



UK Modern Slavery Act Statement

1) Introduction

This statement is made by Deutsche Bahn Group (DB Group) pursuant to section 54 of the UK Modern Slavery Act (MSA) 2015 and covers the financial year ending December 31, 2024. It sets out the steps DB Group is taking to reduce the risk of slavery and human trafficking taking place in its business and supply chain.

In parallel, the following parts of DB Group with larger operations in the United Kingdom have issued individual statements, which are linked to their respective homepages.

DB Schenker (only part of the DB Group until April 30, 2025): <https://www.dbschenker.com/uk-en>
DB Cargo: <https://uk.dbcargo.com/rail-uk-en>

2) DB Group – at a glance

DB Group is the leading integrated provider of public mobility in Germany and of logistics solutions and combined transport throughout Europe. Headquartered in Berlin, the DB Group employs around 226,000 people.

We design and operate the transport networks of the future. By integrating transport and the rail infrastructure, as well as through the economically and environmentally intelligent linkage of all modes of transport, we move both people and goods.

In passenger transport, we transport more than 6 million people each day on our trains and buses throughout Europe. In rail freight transport, our network carries about 180 million tons of freight each year. At more than 33,000 km, our rail network in Germany is Europe's longest and we are also one of Germany's largest energy suppliers.

3) General Statement

DB Group places great importance on respecting and promoting human rights and fundamental freedoms. Our overall commitment and dedication to protecting and respecting human rights is expressed in our "[Policy Statement on Protecting and Respecting Human Rights](#)". That includes having a zero-tolerance policy approach to all forms of slavery and human trafficking.

DB Group signed up to the UN Global Compact in 2009 and is a founding member of the rail sustainable procurement initiative Railsponsible, established in 2015 and further developed ever since. Furthermore, at national level, DB Group is involved with econsense, the Forum for Sustainable



Development of German Business and in the sustainability council of the national association for logistics and procurement (BME). Along with this we also have affirmed our commitment to the understanding of sustainability of the Council for Sustainable Development by our declaration of conformity with the German Sustainability Code. The topic of human rights is also an integral part of DB Group's stakeholder dialogs and supplier contracts based on the DB Code of Conduct for Business Partners.

4) Policies on Modern Slavery and Human Trafficking

Our commitment to maintaining the highest ethical standards is reflected by our regulations, in particular the DB Code of Conduct and the DB Code of Conduct for Business Partners. Both the DB Code of Conduct and the DB Code of Conduct for Business Partners are continuously evaluated and developed. In June 2021, the German legislature passed the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), hereafter "Supply Chain Act" or "LkSG", which came into force on January 1, 2023. Since 2023, the Supply Chain Act initially applies to enterprises that have their central administration, principal place of business, administrative headquarters, statutory seat or branch office in Germany with at least 3,000 and, from 2024, additionally to enterprises with at least 1,000 employees in Germany. The Supply Chain Act explicitly regulates prohibitions on child labor and prohibitions on modern forms of slavery in § 2 Para. 2 No. 1-4 and refers to the ILO Conventions. In the light of this, we revised our Code of Conducts and specified our regulations. We adamantly reject any engagement with internationally prohibited child labor and strictly adhere to the guidelines set forth by the International Labour Organization (ILO), including Conventions 138 and 182, as well as Recommendation 190. Any exceptions to these standards are only permissible if they align fully with the provisions outlined by the ILO, prioritizing the well-being of children. In addition, it is emphasized especially in our Code of Conduct for Business Partners that we reject slave labor, forced or indentured labor, debt servitude and bondage, human trafficking or involuntary labor, inhuman or degrading treatment, and physical or psychological threats in the workplace. Reference is made to ILO Conventions 29, 100 and 105 and the ICCPR in both Codes of Conduct.

The DB is granted the right to implement monitoring measures towards suppliers, including the right to audit on site to confirm that suppliers' activities are in compliance with the Code of Conduct for Business Partners. Business partners are expected to co-operate with the DB Group. In the event of non-compliance with our policies or contractual requirements relating to anti-slavery, the DB Group will, depending on the circumstances, either work with the respective supplier to improve their performance or take adequate legal steps. This can also lead to an immediate termination of the contract or business relationship. Both Codes of Conduct are available in numerous languages.

The DB Code of Conduct and the DB Code of Conduct for Business Partners are binding sets of rules which provide guidance and support when dealing with ethical challenges that might arise in the course of day-to-day management. Business partners are expected to train their employees and the persons working for them on a risk based basis in dealing and complying with the principles set out in the Codes of Conduct for Business Partners or equivalent documents. DB Group has a range of instruments to promote the DB Code of Conduct and the DB Code of Conduct for Business Partners, amongst others our e-learning-courses available to all on our website.



5) Steps taken

Within DB Group, the management approach to human rights centers on identifying relevant risks. Risk analyses are performed to identify potentially adverse impacts of DB Group business activities on human rights. The main criteria of these analyses focus on the type of business activity (business model) and the country risk related specifically to human rights. Specific actions are derived from the findings in respect of identified risks.

According to the Supply Chain Act, companies based in Germany are now legally required to establish a comprehensive risk management system to identify, prevent or minimise the risks of human rights violations and damage to the environment. In 2024, we therefore further improved our due diligence processes and enhanced our comprehensive and systematic risk analysis and its methodology to thoroughly identify and assess the potential and actual risks of our business activities on people and the environment. This analysis encompasses both our company's own business area as well as our global supply chains. Moreover, the Supply Chain Act sets out the necessary preventive and remedial measures, makes complaint mechanisms mandatory and requires reports to the German Federal Office for Economic Affairs and Export Control (BAFA). A so-called "Group LkSG officer" has been appointed by the Group Management Board to monitor our risk management.

Based on the results of our risk analyses, we develop and implement risk-based preventive and corrective measures. To this end, we have developed an overarching catalog that lists potential preventive measures, e.g. the creation of guidelines, the implementation of management and monitoring systems and the conduct of audits and training. The catalog includes potential measures in the areas of child labor, forced labor and modern forms of slavery and serves as a starting point for the risk-based development of specific action plans in individual cases, the so-called Corrective Action Plans. This catalog is constantly being expanded and improved. In 2024, appropriate and effective preventive measures to identified human rights risks and violations were taken on the basis of this catalog. In the road transport industry in particular, where we have occasionally identified some of the indicators for forced labor, we increased controls and inspections.

Procurement continues to focus on sustainable criteria. DB Group's purchasing department implements the DB Code of Conduct for Business Partners and the purchasing guidelines for all suppliers. DB thereby aims at observing and continuously improving environmental and social standards in the supply chain together with suppliers, beyond our own added value. We have implemented an e-learning module about DB Group's Code of Conduct for Business Partners. This web-based training provides business partners of DB Group with a concise overview of essential requirements and principles which serve as a basis for cooperation between DB Group and its partners. In the process of implementing the Supply Chain Act, the procurement rules and regulations were supplemented with the obligation for Business Partners to comply with the Supply Chain Act and with the corresponding right of DB Group to conduct audits.

Collaborating closely with our DB Group suppliers, our supply chain analyses are conducted with precision to identify areas within the supply chain where working conditions may be at risk. This collaborative effort enables us to gain a practical understanding of our supply chain structure and to pinpoint existing social risks effectively. One objective is to develop means of influencing identified risk areas and supply chain stages that do not add value. To this end, DB Group audits the compliance of our Code of Conduct at suppliers which operate in high-risk businesses or supply chains. If we identify increased risks, we also arrange supplier meetings with the suppliers in order to raise their awareness and discuss possible improvement measures. To continually enhance our proficiency in implementing



effective risk management practices, we provide targeted training on human rights issues to key employees who influence the supply chain, including product group managers as well as other related functions within the DB Group. In 2024, special training was rolled out for buyers of road transport services to raise awareness of the human rights risks in this sector. As part of the initiative Railsponsible, DB analyzes the most important raw materials in the rail industry to address human rights risks such as child or forced labor.

For its own operations, DB Group has implemented a central whistle-blowing management. Various channels are offered for employees, business partners, customers etc. to submit reports about suspected infringements. The whistle-blowing management system meets the requirements of the Supply Chain Act and can be used in 22 languages. It is open for all tip-offs on human rights violations, whether arisen in the supply chain or committed by employees of DB Group. Reports are treated with strict confidentiality or - on request - anonymously. Whistleblowers can seek legal advice from the whistleblowing management team or from one of our attorneys of trust before submitting a report. For employees and executives specifically, the ombudsperson is available as a contact person on matters of human rights. All complaints and information are handled only by a small group of selected and specially trained employees who are impartial, independent and sworn to secrecy. A follow-up process is in place to examine alleged violations of human rights. DB Group launched a series of short integrity films for our employees and executives. One of these films deals exclusively with the topic of human rights. Employees who are responsible for handling complaints have access to various training courses. These cover the clarification of issues in our own business area and in our supply chain and deepen the understanding of the various human rights risk areas including child labor and modern forms of slavery.

We review the effectiveness of our risk management once a year and on an ad hoc basis as required. Further information about our fulfillment of the Supply Chain Act due diligence obligations are available on the [DB website](#).

6) Endorsement of this statement

The Board of DB Group recognizes the importance of the matters considered in this Statement and the MSA. DB will continue to take all measures necessary to ensure that slavery and human trafficking have no place in DB Group's business operations.

The Board welcomes this opportunity to restate its commitment to ethical and responsible practices in all parts of DB Group.

Dr. Richard Lutz
CEO, DB Group

Martin Seiler
Member of the Board:
Human Resources and Legal Affairs, DB Group
Commissioning Representative of the Member
of the Board:
Finance and Logistics, DB Group

Effective: June 2025