



**DKV Mobility**  
**Policy Statement**  
German Act on Corporate Due Diligence  
Obligations in Supply Chains (LkSG)

January 2024

# Policy Statement Supply Chain Act

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DKV MOBILITY GROUP is the leading European B2B platform for on-the-road payments and solutions. Our group depends on trust in the lawful and responsible actions of its management, executives and employees. Integrity, the will to succeed, cooperation, responsibility and fair dealings with our business partners are our shared values and therefore part of our corporate culture. Together with the protection of human rights and the environment, these values form the basis for a cooperative and productive working environment and thus the successful further development of the DKV MOBILITY GROUP. They guide us in our cooperation and are the benchmark for our daily actions.

As a company with international business relationships, we recognize our responsibility to strengthen human rights and environmental protection along our supply chains. With this declaration of principles, we are therefore committed to respecting human rights, protecting the environment and conserving natural resources, both in our own business area and in our supply chains. This includes ethical business practices, compliance with applicable legal requirements, the creation of transparency and dialogue, compliance with legal regulations on the employment of minors, the prohibition of forced labor, fair salaries, reasonable working hours, right of association and right of association, the recognition and promotion of diversity and the guarantee of a safe working environment and safe working conditions.

The management endeavors to fulfill the requirements of responsibility and sustainable action. We expect the same from our managers and employees. We also expect our business partners to commit to respecting human rights and protecting the environment, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

This Policy Statement applies to all companies within DKV MOBILITY GROUP.

## HUMAN RIGHTS DUE DILIGENCE OBLIGATIONS

We are convinced that sustainable business success can only be ensured if human rights are recognized and protected. We endeavor to actively prevent and avoid human rights violations. We respect internationally recognized social standards and human rights conventions, among others:

- United Nations Universal Declaration of Human Rights
- United Nation Guiding Principles on Business and Human Rights
- Conventions, protocols and recommendations of the International Labor Organization (ILO) on labor and social standards
- Ten principles of the United Nation Global Compact
- Code of Conduct of the "Business Social Compliance Initiative" (BSCI)
- Diversity Charter

We expect our business partners to comply with the employee rights of the applicable national legislation, as well as to recognize the core labor standards of the International Labor Organization (ILO), which are reflected in the constitutional and legal structures of various countries.

With our Code of Conduct, we define binding standards for the behavior of all employees towards each other, our business partners and the public. By creating a responsible and social working environment in which each individual can contribute and develop, it is our declared aim to use available resources to create healthy and safe working environments for employees at our own sites. We also see ourselves as part of society and are therefore involved in a variety of ways in the local communities at the company locations.

There are certain human rights aspects that are becoming increasingly relevant to our business model. These include anti-discrimination, health and safety in the workplace, right of association and unionization, fair salaries and reasonable working hours (in accordance with applicable national laws). Together with our partners along the supply chain, we want to work on full retraceability and transparency with regard to our business processes.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Freedom of association and collective bargaining form the basis of a well-functioning social partnership between employers and employees. In many countries in which we are represented, national labor law (based on the principles of freedom of association and collective bargaining) stipulates that the interests of employees are represented by institutions appointed to represent their interests, in particular constituted bodies. At European level, the representation of interests is ensured by the SE Works Council of DKV MOBILITY GROUP SE, which was constituted in June 2022 and is responsible for information and consultation rights in cross-border matters. We support all activities in this area and take the opportunity to shape the working conditions of Group employees together with the institutions appointed for this purpose. We therefore consider freedom of association and collective bargaining to be important building blocks of a successful personnel and social policy and thus of entrepreneurial success. At the same time, we expect our suppliers to respect the guaranteed fundamental right of employees to freedom of association and collective bargaining.

## **HEALTH PROTECTION AND OCCUPATIONAL SAFETY**

Considering the legal, economic and social framework conditions, it is part of our responsibility to ensure the health, safety and protection of our employees in the daily performance of their activities in the office and on the road. We make great efforts to protect our employees from accidents and work-related illnesses. We support preventive measures that help to keep our workforce healthy. Our management system for health, safety and well-being in the workplace is therefore firmly anchored in our corporate processes.

## **PROHIBITION OF UNEQUAL TREATMENT**

Equal treatment is a fundamental principle of our corporate policy. We do not tolerate any form of discrimination or unequal treatment in our company. By implementing our diversity, equality and inclusion strategy, we promote, recognize and utilize the diversity of our employees with their different skills and talents. We aim to create a respectful working environment for all employees - regardless of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and ideology, sexual orientation and social background. We are also committed to ensuring that our suppliers do not discriminate against, favor, or harass anyone on the basis of these characteristics.

## **ENVIRONMENTAL RESPONSIBILITY**

As the leading European B2B platform for on-the-road payments and solutions, we are determined to actively promote sustainability in the mobility and transportation industry. We are committed to the principle of responsible corporate governance. We want to drive the transition to the efficient and sustainable mobility of the future by supporting our customers in their transition to more sustainable mobility.

We are aware that our business operations have an impact on the environment. Therefore, we strive to minimize our operational footprint by focusing on avoiding or reducing operational emissions. Sustainability starts on our own doorstep, and from our perspective, acting more sustainably includes reducing energy and water consumption, reducing waste, questioning business travel, using chemicals responsibly, switching to sustainable consumables and ultimately reducing greenhouse gas emissions.

To achieve our climate and environmental goals, we ensure, among other things, that an environmental management system in accordance with DIN EN ISO 14001:2015 is implemented at our headquarters in Ratingen (Germany). In our risk analyses, we consider that raw materials used in the manufacture of our products can be hazardous to people and the environment during procurement and processing and require special measures. We act in accordance 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 Convention).

## **RISK MANAGEMENT**

Our risk management covers both supplier selection and supplier management processes, regardless of whether the services are provided in Germany or abroad. In order to assess the risks, we carry out an abstract risk analysis based on country- and industry-specific risk data. We use a management process to identify and assess the relevant human rights issues and those potentially affected by our business activities in Germany and abroad as well as in our business relationships. Human rights risks and impacts are analyzed annually or on an ad hoc basis in the event of significant changes to business activities, markets or changes in the supply chain in order to ensure their effectiveness and consistency with our aims. We use data from various specialized and renowned data providers. The data is regularly updated by the data providers or considered as soon as it is published.

The Enterprise Governance System department is responsible for risk management, which reviews the effectiveness of the relevant due diligence processes at least once a year and on an ad hoc basis and regularly informs the Executive Board of their effectiveness.

## RISK ANALYSIS

We consider it essential to be aware of the potential and actual human rights risks and impacts of our business activities, services and products on people along the value chain. We therefore systematically analyze our business area and our business relationships with regard to human rights issues. The risk analysis forms the basis for identifying appropriate preventive and remedial measures.

In the initial risk analysis, risks were identified, most of which can be assigned to the following risk groups:

- Disregard of occupational health and safety and work-related health hazards
- Disregard for freedom of association, freedom of collective bargaining and the right to collective action
- Violation of the prohibition of unequal treatment in employment, disregard of occupational health and safety and work-related health hazards
- Violation of the prohibition of withholding an appropriate salary
- Destruction of the natural basis of life through environmental pollution

Before the start of a new business collaboration, the business partner is reviewed according to various criteria. The review assesses, for example, findings based on negative media reports, reputational risks or other specific risk indications. The risk analysis uses various data sources to record generic and specific risks for countries and business partners in the value chain.

As part of the regular reviews, findings that have already been evaluated, e.g. due to negative media reports, reputational risks or other specific risk indications, are reanalyzed. The regular assessment helps to determine whether the cooperation with this business partner is still in line with our objectives and the protected legal positions defined in the law. The regular review also analyzes and evaluates the development of a country and findings on the situation in a country. This review helps to identify operational or strategic adjustments that are necessary to identify risks and avoid violations. In addition, incidents reported by third parties are considered (complaints procedure).

Appropriate measures are assigned via risk management. Measures can be assigned automatically or manually. Measures are categorized and prioritized, assigned to responsible persons, review and processing orders are issued and deadlines are monitored.

We carry out risk analyses on an ad hoc basis if we anticipate a significantly changed or significantly expanded risk situation in the supply chain due to the introduction of new products, projects or a new business area.

## **PREVENTIVE MEASURES AND REMEDIAL MEASURES**

In order to fulfill our responsibility to respect human rights and environmental rights, we take various preventive and remedial measures. Our aim is to protect those (potentially) affected and to identify, prevent or at least minimize adverse human and environmental rights impacts on them. If we identify a grievance, we will take appropriate remedial action. We reserve the right to require our business partners remedy the grievance, take legal action, temporarily suspend the business relationship or terminate it as a last resort. Relevant preventive measures in our own business area are:

- Publication and implementation of this Policy Statement
- Designation of responsible body
- Definition of principles of behavior (Code of Conduct)
- Training and awareness-raising of employees
- Implementation of risk-based controls
- Definition of remedial measures in the event of violation

We also intend to apply appropriate preventive measures to direct suppliers:

- Consideration of human rights and environmental requirements when selecting of suppliers
- Establishing long-term business relationships
- Definition of principles of behavior (Code of Conduct for suppliers and business partners)
- Training and awareness raising regarding sustainable procurement and purchasing practices

## **COMPLAINTS PROCEDURE**

An appropriate and effective complaints procedure is an important part of our due diligence processes. We have therefore aligned our whistleblowing system with the requirements of the LkSG. In addition to the tried-and-tested contact channels, we have set up the whistleblowing system as a platform through which employees, suppliers and third parties can submit information online. The information is recorded in a transparent process that safeguards the legitimate interests of all parties involved in the best possible way. Reports are processed, stored and archived with the necessary confidentiality.

The whistleblowing system is intended to offer the greatest possible protection for whistleblowers and, where applicable, those affected. Investigations are only initiated after a careful preliminary examination and if there are substantiated indications of a violation. Investigations are conducted in a confidential manner. The information is processed as part of a fair, fast and confidential process. Investigations are coordinated by our Group Compliance Office.

Information on how to use the whistleblowing system can be found on our website at:  
<https://www.dkv-mobility.com/en/whistleblowing-system/>

## REPORTING

We prepare an annual report on the fulfillment of our due diligence obligations in accordance with the LkSG. We will publish the report on our website. The reports will be available on our website for at least the legally prescribed period in order to be able to track the development of our compliance with due diligence obligations.

With this report, we intend to inform the public about our human rights and environmental due diligence process and its effectiveness. We will provide information on the material human rights and environmental risks and impacts identified by us as a result of actions in our business area and in our supply chain and describe the preventive and remedial measures taken to fulfill our due diligence obligations.

Ratingen, January 2024

Management | DKV MOBILITY GROUP SE

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**YOU DRIVE, WE CARE.**