

DER Deutsches Reisebüro GmbH & Co. OHG

Declaration of Principles

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I. Foreword by the DER Deutsches Reisebüro GmbH & Co. OHG Management Board

As one of the leading travel agency chains in Germany, DER Deutsches Reisebüro GmbH & Co. OHG is aware of its responsibility within the global flow of services. We can only be commercially successful in the long term if the impact of both our business activities and those of our suppliers is in harmony with people and the environment. It is therefore our goal to strengthen human rights and environmental due diligence and to prevent, minimize and remedy violations. This commitment applies both to our own business activities and to our global supply chains. As part of REWE Group¹, a commitment to respect human rights and environmental due diligence means taking responsibility for our actions and for the impact of our decisions on people and the environment throughout the supply and value chain. Values such as solidarity, community and sustainability are firmly anchored in our corporate culture. Our core business, tourism, is directly and indirectly connected to the lives of millions of people every day. Therefore, it is important to us to take a clear stance and advocate for a society viable for the future.

II. DER Deutsches Reisebüro GmbH & Co. OHG's Commitment to Respect Human Rights and the Environment

In order to emphasize and make tangible the deep anchoring of human rights and environmental due diligence within its own business area and global supply chains DER Deutsches Reisebüro GmbH & Co. OHG aligns its business activities with the following internationally applicable standards and guidelines:

DER Deutsches Reisebüro GmbH & Co. OHG:

- United Nations Universal Declaration of Human Rights (UDHR)
- UN Guiding Principles on Business and Human Rights (UNGPR)
- Conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- UN Global Compact (UNGC)
- UN Convention on the Rights of the Child

- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Priority Industry Principles on Forced Labor of the Consumer Goods Forum (CGF)
- UN Women's Empowerment Principles (WEPS)
- International Covenant on Civil and Political Rights of December 19, 1966
- International Covenant on Economic, Social and Cultural Rights of December 19, 1966
- Minamata Convention on Mercury of October 10, 2013 (Minamata Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Basel Convention)
- Stockholm Convention on Persistent Organic Pollutants (POP Convention) of May 23, 2001
- The Code (The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism)

The implementation of the principles laid down therein and the protection of the legal positions emphasized by these agreements are anchored in the daily actions of all employees in many areas of DER Deutsches Reisebüro GmbH & Co. OHG.

As part of the REWE Group, DER Deutsches Reisebüro GmbH & Co. OHG expects all employees and suppliers to comply with applicable laws and regulations as well as internationally recognized human rights and environmental standards.

DER Deutsches Reisebüro GmbH & Co. OHG expects its own employees to comply with the guidelines set out in this policy statement and the REWE Group Code of Conduct in their daily decisions. DER Deutsches Reisebüro GmbH & Co. OHG and

REWE Group expect their risk suppliers in particular to accept and comply with the Supplier Code of Conduct. At the same time, they are asked to communicate these expectations to their suppliers.

III. DER Deutsches Reisebüro GmbH & Co. OHG's Approach to the Implementation of Human Rights and Environmental Due Diligence Obligations

As part of the various business activities of a leading tourism group, people at DER Deutsches Reisebüro GmbH & Co. OHG and along its supply chains are exposed to various human rights and environmental risks. Comprehensive and uniform management of these risks helps to prevent, minimize or eliminate any violations of the human rights and environmental rights of those potentially affected. In this way, DER Deutsches Reisebüro GmbH & Co. OHG creates trust among its employees, business partners, suppliers and ultimately its customers and contributes to fair cooperation. As part of REWE Group, DER Deutsches Reisebüro GmbH & Co. OHG sees the management of human rights and environmental risks as a system of continuous and interrelated due diligence processes that are firmly integrated into operational procedures.

Detailed analyses of abstract and concrete risks are used to identify potential adverse effects on human rights and the environment as well as potentially affected parties in the company's own business area and in the supply chains. DER Deutsches Reisebüro GmbH & Co. OHG derives specific priority risks from the resulting findings and defines corresponding targets for risk avoidance and minimization. Following the risk assessment and prioritization, DER Deutsches Reisebüro GmbH & Co. OHG takes preventive measures in its own business area and in the supply chains. Where possible, relevant stakeholders are involved and information from the complaints mechanism is used. The effectiveness of the activities carried out is reviewed and continuously developed. The processes and results are documented and stored accordingly and are included in the reporting to the Federal Office of Economics and Export Control in accordance with Section 10 (2) LkSG.

The processes described in detail in sections 3.1 to 3.5 form the basis of the holistic and continuous risk management of DERTOUR Deutschland GmbH and REWE Group with regard to human rights and environmental due diligence.

3.1 Risk Analysis in the Supply Chains and in the Company's Own Business Area

DER Deutsches Reisebüro GmbH & Co. OHG's human rights and environmental risk analyses serve to identify and assess the corresponding potential and actual impacts of its own business activities and those of its suppliers along the entire supply chain.

DER Deutsches Reisebüro GmbH & Co. OHG and REWE Group therefore continuously check where there are particular risks of human rights violations and violations of environmental due diligence obligations in their own business area and in their supply chains. With the help of annual and ad hoc risk analyses, DER Deutsches Reisebüro GmbH & Co. OHG, in cooperation with REWE Group, identifies and evaluates the relevant human rights and environmental risks in its own business area and for direct suppliers. In the case of indirect suppliers of DER Deutsches Reisebüro GmbH & Co. OHG, a risk analysis is carried out on an ad hoc basis if there are actual indications of a violation of a human rights or environmental due diligence obligation (substantiated knowledge).

In its own business area, DER Deutsches Reisebüro GmbH & Co. OHG determines the risk classification for each subsidiary taking

into account various information, including industry- and country-specific risks, and applying the appropriateness criteria specified in the Supply Chain Due Diligence Act. The results are also supplemented by anonymized findings from the complaint channels of DER Deutsches Reisebüro GmbH & Co. OHG and the REWE Group.

In the supply chain, DER Deutsches Reisebüro GmbH & Co. OHG identifies industry- and country-specific supplier risks using the appropriateness criteria specified in the Supply Chain Due Diligence Act. In addition, the findings from the complaints procedures and the expertise of the responsible employees, who are in regular contact with suppliers and civil society organizations, are incorporated into the risk analysis.

The analyses include all legal positions that are protected by the above-mentioned applicable conventions and laws and to which the Supply Chain Due Diligence Act expressly refers. DER Deutsches Reisebüro GmbH & Co. OHG has identified forced labor and discrimination as particularly sensitive areas in its supply chains, taking into account statistical country and industry risks. No particularly sensitive areas were identified in our own business area due to extensive existing preventive measures using the same methodology. DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, will publish deviating priority risks in the next update of the policy statement.

The results of the risk analyses are continuously incorporated into the corporate decision-making processes of DER Deutsches Reisebüro GmbH & Co. OHG with regard to internal business strategies as well as supplier selection and management. The risk analysis forms the basis for the identification of appropriate targets, preventive measures and, if necessary, remedial measures.

3.2 Preventive Measures

DER Deutsches Reisebüro GmbH & Co. OHG, as part of the REWE Group, has been working for years to strengthen human rights and improve working conditions through specific projects and measures.

The following guidelines, which apply at DER Deutsches Reisebüro GmbH & Co. OHG as part of REWE Group, are an instrument for making our own business area and supply chains more sustainable. They form the binding framework for action for all employees and suppliers and define specific measures and goals:

- REWE Group Code of Conduct
- DERTOUR Group Code of Conduct for Suppliers
- DERTOUR Group policy statement on child protection
- REWE Group Guideline for Sustainable Management

Management ensures that these guidelines as well as human rights and environmental concerns are taken into account both in its own business activities and in purchasing and contractual decisions.

In addition to the guidelines, there are various other preventive measures, some of which DER Deutsches Reisebüro GmbH & Co. OHG has been applying for many years. In view of the prioritized risks and the findings from previous years, the following central prevention measures are currently being implemented.

Measures in our own business division: DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, anchors human rights and environmental issues in its workforce through guidelines and internal sensitization through employee training (e.g. diversity

training and occupational safety training). In addition, this is done through the Group-wide Code of Conduct for Employees, the continuous review of targets and measures for their suitability and the regular review of the design of our product portfolio as well as our purchasing and contract strategies.

Measures in the supply chain: DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, addresses the risks that arise in the supply chain with regard to people and the environment through systematic supply chain management. This is characterized by close cooperation with business partners and suppliers. In summary, the following measures are currently being implemented in the supply chain: the design and implementation of purchasing and contract strategies for our product portfolio, the integration of expectations into supplier selection (e.g. by querying suppliers on environmental aspects and human rights risk criteria in certain tendering processes), obtaining contractual assurances for compliance with and implementation of expectations of risk suppliers, training and further education to enforce contractual assurances and the agreement and implementation of risk-based control measures. The aim of DER Deutsches Reisebüro GmbH & Co. OHG is to oblige its risk suppliers to comply with the Supplier Code of Conduct. By sensitizing and obliging suppliers, concrete rules are created to implement human rights and environmental protection measures throughout the supply chain.

Further measures in cooperation with stakeholders: Sustainability along the supply chain can only work in the long term through cooperation with all relevant stakeholders. DER Deutsches Reisebüro GmbH & Co. OHG is in continuous contact with a large number of stakeholders and is involved in various national and international initiatives, alliances, forums and stakeholder dialogues. Important elements include participation in external events, cooperation in multi-stakeholder initiatives, industry initiatives, partnerships, commitment to the further development of sustainability standards and monitoring relevant developments at a political and regulatory level. As part of the further development of the human rights strategy, DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, is examining where the increased involvement of rights holders and potentially affected parties appears possible and appropriate.

At the same time, DER Deutsches Reisebüro GmbH & Co. OHG is aware that respect for human rights and the enforcement of fair working conditions are also heavily dependent on states adopting and implementing effective human rights and environmental regulations and measures on the ground in order to fulfill their duty to protect.

3.3 Grievance Mechanism

Appropriate and effective grievance management is an important part of the human rights strategy of DER Deutsches Reisebüro GmbH & Co. OHG as part of REWE Group. Grievance procedures enable individuals or groups who are affected by adverse human rights impacts or feel threatened by them, as well as their representatives, to raise their concerns. In this way, potentially adverse effects can be identified at an early stage and appropriate measures can be taken to prevent violations, avoid them in the future and take remedial action.

REWE Group has implemented a [grievance procedure](#) for all subsidiaries, through which employees and other potentially

affected groups of people can report potential human rights and environmental violations at any time. The publicly accessible [rules of procedure](#) describe the reporting process for these topics. All reported grievances, reports and substantiated suspicions of possible human rights violations and breaches of environmental due diligence obligations are dealt with as part of a transparent, balanced and predictable process for all parties involved. The confidentiality and anonymity of whistleblowers is respected. DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, ensures, as far as possible and within its sphere of influence, that whistleblowers are protected from discrimination and punishment in connection with the grievances submitted. Regardless of the channel through which the grievance is received, it is documented and checked for admissibility. The grievance is then investigated – for example through discussions with suppliers, on-site visits or in the form of interviews with those affected, industry initiatives or NGOs. If a risk or a violation of human rights or environmental due diligence obligations is identified in this context, measures are developed, initiated and reviewed for their effectiveness. The systematic handling of grievances and the resulting findings enable DER Deutsches Reisebüro GmbH & Co. OHG to continuously improve its human rights due diligence processes.

In addition to REWE Group's grievance system, there are already approaches for external grievance mechanisms. These are made available by actors outside the company, such as government institutions, trade unions, multi-stakeholder organizations, associations or other companies in the supply and value chain, and are intended to ensure that those affected can address their complaints to other bodies if they cannot make progress within their own company. DER Deutsches Reisebüro GmbH & Co. OHG, as part of the REWE Group, is committed to promoting these complaints mechanisms. For example, it supports the [Don't look away](#) reporting platform for (suspected) cases of sexual exploitation of children and young people in tourism.

3.4 Management of Violations

If DER Deutsches Reisebüro GmbH & Co. OHG detects that its business activities contribute to potential or actual human rights violations or are indirectly linked to them, DER Deutsches Reisebüro GmbH & Co. OHG takes appropriate preventive or remedial measures. To this end, internal processes have been further developed that determine how to proceed when potential grievances are discovered and how appropriate measures are defined in the company's own business area and at direct and indirect suppliers.

If DER Deutsches Reisebüro GmbH & Co. OHG has a well-founded suspicion or concrete indication of possible human rights violations in its own business area, it takes immediate measures to end the violation or minimize the risk.

In the event a supplier has violated a human rights or environmental legal position, DER Deutsches Reisebüro GmbH & Co. OHG will work with the supplier to develop remedial measures. These range from the cessation of the supplier's behaviour causing the violation, to preventive measures through training and audits, and other efforts to find appropriate remedies. DER Deutsches Reisebüro GmbH & Co. OHG and REWE Group expect their suppliers to implement appropriate remedial measures. DER Deutsches Reisebüro GmbH & Co. OHG as part of REWE Group reserves the right to contractually oblige its suppliers to support the clarification of the facts and to cooperate fully within a reasonable time frame.

Depending on the severity of the violation, DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, will take appropriate action, such as requesting the immediate rectification of the violation or taking legal action.

3.5 Effectiveness review

As part of a Group-wide initiative, DER Deutsches Reisebüro GmbH & Co. OHG monitors the effectiveness of implemented measures in its own business area and within its supply chains as part of an annual and event-driven effectiveness review. The focus here is on priority risks as well as the impact and objectives of the measures. To review the measures, impact hypotheses are formed which are then compared with the available information on the individual measures in order to confirm the effectiveness of the measure. If an impact hypothesis cannot be confirmed, the measure is checked for the need for change.

REWE Group also centrally reviews the effectiveness of its existing grievance mechanisms using the eight effectiveness criteria for non-judicial grievance mechanisms of the UN Guiding Principles on Business and Human Rights once a year and on an ad hoc basis in the event of significant changes in the risk situation or concrete indications of restrictions in grievance management. DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, actively cooperates with industry initiatives to jointly develop and operate effective grievance procedures in selected supply chains.

In addition to the above-mentioned effectiveness reviews, the entire human rights and environmental risk management of DER Deutsches Reisebüro GmbH & Co. OHG as part of REWE Group is reviewed annually for appropriateness and effectiveness. For this purpose, the results of the effectiveness reviews of the measures, the grievance procedure and the findings from the monitoring carried out by the Human Rights Officer are aggregated and used as a basis for the assessment. Based on the results, the exchange with external experts and stakeholders, suppliers and NGOs as well as its risk analysis, DER Deutsches Reisebüro GmbH & Co. OHG, as part of REWE Group, aims to continuously improve and further develop its human rights and environmental management.

IV. Responsibilities for Human Rights and Environmental Due Diligence at DER Deutsches Reisebüro GmbH & Co. OHG

The Management Board of DER Deutsches Reisebüro GmbH & Co. OHG is ultimately responsible for the implementation of and compliance with the DER Deutsches Reisebüro GmbH & Co. OHG Declaration of Principles. For DER Deutsches Reisebüro GmbH & Co. OHG, REWE Group's central Human Rights Officer is responsible for monitoring the operational implementation of the declared corporate principles. Regular and ad hoc internal reporting to these bodies on the human rights and environmental results of the risk analyses, information from the grievance mechanisms and information on the effectiveness of remedial and preventive measures taken ensures that information-based decisions can always be made. REWE Group's central Human Rights Officer is also responsible for the group-wide monitoring of the risk management system and other tasks. Among other things, they are responsible for ensuring that the management of human rights and environmental due diligence is continuously reviewed and improved. They are also responsible for external group-wide reporting on human rights and environmental due diligence. A central implementation unit for the Supply Chain Due Diligence Act and the relevant specialist departments, in particular the Corporate Responsibility department, the Compliance department, the Human Resources department and the Product

Management department, are responsible for the operational implementation of the human rights and environmental due diligence processes. These are supported by other specialist departments.

V. Outlook and Reporting

DER Deutsches Reisebüro GmbH & Co. OHG is aware that the implementation of human rights and environmental due diligence both in its own business activities and in its supply chain is an ongoing process. DER Deutsches Reisebüro GmbH & Co. OHG accepts this challenge together with REWE Group and regularly reviews its strategic approaches and measures with the aim of continuous improvement. DER Deutsches Reisebüro GmbH & Co. OHG provides regular and transparent information on implementation and strategic developments as part of REWE Group's sustainability reports and in its LkSG report, which is submitted to the Federal Office of Economics and Export Control and made publicly available in accordance with legal requirements.



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