



DECLARATION OF PRINCIPLES ON RESPECT FOR HUMAN RIGHTS



Content

I. Preamble	3
II. Scope	4
III. Human Rights and Environmental Expectations of Employees and Third Parties	4
IV. Our commitment to human rights due diligence	4
V. Risk management	5
(1) Responsibilities	5
(2) Procedures to identify and prevent human rights and environmental impacts	5
1. Preventive measures	5
2. Complaints mechanisms	5
(3) Reporting	6
VI. Data protection and data transmission	6
VII. Contact person	6

I. Preamble

We, the RETHMANN Group, are a family-owned company with a long tradition and international operations, that boasts a company history stretching back almost 90 years.

As the holding company of the RETHMANN Group with its independently operating divisions REMONDIS, SARIA and Rhenus as well as the 34% shareholding in Transdev Group SA, RETHMANN SE & Co. KG (RETHMANN) itself is not operationally active.

All operational business is handled autonomously in the divisions. The RETHMANN Group is characterised by the fact that it negates synergies between the four divisions and dispenses of coordinating matrix functions. RETHMANN SE & Co. KG, as a holding company, has no influence on the definition of the various business development strategies. It does not employ its own staff.

The Executive Boards of the divisions are responsible for ensuring that all laws and regulations are respected and implemented in their organisations. RETHMANN SE & Co. KG, as the shareholder of the four divisions, exerts influence by appointing the Supervisory Boards, which in turn appoint the Executive Boards. The Supervisory Board is informed by the Executive Board about the development and management of the business through the current reporting system and in the Supervisory Board meetings.

With regard to the aforementioned divisions, the Executive Board of RETHMANN SE & Co. KG works to ensure that these divisions conduct their business in such a way that laws and regulations are respected and implemented. In terms of the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (hereinafter: LkSG), this means that environmental risks are identified and managed, and that the human rights and dignity of all people affected by the business activities of the Group companies, i.e. employees, business partners, contractors and external stakeholders, are respected throughout the entire (global) supply and value chain. This also includes the ongoing implementation and updating of occupational health and safety.

The divisions of the RETHMANN Group strive to meet the obligations through clear assignment of responsibility, thorough due diligence, continuous stakeholder involvement, open and transparent communication, access to grievance mechanisms, critical evaluation and continuous improvement of policies, systems and processes.

Through these efforts, we meet our responsibility to society, the public and the environment. In doing so, it depends on each individual employee to integrate and follow the laws and company-specific principles in their daily actions.

As early as the 1980s, the current Honorary Chairman of the Supervisory Board laid down guidelines for the company. Among other principles, these guidelines described the expectations on the managers to respect employees, to protect the environment and natural resources and to comply with laws and regulations as a matter of general principle and without exception. In the following decades, the guidelines were adapted and further developed for the individual corporate divisions. They are an elementary component of the various corporate regulations.

The requirements of the LkSG must be complied without restriction in the divisions of the RETHMANN Group. To ensure this, the Executive Board of RETHMANN SE & Co. KG adopts the following policy statement:

II. Scope

The companies of the RETHMANN Group respect human rights.

This policy statement of RETHMANN SE & Co. KG applies to the entire RETHMANN Group and is the basis for the policy statements of the respective divisions. This declaration of principles is binding for all companies on which RETHMANN SE & Co. KG directly or indirectly exercises a determining influence.

It is the task and responsibility of the respective management to make this policy statement known to the directly involved companies and their sub-companies and to ensure that the processes and systems required under the LkSG are implemented on the basis of the business model of the various units. In addition, the policy statement also represents the basis for cooperation with third parties. In this way, the expectations relating to human rights and the environment should be known throughout the entire supply chain and taken into account into the entrepreneurial actions and thinking of all those involved.

The Declaration of Principles deals with those risks that are addressed and focused on by the LkSG.

III. Human Rights and Environmental Expectations of Employees and Third Parties

Respect for human rights is an integral part of the corporate guidelines adopted and published by the divisions (Corporate Guidelines, Code of Conduct and Supplier Code of Conduct).

The Code of Conduct and Supplier Code of Conduct represent non-negotiable guidelines for ethical, social, legal and ecological principles and expectations that are binding for both employees and suppliers. Violations of these standards will not be tolerated and may result in consequences. Only if these principles are followed consistently, our commitment to human rights and environmental due diligence can be effective.

IV. Our commitment to human rights due diligence

The companies of the RETHMANN Group strictly observe human rights in accordance with the European Convention on Human Rights (ECHR). We reject any kind of forced labour. We also clearly distance ourselves from child labour. The minimum age of employees is determined by the respective national laws or collective agreements, as long as these do not fall below the minimum age of employment laid down in the International Labour Organisation (IAO / ILO). The freedom of association of employees shall be respected. If there are freely elected employee representatives, we work together with them in a spirit of trust.

Equal opportunities and equal treatment of employees as well as the refraining from any discrimination of employees are required by laws and regulations in many countries of the world. These regulations are respected and observed by us. As a result, we recruit and promote our employees exclusively on the basis of qualifications and professional performance.

As we are represented in many regions and markets of the world, we are subject to different legal systems. We ensure that, as a minimum standard, our employees' workplaces worldwide comply with the labour laws applicable in that country, for example with regard to working hours, wages and benefits. Our business activities have an impact on society. That is why we attach particular importance to environmental awareness and social responsibility.

V. Risk management

(1) Responsibilities

In order to comply with international human rights standards, national laws and RETHMANN Group as well as divisional policies, the RETHMANN divisions conduct appropriate human rights and environmental due diligence to identify, assess and address potential and actual negative human rights and environmental impacts in our business activities and supply chain. The audits, and thus the operational implementation, are not carried out at the holding level (RETHMANN), but at the divisional level.

Each corporate division establishes a regulatory framework that takes effect when it is determined that a risk exists in the respective business activities that could cause or contribute to negative impacts on human rights or environmental concerns. The effectiveness and appropriateness of this risk management is regularly evaluated and adjusted if necessary.

The divisions report on the results of the risk analyses of the business units and a detailed description of the procedures regarding the measures taken, which also includes the implementation of the human rights strategies in the business processes, in accordance with the requirements of the LkSG.

(2) Procedures to identify and prevent human rights and environmental impacts

1. Preventive measures

On the one hand, various internal guidelines have been introduced by the divisions in order to provide employees with a clear set of rules and to clarify the assignment of responsibilities for risk management in accordance with the LkSG within the divisions. On the other hand, there are also preventive measures at the suppliers, such as training and further education offers, the selection of suppliers on the basis of certain criteria as well as contractual assurances and control measures. All measures are continuously adapted and revised in order to counteract the risks and their consequences.

In addition, the employees and especially the managers are regularly trained internally with regard to these corporate guidelines and undertake to comply with them in their daily business dealings.

2. Complaints mechanisms

We encourage our employees to report suspected violations of this Human Rights Policy Statement through existing grievance or dispute resolution procedures. This includes local management, relevant human resources departments or the compliance hotline.

Potential violations of our Statement of Principles will be recorded and addressed within the compliance management systems.

Our partners and third parties have the opportunity to report potential violations of this Human Rights Policy Statement through the relevant websites and hotlines offered by the divisions. This hotline also fulfils the requirements of the Whistleblower Protection Act.

(3) Reporting

In the divisions, there is a regular exchange with the persons responsible for the topics and continuous reporting to the Executive Boards. The Executive Boards in turn report to the Supervisory Boards in the course of regular reporting on the development of business.

The annual report is prepared in the holding company by summarising the information from the divisions and their reports. Reference is made to the questionnaire provided by the Federal Office of Economics and Export Control. The aim is to provide transparent reporting on the implementation and development of strategies and processes relating to the topic of LkSG with a focus on the protection of human rights.

VI. Data protection and data transmission

At this point, we would like to point out that the legal framework conditions and regulations, including those of the LkSG, with regard to data transfer and data protection are observed and complied with.

VII. Contact person

More detailed information on respect for human rights in the corporate divisions is published on the respective company websites.

Selm, December 2022

Klemens Rethmann
(Spokesman of the Executive Board)

Ludger Rethmann
(Board member)



www.rethmann-gruppe.de

RETHMANN SE & Co. KG | Norbert-Rethmann-Platz 1 | 59379 Selm