



**Deutsche Bahn AG's
policy statement
on protecting and
respecting human rights**





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Foreword

Sustainability is a central principle of Deutsche Bahn's business activities and is firmly anchored in its Strong Rail corporate strategy. Deutsche Bahn pursues an integrated approach that encompasses the ecological, social, and economic dimensions of sustainability.

Corporate responsibility extends far beyond economic indicators. As a member of the United Nations Global Compact (UNGC), Deutsche Bahn has pledged to uphold the principles of the UNGC and is clearly committed to the United Nations Universal Declaration of Human Rights. This commitment means taking a stand and safeguarding human rights as well as maintaining high environmental and social standards. This is also in line with Deutsche Bahn's ecological transformation and the clear commitment of the DB Group's Management Board and employees to social responsibility.

The DB Group is the leader in integrated public mobility in Germany and a key provider of rail freight and combined transport throughout Europe. This role comes with a great deal of responsibility within the supply chains. Deutsche Bahn is therefore committed to promoting responsible and sustainable value creation along its supply chain – in Germany as well as in all other countries in which it operates. Suppliers and other business partners are therefore expected to treat people and the environment with respect as the basis for reliable and sustainable cooperation. Economic success and socially responsible behavior are not contradictory, but rather mutually dependent – a requirement that also plays a major role in Deutsche Bahn's cooperation with business partners.

The DB Group, headquartered in Berlin, employs around 222,000 people in Germany alone. With billions of passengers traveling on local and longdistance trains every year and a large number of business partners in logistics and freight transport, Deutsche Bahn occupies a central place in society. One thing is clear: sustainable and responsible corporate governance can only be based on respect for people and the environment.



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I. Introduction

The DB Group is Germany's leading integrated provider of public mobility services and a Europe-wide provider of logistics solutions and combined transport. In Germany alone, the DB Group, headquartered in Berlin, employs around 222,000 people [as of September 30, 2025]. Its business activities focus on rail transport in Germany. A central objective of Deutsche Bahn is to shift more traffic to climate-friendly rail. After all, transporting more people and goods by rail is an important lever for achieving German and European climate protection goals. To this end, Deutsche Bahn is committed to the integrated operation of transport and rail infrastructure, the economically and ecologically intelligent linking of all modes of transport, and cooperation within German and European networks.

Deutsche Bahn is aware of its great social and ecological responsibility. The aim is to ensure responsible and sustainable value creation along the supply chain. With the adoption of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)¹, the German legislature has created a framework for this purpose. Recognizing the crucial role that companies play in promoting human rights, environmental protection, and sustainability in global supply chains, companies above a certain size are also legally obliged to implement human rights and environmental due diligence in their supply chains in an appropriate manner and to establish responsible management of their 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 within supply chains.

The Corporate Sustainability Due Diligence Directive (CSDDD)² has now created a European legal framework that harmonizes human rights and environmental due diligence obligations, making them binding throughout Europe in the future. This obliges large European and foreign companies to commit to complying with certain environmental and human

rights standards in their supply and value chains. This policy statement expresses Deutsche Bahn's commitment and dedication to respecting human rights and environmental obligations. This includes:

- a commitment to **sustainable and responsible corporate governance**.
- a description of the **procedures** used to implement the due diligence obligations under the LkSG.³
- a presentation of **the human rights and environmental issues** that are particularly relevant to business activities and have been identified as priorities on the basis of risk analysis.
- the **expectations** placed on its own actions and on suppliers and other business partners to ensure compliance with human rights and environmental obligations.

In addition to Deutsche Bahn AG, other companies within the DB Group are also subject to the LkSG due to their size. The policy statements of these DB subsidiaries are published on the respective companies' websites. While Deutsche Bahn AG's policy statement sets out the Group-wide human rights strategy and outlines an overall risk profile for the entire DB Group, the policy statements of the obligated DB subsidiaries differ in particular in that they each describe the specific risk situation of the subsidiary.

II. Commitment to sustainable and responsible corporate governance

Deutsche Bahn's business activities are committed to the principle of sustainability. Sustainability is a central component of DB's business model and corporate strategy. In order to achieve sustainable and responsible value creation in its own business area and along the supply chain, the DB Group is committed to complying with and promoting internationally recognized human rights, respecting labor standards, and protecting the environment in the course of its business activities. In addition, it strives to make a positive contribution to the protection and promotion of human and environmental rights through its own actions.

The DB Group complies with applicable law in the conduct of its business activities. This also ensures compliance with the LkSG. Its business activities are based in particular on the following internationally recognized human and environmental rights standards:

- the **International Bill of Human Rights**, consisting of the United Nations Universal Declaration of Human Rights (UDHR) and the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR),
- the **UN Guiding Principles on Business and Human Rights** (UNGPs),
- the **core labor standards of the International Labour Organization** (ILO) on fundamental rights and obligations at work,
- the ten principles of the **UN Global Compact** (UNGC),
- the **Guidelines for Multinational Enterprises** of the Organization for Economic Cooperation and Development (OECD).

Sustainability is not only of central importance for Deutsche Bahn's financial development and refinancing. It is also a key promise made by DB to its customers, society, and the state. Deutsche Bahn has therefore anchored ecological transformation at the heart of its Strong Rail corporate strategy and is driving it forward in a focused and cross-business manner in five environment-related areas of action: climate resilience, climate protection, resource protection, environmental protection, and noise reduction. At the same time, DB's decisions and actions have an impact on the lives and daily work of many people. The Group is always aware of this social responsibility. Deutsche Bahn's community involvement is shaped by four standpoints that provide guidance for the company and its stakeholders. They correspond to DB's fundamental beliefs and social values: strengthening community, supporting social engagement, promoting diversity and taking responsibility for its own history.



¹ German Act on Corporate Due Diligence in Supply Chains of July 16, 2021 (Federal Law Gazette I, p. 2959).

² Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. EU Member States must ensure the transposition into national law of the CSDDD by July 26, 2027.

³ Description of the procedures used to comply with the obligations under Section 4 (1), Section 5 (1), Section 6 (3) to (5), and Sections 7 to 10 of the LkSG.

III. Measures to implement due diligence obligations

The DB Group's business activities are aligned with the requirements of the LkSG. To this end, an appropriate and effective risk management system has been established to implement targeted measures to fulfill due diligence obligations. Dealing with human rights and environmental risks is understood as a process that is becoming increasingly embedded in operational structures and continuously improved.

1. Risk analysis

At the heart of Deutsche Bahn's risk management is a systematic and targeted risk analysis that identifies and assesses the potential and actual risks of business activities for people and the environment. As part of an annual risk analysis, the following risk areas in particular are considered for both Deutsche Bahn's own business area and its direct suppliers:

- violation of the prohibition of **child labor**,
- violation of the prohibition of **forced labor** and all forms of **slavery**,
- disregard for **occupational health** and **safety** and **work-related health hazards**,
- disregard for the **freedom to form coalitions**, the **freedom of association** and the **right to collective bargaining**,
- violation of the prohibition of **unequal treatment in employment**,
- withholding of **an adequate wage**,
- destruction of natural resources 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 on Persistent Organic Pollutants (**POPs**) and non-environmentally sound handling of waste containing POPs,
- prohibited import/export of **hazardous waste** as defined by the Basel Convention.

The annual risk analysis is structured in two stages and begins with an **abstract risk analysis** with regard to the aforementioned risk areas. Risk data from an external specialist provider is used to continuously identify country- and sector-specific risks within the company's own business area and among direct suppliers. Country and sector risks are assessed using a variety of indicators based on the risk database of the German Federal Office for Economic Affairs and Export Control (BAFA), as well as publicly available reports and media sources.

Particularly when the abstract risk analysis reveals increased risks, DB subsidiaries and direct suppliers are subjected to a more detailed investigation. The aim of this so-called **specific risk analysis** is to identify the actual risk dispositions for violations of human and environmental rights. A risk-based approach is used to determine which companies and suppliers are subject to in-depth review. Risk-based questionnaires are used to identify actual risks and existing risk mitigation measures, and sustainability

assessments of companies and suppliers are taken into account in accordance with the identified risk situation. Once the specific risk analysis has been completed, the risks are prioritized based on the criteria of the probability of occurrence, the severity of the risks, the capacity to influence, and the contribution to causation, in order to determine which companies and suppliers require individual improvement measures.

In addition, priority risk situations are identified in DB companies in order to recognize and systematically address structural and recurring problems. To this end, the results of the regular risk analysis are combined and evaluated with further findings from audits, ad hoc risk analyses, product group analyses, the complaint procedure, and other empirical values. On this basis, specific risk scenarios are developed, which are addressed through structural preventive measures.

If, for example, there are actual indications of possible risks or violations of human rights or environmental obligations in the company's own business area or in the supply chain due to special events or current reports, additional **ad hoc risk analyses** are carried out. An event-related risk analysis is also carried out if a significantly changed or significantly expanded risk situation is to be expected, for example due to the introduction of new products or entry into new markets.

The insights gained from regular and ad hoc risk analyses are used to support strategic decisions such as market entries and exits, participation in specific projects, or the implementation of appropriate preventive and remedial measures.



2. Preventive and remedial measures

If the risk analysis or complaint procedure identifies relevant risks for specific companies or suppliers, appropriate preventive measures are taken immediately. Here, too, a risk-based approach is pursued, focusing initially on the areas where the highest human rights and environmental risks have been identified. The aim of the preventive measures is to prevent any violation of human rights or environmental obligations by minimizing the risks caused by or contributed to by the DB Group's business activities.

If a violation of human rights or environmental obligations is identified or is imminent, appropriate remedial measures are taken immediately. These serve to prevent, remedy, or minimize the extent of violations. The preventive and remedial measures taken are continuously developed and new approaches established.⁴ At the same time, an overarching prevention process is being developed to support subsidiaries in creating structured, effectiveness-oriented action plans in order to address specific risk scenarios even more effectively in the future.

The following preventive and remedial measures are particularly noteworthy:

- Establishment of clear responsibilities, in particular the appointment of a Group LkSG officer to monitor risk management
- Enforcing codes of conduct (internal CoC and CoC for business partners), particularly in light of the requirements of the LkSG
- Raising awareness among purchasing units of the risk-based consideration of human rights and environmental requirements in procurement

strategies and purchasing practices in product groups with increased risk

- Taking human rights and environmental requirements into account when selecting new suppliers (e.g., through recognized sustainability assessments) and contractually ensuring compliance with human rights and environmental requirements
- Implementation of risk-based control measures in the form of awareness-raising discussions with business partners and business segments
- Risk-based development of concrete action plans with suppliers and business segments when risks or violations are identified
- Further development of a comprehensive catalog of preventive and remedial measures to support the selection and implementation of typical measures for each risk area
- Adaptation of contractual clauses as necessary
- Conducting social audits of risk-based selected business partners
- Risk-based professional development and awareness-raising for employees and business partners through regular information on LkSG-relevant topics and continuous (further) development of information concepts
- Exchange and engagement in industry initiatives (e.g., econsense, Railsponsible)
- Designing and conducting effectiveness tests of prevention and remedial measures.

Deutsche Bahn is continuously working to involve those potentially affected by its business activities, with their diverse interests, in the development and implementation of due diligence measures in order to ensure their effectiveness. When implementing specific preventive and remedial measures, emphasis is placed on cooperative interaction with business partners. However, in the case of serious violations in particular, Deutsche Bahn reserves the right to impose appropriate sanctions against the business partner in question or, as a last resort, to terminate a contract or an entire business relationship.

3. Complaint procedure

Another essential component of Deutsche Bahn's due diligence processes is the provision of an appropriate and effective complaint procedure. This can be used to report human rights and environmental risks as well as violations of human rights or environmental obligations, regardless of whether they have occurred in the supply chain or in the company's own business area.

In addition to the option of postal contact (Deutsche Bahn AG, Sustainability and Environment, LkSG Complaint Procedure, Potsdamer Platz 2, 10785 Berlin), an electronic whistleblowing system is available as a complaint channel, which has been expanded in accordance with the requirements of the LkSG. The system can be used in twelve languages. An important part of the complaint procedure is the protection of the whistleblower from discrimination or punishment as a result of reports submitted. All reports are treated confidentially and, if requested, anonymously.

Incoming reports are reviewed within the DB Group to determine whether the reported circumstances indicate a human rights or environmental risk or a corresponding violation. If this is the case, the report is forwarded to the relevant department. If an initial suspicion is confirmed, the necessary measures are taken to minimize or remedy risks or violations. All reports are handled by selected and specially trained employees who are impartial, independent, and bound to confidentiality. The implementation of the

complaint procedure makes it possible to identify previously unknown risks or violations. In addition to the risk analysis, the complaint procedure thus contributes significantly to the continuous improvement and further development of the risk management.

The effectiveness of the complaint procedure is reviewed once a year and on an ad hoc basis. For this purpose, a systematic analysis of the complaint procedure is carried out, in which random samples of various anonymized cases are examined in detail and evaluated in terms of their effectiveness.

The rules for the complaint procedure are publicly available [here](#) and can also be accessed in [simple language](#).

4. Documentation

The procedures for fulfilling the statutory due diligence obligations are documented on an ongoing basis. The documentation is retained for at least seven years from the date of creation.

5. Responsibilities

The protection of human and environmental rights within its own business activities and along global supply and value chains is of paramount importance to the Group Management Board. Accordingly, responsibility for the effective implementation of the LkSG at Deutsche Bahn AG lies with the Management Board of Deutsche Bahn AG (Group Management Board) at the highest management level. The members of the Management Board define clear responsibilities to ensure the effective implementation and monitoring of risk management.

To monitor the implementation of statutory due diligence obligations at Deutsche Bahn AG, the Group Management Board appoints a Group LkSG Officer. The Group LkSG Officer is involved in the continuous development of the risk management system and carries out risk-based

⁴An overview of measures already in place within the DB Group can be found in the [Integrated Report](#).

IV. Priority risks

control measures to verify compliance with human rights and environmental obligations.

The Group Management Board is informed regularly, at least once a year and on an ad hoc basis, about the work of the Group LkSG Officer. To this end, the Group LkSG Officer provides information in particular on the key results of the risk analysis, on preventive and remedial measures taken, and on reports from the complaint procedure. In addition, he or she reports on whether the procedures established in the course of operations and the measures taken to implement due diligence obligations are appropriate and effective. This ensures that the Management Board always has all the relevant information it needs to fulfill its responsibilities and make informed decisions.

Across the DB Group, the implementation of due diligence obligations is coordinated and managed by the Group Management function Sustainability and Environment in cooperation with the functions for Compliance, Human Resources Strategy, Legal, and Central Procurement.

Within Deutsche Bahn AG, the operational implementation of human rights and environmental due diligence obligations is ensured and managed by a Group LkSG Coordinator, who is appointed by the responsible Group Management function

Sustainability and Environment. The relevant departments, in particular Purchasing, are responsible for the practical implementation of the due diligence processes and are supported in this by other departments. All of these departments contribute to the effective implementation of due diligence obligations in their daily work.

The subsidiaries of Deutsche Bahn AG, which are independently obligated under the LkSG due to their size, are responsible for their own LkSG matters and also appoint an LkSG representative through their management, who monitors the implementation of the legal obligations. In addition, a so-called LkSG coordinator is also appointed in each of the obligated DB subsidiaries to manage the implementation of human rights and environmental due diligence obligations at the operational level.

In order to implement the LkSG in a uniform manner, the Group Management of the DB Group performs a governance function in relation to the DB subsidiaries that are subject to the Act. This includes, in particular, the creation and further development of Deutsche Bahn AG's human rights strategy, the provision of methods and templates for the decentralized implementation of due diligence obligations by the obligated DB subsidiaries, and the functional management of the LkSG coordinators in the DB subsidiaries.

Deutsche Bahn is aware that its activities within its own business operations and along global supply and value chains may have adverse impacts on human rights and the environment.

The abstract risk analysis conducted throughout the DB Group in 2025 with the support of an external provider initially identified abstract risks in all risk areas covered by the LkSG. The subsequent concrete risk analysis determined that the probability of occurrence of these risks in Deutsche Bahn's own business area is predominantly low. This is due, among other things, to the fact that numerous appropriate and effective preventive measures are already in place. The overall risk for suppliers is higher in 2025 than in Deutsche Bahn's own business area. A further developed methodology allows risk situations to be identified more precisely. Linking the results of the risk analysis with additional findings from audits, ad hoc risk analyses, product group analyses, the complaint procedure, and other empirical evidence provides a clearer picture of the actual risks and enables a more targeted identification of the priority risks.

In order to (further) reduce the overall risks and take preventive action, measures are being implemented in relation to all LkSG risk areas. The focus is particularly on the priority risks listed below.

1. Own business area

The following risk is prioritized in Deutsche Bahn's own business area:

- **Violation of the prohibition of unequal treatment in employment** (Section 2 (2) No. 7, No. 12 LkSG, Article 2 of the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights)

The decision to prioritize this risk is in line with the priorities set in recent years. A significant number of reports on this issue have been received from employees and customers via the complaint procedure. The CSR Risk Check also shows that the only relevant country risk identified for Germany, the main field of DB's business activities, relates to "labor law – discrimination". Despite existing preventive measures such as the internal code of conduct (Corporate Principles on Ethics), active diversity management (Group initiative "Einziganders"/"Uniquely Different"), the Group's internal ombudspersons for discrimination issues, and the promotion of women in management positions, particular focus will continue to be placed on this topic, especially on the issue of unequal treatment based on ethnic and national origin.



2. Supply chain

The following risk is prioritized in the supply chain:

- **Disregard for occupational health and safety and work-related health hazards** (Section 2 (2) No. 5 LkSG)

The prioritization of this risk is based on the results of the regular risk analysis and further findings from audits, ad hoc risk analyses, product group analyses, and the complaint procedure. Audits carried out at suppliers reveal deficits in occupational health and safety, in particular in the areas of working hours and safety training. A similar picture emer-

ges from the information received through the complaint procedure, especially with regard to working hours. The analysis of product groups also provides an indication of an increased risk in this area. For the prioritized risk area of occupational health and safety, the DB Code of Conduct for Business Partners already contains corresponding guidelines, which are verified through risk-based reviews (e.g. via EcoVadis ratings) and audits of suppliers. In addition, awareness-raising workshops are held with the relevant decision-makers, both in the Group's own business area and in the supplier sector; these are continuously adapted and further developed. Due to this year's prioritization, particular focus will be placed on the topics of working hours and safety training in the coming year.

Changes in priority risks based on future or ad hoc risk analyses will be published in the next update of the policy statement.



V. Expectations of employees and business partners

When it comes to complying with human rights and environmental due diligence obligations, the DB Group has high expectations of its own actions and those of its business partners. In light of the priority risks identified in Section IV and in affirmation of the commitment to sustainable and responsible corporate governance set out in Section II, the following expectations apply:

The DB Group is committed to conducting its business activities in an ethically and legally impeccable manner and to aligning them with the principles set out in this policy statement. This commitment is inextricably linked to the way in which the Group operates. In its business activities, the Group complies with applicable law and respects internationally recognized human rights and environmental standards.

The commitment to respect human rights and the environment is already reflected in the internal code of conduct (**Corporate Principles on Ethics**), which sets out binding standards and expectations for everyday behavior. All management board members, managing directors, executives, and employees are committed to the principles laid down in the internal code of conduct. As role models, managers have a special obligation to uphold these principles.

In implementing the legal obligations under the LkSG, employees are expected to contribute to the best possible fulfillment of human rights and environmental due diligence obligations through their daily decisions.

Deutsche Bahn is aware that its responsibility extends beyond its own actions. Accordingly, high standards are not only applied within the Group itself, but social and environmental standards are also demanded of its business partners. They are expected to conduct their business activities with integrity, implement appropriate processes to respect human and environmental rights, and take suitable measures to address the expectations of the DB Group along their supply chains.

The specific requirements and principles for working with business partners are set out in the **DB Code of Conduct for Business Partners**. Suppliers and other business partners commit to complying with this code of conduct or equivalent requirements.

To ensure that suppliers and business partners adhere to the same high standards and communicate these standards throughout their supply chains, close cooperation with them is maintained. Transparency and the exchange of information are promoted to ensure that expectations are understood and met. Suppliers and business partners are expected to act honestly, responsibly, transparently, and fairly. Part of these expectations is that suppliers and business partners provide information on request on how they comply with the DB Group's principles. If the DB Group's own actions lead to a situation that makes it difficult for suppliers to comply with these principles, business partners are encouraged to proactively inform the DB Group. The aim is to find suitable solutions together.

VI. Continuous development of due diligence processes

The implementation of human rights and environmental due diligence obligations is an ongoing process. This policy statement will therefore be reviewed annually and on an ad hoc basis, and updated immediately if, for example, changed or expanded risks are identified.

Further information can be found at deutschebahn.com/human-rights.

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