

DekaBank Deutsche Girozentrale (hereinafter "DekaBank") together with its subsidiaries forms the Deka Group (hereinafter "Deka"). Deka has a zero-tolerance approach to modern slavery and human trafficking. Its accession to the United Nations Global Compact means that DekaBank is part of the world's largest and most important corporate sustainability and responsibility initiative. DekaBank has committed itself to implementing its ten principles, which relate to the observance of human rights and labour standards, the protection of the environment and the fight against corruption and bribery. More information on the Global Compact can be found here: [United Nations Global Compact](#).

Since 2013, Deka has issued a declaration of compliance with the German Sustainability Code [*Deutsche Nachhaltigkeitskodex*] (GSC) which is published on the website of the German Council for Sustainable Development (RNE). In addition to the accession by DekaBank to the UN Global Compact (2011), DekaBank made a commitment to comply with the Equator Principles which focus on taking social and environmental standards into account in international project financing. Deka Investment GmbH has been complying with the United Nations Principles for Responsible Investment (UN PRI) since 2012. As part of its UN PRI membership, Deka Investment GmbH also participates in joint engagement initiatives with other global investors, and in the year under review it continued to support an engagement campaign on the topic of cobalt and human rights. It engaged with German automotive and telecommunications companies on how to effectively improve human rights standards in the mining of cobalt and other conflict minerals. In addition, Deka joined the UN PRI in 2020.

The following statements, declarations and statistics are valid as of 31 December 2021.

Deka

DekaBank is a German federal institution incorporated under public law with registered offices in Frankfurt am Main and Berlin. It is 100% owned by the German savings banks. 50% of the shares are held via Deka Erwerbsgesellschaft mbH & Co. KG. The savings banks have pooled their shares in Deka Erwerbsgesellschaft mbH & Co. KG via the regional savings banks and giro associations held by them. The other 50% of the shares are held by the Deutsche Sparkassen- und Giroverband, DSGV ö.K. DekaBank together with its subsidiaries forms Deka.

In addition to its registered offices in Frankfurt am Main and Berlin, Deka maintains branches or representative offices in Dusseldorf, Munich, Hamburg, Vienna, Luxembourg, Leipzig, Amsterdam, Brussels, Paris, London, Madrid, Warsaw, New York and Singapore. Deka currently employs a total of 4,622 individuals.

Deka's Code of Ethics serves as a binding orientation framework for the ethically and morally correct conduct and actions of employees, managers, members of the Board of Management and third parties acting on behalf of Deka. It represents the basic structure for a corporate culture within Deka that complies with the law and is open, transparent and value-oriented. Assessment of good conduct according to the Code of Ethics is integrated into the annual performance evaluation, which in turn flows into the calculation of variable remuneration.

Deka's commitment to sustainable corporate governance and sustainability performance is demonstrated by its sustainability ratings (assigned by sustainability rating agencies), which place Deka as significantly above average in its business sector and attests to Deka being at a very high level, even in a sector comparison. In 2021, DekaBank supported a total of four financings under the specifications of the Equator Principles; these included two projects in category B (limited social and environmental impact) and two projects in category C (projects with minimal or adverse environmental and social risks and/or impacts).

Deka has an extensive list of undesirable or high-risk transactions, which includes financing of companies that violate internationally recognised principles in the area of human rights and labour rights (ILO Declaration on Fundamental Principles and Rights at Work). Such transactions may only be performed with an exceptional approval of the Board of Management. DekaBank exclusively finances ships which fly a flag listed by the Paris Memorandum of Understanding on Port State Control. This ensures uniform control of ships in ports, e.g. with regard to compliance with safety and social standards and living and working conditions for crew members.

As part of the lending process, all exposures awaiting a decision are checked for possible environmental and/or reputational risks – i.e. the possible exclusion of financing on the basis of the negative list. If it is assessed, in these specialist units, that the potential involvement could be associated with increased environmental and/or reputational risks, the sustainability management unit is given a separate audit order. This reviews possible negative impacts of the financing on all relevant ESG aspects, including biodiversity, for example. In the year under review, the sustainability management unit carried out seven separate reviews. This corresponds to a share of 23.3% of the total of 30 credit submissions processed in connection with new business in 2021.

Deka's Policy on Slavery and Human Trafficking

Deka has the following policy on slavery and human trafficking:

Human rights

Deka commits itself to respect internationally proclaimed human rights.

Deka's credit risk strategy forms the key basis for the requirements for proprietary investments. Since 2014 DekaBank has used a sustainability filter for new investments in its proprietary investments. Based on the UN Global Compact, this includes a catalogue of exclusion criteria for the environment, human and labour rights and corruption. All proprietary investments in companies that violate internationally recognised principles in the field of human and labour rights (ILO Declaration on Fundamental Principles and Rights at Work) are excluded.

Discrimination

For Deka it is of central importance to provide a framework that prevents discrimination, sexual harassment or bullying from occurring in the first place. Breaches of the Code of Ethics or other discriminatory behaviour as defined by legal regulations, as well as threatening, hostile or abusive behaviour, is not tolerated.

Deka's 5th Equality Plan, which came into force on 1 January 2021, is a key instrument of HR policy for implementing equal opportunities for women and men and anchoring them in the corporate culture in the long term. To meet these objectives, a new career site, which has been online since September 2020, provides an in-depth insight into Deka's working environment and uses images, text and messages to increase the attractiveness of the employer for female specialists and managers. This is used alongside the Genderdax platform, which details measures taken at Deka for the encouragement of women. Another measure for the implementation of the Equality Plan is the women's mentoring programme.

Forced labour

Deka is totally opposed to all forms of slavery, forced labour and bonded labour and guarantees its staff, whether local employees or migrant workers, the right and opportunity to leave their employment at their own free will.

The topics of labour and human rights took on additional significance in the year under review as a result of the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) passed in Germany in 2021. This Act comes into force on 1 January 2023 for companies with at least 3,000



employees, and from 2024 also for companies with at least 1,000 employees. From 1 January 2023, Deka will take the appropriate measures needed for compliance with the Act. Those companies caught by the Act must ensure that fundamental labour and human rights are respected in their own operations and especially in global value chains. This includes, in particular, the prohibition of child and forced labour as well as slavery.

Child labour

Deka commits itself to adhere to the rules of the Convention on the Minimum Age for Admission to Employment and Work (Convention No. 138 of the International Labour Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the worst forms of Child Labour (Convention No. 182 of the International Labour Organization). If national legislation on child labour imposes stricter standards, the application of such standards shall take precedence.

Protection of health

Protective and hygiene measures were taken for Deka employees from mid-March 2020 in response to the Covid pandemic. In order to protect the workforce from the virus and minimise the risk of infection, numerous countermeasures were taken, in particular the expansion of the possibility for mobile working as well as the implementation of the SARS-CoV-2 occupational health and safety standards required by the Federal Ministry of Labour and Social Affairs (Bundesministerium für Arbeit und Soziales, BMAS) at all locations. Comprehensive information was provided to staff via "Covid-FAQs" on the intranet and staff were also provided with hygiene tools. There were only 158 confirmed cases of Covid among 4,622 Deka employees in the year under review, and as far as can be traced, the infection was almost exclusively attributable to contacts outside work. In addition, Deka made it possible for 1,100 employees and 400 relatives to receive the Covid vaccination within eight weeks from June 2021. Legal requirements in this respect are of course complied with.

A new digital health platform "Deka machfit" was introduced in October 2020 which provides all DekaBank employees with a health budget of Euro 200 per calendar year for booking external offers. As in previous years, there were no deaths at work in Deka in 2021.

Minimum wage, working hours

Deka works to ensure that wages comply with the applicable statutory minimum requirements and industrial standards without unauthorised deductions. Deka ensures that the working hours conform to national regulations and industry practices.

The Sustainability Declaration by DekaBank with its suppliers

When selecting suppliers, DekaBank has defined sustainability-related requirements for both the quality of the products and services purchased and the corporate governance of the suppliers and service providers. Key points of the corporate requirements are set out in the sustainability declaration that the largest suppliers sign before entering into a business relationship. In this declaration, they undertake, among other things, to comply with the core labour standards of the International Labour Organisation (ILO). Two years after the last update, a review of the sustainability declaration took place during the year under review with regard to necessary adjustments to the regulations and references to standards. Among other things, it was determined that DekaBank's contractual partners are obliged to submit a statement and documentation if there are indications of breaches in order to enable an assessment of the situation. By the end of 2021, 330 suppliers had signed the Sustainability Declaration. This represents around 85% of the procurement volume in strategic purchasing. The remaining 15 per cent are smaller consulting and software companies for which, after weighing up the potential impact on the relevant sustainability aspects and the effort required to obtain and follow up the declaration, signing is waived.

Modern Slavery & Human Trafficking Statement

The Deka logo consists of the word "Deka" in a white, sans-serif font, positioned in the lower-left corner of a solid red square.

All new suppliers are also obliged to provide information on their standards and services in the area of environmental management in the DekaBank purchasing portal. This gives the employees in procurement the opportunity to consider relevant aspects in the negotiations with suppliers. In the year under review, new sustainability declarations were concluded with a total of nine suppliers in the areas of consulting, personnel and IT.

Risk Assessment by Deka

Deka considers the implemented policies and controls to be reasonable and effective. They are kept under ongoing review.

Training

As in previous years, all new employees have completed initial compliance training in the year under review. Moreover, all employees are obligated to complete web-based training on the topics of prevention of money laundering, prevention of fraud, financial sanctions/embargoes and capital market compliance on a prescribed rota. In total, 67 training sessions (including web-based training (WBT)) on compliance topics were conducted in the year under review.

Complaints

Between the years of 2017-2021, there have been no complaints against Deka with regard to wrongdoing as defined in the UK's Modern Slavery Act 2015.

Reporting by Deka

The Code of Ethics is communicated to all employees upon commencement of their employment and employees are reminded to adhere to these principles in their daily business operations. In this respect, the annual performance evaluation of employees was expanded to include a module on the evaluation of conduct in accordance with the Code of Ethics.

Deka works to ensure that wages comply with the applicable statutory minimum requirements and industrial standards without unauthorised deductions. Deka ensures that the working hours conform to national regulations and industry practices.

If violations of these ethical guidelines and basic values are detected, we do not limit ourselves to simply reiterating this Code of Ethics, but instead take decisive action. We encourage our employees to report violations or suspected incidents to their superiors, the compliance department or our Ombudsman. Reports can also be made anonymously and in confidence, and information on the whistleblower system is available on Deka's compliance system for all employees.

Future Steps by Deka

Deka reserves the right to take further steps to contribute to the eradication of modern slavery and human trafficking in our business and our supply chains.

Modern Slavery & Human Trafficking Statement



Approval

This statement is made further to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Deka's slavery and human trafficking statement for the 2021 financial year (ending 31 December 2021).

Frankfurt, 24th of June 2022


Martin Klaus Müller


ppa. Manfred Karg

Published by

DekaBank
Deutsche Girozentrale
Institution incorporated under public law
Mainzer Landstraße 16
60325 Frankfurt am Main

www.deka.de
nachhaltigkeit@deka.de