

DEKRA SE

# **Policy Statement on Social Responsibility and Human Rights**

DEKRA Social Standards

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# 1. Policy Statement on Social Responsibility and Human Rights

A central basis of our company and our business activities is to promote sustainable development. Our overarching objective is to ensure the long-term success of the company. For us, sustainable management means incorporating our social and ecological responsibility. Respect for international standards of conduct and human rights is therefore an integral part of our corporate responsibility.

As a global service provider in the areas of testing, inspection and certification, DEKRA also complies with human rights due diligence obligations. Among other things, DEKRA is committed to compliance with internationally applicable human rights within the company and in the supply chain, is a participant in the UN Global Compact and is committed to the Universal Declaration of Human Rights of the General Assembly of the United Nations.

This Social Responsibility and Human Rights Policy Statement describes our human rights strategy and

sets out our position with regard to human rights and social standards.

In this context, DEKRA welcomes the efforts of governments to respect and comply with due diligence obligations along the supply and value chain and assumes responsibility for the protection of human rights in its own sphere of influence. We strive to further improve the sustainability performance of DEKRA and our supply chains as well as our customers through our business activities.

Human rights are of central importance to us - this Policy Statement and the implementation of our human rights strategy play an important role for us. We expect all our employees to take account of the content of this Policy Statement and to implement it in everyday practice. We expect the same from all our business partners.

The Board of Management



**Stan Zurkiewicz**

*Member of the Management Board DEKRA e.V. and DEKRA SE, CEO*




**Wolfgang Linsenmaier**

*Member of the Management Board DEKRA e.V. and DEKRA SE, CFO, HR, and Organizational Excellence*




**Peter Laursen**

*Member of the Management Board DEKRA SE, Chief Operating Officer (COO), Head of Region North-West Europe*




**Petra Finke**

*Member of the Management Board DEKRA SE, Chief Digitalization Officer (CDO)*





## 2. Our Responsibility and Commitment

As an internationally operating group, the DEKRA Group<sup>1</sup> is aware of its social responsibility towards employees and society. We respect and value the diversity in our workforce and in the countries and societies in which we operate as a company. Within the company and in the supply chain, DEKRA is committed to compliance with internationally applicable human rights and corresponding guidelines and

standards, such as the guidelines and standards of the International Labour Organization (ILO),

- the Universal Declaration of Human Rights of the United Nations General Assembly,
- the European Convention on Human Rights (ECHR),
- the United Nations Guiding Principles on Business and Human Rights and
- the ten principles of the UN Global Compact (UNGC).

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<sup>1</sup> "DEKRA Group" refers to DEKRA SE and the controlled Group companies.

### 2.1 Human Rights and Working Conditions

#### 2.1.1 Prohibition of Forced Labor and Slavery

The DEKRA Group is committed to the prohibition of all forms of forced labor, slavery, slavery-like practices such as debt bondage and human trafficking and is committed to combating them<sup>2</sup>

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<sup>2</sup> ILO Conventions 29, 105, Protocol 2014 to Convention No. 29 on Forced/Compulsory work

#### 2.1.2 Prohibition of Child Labor

The DEKRA Group rejects child labor and demands respect for the minimum age for admission to employment in accordance with the respective national regulations and the exclusion from any form of exploitative child labor<sup>3</sup>

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<sup>3</sup> ILO Conventions 138, 182

## 2.1.3 Diversity, Inclusion and Equal Treatment

The DEKRA Group does not allow any form of discrimination or disadvantage based on gender and gender identity, age, ethnic origin & nationality, social origin, religion & belief, sexual orientation and physical or mental abilities. The DEKRA Group is explicitly committed to promoting equal opportunities. The DEKRA Group opposes all forms of coercion, corporal punishment and other forms of unacceptable intimidation and demands that all employees be treated with respect<sup>4</sup>

For the DEKRA Group as a modern employer, topics such as work-life balance, diversity, equal rights for women, employee development and diversity of thought continue to be of growing importance, as does appreciation for the LGBTQIA+ community

and the ambition to create a sense of belonging for the employees. Diversity and equal opportunities are strategic success factors for us. We reaffirm our target of an inclusive organization through the **DEKRA Diversity, Inclusion and Equal Treatment Policy**, which encompasses the three central fields of action of organizational culture, (personnel) processes and networks & initiatives. The DEKRA Group has signed the Diversity Charter and is committed to promoting diversity and creating an open and appreciative working environment.

For information on how to report incidents, please refer to section 4.3 on our DEKRA whistleblower system. Here employees, customers and suppliers can (anonymously) report discriminatory, harassing or bullying situations.

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<sup>4</sup> ILO Conventions 100, 111, 190

## 2.1.4 Occupational health and safety

The DEKRA Group is committed to the occupational health and safety of its employees (including temporary workers). With the help of our EHS policy, we have created a framework to reduce the risk of injuries, accidents and work-related illnesses of our employees, to derive (prevention) measures and to continuously improve our occupational health and

safety and emergency response. The DEKRA Group requires its suppliers to provide and ensure safe and healthy working conditions and to comply with at least the respective national standards regarding occupational health and safety<sup>5</sup>

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<sup>5</sup> ILO Convention 155

## 2.1.5 Adequate living wage

The DEKRA Group is committed to the right to an adequate living wage, which is based on the applicable legal regulations and the respective national

labor market<sup>6</sup> and is committed to compliance with the respective national regulations on working hours and regular paid vacation<sup>7</sup>

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<sup>6</sup> The adequate living wage amounts to at least the minimum wage as laid down by the applicable law and, apart from that, is determined in accordance with the regulations of the place of employment.

<sup>7</sup> ILO Conventions 26, 131

## 2.1.6 Right to freedom of speech and privacy

The DEKRA Group is committed to the right to freedom of speech and privacy.

## 2.1.7 Right to freedom of association

The DEKRA Group is committed to the relevant legal regulations on freedom of association, co-determination and cooperation with employee representatives.<sup>8</sup>

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<sup>8</sup> ILO Convention 87, 98, 135

## 2.1.8 Groups of local communities and other persons

The DEKRA Group is committed to respecting the rights and protection of local communities and indigenous peoples as well as other potentially affected or endangered/vulnerable persons/minorities or groups of persons who could be affected by our business activities.<sup>9</sup>

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<sup>9</sup> ILO Convention 169

## 2.1.9 Refusal of unlawful eviction and deprivation of livelihoods

The DEKRA Group rejects the illegal eviction and confiscation of land, forests and waters, whose use secures a person's livelihood.

## 2.1.10 Vibrant corporate culture and fair, respectful exchange among employees

Communication across all levels and, ideally, personal conversations are indispensable factors for a lively corporate culture. Teamwork, mutual trust, loyalty and integrity are the foundations of our cooperation and components of our values. In order to promote a lively corporate and dialogue

culture, we conduct employee surveys at all DEKRA locations worldwide. These Global Engagement Surveys offer employees the opportunity to think about their workplace and to actively contribute to the company's development.

## 2.2 Human rights and environmental conditions

### 2.2.1 Environmental and climate protection

In the sense of a sustainable future and an awareness of finite resources and climatic changes with the resulting climate consequences for people and the environment, the DEKRA Group is committed to a resource-saving way of working and to environmental and climate protection. Therefore, in addition to labor and human rights, DEKRA also observes environmental due diligence obligations where the DEKRA Group is active as a company itself, as well as with our suppliers and business partners. With the help of our EHS policy, we want to minimize our own negative environmental and climate impact (e.g. prevention of environmental pollution) and at the same time maximize our own efficiency (e.g. economical use of resources and reduction of waste).

Regarding our business practices in the service sector, consideration is also given to not causing

pollution and excessive water consumption<sup>10</sup> that could affect people's livelihoods or harm people.<sup>11</sup>

In the case of handling hazardous substances and waste<sup>12</sup>, the DEKRA Group will comply with the applicable regulations.<sup>13</sup>

Although there is hardly any practical applicability to our business practices with regard to critical raw materials or conflict minerals, the DEKRA Group is aware that handling poses risks to people and the environment and, where relevant, complies with relevant regulations.<sup>14</sup>

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*10 Such as harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption*

*11 In particular, this refers to natural bases for food production and drinking water and sanitation access*

*12 E.g. collection, storage, recycling and disposal*

*13 Minamata-Convention on Mercury of 10 October 2013, Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989, Stockholm Convention on Persistent Organic Pollutants of 23 May 2001 (POPs Convention) as well as other country-specific legal frameworks (e. g. German Ordinance on Hazardous Substances).*

*14 E.g. REGULATION (EU) 2017/821 (EU Conflict Minerals Regulation)*

### 2.2.2 Conservation of biodiversity

Wherever possible, we strive to create habitats for plants and animals at our locations, and in doing so we aim to contribute to the conservation of biodiversity and thus to the preservation of our livelihood.

## 2.3 Human rights in the wider context

### 2.3.1 Engagement of human rights defenders

The DEKRA Group welcomes the engagement of defenders of the protection of human rights and

strictly rejects the intimidation, threats and the like of these persons.

### 2.3.2 Data protection and information security

In the digital age, data protection and information security are important cornerstones of our corporate philosophy. Protecting the personal

rights and privacy of everyone is the basis of a trusting business relationship for the DEKRA Group.

### 2.3.3 Use of security forces

Although there is little practical applicability to our business practices, it is also taken into account in a broader sense that in the event of the deployment of our own security forces, they must adhere to our

guidelines and standards – i.e. respect for human rights. If private security forces are deployed, the DEKRA Group is expected to comply with our standards as well.

### 2.3.4 Other serious infringements

The DEKRA Group rejects any other particularly serious activities or omissions that harm human rights or the environment.



# 3. Our concept of respecting and complying with human rights

## 3.1 Our Human Rights Risk Management System

To meet the requirements for compliance with due diligence obligations and human rights targets along our own business operations and supply chains, the DEKRA Group has a Group-wide Human Rights Risk Management System (HRRMS) with associated processes. It will be successively expanded.

- Principles
- Planning
- Prevention (preventive measures)
- Detection
- Response (remedial actions)
- Efficacy Control & Improvement
- Reporting

In its development and implementation, it follows a management system approach with the following aspects:

Findings from the implementation of measures and from our DEKRA whistleblower system (chapter 4.3) are continuously incorporated into our HRRMS.

## 3.2 DEKRA and controlled subsidiaries

As part of the HRRMS, we have defined measures for dealing with our controlled Group companies. These include, among other things, a regular (at least annual) risk analysis of our human rights and environmental aspects in relation to the respective

subsidiary (considering country-specific characteristics). Appropriate reporting processes are implemented to ensure the continuous improvement and effectiveness of the HRMMS.

### 3.3 Dealing with suppliers

As part of our HRRMS, we have defined measures for dealing with our suppliers. These include, among other things, a regular risk analysis regarding human rights and environmental aspects. To this end, we work at the DEKRA Group with software-supported processes. These and other internal company processes, enable us to continuously build up a reliable risk classification of our entire supplier base.

When selecting suppliers and the products and services we require, we consider social, ecological and business ethical criteria in our purchasing practice. We are committed to ensuring that our direct suppliers respect human rights. Our complaints procedure is also open to persons affected by the economic activities of our indirect suppliers; if we have actual indications that human rights or environment-related violations or risks appear possible, we take specific measures as required.

Our purchasing guidelines within our Global Procurement department define the consideration of sustainability in our purchasing management. We require our suppliers to comply with sustainability

standards. This is laid down in the General Purchasing Conditions (GPC) and in the Sustainability Supplier Code of Conduct and is followed up by means of risk- and demand-oriented controls. Our ambition about global purchasing is to create uniform, sustainable and human rights-compliant purchasing processes.

The GPC set clear requirements for our suppliers regarding ecological (climate protection, environmental pollution, environmental management system) as well as social and business ethical aspects (human rights, non-discrimination, ILO standards, health and safety, compliance).

With our Sustainability Supplier Code of Conduct, we expect our suppliers to follow our principles in the following four areas:

- Sustainability Management & Ethical Business Conduct
- Environmental & Climate Protection
- Social Responsibility & Human Rights
- Sustainability in Supply Chain Management

### 3.4 Dealing with other business partners

It is important that the DEKRA Group's business partners adhere to our compliance program to have the same understanding of values and principles. That is why it is essential for the DEKRA Group to

select fair and trustworthy business partners. Our compliance requirements and expectations of our other business partners are therefore handled individually on a contractual basis.

# 4. Implementation of our Human Rights Strategy

## 4.1 Scope

This policy statement represents our position regarding human rights and social standards. It contains a description of the processes for the effective implementation of our human rights strategy. It addresses the requirements of the UN Guiding Principles on Business and Human Rights and the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains<sup>15</sup> and, in addition to our general requirements of conduct (DEKRA Compliance Guidelines), represents a central requirement with regard to human rights.

<sup>15</sup> German Federal Law

The DEKRA Group ensures the Group-wide communication of this Policy Statement within the company in an appropriate form.

The scope of the human rights and environmental due diligence obligations extends across our own business operations, i.e. including all Group-companies over which DEKRA has a decisive influence, as well as employees and business partners along our supply chain (including other groups that are directly or indirectly affected by the business activities of the DEKRA Group).

## 4.2 Implementation and monitoring

The Board of Management of DEKRA SE is responsible for the overarching activities on human rights. The responsible Board member develops the topic jointly and with the involvement of all relevant departments and receives regular reports on human rights activities through the Compliance Function, Global Procurement and Sustainability Management.

To design, implement and manage suitable prevention and remedial measures, we also work together in cross-functional teams. These teams include specialists in Sustainability, Compliance and Human Rights issues as well as experts from the operational purchasing departments and the internal audit department as well as other (global) departments, if applicable.

## 4.3 DEKRA Whistleblower System

In the event of information, complaints and suspected cases of this Policy Statement or human rights violations, affected employees, business partners or other stakeholders can contact the responsible compliance reporting office openly or, optionally, anonymously via **DEKRA's whistleblower procedure** and request remedial action. The course of the procedure is laid down in our **Rules of Procedure**.

## 4.4 Reporting

We provide regular reporting on human rights due diligence issues in our own business area and in the supply chain to our internal and external stakeholders in our sustainability reports.

The DEKRA Group is guided by and complies with the Sustainability Code (DNK<sup>16</sup>) and reports on its criteria regarding social standards and human rights. In the context of social and environmental standards as well as human rights, we also support

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<sup>16</sup> Deutscher Nachhaltigkeitskodex (DNK)

the UN Sustainable Development Goals (SDGs) and strive to contribute to their fulfillment through our daily work.

From 2023 onwards, we will also report annually to the German Federal Office for Economic Affairs and Export Control (BAFA)<sup>17</sup> on the fulfilment of our due diligence obligations. The report will be made available on our website.

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<sup>17</sup> Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA)



# 5. Further information

Further information and guidelines in the DEKRA Group:

- **DEKRA Compliance Guidelines**
- **DEKRA Diversity Policy**
- **Sustainability Supplier Code of Conduct**
- **DEKRA General Purchasing Conditions**
- **Sustainability Report DEKRA (DNK)**
- **Rules of Procedure for Whistleblower Proceedings in the DEKRA Group**





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