



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 2022. 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 three parts of DB Group with larger operations in the United Kingdom have issued individual statements, which are linked to their respective homepages.

DB Arriva: <http://www.arriva.co.uk/>

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 340,000 employees, with 34% 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 10 million people each day on our trains and buses throughout Europe. In rail freight transport, our network carries more than 220 million tons of freight each year. The number of shipments by road exceeds 100 million. Our global networks move about 1.5 million tons of freight by air and about 2.0 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. 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 Railsponsible, 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

DB Group's 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. They strengthen the strict rejection of any form of forced labor, by explicitly referencing to the ILO Conventions Nos. 29 and 105. In addition, it is emphasized that we reject child labor and comply with the applicable provisions on the prohibition of child labor, for example ILO Convention No. 182. The DB is granted the right to audit suppliers on site to confirm that suppliers' activities are in compliance with the Code of Conduct for Business Partners. It is available in 32 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.

In June 2021, the German legislature passed the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), hereafter "Supply Chain Act", which came into force on January 1, 2023. 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. 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 above-mentioned ILO Conventions. 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). Starting 2022, the implementation of the Supply Chain Act was prepared by a DB Group-wide project. In particular, the focus was on preparing a group-wide comprehensive risk analysis to obtain even greater transparency regarding human rights and environmental risks both in the company's own business area and in the global supply chain.

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 preparation for the implementation of 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.





In addition, further supply chain analyses are conducted together with DB Group suppliers in order to identify working conditions at risk in the supply chain and promote practical understanding of the supply chain structure and existing social risks. 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. Moreover, DB Group has been committed to developing an industry-wide audit standard for ESG topics with the initiative Railsponsible since 2022. 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. In 2022, the whistle-blowing management system underwent a review and was further developed to meet the requirements of the Supply Chain Act starting from January 1, 2023. The whistle-blower system 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.

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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