



DZ Bank AG - London Branch - UK Modern Slavery Act Statement 2024

This statement is made pursuant to section 54 of the Modern Slavery Act (the "**Act**") and constitutes the modern slavery and human trafficking statement of DZ Bank AG (the "**Bank**") for the financial year ended 31 December 2023. This Statement relates to the Bank's UK activities which are covered by the Act but the Bank's stance on Slavery and Human Trafficking are reflected in global policies and procedures which apply to all DZ Bank AG Group entities.

The Bank is committed to abolition of modern slavery and human trafficking by creating a culture of transparency in relation to the supply of goods and services it receives. We have done this by embedding a culture of transparency and openness in our business and supply chains.

The Bank has a centralised procurement function that operates in accordance with our procurement policy. This sets out the requirements for the Bank when procuring goods and services. We have established policies and procedures to help identify where risks of modern slavery may exist and incorporated the management of those risks within our procurement process. Following the introduction of the Act, we have reviewed our procurement policy to reflect our expectation that our suppliers are taking appropriate steps to comply with the Act.

We have been raising awareness of modern slavery and human trafficking within the DZ Bank and have provided training on modern slavery for all our employees. We encourage any employees who do identify potential modern slavery issues within our business or supply chain to report their concerns directly either to their line Manager, or via our whistle-blowing process, or alternately directly to Compliance department.

Next steps

We will continue to work to raise awareness of modern slavery within the Bank by reviewing and evaluating the measures and processes that we have implemented so far to ensure their effectiveness. We will work with our suppliers and review our processes with our delivery partners to identify any additional measures we can take as a business to combat modern slavery and human trafficking.

Approval procedure

This statement, which will be reviewed annually and updated as required, has been reviewed and approved by the Board of Directors of the Bank on 17.06.2024 (add date).

..... Board member signature

U. Brauzi Board member name and title

DZ BANK AG Modern Slavery Statement

DZ BANK AG makes this statement under the provisions of the Modern Slavery Act 2015 (the "Act"). The Act requires the Bank to state what actions it has taken during the financial year ending 31 December 2023 to ensure that neither slavery nor human trafficking took place in its operations or supply chains.

DZ BANK AG

DZ BANK Group focuses its strategy on the local cooperative banks. In doing so, it pursues the objective of consolidating the positioning of the cooperative financial network over the long term as one of the leading financial services providers in Germany. The DZ BANK Group supports the cooperative banks by providing extensive financial products and services in the Retail Banking, Corporate Banking, Capital Markets, and Transaction Banking business lines. This partnership is built on the principles of subsidiarity, decentralization, and regional market responsibility.

The strategic focus of DZ BANK, essentially relates to the activities of DZ BANK – central institution and corporate bank. DZ BANK – central institution and corporate bank comprises both the cooperative central institution function, which supports the operating activities of the local cooperative banks, and the corporate bank function.

Respect and Protection for Human Rights

DZ BANK is committed to democracy, tolerance, equality of opportunity and to human rights. This conforms with the cooperative values which underpin our activities: Mutuality, partnership and responsibility for the community.

As the central institution of the cooperative banks in Germany, we make an important contribution towards a functioning financial system. We are very conscious of our special responsibility towards customers, business partners, shareholders, employees and society as a whole. Against this backdrop, exactly what business activities we focus on and how we operate these is of central importance.

On signing the Global Compact of the United Nations (UN) in 2008, DZ BANK committed itself to ten globally applicable principles in the field of human rights, labour norms, environment and the fight against corruption. These basic principles form a binding framework for our operations. The prevention of slavery and human trafficking is part of our understanding of human rights. DZ BANK has taken several steps to ensure that slavery and human trafficking does not take place in its supply chain, nor in any part of its business during the financial year.

Human rights and customers

DZ BANK subjects both its own investments as well as those made with the loans and finance it provides to a sustainability assessment which also includes respect for human rights. Since 2009, we have worked with a sustainability checklist for lending and project finance based on the UN Global Compact and the Equator Principles. Using this list, we evaluate all factors relevant for finance as regards their environmental and social risks, also including respect for human rights. Finance for companies which breach internationally recognised principles in the field of human rights and labour law is excluded as a matter of principle. Our training sessions on sustainability in lending also take account of human rights.

Human rights and suppliers

Respect and protection for human rights also plays a major role in DZ BANK's selection of service providers and suppliers. All procurement processes must satisfy social and environmental standards which include human rights and labour practice issues. DZ BANK requirements are based, amongst other things, on the principles embodied by the UN Global Compact and applicable conventions of the International Labour Organisation (ILO). As of 2010, we have secured commitments from all suppliers to comply with these standards and principles within the framework of a Sustainability Agreement. Breach can ultimately lead to the exclusion of the supplier.

The majority of services used by DZ BANK are not from high-risk countries.

Human rights and employees

As an employer, DZ BANK respects and promotes the human rights of its employees, the majority of which work in Germany. There, respect for human rights is guaranteed by law. In addition to this, we secure undertakings from our employees to respect human rights based on a Code of Conduct. Corresponding training programmes and seminars are obligatory. We do not tolerate any discrimination of employees or third parties on the basis of age, sex, ethnic origin, nationality, religion, political view, ideology, race, disability or sexual identity.

No complaints in 2023

In case of any questions on human rights or any grounds to suspect a human rights abuse, stakeholders or whistleblowers should contact DZ BANK Compliance via the complaints system ([Home - BKMS System \(bkms-system.com\)](https://bkms-system.com)), the ombudsman or the works' council. In the year 2023, there were no formal complaints in relation to human rights abuses or working practices.

Additional Documents

For more information on the DZ BANK's commitment to the protection of human rights, the following guidelines and policies should be considered:

- DZ BANK AG Policy Statement on Respect for Human Rights
- Human Rights Guideline DZ BANK Group
- Code of Conduct for DZ BANK Group