

# Policy statement on human rights strategy



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# Policy statement on the human rights strategy of the Autobahn Tank & Rast Group

## I. Introduction

The Autobahn Tank & Rast Group GmbH & Co. KG (together with its affiliated companies within the meaning of Sections 15 et seq. AktG "**Tank & Rast Group**") is aware of the important role that companies play in respecting human rights and protecting the environment as part of their business activities. The Tank & Rast Group accepts its responsibility arising from its business activities and endeavors to use its influence on the protection of human rights to bring about positive change. The Tank & Rast Group is committed to promoting human rights in order to improve the situation of individuals and achieve meaningful progress. This commitment also extends to promoting sustainable business practices, minimizing our environmental footprint and actively contributing to the well-being of our planet.

The Tank & Rast Group will regularly and duly identify and consider the interests of relevant stakeholders and involve them appropriately in the continuous implementation and further development of this Declaration of Principles on Human Rights Strategy. The Tank & Rast Group encourages its stakeholders to actively participate in this process.

## II. The values and principles of the Tank & Rast Group

The Tank & Rast Group respects and observes all internationally recognized human rights as contained in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

In addition, the Tank & Rast Group recognizes the importance of the following conventions and adopts them as its own:

- the Minamata Convention on Mercury,
- the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and
- the Stockholm Convention on Persistent Organic Pollutants (POP Convention).

These frameworks are the foundation for the Tank & Rast Group's business practices and reflect the values that the Tank & Rast Group wishes to promote in its supply chain. By complying with the requirements set out in this policy statement, the Tank & Rast Group confirms its commitment to responsible and sustainable business activities and at the same time promotes the values that are of the utmost importance to the company.

The Tank & Rast Group's declaration of principles is in line with the core principles of the Tank & Rast Group's Corporate Compliance Code.

### III. The Tank & Rast Group's approach to protecting human rights and the environment

#### 1. Implementation of measures for effective risk management

The Tank & Rast Group complies with all applicable laws and regulations. These include, in particular, the protection of human rights and the enforcement of due diligence obligations in the supply chain.

As part of its commitment, the Tank & Rast Group has implemented a risk management system for human rights and the protection of the environment, which is designed to identify and minimize risks in connection with human rights and the environment. Through its due diligence measures, the Tank & Rast Group actively identifies and mitigates risks in its supply chain and ensures that its business activities are conducted in accordance with its values and commitments.

##### (a) Risk management

The Tank & Rast Group has established a risk management system for human rights that is firmly anchored within the company. Clear responsibilities ensure the operational implementation of risk management. The risk management processes are designed to proactively take account of constantly changing risks through continuous assessment. The Tank & Rast Group promotes close cooperation between the departments with ultimate responsibility and the relevant internal stakeholders.

To ensure effective monitoring, the departments involved report on human rights risks and developments to the Tank & Rast Group's management via the Human Rights Officer. The Tank & Rast Group attaches great importance to proper documentation of the measures taken to protect human rights and ensures that all applicable reporting obligations are complied.

The Tank & Rast Group is also aware of the potential impact of environmental risks on human rights. The risk management system should also monitor compliance with relevant environmental regulations and follow a comprehensive approach to mitigating environmental and human rights risks. In this way, the Tank & Rast Group actively protects human rights and the environment and promotes responsible business practices in its business area.

##### (b) Risk analysis

The Tank & Rast Group carries out a comprehensive risk analysis at least once a year and on an ad hoc basis as required in accordance with applicable law. This risk analysis makes it possible to identify potential human rights and environmental risks and prioritize them appropriately. Risks are assessed and analyzed with the support of the relevant specialist departments. They provide their expertise and assessments of the risk profile in their area of responsibility. The results of the risk analyses are communicated to the management on a regular and ad hoc basis.

The Tank & Rast Group will continue to develop its risk analysis process and its understanding of human rights and environmental risks in its supply chain. The Tank & Rast Group is committed to improving its expertise in identifying, assessing and managing these risks, to ensure a proactive and informed approach to protect human rights and the environment. Where possible, the Tank & Rast Group participates in stakeholder dialogs and industry initiatives.

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**(c) Preventive measures**

**(i) Own business division**

The Tank & Rast Group aims to minimize human rights and environmental risks as far as possible by effective and appropriate means. To this end, the Tank & Rast Group has taken effective and appropriate steps to implement this declaration of principles in its own business area. In accordance with the applicable laws and regulations, the preventive measures include various precautions. This includes the implementation of special procurement strategies and purchasing practices, including an onboarding process for suppliers that incorporates human rights and environmental aspects. The Code of Conduct for Suppliers of the Tank & Rast Group underlines the strong commitment to the protection of human rights and the environment. In addition, the Tank & Rast Group conducts regular training courses for employees to raise awareness and understanding of human rights principles and environmental risks. By incorporating these multi-layered precautions, the Tank & Rast Group is actively working to prevent and resolve any problems within its own business and operations. In order to monitor compliance with this declaration, the Tank & Rast Group carries out risk-based control measures.

**(ii) Supply chain**

The Tank & Rast Group strives to act responsibly, minimize risks and continuously improve its actions in this area. Human rights and environmental expectations are a central component of the Tank & Rast Group's cooperation with its direct suppliers. The Tank & Rast Group implements a range of effective and appropriate preventive measures at its direct suppliers. These measures include the risk-based use of contractual assurances. To this end, the Tank & Rast Group uses a code of conduct that specifically addresses human rights and environmental concerns at direct suppliers and along the supply chain.

The Tank & Rast Group thus pursues the goal of only entering into business relationships with direct suppliers who are committed to the applicable laws, rules and regulations and to the Tank & Rast Group's standards of business conduct as set out in the Supplier Code of Conduct.

The Tank & Rast Group expects its direct suppliers to adequately address human rights and environmental issues in their business area and along their supply chain. The Tank & Rast Group aims to enable its direct suppliers to improve their human rights and environmental practices and minimize risks. The Tank & Rast Group takes a proactive approach to promoting positive change and encouraging continuous improvement in its supply chain.

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**(d) Remedial measures**

A key component of the Tank & Rast Group's corporate responsibility is the elimination of negative impacts on human rights and the environment. When it comes to (imminent) human rights and environmental violations, the Tank & Rast Group pursues a zero-tolerance approach. (Imminent) violations will be investigated immediately by the Tank & Rast Group. In accordance with applicable laws, the Tank & Rast Group will, where necessary, take appropriate remedial action. To this end, the Tank & Rast Group has implemented internal guidelines and a process for escalation and remedial measures.

The Tank & Rast Group will use its influence to immediately end or prevent (imminent) violations. It is their clear expectation that direct suppliers will support the Tank & Rast

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Group in this case. If the violation cannot be ended in the foreseeable future, the Tank & Rast Group will work with the direct supplier concerned to develop a concept for ending or minimizing the violation without delay.

The Tank & Rast Group will use all relevant contractual assurances available to terminate a breach. If the supplier or business partner does not take reasonable measures to prevent, terminate or minimize the violation, the Tank & Rast Group reserves the right to terminate the business relationship as a last resort.

**(e) Complaints procedure**

The Tank & Rast Group has established an effective complaints procedure for reporting human rights and environmental risks and violations in its own business area and along its supply chain. The Tank & Rast Group strives to maintain an open dialog with its suppliers and business partners, their employees and persons who are otherwise affected by the business activities of the Tank & Rast Group or its direct or indirect suppliers (or their representatives). The Tank & Rast Group works with involved stakeholders, to find joint solutions to address and solve any problems that arise.

In doing so, the Tank & Rast Group undertakes to protect itself against reprisals. Therefore, employees and third parties who are also protected by applicable laws do not have to fear negative consequences of a discriminatory or disciplinary nature because they file a report or raise questions, doubts or concerns. The Tank & Rast Group does not tolerate any threats, harmful behavior or reprisals. This also applies, if employees are not absolutely certain of the facts provided but acting in good faith. Acting in good faith means that employees have a reasonable suspicion, based on the circumstances available to them at the time of the report, that the information reported is true.

The Tank & Rast Group offers various reporting channels. Further information on the reporting channels and the implemented procedure can be found in the rules of procedure. Both, employees and external persons, can use these reporting channels to report possible compliance violations at any time. Information can also be submitted anonymously.

The Tank & Rast Group's case handlers take every report very seriously and treat them in strict confidence. The Tank & Rast Group guarantees a neutral and fair procedure. The clerks work independently and are not bound by instructions. If a violation of applicable laws and regulations or a relevant risk is identified, the Tank & Rast Group will take effective and appropriate measures to rectify them as quickly as possible and sanction violations appropriately.

The rules of procedure and further information on the implementation of the complaints procedure can be found at: <https://sicher-melden.de/tankundrast>

**(f) Measures towards indirect suppliers**

If an indirect supplier demonstrably violates human rights or environmental regulations, the Tank & Rast Group will take effective and appropriate remedial action to end or mitigate such violations immediately and take appropriate preventive measures to prevent future violations.

**(g) Documentation and reporting**

In accordance with applicable laws and regulations, the Tank & Rast Group documents and stores all necessary information about the measures the Tank & Rast Group takes and the information it collects to fulfill its obligations in the area of human rights and

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environmental due diligence, as required by applicable laws (e.g. the German LkSG). The Tank & Rast Group retains the relevant documents for a period of seven years from their creation.

## 2. Expectations of employees and suppliers

The Tank & Rast Group actively promotes a culture of respecting and promoting human rights and preserving the environment throughout its supply chain. Its procurement practices are based on globally recognized standards and the applicable laws on due diligence in the supply chain.

The Tank & Rast Group strives to act responsibly, minimize risks and continuously improve its actions in this area. The Tank & Rast Group expects that its employees, its suppliers and their employees and their suppliers and all other parties involved in carrying out activities for the Tank & Rast Group will also comply with applicable laws and undertake to comply with the standards set out in this declaration.

The Code of Conduct for Suppliers of the Tank & Rast Group describes the most important principles that should form the basis for this relationship. In order to improve the situation along the entire supply chain, it is crucial that suppliers and their business partners not only adopt these principles, but also apply them in their supply chain. They should ensure that their suppliers also commit to implementing these principles. In this way, the Tank & Rast Group aims to build and ensure a sustainable and resilient supply chain for its operations.

Based on its due diligence obligations in the area of human rights and environmental protection, the Tank & Rast Group has developed the following expectations of its employees and suppliers in particular, which are described in more detail in the Code of Conduct for Suppliers:

- No child labor;
- No forced labor or slavery;
- Health and safety in the workplace (occupational health and safety);
- Protection of freedom of association;
- No discrimination;
- Adequate living wage;
- No harmful effects on the environment;
- No unlawful eviction and deprivation of land;
- No uncontrolled deployment of security forces;
- Responsible handling of hazardous substances and waste.

## IV. Outlook for the future human rights strategy - review and reporting

The Tank & Rast Group sees due diligence in the supply chain as an ongoing and living process. The Tank & Rast Group will therefore continuously monitor the measures implemented and review them for possible improvements in order to adjust them if necessary. In doing so, the Tank & Rast Group will take into account significant changes in the risk situation or indications that the functionality of preventive measures (including the complaints procedure) and/or remedial measures is significantly impaired.

## V. Contact us

If you have any questions, please contact:

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Or

E-Mail: [Human Rights Officer@tank.rast.de](mailto:Human Rights Officer@tank.rast.de)

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