



Policy statement on the human rights strategy of DB Bahnbau Gruppe GmbH

Foreword

Sustainability is a central principle of our business activities at DB Bahnbau Gruppe GmbH and is firmly anchored in the DB Group's Strong Rail strategy. We pursue an integrated approach that encompasses the environmental, social, and economic dimensions of sustainability.

Corporate responsibility goes far beyond economic key figures. 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. For us, this means taking a stand and safeguarding human rights as well as maintaining high environmental and social standards. This aligns with Deutsche Bahn's environmental transformation and the clear commitment to social responsibility that the Board of Managing Directors and employees of DB Bahnbau Gruppe demonstrate.

As a construction company for rail infrastructure that operates in Germany and around Europe, we are also aware that we have an important responsibility for our supply chains. It is therefore important to us to ensure responsible and sustainable value creation along our supply chain – in Germany, but also in all other countries in which we operate. We expect our suppliers and other business partners to treat people and the environment with respect as the basis for reliable and sustainable collaboration. For us, economic success and socially responsible action are not contradictory, but rather mutually dependent. This is also important to us when working with our business partners.

With some 4,300 employees and some 600 vocational trainees and cooperative education students, revenues of approximately EUR 1.3 billion, and a large number of business partners in Germany and other countries, we have a responsibility to society. It is clear to us that sustainable and responsible corporate governance can only be based on respect for people and the environment.

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I. Introduction

As a company of the Deutsche Bahn Group, DB Bahnbau Gruppe is Germany's leading full-service provider for rail infrastructure – it ensures the availability of tracks for customers in Germany and Europe. Its business activities fully support the DB Group's central objective of shifting more traffic to climate-friendly rail. Encouraging more people and more freight onto the railways is an important lever in achieving the German and European climate targets.

As part of the DB Group, DB Bahnbau Gruppe is aware of its great social and environmental responsibility. Its goal is to ensure responsible and sustainable value creation along its supply chain.

With the adoption of the Act on Corporate Due Diligence Obligations in Supply Chains (*Lieferkettensorgfaltspflichtengesetz*, "LkSG"),¹ a framework for this has been created in German legislation. In recognition of the crucial role companies play in promoting human rights, environmental protection and sustainability in global supply chains, companies above a certain size are legally obliged to implement human rights and environmental due diligence obligations 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 in supply chains.

The Corporate Sustainability Due Diligence Directive (CSDDD)² has now created a European legal framework to harmonize human rights and environmental due diligence obligations and will set these obligations Europe-wide 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 DB Bahnbau Gruppe's commitment and dedication to respecting human rights and environmental responsibilities. This includes:

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

² Directive 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 transpose the Corporate Sustainability Due Diligence Directive (CSDDD) into national law by no later than July 26, 2027.

- the commitment to **sustainable and responsible corporate governance**.
- a description of the **process** by which we implement our due diligence obligations pursuant to the LkSG.³
- a presentation of the **human rights and environmental topics** that are particularly relevant in the context of our business activities and that have been identified as priorities on the basis of our risk analysis.
- the **expectations** that DB Bahnbau Gruppe has of its own activities and of its suppliers and other business partners in order to ensure compliance with human rights and environmental obligations.

In addition to DB Bahnbau Gruppe GmbH, other DB Group companies have obligations under the LkSG, including the parent company of the DB Group, Deutsche Bahn AG. While Deutsche Bahn AG's policy statement sets out the Group-wide human rights strategy and provides an overarching risk profile for the entire DB Group, this policy statement from DB Bahnbau Gruppe GmbH is different in that it describes the company's specific risk situation.

II. Commitment to sustainable and responsible corporate governance

DB Bahnbau Gruppe has made sustainability an essential part of its business operations. Sustainability is a central component of the DB Group's business model and of DB Bahnbau Gruppe's corporate strategy. In order to achieve sustainable and responsible value creation in our own business activities and along the supply chain, we are committed to upholding and promoting internationally recognized human rights, respecting labor standards and protecting the environment as part of our business activities. In addition, we strive to make a positive contribution to the protection and promotion of human and environmental rights through our actions.

We comply with applicable law in the conduct of our business activities. This is the foundation to also ensure compliance with the LkSG. Our business activities are based in particular on the following internationally recognized human and environmental rights standards:

³ Description of the procedures by which the obligations under Section 4 (1), Section 5 (1), Section 6 (3) to (5) and Sections 7 to 10 LkSG are fulfilled.

- the **International Bill of Human Rights**, consisting of the United Nations Universal Declaration of Human Rights (UDHR), 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** (UNGPR),
- the **core labor standards of the International Labor 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 to Deutsche Bahn's financial performance and funding. It is also a key promise made by DB to its customers, society, and the state. Deutsche Bahn has therefore put environmental transformation at the center of its Strong Rail corporate strategy and is driving it forward in a focused, company-wide approach with five environmental action fields: climate resilience, climate protection, resource conservation, environmental protection, and noise reduction. At the same time, DB's decisions and actions have an impact on the lives and work of many people. The DB Group is always conscious of this social responsibility. Deutsche Bahn's social commitment is characterized by four standpoints that offer guidance for the company and its stakeholders and correspond to DB's fundamental convictions and social values: strengthening community, supporting social engagement, promoting diversity, and taking responsibility for its own history.

III. Measures to implement due diligence obligations

DB Bahnbau Gruppe aligns its business activities with the requirements of the LkSG. It has put in place appropriate and effective risk management instruments to implement targeted measures to fulfill due diligence obligations. It sees dealing with human rights and environmental risks as an ongoing process that is becoming ever more deeply embedded in operational structures and continuously improved.

1. Risk analysis

At the heart of risk management at DB Bahnbaugruppe is a systematic and targeted risk analysis that identifies and assesses the potential and actual risks of the company's business activities on people and the environment. As part of an annual risk analysis, the following risk areas in particular are considered both for the company's own business and for 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 a **fair wage**
- Destruction of natural resources through **environmental pollution**
- Unlawful violation of **land rights**
- Violation of the ban on contracting or using private/public **security forces** if these forces adversely impact human rights due to a lack of instruction or oversight
- 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 above-mentioned risk areas. We use the risk data of an external, specialized provider to continuously identify country and sector-specific risks in our own business and with direct suppliers. Country and sector risks are assessed using a large number of indicators (based on the risk database of the German Federal Office for Economic Affairs and Export Control) as well as publicly available reports and media sources.

Particularly if the abstract risk analysis reveals increased risks, the company's own business and direct suppliers are then subjected to a more detailed investigation. The aim of this **specific risk analysis** is to identify the actual dispositional risk factors that could lead to human and environmental rights being violated. We use a risk-based approach to determine which business areas or suppliers to look at in more detail.

Risk-based questionnaires are used to identify actual risks and existing risk-mitigating measures, and sustainability assessments of companies and suppliers are taken into account in line with the identified risk situation. Once the specific risk analysis has been completed, the risks are prioritized based on the criteria of probability of occurrence, severity, capacity to influence and contribution to causation. This determines the business areas or suppliers where there is a need for individual improvement measures.

In addition, priority risk situations at DB Bahnbau Gruppe are identified in order to recognize and systematically address structural and recurring problems. For this purpose, the results of the regular risk analysis are combined and evaluated with other findings from possible audits, ad hoc risk analyses, product group analyses and the complaints procedure as well as other empirical data. This information is used to develop specific risk scenarios that are then addressed by structural preventive measures.

If there are actual indications, highlighted by particular incidents or current reports for example, that point to possible risks or violations of human rights or environmental obligations in the company's own business or supply chain, **ad hoc risk analyses** are also carried out. An ad hoc risk analysis is also performed if a significantly changed or significantly expanded risk situation is expected in the company's own business or supply chain – as a result of the introduction of new products or entry into new markets, for instance.

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 hardwiring of appropriate preventive and remedial measures.

2. Preventive and remedial measures

If relevant risks are identified in the risk analysis or complaints procedure, appropriate preventive measures are taken without delay. These also follow a risk-based approach, focusing initially on the areas in which the greatest human rights and environmental risks have been identified. The aim of preventive measures is to avoid any violation of a human rights or environmental obligation by minimizing risks caused by or contributed to by the business activities of DB Bahnbau Gruppe.

If an imminent or actual violation of a human rights or environmental obligation is identified, appropriate remedial action is taken without undue delay. These actions serve to avoid or end the violation or minimize the extent of the violation if ending it is not possible.

The preventive and remedial measures are constantly updated and new approaches established.⁴

The following preventive and remedial measures taken and planned by DB Bahnbau Gruppe and Deutsche Bahn AG should be emphasized in particular:

- Definition of clear responsibilities, in particular designation of an LkSG officer to monitor our risk management
- Enforcement of our codes of conduct (internal and [for business partners](#)), in particular against the background of the requirements of the LkSG
- Addressing of purchasing units with product group responsibility to raise awareness for risk-based consideration of human rights and environmental requirements in our procurement strategies and purchasing practices in high-risk product groups
- Consideration of human rights and environmental requirements in the procurement strategy when selecting new suppliers (e.g., through recognized sustainability assessments) and gaining of their contractual assurance of the requirements
- Implementation of risk-based control measures in the form of awareness-raising discussions with business partners and business segments
- Risk-based drafting of dedicated action plans with suppliers and business segments when risks or violations are identified
- Maintenance of a comprehensive catalog of preventive and remedial measures to support the selection and implementation of typical measures in each risk area
- Amendment of our contractual clauses if required
- Conducting of social audits of business partners selected in line with the risk-based approach
- Further risk-based training and awareness raising for employees and business partners by regularly providing information on LkSG-relevant topics, as well as continuous development of communication concepts
- Dialogue and involvement in industry initiatives (e.g., econsense, Railsponsible) by the Group Management of the DB Group
- Design and implementation of effectiveness testing of preventive and remedial measures.

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

DB Bahnbau Gruppe works continuously to appropriately involve any parties, with their diverse interests, potentially affected by its business activities in the development and implementation of due diligence measures in order to ensure that these are effective.

In the implementation of preventive and remedial measures, great importance is attached to a cooperative relationship with business partners. In the event of serious violations, however, DB Bahnbau Gruppe reserves the right to impose appropriate sanctions on the respective business partner or – as a last resort – to terminate a contract or an entire business relationship.

3. Complaints procedure

Another key component of our due diligence obligations is the provision of an appropriate and effective complaints procedure. This can be used to report human rights and environmental risks as well as violations of rights, regardless of whether they have occurred in the supply chain or in our own business.

In addition to the option of writing to Deutsche Bahn AG, Nachhaltigkeit und Umwelt, LkSG-Beschwerdeverfahren, Potsdamer Platz 2, 10785 Berlin, Germany, an [electronic whistleblowing system](#) is available as a complaints channel and has been expanded in line with the requirements of the LkSG. The system can be used in 12 languages. Protecting people who submit complaints or information from being discriminated against or penalized as a result of whistleblower reports or information they submit is an important part of our complaint process. All reports are treated in confidence and, if requested, anonymously.

Reports received are examined to determine whether they refer to risks affecting human rights or environmental issues or a violation of obligations in these areas. If this is the case, the report is forwarded to the appropriate company. If an initial suspicion is confirmed, necessary measures are taken to minimize or end risks or violations. All reports are handled only by a small group of selected and specially trained employees who are impartial, independent, and sworn to secrecy. Implementing the complaints procedure provides the opportunity to learn about previously unknown risks or breaches of duty. Alongside risk analysis, the complaints procedure thus plays a key role in the continuous improvement and evolution of our risk management program.

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis as required. To this end, a systematic analysis of the complaints 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 of procedure for the complaints procedure are publicly available [here](#). A version in simple language can also be downloaded.

4. Documentation

The procedures for complying with statutory due diligence requirements are documented on an ongoing basis. The documentation is kept for at least seven years from the time of its creation.

5. Responsibilities

Safeguarding human and environmental rights in its own business operations and along the global supply and value chains is of paramount importance to DB Bahnbaugruppe GmbH. For this reason, responsibility for the effective implementation of the LkSG at DB Bahnbaugruppe GmbH lies at the highest management level, with the Board of Managing Directors. For their part, the managing directors have defined clear responsibilities to ensure the effective implementation and monitoring of risk management.

The Board of Managing Directors appoints an LkSG officer to monitor the implementation of the statutory due diligence obligations at DB Bahnbaugruppe GmbH. The LkSG officer is involved in the ongoing development of the risk management system and carries out risk-based control measures to verify compliance with human rights and environmental obligations.

The Board of Managing Directors informs itself regularly, at least once a year, as well as on an ad hoc basis, about the work of the LkSG officer. To this end, the LkSG officer provides information on the main results of the risk analysis, on preventive and remedial measures taken, and on information gained from the complaints procedure. He or she also reports on whether the procedures embedded in operations and the measures taken to implement due diligence are appropriate and effective. This ensures that the Board of Managing Directors always has all the relevant information it needs to fulfill its responsibilities and make sound decisions.

In the DB Group, the implementation of due diligence is coordinated across the Group by the Sustainability and Environment Group Management function, which is the body

responsible for it and manages it in cooperation with the Compliance, Human Resources Strategy, Legal Affairs and Central Procurement Group Management functions.

Within DB Bahnbau Gruppe GmbH, the implementation of human rights and environmental due diligence obligations throughout the business is ensured and managed by an LkSG coordinator appointed by the Board of Managing Directors. The relevant functional departments, particularly Purchasing, are responsible for the practical implementation of due diligence processes and receive advisory support from other departments. All these departments contribute to the effective implementation of due diligence in their daily work.

In order to implement the principles of the LkSG uniformly, the Group Management of the DB Group performs a governance function in relation to all DB subsidiaries bound by the Act. This involves, in particular, creating and updating Deutsche Bahn AG's human rights strategy, providing methods and templates for the decentralized implementation of due diligence by the obligated DB subsidiaries and performing functional management of the LkSG coordinators in the DB subsidiaries.

IV. Priority risks

DB Bahnbau Gruppe recognizes that its business activities in its own business and along its global supply and value chains can potentially have an adverse impact on human rights and the environment.

The risk analysis carried out in 2025, supported by an external provider, identified abstract risks in all risk areas covered by the LkSG. The specific risk analysis subsequently conducted showed that the probability of these risks actually occurring in DB Bahnbau Gruppe's own business is predominantly low. This is due to the numerous appropriate and effective preventive measures already in place. The result of the specific risk analysis for suppliers is higher overall than in the company's own business for 2025, as it was in the previous year. An improved methodology is enabling risk situations to be captured more precisely. Combining the results of the risk analysis with additional findings from possible audits, ad hoc risk analyses, product group analyses, the complaints procedure and other empirical data enables a clearer picture of the actual risks and a more targeted limitation of priority risks.

Measures are being implemented in the LkSG risk areas to (further) reduce the overall risks and take preventive action. These are focused particularly on the prioritized risks listed below.

1. Own business

No specific risk area is being prioritized in **our own business** in 2025. This decision was based on the results of the risk analysis. Moreover, no further findings emerged from the complaints procedure.

The measures set in 2024 in the priority risk area "Violation of the prohibition on causing harmful changes to soil, water pollution, air pollution, harmful noise emissions or excessive water consumption (Section 2 (2) No. 9 LkSG)" are being implemented or are already underway. This is hardwiring the topic in the company for the long term.

2. Supply chain

The following risk is being prioritized in the direct supply chain:

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

The Code of Conduct for Business Partners contains guidelines on the above topic, which are monitored by means of risk-based queries (e.g., EcoVadis ratings) and in some cases via audits of suppliers.

In addition, awareness-raising workshops take place with the relevant decision-makers both in the company's own business and in the supplier domain, held for example by those responsible for the product groups. The workshops are continuously adapted and improved. They provide the basis for further action, such as adapting the procurement strategy and purchasing practices in use at DB Bahnbaugruppe.

We will publish any changes in priority risks resulting from future or ad hoc risk analyses in the next update of this policy statement.

V. Expectations of employees and business partners

Where compliance with human rights and environmental due diligence obligations is concerned, DB Bahnbaugruppe has high expectations of its own activities and 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:

DB Bahnbaugruppe is committed to conducting all its business activities in an ethical and legal manner and in accordance with the principles set out in this policy statement. This commitment is inextricably linked to the way in which the company works. In its business activities, the company complies with applicable law and respects internationally recognized human and environmental rights standards.

The commitment to respecting human rights and the environment is already reflected in the internal Code of Conduct ([Corporate Principles on Ethics](#)), in which binding standards and expectations for day-to-day conduct are set out. All management board members, managing directors, managers and employees are committed to the principles set out in the internal Code of Conduct. Managers in particular are expected to set a good example.

As part of the implementation of our 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.

DB Bahnbaugruppe is aware that its responsibility goes beyond its own actions. The company therefore not only has high expectations of itself but also demands social and environmental standards from its business partners. They are expected to conduct their business with integrity, to implement appropriate processes to respect human rights and environmental laws, and to take appropriate steps to address DB Bahnbaugruppe's expectations throughout their supply chain.

The specific requirements and principles for cooperation with business partners are set out in the [DB Code of Conduct for Business Partners](#). Suppliers and other business partners pledge to comply with this Code of Conduct or equivalent requirements.

DB Bahnbaugruppe works closely with suppliers and business partners to ensure that they adhere to the same high standards and communicate these standards along their supply chain. Transparency and information-sharing are encouraged to ensure that they understand and meet expectations. Suppliers and business partners are expected to act honestly, responsibly, transparently, and fairly. One of these expectations is that suppliers and business partners, when requested to do so, provide information on how they comply with DB Bahnbaugruppe's principles. Should DB Bahnbaugruppe's own behavior lead to a situation that makes it difficult for suppliers to comply with these principles, business partners are encouraged to proactively inform DB Bahnbaugruppe. Efforts are then made to find appropriate solutions together.

VI. Continuous further development of due diligence processes

The implementation of human rights and environmental due diligence is an ongoing process. This policy statement is therefore reviewed annually as well as on an ad hoc basis and updated without delay if, for example, changed or increased risks are identified.

Further information can be found on our website at <https://www.bahnbaugruppe.de/bahnbaugruppe-de/Ueber-uns/Compliance-LKSG/Lieferkettensorgfaltspflichtengesetz-12837410>.

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