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1. Preamble

According to Section 6 (2) LkSG, a company must issue a declaration of principles on its human rights strategy. The policy statement must contain at least the following elements:

- The description of the procedure by which the company fulfills its obligations under Section 4 (1) LkSG (risk management), Section 5 (1) LkSG (risk analysis), Section 6 (3) to (5) LkSG (preventive measures) and Sections 7 to 10 LkSG (remedial measures, complaints procedure, indirect suppliers and service providers, documentation and reporting obligations).
- The priority human rights and environmental risks identified for the company on the basis of the risk analysis.
- The definition, based on the risk analysis, of the human rights and environmental expectations that the company has of its employees, suppliers and service providers in the supply chain.

As a logistics company with national and international business relationships, we are committed to respecting human rights, protecting the environment, sustainability, complying with all applicable legal and official regulations and observing all internal rules of conduct in our own divisions with this declaration of principles. We also ensure compliance with due diligence obligations in the supply chain and that our direct suppliers and service providers respect human rights and comply with environmental standards.


The implementation of the conditions of the Supply Chain Duty of Care Act is considered by our management to be a central corporate activity. We consider the observance and implementation of our declaration of principles within the company to be a mandatory prerequisite for our professional and business cooperation and thus for the long-term success of our company. For this reason, clear structures and responsibilities have been created in our company for the implementation of the principles of the Supply Chain Duty of Care Act.

The fulfillment of the due diligence obligations pursuant to Section 3 LkSG is continuously documented in the company in accordance with Section 10 (1) LkSG. An annual report on the fulfillment of its due diligence obligations pursuant to Section 10 (2) to (4) LkSG shall be prepared.

2. Compliance with internationally recognized standards

We implement the following regulations as the basis for compliance with the LkSG:

- The 8 core labor standards of the International Labor Organization (ILO) with their five basic principles (freedom of association and the right to collective bargaining, elimination of forced labor, abolition of child labor, prohibition of discrimination in respect of employment and occupation, occupational health and safety).
- International Covenant on Civil and Political Rights (BGBl. 1973 II p.1533,1534). International Covenant on Economic, Social and Cultural Rights (BGBl. 1973 II p.1569,1570).
- Minamata Convention (BGBl. 2017 II p.610,611). Stockholm Convention (BGBl. 2002 II p.803,804) with amendment 2005 (BGBl. 2009 II p.1060,1061). Basel Convention (BGBl. 1994 II p. 2703,2704) with amendment 2014 (BGBl. II p. 306,307)

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3. Implementation of measures to fulfill due diligence obligations

In order to ensure that human rights are observed across the board in our own company and by our suppliers and service providers, we have defined our internal processes and procedures for fulfilling our obligations as follows in accordance with the requirements of Section 6 (Preventive measures), Paragraph 2, No. 1 LkSG:

- Supplementing the existing risk management system with the requirements of the Supply Chain Due Diligence Act in accordance with Section 4 (1).

Our company maintains a risk management system that also considers the human rights and environmental risks within the company and in the supply chain in order to comply with due diligence obligations.

- Determination of responsibility within the company in accordance with Section 4 (3) LkSG

Our risk management is firmly anchored in all relevant areas and therefore also in all relevant operational processes and is monitored by the responsible or authorized persons in accordance with Section 4 (3) LkSG.

- Regular implementation of documented risk analyses in accordance with Section 5 (1) LkSG

To ensure that we can adequately and effectively fulfill our human rights and environmental due diligence obligations, we carry out risk analyses regularly, at least once a year or on an ad hoc basis. To this end, we have established standardized risk management processes so that potential and actual risks within our own divisions and our supply chain can be systematically identified, reliably recorded and assessed according to a uniform standard.

- Risk minimization by defining and implementing preventive measures in accordance with Section 6 (3) to (5) LkSG. Immediate risks and hazards for people and the environment in the supply chain are prevented or minimized through appropriate preventive measures. As part of our risk management, suitable preventive measures are defined where necessary and effective remedial measures are developed and implemented.

In accordance with Section 6 (5) LkSG, the effectiveness of the preventive measures is reviewed once a year or on an ad hoc basis.


Our company regularly instructs suppliers and service providers on the implementation of contractual assurances in accordance with Section 6 (4) LkSG.

Raising the awareness of our employees in the relevant business areas in accordance with Section 6 (3) LkSG so that human rights and environmental risks are identified and reported promptly is also very important to our company.

- Implementation of suitable measures to detect deviations and non-conformities in accordance with Section 6 (4) LkSG (contractual control mechanisms)

Our suppliers and service providers are selected on the basis of their compliance with human rights and environmental protection targets and their preventive measures to protect human rights and the environment, among other things, and are evaluated at least once a year and on an ad hoc basis during the year according to the following criteria, among others (supplier evaluation):

Location, quality, service, delivery reliability, price/performance, proof of certifications, number of complaints, environment/sustainability.

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In accordance with Section 6 (4) LkSG, our direct suppliers and service providers are audited as part of supplier audits to ensure compliance with contractual assurances regarding the fulfillment of human rights and environmental expectations along the supply chain.

We carry out a review of the contractual agreements with every supplier and service provider who has a contractual relationship with our company at least once a year, including with regard to the agreed conditions relevant to human rights and environmental protection.

In the event of contractual and legal violations by our suppliers and service providers or other business partners, measures are taken that may result in a temporary suspension of the business relationship while efforts are made to minimize risk or, in the event of serious breaches of duty, the termination of the business relationship.

- taking immediate remedial action if a breach of human rights or environmental obligations is identified within the company or at an indirect supplier or service provider in accordance with Section 7 (1) to (3) LkSG.

Our company takes corrective measures in its own divisions through targeted training, defined and communicated guidelines, binding work instructions and an established company disciplinary process.

We part ways with suppliers and service providers for whom the remedial measures are not effective and who repeatedly fail to comply with the required due diligence obligations.

- Complaints procedure in accordance with Section 8 (1) to (5) LkSG, taking into account the provisions of the Whistleblower Protection Act (HinSchG)

Our company has implemented a complaints and claims management system that meets the requirements of the DIN EN ISO 9001 and DIN EN ISO 14001 standards.


To ensure that misconduct, violations and grievances can be reported, recorded and analyzed, we have set up an internal complaints and reporting office in accordance with the Supply Chain Due Diligence Act (LkSG) and the Whistleblower Protection Act (HinSchG). All of our company's employees and external third parties have various protected reporting channels at their disposal for this purpose.

Reports of any kind are treated confidentially and consistently followed up by the Compliance Office. Every suspected case or violation reported is recorded and processed according to a bindingly defined procedure. During the procedure, the presumption of innocence in favor of the accused is taken into account, attention is paid to fair and impartial treatment of the case and traceable documentation is ensured.

Reported misconduct, violations and grievances are also subjected to a risk analysis if there is a high probability of negative effects on the company and its employees.

- Ensuring the implementation of due diligence obligations with regard to risks for indirect suppliers and service providers in accordance with Section 9 LkSG

In order to fulfill our due diligence obligations, clear responsibilities and accountabilities have been bindingly defined within our company. Our management ensures that we comply with our due diligence obligations in order to identify, prevent and minimize human rights and environmental risks at an early stage.

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- Ensuring the continuous and comprehensible documentation of the fulfillment of due diligence obligations in accordance with Section 3 LkSG and preparing an annual report on the fulfillment of due diligence obligations in the past financial year, including its publication on our company's website in accordance with Section 10 LkSG.

4. Identification, assessment and treatment of human rights and environmental risks

As part of our risk analysis, the following priority human rights and environmental risks, among others, are identified, assessed and addressed in accordance with the requirements of Section 6 (2) LkSG:

- Forced labor
- Child labor
- Restrictions on freedom of assembly and association
- Discrimination in any form (e.g. based on gender, age, ethnic and social origin, nationality, religion or ideology, physical or mental disability, sexual orientation)
- Health and safety hazards in the workplace (occupational health and safety)
- Health hazards due to environmental pollution
- Unequal treatment in employment
- appropriate remuneration
- Possible environmental damage (environmental protection)

Identification of risks


Human rights and environmental risks in our own business area are identified via the following facilities in our company:

- Internal compliance reporting office (complaints and reporting office)

Risk identification by means of a compliance reporting office that receives, processes and continuously monitors internal and external reports on labor practices, human rights and environmental issues, among others.

- authorized persons of the company

Our officers in the areas of human rights, occupational health and safety, environmental protection, sustainability, compliance, quality management and data protection work together and, as part of their duties, also identify risks that are related to human rights or the environment.

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- Conducting internal and external audits as well as assessments and self-assessments

Risks are identified as part of internal and external audits in areas such as quality management, supplier management/purchasing, environmental protection, governance and sustainability, occupational health and safety, finance, IT, information and data protection and HR management.

Risk assessment

The risk assessment is carried out in two stages. In accordance with LkSG §3 (2) and §2 (6,7,8) and §9 (3), the relevant suppliers and service providers for whom a detailed risk analysis is required are first identified as part of an abstract risk assessment.

Our risk analysis is carried out methodically on the basis of an FMEA (Failure Mode and Effects Analysis). The extent of damage (impact on the customer or operation), the probability of occurrence and the recognizability and influenceability of each individual human rights, occupational safety, environmental and business risk are recorded and evaluated. The risk priority number is calculated by multiplying the respective results for the three assessment criteria. Newly identified risks are recorded and assessed promptly. After the initial assessment, they are carried out together with the risks already recorded at least once a year or several times during the year, depending on the risk development (regular and event-driven risk analyses). In addition to all risks that cannot be remedied or that could only be minimized, all risks that have already been remedied are still included in the risk analysis and reassessed on an ongoing basis. In this way, we ensure that risks that have already been remedied are identified at an early stage. We keep our risk analysis up to date.


Risk treatment (preventive and remedial measures)

We counter the relevant risks identified in our risk analysis with defined risk prevention and minimization measures. Our preventive and remedial measures are designed to avoid risks of violations of human rights and environmental protection as far as possible or to minimize the impact of a violation that has already occurred. All risk elimination and risk minimization measures implemented are evaluated for their effectiveness after a defined review interval.

5. Definition of human rights and environmental expectations by the company

The fundamental importance of human rights and environmental protection and the commitment of our company management to respect and implement them are anchored in our company's Code of Conduct.

Our company expects its employees and its suppliers and service providers to respect human rights and comply with environmental protection regulations. In addition, our company has required persons with the appropriate professional qualifications to take appropriate precautions to fulfill due diligence obligations regarding compliance with human rights and environmental standards and to monitor these.

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All employees as well as all direct suppliers and service providers of the company are required to meet the human rights and environmental expectations of our company through appropriate behavior and precautionary measures.

Our company expects that

- the guidelines from our Code of Conduct are observed by all employees of the company as well as by all direct suppliers and service providers.
- all our direct suppliers and service providers incorporate the requirements of this Declaration of Principles and our Code of Conduct, as far as possible, into their business relationships with their own suppliers and business partners as minimum standards in accordance with Section 6 (4) sentence 2 LkSG.
- special consideration is given to vulnerable people and disadvantaged and weak members of society.
- all suppliers and service providers who cooperate with our company comply with the legal and official requirements as well as the contractual agreements to fulfill the duty of care in accordance with the Supply Chain Duty of Care Act.
- Risks that may arise or that already exist must be reliably reported to the internal compliance reporting office or to the responsible authorized person.

6. Further development of human rights and environmental due diligence processes

Compliance with human rights and environmental protection regulations, as well as the implementation of due diligence obligations in accordance with the Supply Chain Due Diligence Act, is an important contribution to ensuring secure and peaceful coexistence for our company. For this reason, our company will make every effort to ensure that the due diligence obligations arising from the Supply Chain Due Diligence Act are complied with and that our operational processes are constantly adapted to the global improvement of the human rights situation and the current environmental protection requirements.

Heddesheim, 16.02.2024

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Management Board

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