

Declaration by DekaBank Deutsche Girozentrale on its responsibility for human rights and the environment in its supply chains



1. Introduction

This document is a voluntary declaration by DekaBank Deutsche Girozentrale ("DekaBank") on its responsibility for human rights and the environment in its supply chains. It applies to DekaBank's own business unit and to its suppliers (mainly service providers).

DekaBank is committed to its responsibility for human rights and the environment in its supply chains. Accordingly, DekaBank already has the provisions of the German Supply Chain Act (*Lieferkettensorgfaltspflichtengesetz—LkSG*) in mind and the agreements listed in the appendix thereof, and expects employees in its own business area and its suppliers to comply with the protection of human rights and the environment required by and described in detail in the LkSG. DekaBank also expects its suppliers to adequately address this expectation along the supply chain.

2. Fulfilment of due diligence obligations

We are about to develop a risk management strategy and incorporate it into all relevant business processes in order to identify and minimise risks to human rights and the environment, and to prevent, put an end to or minimise the extent of violations of human rights or environmental obligations. We have appointed a person responsible for monitoring risk management.

a. Conducting risk analyses

We will conduct risk analyses in our own business area and with our suppliers — once a year and on an event-by-event basis.

In the context of an abstract risk analysis, potential risks to human rights and the environment are first identified on the basis of defined risk factors. If a relevant risk has been identified, a specific risk analysis will be carried out in the next step.

b. Prevention measures in the company's own business unit

If we identify a relevant risk in our business area based on the abstract risk analysis, we will take appropriate preventive measures, such as:

- Implementing the human rights strategy set out in this declaration in the relevant business processes;
- Developing and implementing appropriate procurement strategies and purchasing practices that avoid or mitigate identified risks;
- Providing training in the relevant areas,
- Implementing risk-based controls to verify compliance with the human rights strategy contained in this declaration in the specific business area.

c. Preventive measures for suppliers

aa. Due diligence obligations for direct suppliers

If we determine a relevant risk from a direct supplier based on the abstract risk analysis, we will take appropriate preventive measures, such as:

- Taking into account our expectations regarding human rights and the environment when selecting a direct supplier;

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- Obtaining contractual assurance from a direct supplier that they will comply with our human rights and environmental requirements and address these appropriately along the supply chain;
- Agreeing appropriate contractual control mechanisms and providing training and ongoing training to enforce the contractual assurances of the direct supplier;
- Implementing risk-based controls based on agreed control mechanisms to verify the direct supplier's compliance with the human rights strategy.

bb. Due diligence obligations for indirect suppliers

If we obtain substantiated knowledge of a potential violation of a human rights or environmental obligation by indirect suppliers, we take immediate action on an event-by-event basis, such as:

- Conducting a risk analysis;
- Anchoring appropriate prevention measures against the polluter;
- Creating and implementing concepts to prevent, put an end to or minimise the violation of a human rights or environmental obligation; and
- If necessary, update our policy statement in accordance with the LkSG.

d. Corrective action

If we establish that a violation of a human rights or environmental obligation has already occurred or is imminent in our own business area or by a direct supplier, we will immediately take reasonable corrective action to prevent, put a stop to or minimise the extent of this violation. With regard to direct suppliers, the persons responsible will be consulted on a case-by-case basis to determine which specific corrective action should be taken. Corrective action may include temporary suspension or termination of the business relationship.

e. Complaints procedure

We have set up a complaints procedure in order to detect risks to human rights and the environment at an early stage and to be able to provide timely support and remedies in the event of the violation of human rights or environmental obligations that have arisen as a result of the economic activities of DekaBank in its own business area or by a direct supplier. For more information, refer to: <https://www.deka.de/deka-gruppe/kontakt>.

e. Documentation and reporting

We continuously document the fulfilment of the due diligence obligations within the company and will report on the fulfilment of the due diligence obligations in the past financial year every year. We will publish our reports here: <https://www.deka.de/deka-group/our-responsibility/how-we-practice-sustainability/sustainable-corporate-management-at-dekabank/business--human-rights>.

3. Annual and event-related review

We will review the effectiveness of the aforementioned measures annually and on an event-by-event basis and, if necessary, repeat the measures or update them immediately.

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4. Priority risks

If, on the basis of the risk analysis, we identify priority risks to human rights or the environment, we will identify them after the completion of the first regular risk analysis.

Frankfurt am Main, 01/01/2023

Board of Management