

Modern Slavery & Human Trafficking Statement

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 Deka is part of the world's largest and most important corporate sustainability and responsibility initiative. We have committed ourselves 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. These are also all defined as relevant in the CSR Directive Implementation Act (CSR-Richtlinie-Umsetzungsgesetz, CSR-RUG). 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 which DekaBank joined in 2020. All the main companies of Deka have committed to implementing the six principles for sustainable investment. Deka Investment GmbH also participates in joint engagement initiatives with other global investors and it continues to support an engagement campaign on the topic of cobalt and human rights. In the year under review the PRI office assessed the Transparency Reports to be submitted by the signatories and published on the PRI website.

The following statements, declarations and statistics are valid as of 31 December 2022.

Deka

DekaBank is a German federal institution incorporated under public law with registered offices in Frankfurt am Main and Berlin. It is wholly 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 clearing associations held by them. The other 50% of the shares are held by the Deutscher Sparkassen- und Giroverband, DSGV ö.K. DekaBank together with its domestic and foreign subsidiaries forms Deka.

Deka maintains registered offices, branches or subsidiaries in Frankfurt am Main, Berlin, Dusseldorf, Munich, Hamburg, Wiesbaden, Salzburg, Luxembourg, Leipzig, Amsterdam, Brussels, Paris, London, Madrid, Milan, Warsaw, Auckland, New York and Singapore.

Deka's Code of Ethics, September 2022, 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. The section on sustainability within the Code of Ethics, September 2022, was expanded in the year under review to include Deka's nine sustainability principles, specifying the services it provides to support its customers and partners in taking sustainability criteria into account in their investments and in the transformation towards a climate-friendly economy.

Deka's commitment to sustainable corporate governance and sustainability performance is demonstrated by its sustainability ratings (assigned by sustainability rating agencies). Overall, Deka's sustainability ratings confirm the high level of its sustainability-related measures and underline its leading position in the national and international banking sector. In 2022, DekaBank supported a total of four financings under the specifications of the Equator Principles with all projects being assigned to

category B (limited social and environmental impact). DekaBank reports annually on the implementation of these principles, which is published on the Equator Principles website.

Deka has an extensive list of undesirable and/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) and project finance that does not meet the requirements of the Equator Principles. Such transactions may only be performed with an exceptional approval of the full Board of Management. The transport finance portfolio of DekaBank primarily includes loans secured by mortgages on aircraft and ships. 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.

As part of the loan portfolio and the lending process, all exposures awaiting a decision are checked for possible sustainability-related 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 reputational risks, a supplementary vote must be obtained. A sustainability check is carried out taking into account labour and human rights criteria as well as governance and environmental aspects. In the year under review, the sustainability management unit, together with the Risk Controlling Unit, carried out eight separate reviews. This corresponds to a share of 21.1% of the total of 38 credit submissions processed in connection with new business in 2022.

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 proprietary investments. Based on the UN Global Compact, this includes a catalogue of exclusion criteria for the environment, human and labour rights and corruption. For each new investment, in addition to the sustainability check already carried out, an examination of the issuers is carried out on the basis of comprehensive criteria of the sustainability filter for proprietary investments, with exclusion criteria. Issuers of securities that violate one or more of this exclusion criteria are excluded from new investments. In October 2022, a final report was produced on the Minimum Social Safeguards (MSS) of the Platform on Sustainable Finance, which developed and published criteria to comply with the MSS. It must be demonstrated that there is no breach of the four identified core issues of human and labour rights, bribery and corruption, taxation and fair competition, and that processes and/or measures are implemented to ensure compliance with the core issues. Deka is compliant in all four core topics and ensures that compliance will continue in the future.

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 2022, 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 its equal opportunities' objectives for men and women, Furthermore, the equal opportunities officers offer events aimed specifically at women. These include the annual women's meeting and the DekaFrauenFokus series of events focusing on topics such as "Strengthening cooperation and increasing impact". During this year under review, two women's networks founded by female employees and managers in Deka promoted internal networking within the company. In 2022, the Diversity Dashboard was introduced as an internal reporting and

management tool, providing information on the diversity of the workforce of Deka on a six-monthly basis with a focus on gender distribution in the workforce, age and generation mix, diversity of nationalities and people with a declared severe disability.

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 Corporate Due Diligence in Supply Chains Act (Lieferkettensorgfaltspflichtengesetz, LkSG). This Act came into force on 1 January 2023 for companies with at least 3,000 workers in Germany. In implementing the legal requirements, a human rights officer was appointed in 2022 and a complaints procedure was set up – both starting on 1 January 2023. In 2023, further steps will follow to implement the LkSG including risk analyses for its own business division and direct suppliers. As required by the LkSG, DekaBank will report annually on the results of the analyses and the measures derived. DekaBank will also publish a declaration on its responsibility for human rights and the environment in its supply chains and, if required, update the content accordingly. Those companies caught by the Act must ensure that fundamental labour and human rights are respected in their own operations and especially their 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

The ongoing Corona pandemic has presented occupational health and safety with a number of challenges. 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 "CovidFAQs" on the intranet and staff were also provided with hygiene tools, such as rapid tests and FFP2 masks. Deka offered booster vaccinations in December 2021 and January 2022; around 1,000 employees and their relatives and external employees took advantage of this opportunity. Legal requirements in this respect were of course complied with.

A new digital health platform "Deka machtfit" was introduced in October 2020 which provides all DekaBank employees with a health budget of Euro 200 per calendar year for booking external offers. At the end of the year under review, 3,845 employees had registered on the platform.

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 aim of the Board of Management remuneration system is to comply with regulatory requirements, including ESG criteria. Employees also have the option of using mobile working.

The Sustainability Declaration by DekaBank with its contractual partners

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). As part of the comprehensive review of the Sustainability Declaration in 2021, it was determined that DekaBank's contractual partners are obliged to submit a statement and documentation if there are indications of violations in order to enable an assessment of the situation. By the end of 2022, 360 suppliers had signed the Sustainability Declaration. This represents around 85% of the procurement volume in strategic purchasing. The remaining 15% 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.

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 30 suppliers in the areas of consulting, personnel and IT.

Risk Assessment by Deka

Deka considers the implemented policies and controls to be reasonable and proportionate to any potential risks in its business. They are kept under ongoing review.

Deka's overall risk with regard to money laundering and terrorist financing has been classified as low based on the annual risk analysis. DekaBank also defines requirements for compliance with applicable sanctions and embargoes and for the implementation of sanctions related measures through the "Group-wide minimum standards on financial sanctions", particularly due to the complex and uncertain development of the sanctions environment due to the Russian war of aggression on Ukraine in 2022. To identify and control risks related to sanctions and embargoes, transactions and customer/business partner portfolios are checked against applicable sanctions lists, among other things. Technical solutions have also been implemented for sanctions checks on trading in financial instruments.

For Deka, the risk of corruption is regularly surveyed and assessed as part of the Fraud Prevention Forum. The assessment as of 31 December 2022 showed a medium risk overall. As in previous years, there was no information in 2022 that employees were under investigation by the criminal prosecution authorities for corruption offences.

Training

As in previous years, all new employees have completed initial compliance training in the year under review. Moreover, all employees are obliged to complete web-based training on the topics of prevention of money laundering, prevention of fraud, financial sanctions/embargoes and capital market compliance and risk culture at the start of their employment and at regular intervals. In total, 50 training topics (including web-based training (WBT)) on compliance topics were conducted in the year under review.

Complaints

Between the years of 2017-2022 there have been no complaints relating to environmental issues submitted via formal procedures or complaints on the subject of corruption or the human rights impact of Deka's Activities. Further there have been no complaints against Deka with regard to wrongdoing as defined in the UK's Modern Slavery Act.

Reporting by Deka

The Code of Ethics 2022, Sustainability component has been expanded and sharpened during the

reporting period. 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, and consequently in the variable of remuneration.

Particularly serious violations of the Code of Ethics can lead to measures under labour law, civil and criminal proceedings, and even termination of the contractual relationship.

Deka's compliance system includes a whistleblower system which ensures information from employees and external persons about potential and actual breaches of legal regulations and requirements, in particular the Money Laundering Act, as well as illegal or dishonest actions, can be reported in confidence to DekaBank's external ombudsman. In 2022, two tips were received via the ombudsman.

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.

Approval

This statement is made further to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes Deka's slavery and human trafficking statement for the 2022 financial year (ending 31 December 2022).

Frankfurt, 27 June 2023



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Published by

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