



## UK Modern Slavery Act Statement

### 1) Introduction

This statement is made by Deutsche Bahn Group (DB Group) pursuant to section 54 of the UK Modern Slavery Act (MSA) 2015 and covers the financial year ending 31 December 2016. It sets out the steps DB Group is taking to reduce the risk of slavery and human trafficking taking place in its business and supply chain.

In parallel, the following three parts of DB Group with larger operations in the United Kingdom have issued individual statements, which are linked to their respective homepages.

DB Arriva: <http://www.arriva.co.uk/>

DB Schenker: <http://www.dbschenker.co.uk>

DB Cargo: <http://www.dbcargo.co.uk>

### 2) DB Group – at a glance

DB Group is an international provider of mobility and logistics services operating globally in more than 130 countries. Its headquarters are in Berlin. DB Group has more than 300,000 employees, with almost 40% employed outside Germany.

We are designing and operating the transport networks of the future. By integrating transport and the rail infrastructure, as well as using economically and environmentally intelligent linkage of all modes of transport, we move both people and goods.

In passenger transport, we transport more than 12 million people each day on our trains and buses. In freight transport and logistics, nearly 280 million t of goods are transported by rail and about 100 million shipments are made by road each year via our European network. About 1.2 million t of air freight and just under 2.0 million TEUs of ocean freight are processed in our global networks. In Germany, we operate the longest rail network in Europe, at about 33,000 km in length. We are also the fifth-largest energy provider in Germany.

### 3) General Statement

DB Group places great importance on respecting and promoting human rights and fundamental freedoms. That includes having a zero-tolerance policy approach to all forms of slavery and human trafficking.

DB Group signed up to the UN Global Compact in 2009, and is a founding member of the industry initiative "Railsponsible", established in 2015 and further developed ever since. Furthermore, at national level, DB Group is involved with econsense, the German industry forum for sustainable development. Along with this we also have affirmed our commitment to the understanding of sustainability of the Council for Sustainable Development by our declaration of conformity with the German Sustainability Code. The topic of human rights is also an integral part of DB Group's stakeholder dialogs.

### 4) Policies on Modern Slavery and Human Trafficking

DB Group's commitment to maintaining the highest ethical standards is reflected by our regulations, in particular by applying the DB Code of Conduct and the DB Code of Conduct for Business Partners. In both standards any form of forced labor is strictly rejected.

The DB Code of Conduct and the DB Code of Conduct for Business Partners are binding sets of rules which guide and support when dealing with ethical challenges that might arise in the course of day-to-

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day management. DB Group has a range of instruments to promote the DB Code of Conduct and the DB Code of Conduct for Business Partners, amongst others our e-learning-courses.

The DB Code of Conduct and the DB Code of Conduct for Business Partners are implemented by DB Group's national subsidiaries, which includes DB Arriva and all UK subsidiaries of Arriva, DB Cargo UK, and DB Schenker UK.

### 5) Steps taken

Within DB Group, the management approach to human rights centers on identifying relevant risks. A risk analysis method was developed and implemented in the year under review to identify potentially adverse impacts of DB Group business activities on human rights. The main criteria of this analysis focus on the type of business activity (business model) and the country risk related specifically to human rights. Specific actions are derived from the findings in respect of identified risks.

Procurement continues to focus on sustainable criteria. In addition to the DB Code of Conduct for Business Partners and our purchasing guidelines, DB Group's purchasing department also implements further CSR policies in the supply chain. DB therefore ensures that environmental and social standards are observed and maintained in the supply chain together with suppliers, above and beyond our own added value.

The DB Group's risk management system developed in 2015 to flag potentially risky suppliers has been further developed, together with the CSR assessment procedure that builds on the system. Flagged suppliers are audited and assessed with regard to environmental and social standards.

In addition, further supply chain analysis is conducted together with DB Group suppliers in order to promote practical understanding of the supply chain structure and existing social risks. One objective is to develop means of influencing identified risk areas and supply chain stages that do not add value.

For its own operations, DB Group has implemented a central whistle-blowing management. Various channels are offered for employees, business partners, customers etc. to submit reports about suspected infringements, among others regarding violations of human rights. Reports are treated with strict confidentiality or - on request - anonymously. Whistleblowers can seek legal advice from the whistleblowing management team or from one of our attorneys of trust before submitting a report. For employees and executives specifically, the HR ombudswoman is available as contact person on matters of human rights. A follow-up process is in place to examine alleged violations of human rights.

### 6) Endorsement of this statement

The Board of DB Group recognizes the importance of the matters considered in this Statement and the MSA. DB will continue to take all measures necessary to ensure that slavery and human trafficking have no place in DB Group's business operations.

The Board welcomes this opportunity to restate its commitment to ethical and responsible practices in all parts of DB Group.

Dr. Richard Lutz  
CEO, Deutsche Bahn AG

Berthold Huber  
Member of the Board: Passenger Transport and Freight Transport  
and Logistics, Deutsche Bahn AG