

As at: December 2023

In accordance with § 3 of the Act on Corporate Due Diligence in Supply Chains ("LkSG") of July 16, 2021 (BGBl. 2021 I, 2959 ff)

## Commitment to respecting human rights and the environment

GEODIS CL Germany GmbH is committed to respecting human rights and social and environmental obligations in our supply chains.

A central element is the protection of human rights and environmental obligations. We are guided by internationally applicable guidelines and standards, such as the United Nations Universal Declaration of Human Rights, the United Nations Global Compact and the conventions and recommendations of the International Labor Organization on labor and social standards.

This includes in particular:

- The prohibition of child labour and forced labour  
We are strictly opposed to all forms of child labour.
- The prohibition of all forms of slavery and discrimination  
We reject all forms of forced or compulsory labour and all forms of slavery, including modern forms of slavery and human trafficking.
- The respect of freedom of association  
We recognize and support the right to establish employee representative bodies. The company rejects any form of unjustified unequal treatment or retaliation. The company and managers intend to remain neutral, while the trade unions and the company ensure that employees are free to make a free decision.
- Human rights protection when deploying security personnel.  
We use security personnel to protect our operations in some cases; they are bound by our Code of Conduct.
- Mutual respect, regardless of age, disability, religion, social origin, ethnic or cultural diversity, gender or sexual orientation and identity  
We reject any form of discrimination; we promote cultural diversity in our company and respect the diversity of all stakeholders by applying the GEODIS Code of ethics.
- Compliance with occupational health and safety  
We are actively committed to occupational safety; we are committed to continuous improvement by applying the GEODIS GROUP Health Safety policy.
- Payment of fair wages  
We observe applicable standards in connection with the Minimum Wage Act and the principle of equal pay for work of equal value regardless of gender. Equal opportunities are an integral part of our corporate policy.
- Working hours  
We ensure that, within the framework of applicable law, breaks, regular paid leave and the legally prescribed limits on working hours are guaranteed and observed.

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- Prohibition of environmental pollution.  
We are committed to protecting the environment. Our Group guidelines for environmental and energy management are applied to all our activities.
  - Highest possible waste recycling rate (in the warehouse area)
  - Lowest possible energy consumption (in the warehouse area)
  - Lowest possible greenhouse gas emissions (determined on the basis of scientific guidelines)
  - Highest possible employee satisfaction rate in the area of environmental protection at GEODIS
  - Highest possible satisfaction rate of our customers with the environment and CO2 reduction at GEODIS
  - Full compliance with legal requirements (100% compliance)

In addition, the declaration of principles reaffirms our support for the United Nations' 2030 Agenda for Sustainable Development and our commitment to the Sustainable Development Goals (SDGs).

A detailed description of our commitment to the UN 17 Sustainable Development Goals can be found in our yearly CSR Report.



Bildquelle: <https://www.dahw.de/unsere-arbeit/un-nachhaltigkeitsziele.html>

These efforts represent our contribution to preserving a world worth living in for future generations.

We expect our business partners and suppliers to comply with ethical and legal standards and demand respect for people and the environment.

## 1. Compliance with § 2 LkSG - Supply Chain Duty of Care Act based on firm principles

We base our actions on the following international standards and frameworks, among others:

- The Organization for Economic Co-operation and Development (OECD) guidelines for multinational enterprises
- The principles and rights set out in the eight fundamental conventions of the International Labour Organization (ILO)
- The principles and rights set out in the International Bill of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Global Compact (GEODIS has been a signatory since 2003)

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As part of our compliance with LKSG, we will be guided by the standards set out in the LkSG, which serve as sources for this.

To ensure compliance, we have established an appropriate risk management system and conduct regular analyses to identify and minimize potential environmental or human rights risks and to prevent or remedy any violations of human rights or environmental obligations.

If local law and international human rights are not harmonised, we are guided by the higher standard. If these conflict, national law applies. In addition, efforts are made to respect and implement international human rights as far as possible.

## 2. The Supply Chain Due Diligence Act

In order to meet the requirements, GEODIS CL Germany GmbH has implemented processes along the supply chains as part of its business activities to ensure compliance and guarantee that potential human rights and environmental risks are identified, eliminated or at least minimized at an early stage.



Continuous development of processes to ensure that requirements are met is firmly integrated into our daily efforts and the following processes/mechanisms ensure this.

### 2.1 Risk management and risk analyses

We systematically identify and manage the impact of our business activities on human rights, personal rights and environmental risks.

All relevant functions and operational areas are involved in carrying out the risk analysis.

This involves examining where there are risks of human rights violations and environmental hazards in our own business areas, through our business activities or in our supply chains. In our analysis of human rights risks, we take into account the interests of our employees and all groups involved (stakeholders) who could be directly affected by our business activities in a protected legal position. Our aim is to engage in a dialogue with potentially affected rights holders or their representatives in particular and to take their interests into account as far as possible. The basis of the risk analysis for our direct suppliers are in particular:

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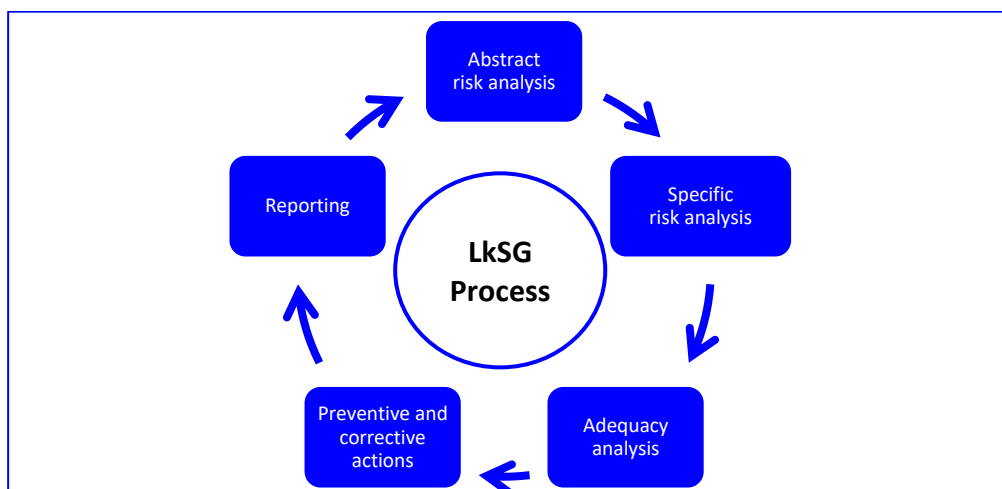
- the origin of the supplier and the locations of its production facilities
- the products and services
- the purchasing volume
- external and officially recommended sources of risk
  - Democracy Quality Index
  - Human Rights Index
  - Corruption Perception Index
  - Occupational Safety Index
  - CO<sup>2</sup> Index
  - Environmental Index
  - Product Group Index (risks in transportation, storage, handling)
  - Reputation Perception
- specific self-disclosures by individual suppliers
- the calculation of risk values based on the available data in accordance with § 2 LkSG.

GEODIS CL Germany GmbH evaluates, weights, and prioritizes the risks analyzed in this way individually and to an appropriate extent according to the type of business relationship, the influence of our business activities, the severity and reversibility of the potential breach and our own contribution to causing it.

Based on the identified risk values, appropriate measures and corrections are taken where necessary. The measures follow the principle of prevention, detection, minimization, termination, and avoidance of risks.

Any violations of human rights that are identified are consistently pursued investigated. The existing processes for complying with human rights and identifying potential risks are regularly but at least once a year reviewed and further developed (Continual Improvement Process).

Risk management is monitored by the persons appointed in accordance with § 4 (3) LkSG.



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## 2.2 Preventive measures

We have implemented and applied appropriate preventive measures and control functions for compliance in our own business areas. The strategies developed and implemented for procurement and purchasing practices are intended to prevent or minimize the identified risks.

Similarly, risk-based controls of processes, which take place once a year and on an ad hoc basis, are intended to ensure compliance with the human rights strategy contained in the Declaration of Principles in our own business area, taking into account all internal and external interfaces and direct suppliers.

If necessary, the measures are updated immediately and aligned with the new requirements.

## 2.3 Remedial Measures

If GEODIS CL Germany GmbH discovers a breach that has occurred or is about to occur that directly or indirectly violates the Declaration of Principles issued by us, these will be investigated in an appropriate procedure and remedial measures will be taken and initiated.

The type of action to be taken depends on various factors, such as the type and severity of the impending or actual breach of duty.

This approach also applies to indirect suppliers if there is substantiated knowledge of human rights or environmental violations that have occurred or may be imminent. We expect our suppliers to cooperate fully in clarifying, minimizing, and ending potential human rights and environmental violations.

Identified and established violations must be appropriately minimized, reduced, or eliminated within an agreed period of time.

## 2.4 Effectiveness checks

The effectiveness of the measures taken by GEODIS CL Germany GmbH to prevent human rights and environmental violations in its own business area or at direct suppliers are reviewed at least once a year and on an ad hoc basis.

We gain additional and expanded knowledge of human rights and environmental issues from the roundtable discussions implemented at GEODIS CL Germany GmbH with our employees and employees deployed under temporary employment contracts.

Our direct suppliers are adequately and appropriately reviewed, and the implementation of human rights and environmental due diligence obligations is monitored in the form of supplier assessments. If indirect suppliers of direct suppliers play an important role in the provision of services, they are included in the supplier assessment processes.

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## 2.5 Whistleblower system

An effective and appropriate reporting procedure is an important part of our duty of care. Compliance with legal, social and internal company regulations is a top priority for the company.

All stakeholders involved are encouraged to raise concerns about suspected violations of our policy statement and the guidelines to which GEODIS CL Germany GmbH is committed and to use our country whistleblower system, which is accessible by anyone inside or outside our company.

Please not however, that the intentional reporting of misinformation is prohibited by law in many countries.

## 2.6 Internal company responsibilities and management

We have defined clear responsibilities within the company in order to fulfill and comply with our obligations with regard to human rights and environmental protection.

The Human Rights Officer appointed by GEODIS CL Germany GmbH is responsible for company-wide monitoring and compliance with the due diligence obligations set out above and reports to the Managing Director on an ad hoc basis, but at least once a year.

Information on possible violations  
of the LkSG by post

GEODIS CL Germany GmbH  
LkSG Office  
Colmarer Straße 11  
60528 Frankfurt am Main

Information on possible violations of the LkSG by e-Mail

[lksg-office.europe.frankfurt@geodis.com](mailto:lksg-office.europe.frankfurt@geodis.com)

## 2.7 Documentation and reporting

The required documentation and reporting are carried out in an appropriate and transparent manner. The fulfillment of our duty of care in accordance with § 3 LkSG is documented internally on an ongoing basis and retained for at least 7 years.

The main content of the documentation is in accordance with Section 10 of the LkSG,

- Supplier Code of Conduct
- Declaration of principles
- Annual report to BAFA

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They are published on our homepage. While safeguarding trade and business secrets, the report shall at least comprehensibly present:

1. Description of the measures taken to fulfill the due diligence obligation.
2. Whether and, if so, which human rights and environmental risks or violations of a human rights-related or environmental duty GEODIS CL Germany GmbH has identified. If no risks or violations of human rights-related or environmental obligations were identified, this is plausibly reflected and explained in the report.
3. How GEODIS CL Germany GmbH evaluates the effectiveness and impact of the measures and which follow-up measures and conclusions are taken for further and future measures.

## 2.8 Communication

Our suppliers are informed about our standards and undertake to comply with the requirements set out in the GEODIS CL Germany Declaration of Principles and its recognized human rights frameworks and standards for the protection of human rights and environmental obligations.

We will communicate this declaration of principles as a guiding principle for respecting human rights and environmental obligations to our employees and those employed and deployed through temporary employment contracts and actively and sustainably raise awareness of compliance with them.

In addition, as part of our onboarding process, all new employees throughout Germany at GEODIS CL Germany GmbH undergo an induction program.

## 2.9 Concluding remarks

GEODIS CL Germany GmbH is aware of its responsibility towards all employees and the supply chain with regard to compliance with human rights and environmental due diligence obligations.

