

# POLICY STATEMENT

of Rhenus Automotive SE  
on our human rights policy



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# 1

## FOREWORD

### We take responsibility

At the Rhenus Automotive Group, we are aware of our responsibility to respect human rights and the related environmental rights. And we fulfil our responsibilities – both in our own business area and within our supply chains.

We follow a clear moral compass and act according to straightforward principles. Essentially, we aim to continuously harmonise our business activities with people and the environment in the interests of a long-term responsible enterprise.

We are a global logistics and assembly service provider who supply complex value-added services and employ a large number of people in many different companies. Therefore, we first and foremost ensure that human rights and occupational health and safety standards are observed in our own business area in order to provide healthy and safe workplaces for our employees. As we operate numerous warehouses and assembly centres, it is also critical to us that these operations comply with local environmental laws and international environmental standards.

Furthermore, we strive to guarantee compliance with these fundamental rights throughout our global supply chains. To this end, we encourage existing and new

suppliers to comply with our standards and insist that they impose these standards on their own suppliers and business partners.

The starting point for our due diligence is always a comprehensive risk assessment. This is used as the basis on which we develop our human rights strategy, implement resulting measures in our own business area and discuss these with our direct suppliers. Our risk management strategy focuses above all on preventing violations and reducing risks. If our standards are violated, we have implemented strict rules for handling these cases and applying remedial measures.

It is our belief that responsible corporate management can only be put into practice if all partners in a value chain work together.

This policy statement describes our specific endeavours towards consistently fulfilling our corporate due diligence obligations in supply chains in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG).

Dr. Marcus Ewig and Thomas Bernhardt  
Managing Directors of Rhenus Automotive SE

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### SCOPE OF APPLICATION

The scope of our corporate due diligence obligations covers Rhenus Automotive SE's own business operations, all Group companies over which we have a decisive influence (hereinafter referred to as the Rhenus Automotive Group) and employees and business partners throughout our entire supply chain. The Rhenus Automotive Group is part of the Rhenus Group.

## 3

### HUMAN RIGHTS AND ENVIRONMENTAL RISKS OVER WHICH WE HAVE INFLUENCE

Our risk assessment processes review the human rights risks and environmental risks that we have identified in our business activities. These either arise in connection with our business activities either at our own sites or within our supply chains. This means that we affect the upstream and downstream supply chain. We require both new and existing suppliers to suitably address the risks we have identified in their business activities and to impose our standards to their own suppliers and business partners.

#### 3.1 Prohibition of child labour

In line with the fundamental labour standards of the ILO (International Labour Organization), we strictly reject child labour and comply with minimum age requirements for employment in accordance with the applicable national regulations. This applies in particular to the worst forms of child labour for children and young people under the age of 18, such as particularly dangerous tasks, conditions akin to slavery or immoral activities. We check whether applicants and employees have reached the minimum age for employment and which tasks persons below the age of 18 are permitted to perform.

#### 3.2 Prohibition of forced labour

In line with the fundamental labour standards of the ILO, we strictly reject the use of forced labour in our business activities up to and including the source of our supply chain. This also includes all forms of modern slavery and human trafficking.

#### 3.3 Freedom of association and the right to collective bargaining

We recognise the rights of workers to form trade unions and to bargain collectively for the regulation of working conditions. Employees are neither favoured nor disadvantaged based on their membership or non-membership of a trade union or employee representative body.

We promote regular dialogue between employees and management at sites without employee representatives.

#### 3.4 Protection against discrimination

Equal treatment is a fundamental principle of our corporate policy. We do not tolerate discrimination or unfounded unequal treatment of any kind.

In our own business area and in our supply chain we are therefore committed to ensuring that no person is subject to discrimination or harassment or given preferential treatment due to characteristics such as their gender; origin; background; nationality; religion or ideology; political, social or union activities; sexual identity and orientation; physical and/or mental limitations or age.

#### 3.5 Right to health and safety in the workplace

As employers, we safeguard health and safety in the workplace as stipulated by the relevant law as a minimum requirement. We support continuous development to improve the working environment with the aim of reducing work-related accidents and illnesses.

We comply consistently with the applicable labour protection laws worldwide. For instance, we apply ISO certification standards – such as ISO 45001 – to improve occupational health and safety. We strive to ensure the



well-being of all employees in our supply chain and to impose our own high standards on our direct suppliers.

#### 3.6 Right to appropriate remuneration

We provide our employees with performance-related remuneration and comply with locally applicable, legally guaranteed minimum standards and minimum wages. We pay all wages and reimbursable expenses on time without deduction.

#### 3.7 Working hours

We follow ILO fundamental labour standards and comply with the applicable national working hours regulations. As stipulated by the applicable law, we ensure that working conditions are safe and healthy and that work breaks, appropriate working hours limitations and regular paid holidays are guaranteed. The Rhenus Automotive Group's working hours principles take operational and individual

concerns into consideration. We consider maintaining a healthy work-life balance to be crucial.

#### 3.8 Deployment of security staff

We do not tolerate security personnel behaving unlawfully towards either our own employees or others. We contractually oblige the security service providers we commission to respect human rights. We also ensure that our service providers only employ trained security personnel.

#### 3.9 Rights of minorities, local communities and indigenous peoples

We recognise that members of minority groups need special protection. At Rhenus Automotive SE, we respect the rights of minorities, local communities and indigenous peoples who may be affected by business activities at our sites. We carefully consider the local impact of our business activities.

### 3.10 Handling high-risk commodities

We handle high-risk commodities in line with the Minamata Convention on Mercury, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the Stockholm Convention on Persistent Organic Pollutants (POPs).

### 3.11 Protecting personal data

We acknowledge data protection as a personal right. We only use and process personal data to the extent permitted by laws, regulations, our internal guidelines and the data subjects themselves. Our data protection policy regulates how we process the personal data of employees, customers and partners within the scope of the General Data Protection Regulation. It establishes a uniform data protection and data security standard and creates the required framework conditions for exchanging data between the companies of the Rhenus Group.

## 4

### HUMAN RIGHTS AND ENVIRONMENTAL REQUIREMENTS FOR EMPLOYEES AND SUPPLIERS

We require that our employees act in accordance with our principles. These are set out in writing in the Rhenus Code of Conduct and our Ethics Policy.

We also require our executives to put the standards set out in the foreword into practice within our companies (tone from the top).

We require that our suppliers act in line with our principles, which are detailed in our supplier self-disclosure questionnaire and the Rhenus Automotive SE Supplier Code of Conduct.

We can only fulfil our shared ethical responsibilities if we all comply with the applicable standards of the LkSG to maintain fair and respectful cooperation.

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### RISK MANAGEMENT

Risk management is governed by our organisational guidelines and our reporting and implementing guidelines. Risk management also includes defining responsibilities for conducting certain tasks. Responsibilities and tasks related to the requirements of the LkSG are specified in detail in the guidelines. Our risk management activities affect our internal business area, direct suppliers and indirect suppliers and include the following (summary):

#### 5.1 Risk management in our own business area

##### 5.1.1 Regular and ad hoc risk analyses

Regular in-house risk analyses take place every year before the report is submitted. To this end, we issue a questionnaire to the operational units that have completed LkSG training. The aim of the questionnaire is to obtain information concerning the risk probabilities of damage to protected interests. The site manager is responsible for completing the questionnaire and obtaining the necessary information. Any damage that has occurred must be reported. We then determine a graded risk probability based on the completed questionnaire.

Additional ad hoc risk analyses are always carried out when we can expect a risk profile to expand significantly. Examples of triggers include the introduction of new products or services. Ad hoc risk analyses and regular risk analyses are conducted using the same methodology and specifications

##### 5.1.2 Preventative measures in our own business area

The following measures are entrenched in our policy statement:

#### Rhenus Group Code of Conduct

The Code of Conduct communicates the binding expectations of the Executive Board of the Rhenus Group regarding the behaviour of Rhenus Group employees, which also includes Rhenus Automotive SE.

#### Organisational guidelines

The Rhenus Automotive SE organisational guidelines describe how risk management tasks are to be implemented and specify the parties responsible. They also define the rules of cooperation between the various divisions.

#### Ethics Policy

Our Ethics Policy sets out ethical requirements for executives and employees. This document covers the interests protected by the LkSG, compliance and sustainability. It is posted in all Rhenus Automotive Group companies.

#### Reporting and implementation guideline

The Rhenus Automotive SE reporting and implementation guideline establishes human rights and environmental standards within our organisation. These obligations apply in particular to executives of the companies and service departments. This is because they are responsible for ensuring that these standards are met in their respective areas of responsibility. They are also obliged to report risks and violations to the human rights officer and compliance officer to allow preventative and remedial measures to be taken immediately. Specialist organisations in the areas of HR, occupational health and safety, compliance, sustainability and the environment are also continually involved.

#### E-learning programme: Fair working conditions in the supply chain

The e-learning programme Fair working conditions - Preventing modern slavery in the supply chain was introduced to raise awareness and improve the understanding of possible risks and violations. In particular, it covers the issues of fair working conditions, child labour, forced labour, health hazards in the workplace and wage dumping. All offices affected by LkSG regulations within the entire Rhenus Group have been taking part in this training programme since 1 March 2023. Their participation is documented and includes a final examination.



### Face-to-face training on compliance and human rights

On 1 January 2022, Rhenus Automotive SE introduced face-to-face training for industrial executives and administrative employees in every company. We regularly train our employees on the issues of human rights risks and offences in the workplace.

As well as communicating the content, we also want to sensitise the participants to complaints received from employees and demonstrate how these complaints should be appropriately handled by management. In this way, we want to actively promote a culture of respect and encourage collegial behaviour free from harassment within the commercial team groups.

### Face-to-face training on the LkSG

Since 1 January 2023, the managers of our companies and service departments, and administrative purchasing staff have received training in the content of the LkSG and the measures developed for this purpose.

### Further preventative measures

We are convinced that the aforementioned preventive measures help to address and minimise the risks revealed during risk analyses. If other specific risks arise that require further steps, these will also be taken outside of the routine review process.

### 5.1.3 Remedial measures in our own business area

If we determine that a violation as specified by the LkSG has already occurred or is imminent within our business area, the responsible human rights officer will take action. In consultation with the locally responsible managers and executive board of the company in question, the human rights officer will take necessary steps to put a stop to and minimise the extent of the violation.

The implemented measures are documented and the documentation submitted to the responsible specialists and managers.

We also monitor how successful the respective measures prove to be. The documentation is also presented to the human rights officer.

## 5.2 Risk management for direct suppliers

### 5.2.1 Risk analyses for direct suppliers

We analyse our direct suppliers based on multiple criteria to help us arrive at a well-founded assessment. Our analyses consider the specific risks posed by the country and sector in which the supplier operates. They covers the following risk areas:

- Environmental risks
- Labour and human rights risks
- Ethical risks
- Risks related to sustainable procurement

We use a range of software tools to collect and evaluate the information. We also require our suppliers to fill out a self-disclosure questionnaire and sign a declaration of commitment to adhere to our human rights and environmental expectations.

Risk analysis of direct suppliers is managed by the head of the Rhenus Automotive Group Procurement department. They are responsible for ensuring that risk analyses are conducted both annually and as necessary.

### 5.2.2 Preventative measures related to direct suppliers

We have implemented various preventative measures for our direct suppliers:

#### Supplier Code of Conduct

Our Supplier Code of Conduct sets out the human rights and environmental standards that the Rhenus Automotive Group demands of its suppliers, among other things.

#### Suppliers' self-disclosure questionnaire

In the supplier's self-disclosure questionnaire, our suppliers confirm in writing that they adhere to the Rhenus

policies for human rights, environmental standards, sustainability and compliance, among other things.

### Contractual assurances (declaration of commitment)

We also demand a contractual commitment from our direct suppliers that covers the following aspects:

- Our suppliers must comply with the principles of the Rhenus Automotive Group.
- They comply with the explicit requirements of the LkSG.
- They entrench compliance with these requirements along their entire supply chains.

They also grant us monitoring options if required.

### 5.2.3 Remedial measures for direct suppliers

If we discover that a human rights-related or environmental obligation has already been violated or that a violation is imminent at one of our direct suppliers, we will take immediate action.

First and foremost, we aim to ensure that the violation is stopped immediately, if possible. If this is not immediately possible, we develop a concept for stopping or minimising the violation in collaboration with the supplier in question.

In consultation with the head of Procurement and locally responsible management, the human rights officer decides what specific measures are to be taken. The following measures can be considered:





- Joint development and implementation of a plan to stop or minimise the infringement
- Forming associations with other companies related to industry initiatives and industry standards to increase our ability to influence perpetrators
- Temporary suspension of our business relationship for the duration of one of the aforementioned measures
- Termination of the business relationship

Any incident of this kind must be reported immediately to the human rights officer. All steps taken must be documented and the documentation submitted to the human rights officer.

The success of the steps taken is also monitored, documented and the documentation presented to the human rights officer.

### 5.3 Risk management for indirect suppliers

If we have indications of an infringement of human rights or environmental standards by an indirect

supplier, we will conduct a risk analysis within their operation and take appropriate monitoring and remedial measures if necessary. The process is similar to that applied to direct suppliers.

### 5.4 Reviewing the effectiveness of measures

We review the effectiveness of our risk management measures on a regularly basis. To this end, the human rights officer and compliance officer discuss and evaluate individual measures and concepts every six months. They then plan and implement changes as and when necessary. The human rights officer carries out spot checks to ensure that the obligations stipulated by the LkSG are being met by international units of the Rhenus Automotive Group.

### 5.5 Complaints procedure

It is of great importance to us that both internal and external parties can provide information on irregularities in accordance with legal requirements and we make appropriate arrangements to secure this capability. We operate our Integrity Line for just this reason.

It is an externally hosted whistleblower system that can be used by employees, suppliers and other stakeholders to leave messages, whether anonymously or otherwise. The Rhenus Integrity Line can be accessed internationally at all times at

**Rhenus.integrityline.org**

The Rhenus Group also ensures that the persons entrusted with handling the complaints procedure are not bound by instructions. They are also bound to confidentiality.

A separate guideline explains in detail how to handle the complaints procedure and the information received via the complaints process.

### 5.6 Reporting and documentation

It is the human rights officer's responsibility to document all measures taken in connection with this policy statement comprehensively and centrally.

Based on this documentation, the human rights officer prepares an annual report in line with the catalogue of questions provided by the German Federal Office for Economic Affairs and Export Control.

### 5.7 Risk management responsibilities

Overall responsibility lies with the executive board of Rhenus Automotive SE. The board has instructed the managers of the various service centres to implement and monitor measures that minimise risks related to the environment, human rights and occupational health and safety.

The executive board has also appointed a human rights officer who monitors the implementation of risk management processes and reports to the executive board.

The human rights officer is also responsible for conducting risk analyses and for preventive and remedial measures relating to the internal business area. The head of Procurement is responsible for the supply chain.

The human rights officer can request the support of the HR, Occupational Health and Safety Management and Environmental Management departments.

The compliance officer is responsible for receiving and processing complaints (complaints officer).

The human rights officer is responsible for preparing and submitting reports to the German Federal Office for Economic Affairs and Export Control.

## 6

### HUMAN RIGHTS AND ENVIRONMENTAL PRIORITIES

Risk analysis revealed that the Rhenus Automotive Group's priority risks are connected to occupational health and safety.

## 7

### CONTACT

The contact person is our human rights officer.  
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**Picture credits**

Photos: Rhenus Group

Photographer: Dominik Buschardt

Cover photo: Hannah Busing/Unsplash

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