

**Policy statement by DekaBank  
Deutsche Girozentrale on the German  
Supply Chain Act (*Lieferkettensorg-  
faltspflichtengesetz* — LkSG)**

1. October 2023

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## 1. Introduction

This document is a policy statement by DekaBank Deutsche Girozentrale (DekaBank) on the German Supply Chain Act (*Lieferkettensorfaltspflichtengesetz* — LkSG). It applies to DekaBank's own business area and to its suppliers. The company's own business area comprises all DekaBank employees and the employees of its subsidiaries, over which it has a decisive influence.

DekaBank is committed to its responsibility for human rights and the environment in its supply chains. The framework for the protection of human rights is provided by a number of international standards and principles — including in the supply chain.

DekaBank has been committed to many of these internationally recognised principles and frameworks for many years now. This includes compliance with the Equator Principles and the core labour standards of the ILO. As a member of the United Nations Global Compact, DekaBank is part of the world's largest and most important initiative for corporate sustainability and responsibility. By joining, DekaBank has committed itself to upholding the ten principles in relation to respect for human rights and labour standards, protection of the environment and the fight against bribery and corruption.

Furthermore, the newly created Diversity Management position and the Diversity Council, which is staffed by members of the DekaBank Board of Management, have strengthened the existing commitment to promoting and valuing diversity in the Deka Group since October 2021.

Lastly, DekaBank is committed to ensuring ethical conduct. Values such as integrity and respect are important to DekaBank, which is why the company has established its own [Code of Ethics](#). Regular standardised checks are carried out to ensure that all employees are acting in compliance with the requirements of the Code. Violations of the Code of Ethics may lead to disciplinary measures, civil or criminal proceedings, and even termination of employment.

Accordingly, DekaBank acts in conformity with the LkSG and the agreements set out in its annex. The company expects employees in its own business area and its suppliers to comply with the protection of human rights and the environment required by and described in detail in the LkSG. DekaBank also expects its suppliers to adequately address this expectation along the supply chain.

## 2. Fulfilment of due diligence obligations

The DekaBank human rights strategy aims to identify and minimise risks to human rights and the environment in all key business processes, and to prevent, put an end to or minimise the extent of violations of human rights or environmental obligations. To achieve this goal, DekaBank has implemented appropriate initiatives in its own business area and in its procurement processes. DekaBank has appointed a human rights officer, who is responsible for monitoring risk management.

### 2.1. Conducting risk analyses

DekaBank conducts risk analyses in its own business area and with its suppliers once a year and on an event-by-event basis.

In the context of an abstract risk analysis, potential risks to human rights and the environment are first identified on the basis of defined risk factors. If a relevant risk has been identified, a specific risk analysis will be carried out as the next step.

### 2.2. Prevention measures in the company's own business area

If DekaBank identifies a relevant risk in its own business area based on the risk analysis, it will take appropriate preventive measures, such as:

- Implementing the human rights strategy set out in this policy statement;
- Developing and implementing appropriate procurement strategies and purchasing practices that avoid or mitigate identified risks;
- Providing training in the relevant areas;
- Implementing risk-based controls to verify compliance with the human rights strategy contained in this policy statement in the company's own business area.

## **2.3. Preventive measures for suppliers**

### **2.3.1. Due diligence obligations for direct suppliers**

If DekaBank determines a relevant risk from a direct supplier based on the risk analysis, it will take appropriate preventive measures, such as:

- Taking into account DekaBank's expectations regarding human rights and the environment when selecting a direct supplier;
- Obtaining contractual assurance from a direct supplier that they will comply with DekaBank's human rights and environmental requirements and address these appropriately along the supply chain;
- Agreeing appropriate contractual control mechanisms and providing training and ongoing training to enforce the contractual assurances of the direct supplier;
- Implementing event-specific controls based on agreed control mechanisms to verify the direct supplier's compliance with the human rights strategy.

### **2.3.2. Due diligence obligations for indirect suppliers**

If DekaBank obtains substantiated knowledge of a potential violation of a human rights or environmental obligation by indirect suppliers, it will take the following action immediately on an event-by-event basis:

- Conducting a risk analysis;
- Agreeing appropriate prevention measures against the infringing party;
- Creating and implementing concepts to prevent, put an end to or minimise the violation of a human rights or environmental obligation; and
- Updating this policy statement as necessary.

## **2.4. Corrective action**

If DekaBank establishes that a violation of a human rights or environmental obligation has already occurred or is imminent in its own business area or by a direct supplier, it will immediately take reasonable corrective action to prevent, put a stop to or minimise the extent of this violation. With regard to direct suppliers, the specific corrective action to be taken will be determined on a case-by-case basis. Corrective action may include temporary suspension or termination of the business relationship.

## **2.5. Complaints procedure**

DekaBank has set up a [complaints procedure](#) in order to detect risks to human rights and the environment at an early stage and to be able to provide timely support and remedies in the event of the violation of human rights or environmental obligations that have arisen as a result of the economic activities of DekaBank in its own business area or by a direct supplier.

## **2.6. Documentation and reporting**

DekaBank continuously documents the fulfilment of the due diligence obligations within the company and will report on the fulfilment of the due diligence obligations in the past financial year every year. The reports will be published [online](#) on the DekaBank website.

## **3. Annual and event-related review**

DekaBank will review the effectiveness of the aforementioned measures annually and on an event-by-event basis and, if necessary, repeat the measures or update them immediately.

## **4. Results of the risk analysis**

The risk positions with suppliers and within DekaBank's own business area have been assessed by country and sector risk and then reviewed. The risk analysis for suppliers produces only isolated, abstract risk positions stemming primarily from country risks; the

analysis does not generate concrete risk positions. The risk analysis for the company's own business area also produces only isolated, abstract risk positions rather than concrete risk positions.

Frankfurt am Main, 1 October 2023

Board of Management



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