to ILO Conventions 29, 100 and 105 and the ICCPR in both Codes of Conduct.

The DB is granted the right to implement monitoring measures towards suppliers, including the right to audit on site to confirm that suppliers' activities are in compliance with the Code of Conduct for Business Partners. Business partners are expected to co-operate with the DB Group. Both Codes of Conduct are available in numerous languages.

The DB Code of Conduct and the DB Code of Conduct for Business Partners are binding sets of rules which provide guidance and support when dealing with ethical challenges that might arise in the course of day-to-day management. DB Group has a range of instruments to promote the DB Code of Conduct and the DB Code of Conduct for Business Partners, amongst others our e-learning-courses.

5) Steps taken

Within DB Group, the management approach to human rights centers on identifying relevant risks. Risk analyses are performed to identify potentially adverse impacts of DB Group business activities on human rights. The main criteria of these analyses focus on the type of business activity (business model) and the country risk related specifically to human rights. Specific actions are derived from the findings in respect of identified risks.

According to the Supply Chain Act, companies based in Germany are now legally required to establish a comprehensive risk management system to identify, prevent or minimise the risks of human rights violations and damage to the environment. In 2023, we therefore improved our due diligence processes and implemented a comprehensive and systematic risk analysis to thoroughly identify and assess the





potential and actual risks of our business activities on people and the environment. This analysis encompasses both our company's own business area as well as our global supply chain. Moreover, the Supply Chain Act sets out the necessary preventive and remedial measures, makes complaint mechanisms mandatory and requires annual reports to the German Federal Office for Economic Affairs and Export Control (BAFA). A so-called "Group LkSG officer" has been appointed by the Group Management Board to monitor our risk management.

Based on the results of our risk analyses, we develop and implement risk-based preventive and corrective measures. To this end, we have developed an overarching catalog that lists potential preventive measures, e.g. the creation of guidelines, the implementation of management and monitoring systems and the conduct of audits and training. The catalog includes potential measures in the areas of child labor, forced labor and modern forms of slavery and serves as a starting point for the risk-based development of specific action plans in individual cases, the so-called Corrective Action Plans (CAPs).

Procurement continues to focus on sustainable criteria. DB Group's purchasing department implements the DB Code of Conduct for Business Partners and the purchasing guidelines for all suppliers. DB thereby aims at observing and continuously improving environmental and social standards in the supply chain together with suppliers, beyond our own added value. We have implemented an e-learning module about DB Group's Code of Conduct for Business Partners. This web-based training provides business partners of DB Group with a concise overview of essential requirements and principles which serve as a basis for cooperation between DB Group and its partners. In the process of implementing the Supply Chain Act, the procurement rules and regulations were supplemented with the obligation for Business Partners to comply with the Supply Chain Act and with the corresponding right of DB Group to conduct audits.

Collaborating closely with our DB Group suppliers, our supply chain analyses are conducted with precision to identify areas within the supply chain where working conditions may be at risk. This collaborative effort enables us to gain a practical understanding of our supply chain structure and to pinpoint existing social risks effectively. One objective is to develop means of influencing identified risk areas and supply chain stages that do not add value. To this end, DB Group audits the compliance of our Code of Conduct at suppliers which operate in high-risk businesses or supply chains. If we identify increased risks, we also arrange supplier meetings with the suppliers in order to raise their awareness and discuss possible improvement measures. To continually enhance our proficiency in implementing effective risk management practices, we provide targeted training on human rights issues to key employees who influence the supply chain, including product group managers, strategic buyers, and procurement managers. Moreover, DB Group has been committed to developing an industry-wide audit standard for ESG topics with the initiative Railsponsible in 2023. The standard aims to create a common approach to addressing human rights issues such as child or forced labor.

For its own operations, DB Group has implemented a central whistle-blowing management. Various channels are offered for employees, business partners, customers etc. to submit reports about suspected infringements. The whistle-blowing management system meets the requirements of the Supply Chain Act and can be used in 22 languages. It is open for all tip-offs on human rights violations, whether arisen in the supply chain or committed by employees of DB Group. Reports are treated with strict confidentiality or - on request - anonymously. Whistleblowers can seek legal advice from the





whistleblowing management team or from one of our attorneys of trust before submitting a report. For employees and executives specifically, the ombudsperson is available as a contact person on matters of human rights. A follow-up process is in place to examine alleged violations of human rights. DB Group launched a series of short integrity films for our employees and executives. One of these films deals exclusively with the topic of human rights. Employees who are responsible for handling complaints have access to various training courses. These cover the clarification of issues in our own business area and in our supply chain and deepen the understanding of the various human rights risk areas including child labor and modern forms of slavery.

We review the effectiveness of our risk management once a year and on an ad hoc basis as required.

6) Endorsement of this statement

The Board of DB Group recognizes the importance of the matters considered in this Statement and the MSA. DB will continue to take all measures necessary to ensure that slavery and human trafficking have no place in DB Group's business operations.

The Board welcomes this opportunity to restate its commitment to ethical and responsible practices in all parts of DB Group.

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