

Basic statement by the duisport Group on respect for human rights and the environment

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Created by CS in consultation with ESG, RE, PC,

QHS Approved by Executive

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1. Preamble

The duisport Group stands for logistical expertise, innovative strength, customer focus, and motivated, responsible employees.

Duisburger Hafen AG is the owner and management company of the Port of Duisburg. Together with its subsidiaries, it operates as the duisport Group. The duisport Group offers full-service packages for the port and logistics location in the areas of infrastructure and superstructure, including settlement management. In addition, the duisport Group provides logistics services such as the development and optimization of transport and logistics chains, rail freight services, facility management, and contract and packaging logistics. With approximately 1,400 employees across the entire duisport Group, we develop future-proof infrastructure and (inter)nationally networked logistics solutions to strengthen the resilience and competitiveness of North Rhine-Westphalia and Germany as business locations.

We take responsibility and are convinced that sustainable economic activity can only be achieved through ethical and honest behavior. Compliance is a matter of course for us and is reflected in our adherence to the law and the rules and regulations of the Group guidelines, which are binding for every employee. Every employee is required to consider the impact of value-based actions when performing their duties.



Inclusive stakeholder¹management is a central component of our corporate strategy. It enables us to overcome challenges, develop innovative business models, and use resources sustainably in collaboration with our stakeholders. It is our overarching goal to uphold, protect, and respect the human rights of every individual. We therefore adhere to human rights, fair working conditions, and social standards in our daily business activities. We promote human rights along our supply chain and examine indications of human rights violations in the course of our business activities. In this

¹Stakeholders are individuals or organizations that are affected by or influenced by the activities of the duisport Group. These include customers, suppliers, employees, and society.

In the policy statement issued by the Executive Board of Duisburger Hafen AG, we set out our group-wide human rights strategy. It applies to the subsidiaries of the duisport Group over which Duisburger Hafen AG has a controlling influence in accordance with Section 2 (6) of the German Local Authority Control and Transparency in Expenditure Act (LkSG). In this way, we ensure that human rights and the environment are respected within the duisport Group and throughout our supply chain. We are committed to international human rights standards, in particular:

- the Universal Declaration of Human Rights (1948);
- the European Convention on Human Rights (ECHR) (1950);
- the International Covenant on Civil and Political Rights (Civil Covenant) and the International Covenant on Economic, Social and Cultural Rights (Social Covenant) (1966);
- the Convention on the Rights of Persons with Disabilities (UN Convention on the Rights of Persons with Disabilities, UN CRPD) (2006);
- the UN Guiding Principles on Business and Human Rights (2011) and
- the other core human rights treaties developed within the framework of the United Nations (UN);
- the core labor standards of the International Labor Organization (ILO), including a safe and healthy working environment.

2. Human rights strategy in accordance with the Supply Chain Due Diligence Act (LkSG)

Responsible, sustainable, and lawful conduct is one of our core values and is firmly anchored in our corporate strategy and Code of Conduct. This also includes appropriate compliance with human rights and environmental due diligence obligations in accordance with the LkSG:

- Prohibition of child labor – Section 2 (2) No. 1 and 2
- Prohibition of forced labor and all forms of slavery - Section 2 (2) No. 3 and 4
- Disregard for occupational health and safety and work-related health hazards – Section 2 (2) No. 5
- Disregard of freedom of association - freedom of association and right to collective bargaining - Section 2 (2) No. 6
- Prohibition of unequal treatment in employment - Section 2 (2) No. 7
- Prohibition of withholding appropriate remuneration - Section 2 (2) No. 8
- Destruction of the natural foundations of life through environmental pollution - Section 2 (2) No. 9
- Unlawful violation of land rights – Section 2 (2) No. 10
- Prohibition of the commissioning or use of private/public security forces which, due to a lack of instruction or control, may lead to infringements - Section 2 (2) No. 11
- Prohibition of any act or omission in breach of duty which is directly capable of impairing a protected legal position (arising from the human rights conventions within the meaning of Section 2 (1)) in a particularly serious manner and whose unlawfulness is obvious upon reasonable assessment of all relevant circumstances – Section 2 (2) No. 12

- Prohibition of the production, use, and/or disposal of mercury (Minamata Convention) - Section 2(3) Nos. 1 to 3
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and environmentally unsound handling of POP-containing waste - Section 2 (3) Nos. 4 and 5
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention - Section 2 (3) Nos. 6 to 8.

3. Expectations

We expect our employees and suppliers in the supply chain within the meaning of the LkSG to support us to the best of their ability in order to prevent human rights and environmental risks in accordance with the LkSG in an appropriate manner and, where necessary, to eliminate or minimize them.

We expect our employees to comply with the rules and values set out in the Code of Conduct and to contribute through their actions to fulfilling our due diligence obligations.

We expect our suppliers to:

- Acting in accordance with the law and in line with our Supplier Code of Conduct
- Providing information and audit reports,
- Participating in information and training events to ensure a common understanding of compliance with human rights and environmental standards.

4. Procedures

4.1 Structure and responsibilities

We have a proven management system for managing the duisport Group and its organizational units. An operational LkSG team has been formed, consisting of representatives from the Legal, Compliance, Quality, Health & Safety, Procurement, and ESG departments. Our human rights officers monitor LkSG risk management in close coordination with the LkSG team. They have been members of the Compliance Board since this year and report directly to the Executive Board. In addition, there are relevant binding Group guidelines and procedural instructions.

4.2 Risk management in our own business area

4.2.1 Risk analysis

In our own business area, we conduct annual and ad hoc (e.g., in the event of new risks arising from new business models) abstract and concrete risk analyses in accordance with the provisions of the LkSG and Group guidelines, and the results are appropriately weighted and prioritized. In addition to new organizational structures, a software-based tool for risk analysis and assessment has also been implemented.

4.2.2 Priority risks

We pay particular attention to the area of transport logistics and the potential risks associated with it in terms of working conditions, occupational health and safety, and appropriate remuneration. We are actively pursuing efforts to find an industry-wide solution in this risk area.

4.2.3 Preventive measures

In order to avoid or mitigate risks, we have introduced various preventive measures in our own business area, the effectiveness of which we continuously monitor and adapt as necessary.

Our rules and regulations are a binding framework for all our employees, such as:

- Code of Conduct
- Diversity policy
- Environmental policy
- Occupational health and safety guidelines
- Procurement guidelines
- Whistleblowing procedure and complaints procedure
- Requirements for implementing the LkSG in the individual business areas

In addition, we provide our employees with ongoing training and offer continuous information and support. We have revised our business partner review process for defined risk areas. We have revised our contracts to comply with the LkSG. We take ESG standards, including LkSG criteria, into account as part of preventive due diligence for planned investments in locations, facilities, equipment, and financial assets.

4.2.4 Remedial measures

If we identify imminent or actual violations of human rights or environmental obligations in our own business, we will prevent, end, or minimize them.

4.3 Risk management for direct suppliers

4.3.1 Risk analysis

We conduct risk analysis for direct suppliers with the support of ESG risk management software to ensure a comprehensive and in-depth analysis.

In the "abstract risk analysis," country and industry risks for human rights and environmental standards are assessed for our direct suppliers.

The potential risks identified at direct suppliers are then examined in more detail using "concrete risk analysis." We prioritize suppliers for whom the abstract risk analysis identified a medium or high country and industry risk for violations of human rights or environmental standards.

In addition, we monitor a broad supplier base for critical news in order to stay informed about reports in the areas of human rights and environmental standards and to be able to respond to them.

We then prioritize direct suppliers and their risks according to criteria of appropriateness, including probability of occurrence, severity, and our ability to influence the suppliers.

Based on the results of the risk analysis, this policy statement is also reviewed and updated accordingly.

4.3.2 Priority risks

We analyze potential risks in our supply chain, particularly in the wood product group, with regard to working conditions, economic inequality in relation to local communities, and health risks in consultation with our suppliers. We work directly only with German and European sawmills and wholesalers. The majority of our suppliers are based in Germany and Europe.

We also see a potentially increased risk in relation to working conditions, including adequate remuneration and social security, among our suppliers in the transport logistics sector.

4.3.3 Preventive measures

We have implemented various preventive measures for dealing with direct suppliers, depending on the field of activity or the achievement of certain thresholds. These include, among other things, the recognition of our Supplier Code of Conduct, the updating of our contractual regulations and our procurement processes, and IT-based business partner compliance.

4.3.4 Remedial measures

If we discover a violation of human rights or environmental due diligence obligations by our direct suppliers, we will work to terminate the relationship immediately. If a violation by such a supplier is such that we cannot prevent it or terminate it in the foreseeable future, we will take all appropriate measures to minimize the breach of duty. Termination of the supplier relationship should only occur in exceptional cases.

We also include indirect suppliers in the aforementioned analyses and measures, in particular if we have actual indications that a violation of a human rights or environmental obligation appears possible at an indirect supplier (substantiated knowledge).

5. Complaints procedure

We have established a freely accessible and free system for complaints and reports on human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen through economic activities in our own business area or that of our direct suppliers. The contact details of our external lawyer are communicated in the relevant guidelines, such as our Code of Conduct and the Supplier Code of Conduct, as well as in the rules of procedure on our website at: www.duisport.de/compliance .

6. Documentation and reporting

We document and will report in accordance with the LkSG.

7. Updates

This policy statement and the measures will be updated by us annually and as required in accordance with the LkSG.

8. Data

The in connection with the LkSG collected data for preparation this policy statement is carried out in accordance with data protection regulations.

9. Entry into force

If you have any questions about this statement, please contact the LkSG team at lksk@duisport.de . This statement comes into force upon signature by the entire Executive Board.

Duisburg, October 1, 2024

On behalf of the Executive Board

CEO Markus Bangen

CTO Lars Nennhaus