



DECLARATION OF PRINCIPLES ON HUMAN RIGHTS

OF THE BLG LOGISTICS GROUP AG & CO. KG



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Our convictions

We are a seaport and logistics service provider with an international network. In almost 100 locations and branches, we offer our customers in industry and retailing around the world extensive logistics services.

We see it as our responsibility to respect human rights and the related environmental rights in our global supply and value creation chains. That is why we are committed to guaranteeing these rights.

Human rights are core principles that protect the safety, dignity and equality of all of humanity. They are universal, inalienable and indivisible rights to which all people are equally entitled.

This Declaration of Principles applies for all bodies and employees of the companies in the BLG Group. BLG Group companies in this sense are BLG AG, BLG LOGISTICS GROUP AG & Co. KG and all companies in which they directly or indirectly hold 50 percent or more of the shares and act as the executive management.

National and international standards and guidelines

We accept the following internationally recognized frameworks for respect for human rights as essential standards and guidelines for us and our corporate conduct:

- German Supply Chain Due Diligence Act (LkSG)
- Universal Declaration of Human Rights of the United Nations (UN)
- United Nations Global Compact (UN)
- United Nations Guiding Principles on Business and Human Rights (UN)
- OECD Guidelines for Multinational Enterprises
- Charter for Sustainable Development of the International Chamber of Commerce (ICC)
- Core Conventions of the International Labour Organization (ILO)

Furthermore, we support the Sustainable Development Goals of the United Nations and are committed to doing what is in our power to help achieve these goals.

BLG LOGISTICS always complies with applicable national law. If there are conflicts between international principles of human rights and national provisions, BLG consistently strives to follow international human rights standards without breaching local laws. Wherever local legislation goes beyond the provisions of the international principles of human rights, BLG complies with the local laws.

Obligations of our employees and business partners

This Declaration of Principles and the regulations it refers to are binding for all our management staff and employees as well as for all our business partners. It defines our expectations of our workforce and suppliers in the spheres of human rights and the environment, also within the terms of the German Supply Chain Due Diligence Act (LkSG). We expect our suppliers to also tackle the issues addressed here in their own supply chains.

We do not tolerate breaches against the above regulations or against applicable laws and human rights conventions, and we take decisive action if we find such breaches. They can have legal consequences up to and including termination of the employment contract or business relationship.

Implementation of the obligation to uphold human rights

LkSG risk management

To prevent risks associated with human rights and the environment, BLG LOGISTICS has introduced an LkSG risk management process throughout the Group and also issued a manual for the process.

Our Human Rights Officer is responsible for this area in the company and reports regularly and as needed to the BLG Board of Management about the risk situation in terms of human rights and environmental protection, as well as informing the Board about the implementation of due diligence obligations. In affiliated companies which are also subject to the LkSG, Human Rights Coordinators provide support with the implementation of the relevant management systems.

The individual company management teams are responsible for full compliance with the due diligence obligations, while the Board of Management holds overall responsibility for ensuring that statutory requirements are met.

LkSG risk analysis

Within the LkSG risk management process, BLG LOGISTICS carries out risk analyses annually and as circumstances require in order to determine the human rights and environment-related risks in the company as well as in the companies of direct suppliers. These risks are then evaluated so that suitable actions can be taken.

In the individual divisions, the (potential) human rights and environmental risks of the BLG LOGISTICS locations are identified and, according to the severity of possible breaches, the number of people that could be affected, the reversibility, and the probability of occurrence are assessed.

For the risk analysis of direct suppliers, an initial evaluation is carried out based on national and industry risks, and the supplier is categorized in a risk level. Suppliers who are assessed with a medium or high risk are subsequently prioritized in the analysis. If necessary, measures are taken such as requiring the supplier to complete a self-disclosure form in order to gain more precise information about concrete risks.

Based on the results of our LkSG risk analyses, we focus in our own division in particular on the following human rights:

- Working conditions and fair pay
- Occupational protection and safety
- Equal opportunities
- Environmental protection

Prevention and corrective measures

Based on the results of the risk analysis, BLG LOGISTICS implements preventive measures to mitigate existing risks in a targeted manner. Standard preventive measures include raising the awareness of our employees and business partners. Via training courses and communication formats such as the staff magazine, we inform employees about human rights risks and instruct them to report any abuses or possible risks. Furthermore, our suppliers must agree to comply with our Code of Conduct for Suppliers.

If BLG LOGISTICS becomes aware of possible abuses within its own division or by (in)direct suppliers, we immediately examine these and evaluate the appropriateness and effectiveness of the existing program of measures. If necessary, we make fundamental adjustments or take specific corrective action together with the parties affected and/or the stakeholders. The measures to be implemented are chosen on a case-by-case basis according to the nature of the breach and with the goal of immediately ending it. If this is not possible, we draw up and implement a concept for ending or minimizing the breach.

Breaches can have legal consequences up to termination of the employment contract and/or the business relationship, including all associated supply contracts with the supplier. Depending on the severity of the breach, the termination can be implemented without notice.

Whistleblowing procedure

BLG requires employees and third parties to report any abuses or possible risks. Reports can be submitted either directly to our Compliance Officer or – also anonymously – to an externally appointed ombudsperson.

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| <p>Compliance Officer Stefan Häseker</p> <p>☎ +49 421 398 3785 ✉ compliance@blg.de</p> | <p>Deputy Nermin Varmaz</p> <p>☎ +49 421 398 3156 ✉ nermin.varmaz@blg.de</p> | <p>Ombudsman Lawyer Markus Klindwort</p> <p>☎ +49 421 333922 66 ✉ blg-ombudsmann@rmk-partner.de</p> |
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Naturally, our Human Rights Officer also acts as a contact in this respect.

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Documentation and reporting

BLG LOGISTICS continually documents compliance with all due diligence obligations internally and archives this information for at least seven years in audit-compliant form. All measures concerning the due diligence obligation are included in the documentation. An external report is published according to the valid legal requirements.

Effectiveness review

BLG LOGISTICS monitors the implementation of the human rights obligations in the form of annual and event-driven effectiveness checks.

This includes application of the two-person principle when checking the risk level categorization as well as the resulting implementation of preventive measures, the processing of potential complaints/reports of abuse and the derivation of corresponding corrective measures.

Furthermore, the Human Rights Officer cooperates with Human Rights Coordinators to carry out random checks to ensure the effectiveness of the processes for risk categorization, prevention and correction.

A fundamental purpose of the Sustainability Board together with representatives of specialist departments and affected companies is to validate the processes that apply throughout BLG for compliance with the due diligence obligations relating to the LkSG.

Continuous improvement

In order to anchor human rights protection even more firmly along the entire supply chain in our systems and processes, we continuously further develop our risk management system and our measures to identify and prevent human rights risks and potential breaches. We regularly report on our progress in this area in our annual Sustainability Report.

This version of the Declaration of Principles on Human Rights is the thoroughly revised and extended edition of the original Declaration of Principles issued in 2022. In the future, it will be updated based on the results of the LkSG risk analysis.