

# Schenker AG Policy Statement on Human Rights and Environmental Due Diligence

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Lieferkettensorgfaltspflichtengesetz (LkSG) Grundsatzerklärung

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Schenker Aktiengesellschaft (SAG)

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# 1 Foreword

For us at Schenker AG and our global affiliates (“Schenker”), sustainability is a central principle of our entrepreneurial actions and is firmly anchored as part of our core values through our commitment to play fair with people and planet. At Schenker, we aim to be a socially responsible corporate citizen. We have a holistic approach for environmental, social and governance factors (“ESG”) enabled by 3 strategic dimensions under our commitment to lower-emission logistics, a thriving workplace, and trusted supply chains.

With around 72,000 employees and 1,850 locations worldwide, millions of loads transported a year in local and long-distance transport, and a large number of business partners in freight transport, we have an important responsibility to walk the talk when it comes to sustainability. It is clear to us that sustainable and responsible corporate governance can only be based on respect for people and the environment.

With the adoption of the Act on Corporate Due Diligence Obligations in Supply Chains / Lieferkettensorgfaltspflichtengesetz (“LkSG”)<sup>1</sup>, the German legislature has created a framework to realize our values and commitments to promoting human rights, environmental protection and sustainability in global supply chains. Companies above a certain size, including Schenker AG, are legally obliged to implement appropriate human rights and environmental due diligence in and management of their own business operations and supply chains. The aim is to improve the protection of human rights and the environment along supply chains, strengthen social and corporate responsibility and create enforcement potential in supply chains.

We know that corporate responsibility goes beyond economic key figures. Schenker AG and its global subsidiaries are committed to foundational international human rights standards, such as the Universal Declaration of Human Rights (“UDHR”) of the United Nations. For us, this means taking a stand and safeguarding human rights as well as maintaining high environmental and social standards. This is also in line with the commitment of the Schenker AG Board of Management (“BoM”) to play fair with people and planet.

Sustainability, respect for human rights, integrity, and mutual respect are also core pillars of our parent company, DSV A/S, and its global subsidiaries (“DSV Group”). DSV Group is similarly committed to consistently identifying and mitigating risks within their own operations and along the supply chain, and where necessary, implementing remedial measures. In doing so, they work closely with their business partners, foster long-term relationships, and expect all parties involved to adhere not only to ethical conduct but also to a shared commitment to human rights and environmental standards.

As an internationally operating logistics company, we are also aware of our great responsibility within our supply chains. It is therefore important to us to ensure responsible and sustainable value creation along our supply chain - in Germany, but also in all other countries in which we operate. We also expect our customers, our suppliers and our other business partners to treat people and the planet with respect as the basis for a reliable partnership. For us, economic success and socially responsible action are not contradictory,

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<sup>1</sup> Supply Chain Act of July 16, 2021 (BGBl. I 2959).

but rather mutually dependent. This is important to us in our cooperation with our business partners. We pursue an increase in transparency and strive to maintain high governance standards and practices beyond compliance with our partners.

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Schenker AG

## 2 Introduction

As world's leading logistics service provider SCHENKER is active in over 90 countries worldwide and employs around 72,000 people. The focus of our business activities is on logistics internationally, operating in land, air, and ocean transportation services, with the majority of our business located in the European market. Our fundamental concern is to unleash logistics for a future in motion through being fair with people and planet, together with partners. To achieve this, we focus on lower-emissions logistics, a thriving workplace, and a trusted supply chain.

As a globally active company, we are aware of our great social and environmental responsibility. Our goal is to ensure responsible and sustainable value creation not only for Schenker internally but also along our supply chain.

In this policy statement, we express our commitment to respect human rights and environment-related obligations:

- We are committed to **sustainable and responsible corporate governance**;
- We describe the **procedures** we use to implement our due diligence obligations in accordance with the LkSG<sup>2</sup>;
- We address the **human rights and environmental issues** that are particularly relevant in the context of our business activities and that we have identified as priorities on the basis of our risk analysis
- We define the **expectations** we have of ourselves and of our suppliers and business partners in order to ensure compliance with human rights and environmental obligations.

In addition to Schenker AG, other DSV Group companies are obliged under the LkSG due to their size, including DSV Holding Germany GmbH. The policy statements for all obligated DSV Group companies, including Schenker AG, are published on their respective websites.

## 3 Our commitment to sustainable and responsible corporate governance

We have made sustainability a central part of our business operations and our sustainability ambition, and an integral part of our company strategy. This is a defined key success factor to future-proofing our company. Therefore, we are fully committed to making a positive impact through our operations and services. Fairness and transparency are our key values, hence we are committed to upholding and promoting universal human rights, respecting labour standards, and protecting the environment in our business activities. Furthermore,

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<sup>2</sup> Description of the procedure by which we fulfill our obligations under § 4 (1), § 5 (1), § 6 (3) to (5), and §§ 7 to 10 LkSG.

we strive to make a positive contribution to the protection and promotion of human and environmental rights through our actions.

We comply with the applicable law in the conduct of our business activities. This is the foundation to also ensure compliance with the LkSG. Our business activities are based in particular on the following internationally recognised human and environmental rights standards:

- the **International Bill of Human Rights**, consisting of the United Nations Universal Declaration of Human Rights (“UDHR”), the Civil Covenant (International Covenant on Civil and Political Rights, “ICCPR”) and the Social Covenant (International Covenant on Economic, Social and Cultural Rights, “ICESCR”);
- the **UN Guiding Principles on Business and Human Rights** (“UNGP”);
- the **core labour standards of the International Labour Organization** (“ILO”) with its five fundamental principles on freedom of association and the right to collective bargaining, elimination of forced labour, abolition of child labour, prohibition of discrimination in respect of employment and occupation, and occupational health and safety;
- the ten principles of the **UN Global Compact** (“UNGC”);
- the **UN Sustainable Development Goals** (“SDGs”), and
- the **Guidelines for Multinational Enterprises** of the Organisation for Economic Co-operation and Development (“OECD”).

We are taking ambitious actions for a more sustainable future and are committed to growing our business in a sustainable and collaborative manner for our people and planet, together with our partners. Our sustainability strategic framework takes a holistic approach to ESG, with a commitment to lower-emissions logistics, a thriving workplace, and a trusted supply chain. It is founded on the United Nations Sustainable Development Goals (“UN SDGs”), being closely aligned with nine of the SDGs where we want to drive positive impacts within our industry.

Our dedication to taking the necessary steps to reduce the environmental impacts of our products and operations is underscored by our commitment to Driving Climate Action (SDG 13), Managing Resources Effectively (SDG 12), and Pioneering Urban Logistics (SDG 11).

To create a culture of empowerment to unleash our people’s full potential, we are committed to Providing Fair Work Opportunities (SDG 8), Protecting Our Employee well-being (SDG 3), and Driving Gender Equality at Work (SDG 5).

We believe that strong partnerships with our suppliers, customers, and other business partners are the prerequisite for trusted supply chains. To achieve this, we are Partnering for the Goals (SDG 17), Developing Sustainable Solutions (SDG 9), and Fostering Collaborative Learning (SDG 4).

## 4 Our measures to implement our due diligence obligations

In order to fulfil our human rights and environmental due diligence obligations, we align our business activities with the requirements of the LkSG. Here we have established an appropriate and effective risk management system in order to implement targeted measures to fulfil our due diligence obligations. We view the management of human rights and environmental risks as an ongoing commitment, continuously integrated into our operational structures and enhanced through ongoing investments.

### 4.1 Risk Analysis

At the heart of our risk management system is a comprehensive and systematic risk analysis in which we identify and assess the potential and actual risks of our business activities on people and the environment. The aim is to prevent, minimize or end these risks.

As part of our annual risk analysis, we consider the following risk areas, both for our own business area and for our direct suppliers:

- Prohibition of **child labour**;
- Prohibition of **forced labour** and all forms of **slavery**;
- Disregard of **occupational health** and **safety** and work-related health hazards;
- **Freedom of association** and right to collective bargaining;
- Violation of the prohibition of **unequal treatment in employment**;
- Withholding a **fair wage**;
- Destruction of the natural basis of life through **environmental pollution**;
- Illegal violation of **land rights**;
- Commissioning or use of private/public **security forces** without appropriate instruction and control;
- Prohibited production, use and/or disposal of **mercury** (Minamata Convention);
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (**POPs**) and non-environmentally sound handling of waste containing POPs, and
- Prohibited import/export of **hazardous waste** as defined by the Basel Convention.

Our annual risk analysis is structured in two stages and begins with an **abstract risk analysis** with regard to the aforementioned risk areas. We use the risk data of an external, specialized provider to continuously identify country- and industry-specific risks in our own business area and at our direct suppliers. Country and industry risks are assessed using a large number of indicators (based on the risk database of the Federal Office of Economics and Export Control / Bundesamt für Wirtschaft und Ausfuhrkontrolle, “BAFA”) which includes publicly available reports and media sources. The results of the abstract risk values are then validated enabling us to make an initial assessment of the existing risk profiles in our own business areas and at our direct suppliers.

Particularly, when our abstract risk analysis reveals increased risks, we then subject companies within our own business area and our direct suppliers to a more detailed analysis. The aim of this so-called **concrete risk analysis** is to identify the actual risk dispositions for



violations of human rights and environmental obligations, especially the human rights and environmental risks which should be prioritized for action.

For our affiliates, in 2025 we validated the results of the abstract risk analysis against all relevant complaints received via the complaint mechanism for the entirety of 2025.

In 2025, we validated the results of the abstract risk analysis for our supply chain by applying risk-based supply chain risk mapping to our major products: Land Transport, Airfreight, Oceanfreight, and Contracts Logistics.

Once the concrete risk analysis has been completed, the risk findings on the probability of occurrence of a breach are prioritised based on the appropriateness criteria of the severity of the risks, the existing capacity to influence and the contribution to causation. On this basis, we initiate risk-based preventive measures.

If there are concrete indications of potential risks or violations of human rights or environmental obligations within our own business areas or our supply chain due to special events or current reports, for example, we also conduct **ad hoc risk analyses**. An event-driven risk analysis is also indicated if we have to expect a significantly changed or significantly expanded risk situation in the supply chain, for instance due to the introduction of new products or entry into new markets.

The LkSG Officer ensures that the results of the risk analysis are communicated internally to the relevant decision-makers. We use the knowledge gained from regular and event-related risk analyses to support strategic decisions such as market entries and exits, participation in certain projects or the implementation of suitable preventive and remedial measures. We strive to continuously improve our risk analysis approach by incorporating the insights we gain from fulfilling our due diligence obligations and through our complaints procedure.

## 4.2 Preventive and remedial measures

If we identify relevant risks, we immediately take appropriate preventive measures. We follow a risk-based approach and initially focus on the areas in which we have identified the highest human rights and environmental risks. The aim of preventive measures is to prevent any violation of a human rights or environmental obligation by minimising the risks caused or contributed to by our business activities.

If we identify a violation or imminent violation of a human rights or environmental obligation, we take appropriate remedial action without delay. These are aimed at preventing or ending violations or minimising the extent of the violation. If violations occur within our domestic business areas, we immediately implement remedial measures to ensure the violation is fully resolved.

The following preventive and remedial measures taken and planned by us deserve particular mention:

- Publication of this policy statement and anchoring it within Schenker;
- Definition of clear responsibilities, in particular the appointment of an LkSG Officer to monitor our risk management;

- Implementation of our codes of conduct (employee CoC and supplier CoC), in particular considering the requirements of the LkSG;
- Raising awareness among purchasing units of the need for risk-based consideration of human rights and environmental requirements in our procurement strategies and purchasing practices;
- Consideration of human rights and environmental requirements when selecting new suppliers (e.g. through recognized sustainability assessments) and the contractual assurance of human rights and environmental requirements;
- Implementation of risk-based control measures in the form of awareness-raising discussions with business partners and business units;
- Risk-based development of specific action plans with suppliers and business units when risks or breaches are identified;
- Further development of a comprehensive catalogue of measures for preventive and remedial measures to support the selection and implementation of typical measures per risk area;
- Risk-based training and sensitization of employees and business partners through regular information on LkSG-relevant topics and continuous (further) development of information concepts;
- Exchange and engagement with expert groups and in industry initiatives (e.g. DSLV)
- Designing and carrying out effectiveness tests of preventive and remedial measures.

We strive to adequately involve those potentially affected by our business activities and their diverse interests in the development and implementation of due diligence measures in order to ensure their effectiveness.

In the concrete implementation of preventive and remedial measures, we value a cooperative approach with our business partners. However, we reserve the right to impose appropriate sanctions against the respective business partner or -as a last resort- to terminate a contract or an entire business relationship, particularly in the event of serious violations.

### **4.3 Complaints procedure**

Another key component of our due diligence obligations is the provision of an appropriate and effective complaints procedure. This can be used to submit reports on human rights and environmental risks and breaches of duty regardless of where they have occurred in the supply chain or in our own business area.

With its acquisition by DSV A/S, Schenker is now part of the whistleblower programme – known as the IntegrityLine – which DSV Group has implemented across all DSV entities. Through this programme, individuals can report situations involving potentially unlawful or unethical behaviour, including serious criminal offences, either anonymously or by providing their name, regardless of national borders. The grievance procedure enables individuals to raise concerns about human rights and environmental risks, as well as violations of human rights or environmental obligations. The foundation of this procedure is the [DSV Whistleblower Policy](#), which is publicly available on in English and in several other languages via the IntegrityLine platform.

The individuals entrusted by our company with managing the grievance mechanism act impartially, are independent, and are not subject to instructions during investigations or the review of complaints. These individuals are qualified, bound to confidentiality, and are organisationally and technically separated from other departments to ensure the independence and confidentiality of the complaints process. The confidentiality of whistleblowers' identities is safeguarded through the design of our internal procedures, and effective protection is in place to prevent any disadvantage or punishment resulting from the submission of a complaint.

#### **4.4 Documentation**

Our procedures for fulfilling the statutory due diligence obligations are documented on an ongoing basis. We keep the documentation for at least seven years from the time it is created.

#### **4.5 Responsibilities and effectiveness control**

Safeguarding human rights and environmental rights in their own business area and along the global supply and value chains is of paramount importance to both DSV Holding Germany GmbH's Board of Management ("DSV BoM") and the SCHENKER AG BoM ("BoM"). For this reason, responsibility for the effective implementation of the LkSG at DSV Group and Schenker lies at the highest management level with the DSV BoM and the Schenker AG BoM, respectively. For their parts, both management boards have defined clear responsibilities to ensure the effective implementation and monitoring of risk management.

The BoM appoints an LkSG Officer to monitor the implementation of its statutory due diligence requirements. The LkSG Officer is involved in the implementation and updating of the risk management system and carries out risk-based control measures to check compliance with human rights and environmental obligations.

The BoM is informed regularly, at least once a year, and on an ad hoc basis, about the LkSG Officer's work. In particular, the LkSG Officer provides information on the key results of the risk analysis, on preventive and remedial measures taken, and on the complaints procedure. He also reports on whether the procedures anchored in the operating process and the measures taken to implement the due diligence obligations are appropriate and effective. This ensures that the BoM always has all the relevant information it needs to fulfil its responsibilities and make informed decisions.

The implementation of due diligence obligations is coordinated in Schenker by the Global Sustainability department. A so-called LkSG Coordinator has been appointed within the Global Sustainability department at Schenker AG to manage the implementation of human rights and environmental due diligence obligations.

Within DSV Holding Germany GmbH, the implementation of the due diligence obligations is coordinated and managed by the Quality, Health, Safety and Environment (QHSE) and Compliance team, with which Schenker aligns in the fulfilment of its LkSG obligations. From 2026, the central functions at DSV Holding Germany GmbH will assume responsibility for the monitoring and implementation of the LkSG at Schenker .

The practical fulfilment of Schenker due diligence obligations is managed by the operationally and functionally responsible departments including People & Organization,

Compliance, Real Estate, Land Transport, Air Freight, Ocean Freight, Contract Logistics, Network Partner Development, and Global Procurement. These departments receive advisory support from other specialist departments, including Contract Risk Management & Legal, and administrative support through its shared service centres. All of these departments contribute to the effective implementation of the due diligence obligations in their daily work.

## **5 Our priority human rights and environmental issues**

We recognize that our business activities in our own business areas and along our global supply and value chains can potentially cause impacts on human rights and the environment. Our risk analysis conducted throughout Schenker in 2025 initially revealed abstract risks in all risk fields covered by the LkSG. Following the subsequent concrete risk analysis, we were able to determine that the probability of these risks actually occurring is predominantly low with regard to most protected legal positions in our business areas due to numerous effective preventive measures already in place. On the supply chain side, we were able to identify specific protected legal positions as being higher risk than others.

In order to (further) reduce our overall risks and act preventively, we are implementing measures relating to all LkSG risk areas. Our focus is in particular on the risks prioritized on the basis of our own risk analysis.

### **5.1 Own business areas**

For our own business areas, our risk analysis has revealed primarily low risks with regard to most protected legal positions. We prioritize the following risk fields for systemic action:

- Prohibition of unequal treatment in employment (Sec. 2 (2) No. 7 LkSG)
- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)

The decision to prioritize these risks for systemic action is based on the fact that we have received a relevant number of reports on this issue via our complaints procedure and take these into account in our annual risk analysis. This prompts us to focus in particular on this area despite existing preventive measures such as our internal Code of Conduct (pre-sale Group Principles on Ethics, post-sale DSV employee Code of Conduct), our Social Minimum Standards, our Child Charter, our active diversity management (Ignite Women's Network, DBS Pride, Leaders in Conversation, annual Diversity Week, Inclusive Leadership in Leadership Academy, Female Empowerment Measures, and learning courses) our Global Health and Safety Management System (GE07), and various global ISO 45001 certifications.

Additionally, we did identify 4 complaints received via the complaints procedure which did not deal with the above-mentioned risk areas; however, these were concentrated in only very few entities and are indicative of isolated incidents rather than systematic risks. These cases are subject to individual investigation and resolution.

## 5.2 Immediate suppliers

In our direct supply chain, after conducting the annual risk analysis we identified a higher risk in 5 risk areas.

Based on severity and prevalence we have prioritized the below 3 risks:

- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)
- Prohibition on the use of forced labour and modern slavery (Sec. 2 (2) Nos. 3-4 LkSG)
- Prohibition on disregarding the freedom of association (Sec. 2 (2) No. 6 LkSG)

In addition to prioritising specific risks, due to event-related risk analyses in 2023 and 2024 we have also decided to prioritize trucking as a supply chain.

For all of the aforementioned topics and for the trucking supply chain, the DSV Supplier Code of Conduct already contains requirements that are verified through risk-based queries.

With regard to the identified priority risks, we have identified further proposed measures to address these risks within the context of each of our major product groups (Land Transport, Airfreight, Oceanfreight, and Contracts Logistics) to be finalized and implemented beginning in 2026.

## 5.3 Indirect suppliers

Our LkSG-relevant risks in the indirect supplier area are based on findings from incident-related risk analyses and risk-based supply chain mapping.

As our risk-based supply chain mapping is valid not only to our immediate suppliers but also to our indirect suppliers, the 3 risk areas prioritized for our immediate suppliers are also applicable to our indirect suppliers including:

- Disregard for occupational health and safety and work-related health hazards (Sec. 2 (2) No. 5 LkSG)
- Prohibition on the use of forced labour and modern slavery (Sec. 2 (2) Nos. 3-4 LkSG)
- Prohibition on disregarding the freedom of association (Sec. 2 (2) No. 6 LkSG)

For all of the aforementioned topics, the DSV Supplier Code of Conduct already contains requirements that our suppliers must in turn pass on to their supply chain. These requirements are verified through risk-based queries.

Through supply chain mapping we have also identified and implemented measures in our own activities and with our Tier 1 suppliers to mitigate these risks further back in the supply chain such as providing resources directly to drivers through our driver lounges.

Further proposed measures to address these risks within the context of each of our major product groups (Land Transport, Airfreight, Oceanfreight, and Contracts Logistics) have been identified, to be finalized and implemented beginning in 2026.

We will publish any changes to priority risks resulting from future or incident-related risk analyses in the next update of the policy statement.

## 6 Our expectations of our employees and business partners

When it comes to complying with our human rights and environmental due diligence obligations, we have high expectations of ourselves and our business partners. In awareness of the priority risks identified in section 5 and in affirmation of the commitment to sustainable and responsible corporate governance set out in section 3 we have the following expectations:

We aspire to conduct our business activities in an ethical manner and in compliance with legal standards and the guidelines set out in this policy statement. This aspiration is inextricably linked to the way in which we conduct ourselves in our work. In our business activities, we comply with applicable law and respect internationally recognized human rights and environmental standards.

Our commitment to respecting human rights and the environment is already reflected in our internal Code of Conduct (pre-sale: [Corporate Principles Ethics Code of Conduct](#); post-sale: [DSV Code of Conduct](#)) and Social Minimum Standards ([Standard Operating Policy GE25](#)), in which we set out binding standards and expectations for our daily conduct. All board members, managing directors, executives and employees are committed to the principles set out in these documents.

In implementing our legal obligations under the LkSG, we expect our employees to contribute to the best possible fulfilment of our human rights and environmental due diligence obligations through their daily decisions.

As an international company, we are aware that we have a responsibility that goes beyond our own actions. We therefore not only set high standards for ourselves, but also demand social and environmental standards from our business partners. We expect them to also conduct their business with integrity, implement appropriate processes to respect human rights and environmental rights, and take suitable measures to address our expectations along their supply chain.

We set out our concrete requirements and principles for cooperation with our business partners in our [DSV Supplier Code of Conduct](#). Suppliers and business partners undertake to comply with our Code of Conduct or equivalent requirements.

We work closely with our suppliers and business partners to ensure their adherence to the same high standards as we do and communicate these standards along their supply chain. We encourage transparency and the sharing of information to ensure that they understand and meet our expectations. We expect them to act honestly, responsibly, transparently and fairly. Part of our expectation is that our suppliers and business partners provide information on request about how our principles are adhered to. Should our own behaviour lead to a situation that makes it difficult for suppliers to comply with our principles, we encourage our business partners to proactively inform us and strive to find suitable solutions together.

## 7 Continuous further development of our due diligence processes

We are aware that the implementation of human rights and environmental due diligence is an ongoing process. We therefore review this policy statement annually as well as on an ad hoc basis and will update it without delay if, for example, we identify changed or expanded risks. Previous versions of this policy statement will remain available for at least 7 years following their publication.

More information is available on our website at: [dbschenker.com/global/compliance/german-supply-chain-due-diligence-act](https://dbschenker.com/global/compliance/german-supply-chain-due-diligence-act) and at our parent company's website <https://www.dsv.com/de-de/>.

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