



Human Rights Policy Statement

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1 Lufthansa Cargo AG's commitment to observing Human Rights

Lufthansa Cargo AG is a subsidiary and part of the Lufthansa Group. This policy statement of Lufthansa Cargo AG largely refers to the policy statement of the Lufthansa Group by virtue of the uniform implementation of the LkSG (Lieferkettensorgfaltspflichtengesetz) throughout the Group. The Lufthansa Group connects people, cultures, and economies every day.

As a company that stands for open-mindedness, tolerance, and diversity, we consider it our responsibility to observe human rights and to act in as sustainable a manner as possible. The protection of human rights is not guaranteed in all countries in which we operate as a company.

We cannot control the political development of these countries. However, we can contribute to observing human rights by identifying human rights and environmental risks in our business area and in our supply chain and preventing violations. That is why we select our suppliers carefully and contractually oblige them to comply with human rights, labor and health standards, and environmental protection. We check any cases of doubt. Embedding human rights and sustainability in our business processes and our global supply chain is an ongoing task.

We are guided by:

- key international conventions and declarations such as the Universal Declaration of Human Rights,
- the International Covenant on Civil and Political Rights,
- the International Covenant on Economic, Social and Cultural Rights,
- the core labor standards of the International Labor Organization (ILO),
- the UN Guiding Principles on Business and Human Rights,
- the 10 principles of the UN Global Compact,
- the OECD Guidelines for Multinational Enterprises
- the IATA resolution on combating human trafficking,
- and environment-related agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Transboundary Movement of Hazardous Wastes.

In conjunction with the requirements of the Supply Chain Duty of Care Act, they form the framework for our corresponding actions. Lufthansa Cargo AG always complies with applicable national law. Wherever international human rights are restricted by local laws, we endeavor to comply with internationally recognized standards without coming into conflict with local laws.

Where local laws go beyond international standards, Lufthansa Cargo AG will comply with local laws.

2 What Lufthansa Cargo AG expects of employees and suppliers

Lufthansa Cargo AG expects its employees and suppliers to observe human and environmental rights and to support Lufthansa Cargo AG in preventing human rights and environmental risks and in preventing, ending or minimizing violations.

What Lufthansa Cargo AG expects of its own employees and managers is specifically set out in the Code of Conduct - Lufthansa Group Investor Relations.

The expectations for supplier conduct are summarized specifically in the Code of Conduct – Lufthansa Group Investor Relations.

Lufthansa Cargo AG also expresses its expectations, especially in terms of priority risks, through further preventive and remedial measures (see below).

3 Lufthansa Cargo AG's procedure to fulfill their duties of care

3.1 Risk Management

Lufthansa Cargo AG, as part of the Lufthansa Group, is part of the risk management system set up by the Lufthansa Group. The aim of this risk management is to identify and prevent or end human rights and environmental risks and violations of legal interests in its own business area and along the supply chain.

As a subsidiary of the Lufthansa Group, Lufthansa Cargo AG utilizes the risk management system introduced by the Lufthansa Group. The Lufthansa Cargo AG has therefore established two key accounts to implement the processes introduced by the Lufthansa Group.

The Lufthansa Group has therefore specifically set up the following clear internal responsibilities: Two teams within the Lufthansa Group are responsible for implementing the LkSG. The Human Rights & Non-Discrimination Team coordinates the observance of human rights and environmental obligations within the Lufthansa Group. The Group Procurement team is

responsible for these processes regarding our suppliers and the supply chain. The two teams are supported by contacts from specialist departments such as Occupational Health and Safety, Human Resources, Compliance and Purchasing, as well as by key accounts in individual prioritized Lufthansa Group companies. This network can be continuously expanded based on the results of the risk analysis.

To monitor risk management, the function of a Group-wide Human Rights Officer was created. The Human Rights Officer in turn informs the Group Executive Board about the work of the responsible persons at regular intervals and as required. The Key Accounts of Lufthansa Cargo AG then informs the Lufthansa Cargo AG Executive Board about risks and measures in its own business area and in the supply chain of Lufthansa Cargo AG. The Internal Audit department supports the Human Rights Officer and checks the areas of implementation. The Group Human Rights Steering Board was also created as a steering committee that can make recommendations on risk management. It is chaired by the Human Rights Officer and consists of the heads of the Sustainability, Compliance, Audit, Purchasing and Occupational Safety departments.

3.2 Risk analyses and priority risks

Lufthansa Cargo AG conducts human rights and environmental risk analyses on an annual and as-needed basis. Software is used to help identify, evaluate and prioritize the risks associated with the substantial number of subsidiaries and suppliers. The branches and suppliers are subjected to a country, sector and media information screening. At the branches, the plausibility of the identified risks is checked using surveys and company statistics. In addition to external data sources, internal findings, such as information received via Group reporting channels including the anonymous whistleblower system, are also considered.

The risks identified are then weighted and prioritized, taking into account the appropriateness criteria of the LkSG, such as Lufthansa Cargo AG's ability to influence a supplier. Lufthansa Cargo AG takes preventive measures to avoid violations at subsidiaries and suppliers that have a prioritized human rights or environmental risk. If violations are identified, Lufthansa Cargo AG stops the violation as quickly as possible or creates a remedial concept - depending on where and which violation occurs.

The Human Rights Officer informs the Executive Board of the Lufthansa Group annually about the results of the risk analysis. The results are also communicated to other key decision-makers such as the Group Works Council and the Group Economic Committee. In addition, the Executive Board of Lufthansa Cargo AG is also informed annually about the results of the risk analysis of Lufthansa Cargo AG. Here, too, the results are communicated to key decision-makers such as the Economic Committee.

Lufthansa Cargo AG considers the prohibition of improper occupational health and safety and the prohibition of unequal treatment in employment to be particularly relevant in its own business area. In the supply chain, Lufthansa Cargo AG considers the prohibition of disregarding occupational health and safety, the prohibition of disregarding freedom of association and the prohibition of slavery and forced labor to be particularly relevant. Lufthansa Cargo AG addresses these risks primarily through the preventive measures described below.

3.3 Precautions

Lufthansa Cargo AG pursues a two-part strategy to protect human and environmental rights: First, it aims to prevent risks from arising in the first place. Second, it seeks to respond to structural risks identified in the context of the risk analysis with appropriate measures and to prevent or at least minimize adverse human rights and environmental impacts.

Risks within the Lufthansa Group's own business area are to be prevented primarily through regular global awareness-raising campaigns, a wide range of grievance mechanisms and a broad range of advisory services provided by the Human Rights & Non-Discrimination Team established within the Lufthansa Group.

Sustainability criteria already play a significant role in the Lufthansa Group's procurement process when selecting suppliers; suppliers are generally checked for compliance with human rights, labor and environmental standards and integrity before contracts are concluded.

Suppliers are also contractually checked for compliance with human rights, labor and environmental standards and integrity. Suppliers are also contractually obliged to protect human rights and the environment. A portfolio of measures was used to primarily prevent, eliminate or mitigate the priority risks of Lufthansa Cargo AG.

The Lufthansa Cargo AG have summarized their expectations with regard to respecting human rights and protecting the environment in two codes of conduct: in a code addressed to managers and employees of the Lufthansa Group and in a code addressed to suppliers.

Both codes have been revised in order to fully meet the requirements of the LkSG. The rules of conduct are actively communicated to companies in the Group's own business area and suppliers prioritized as part of the risk analysis. A detailed corporate social responsibility clause is negotiated in supplier contracts, which combines the expectations of Lufthansa Cargo AG with rights and obligations and in which suppliers are also requested, among other things, to pass on the expectations placed on them to their own suppliers.

Audits are conducted within Lufthansa Cargo AG to check whether the human rights and environmental due diligence obligations are being complied with and whether the Lufthansa Group's risk management is appropriate. The audits are primarily carried out by Internal Audit. They can also be carried out by external auditors on an ad hoc basis or based on necessary specialist knowledge. In the case of direct suppliers and on an ad hoc basis in the case of indirect suppliers, audits are conducted by external auditors on a risk-based basis.

As a first measure was used to primarily prevent, eliminate or mitigate the priority risks of Lufthansa Cargo AG. This measure was developed by the Human Rights Team and includes an online Training. This newly developed online training program is to promote diversity, inclusion and intercultural skills is also used with a focus on risk. The Human Rights Team themselves and the Group Procurement Team also continue their own training.



The Lufthansa Cargo AG can look back on a long tradition of cooperation with the social partners both at company and collective bargaining level and in co-determined supervisory boards. This pursues the goal of joint interest-based action. The joint development of solutions in the interests of the companies involved and their employees is based on an understanding of the value of freedom of association and is part of the corporate culture.

To firmly establish measures in the supply chain, the Lufthansa Cargo AG Procurement Team pursues a close exchange with risk-prioritized suppliers.

Codes of conduct and contractual measures

The Lufthansa Group, to which Lufthansa Cargo AG belongs, has summarized its expectations about observing human rights and protecting the environment in two codes of conduct: one code addressed to managers and employees of the Lufthansa Group, and one code addressed to suppliers. Both codes were revised to fully meet the requirements of the LkSG. The rules of conduct are actively communicated to companies in the Group's own division and suppliers prioritized as part of the risk analysis. In addition, the employment contracts of managers of prioritized companies are extended to include an annex that obliges them to ensure observance of human rights and environmental obligations in their area of responsibility. A detailed corporate social responsibility clause is negotiated in supplier contracts, which combines the expectations of the Lufthansa Group with rights and obligations and in which suppliers are also requested, among other things, to pass the expectations placed on them onto their own suppliers.

The Executive Board also issues guidelines on specific topics such as occupational health and safety, which apply worldwide. There are also specific guidelines for managers and minimum standards.

Control measures

Audits are conducted within the Lufthansa Group to check whether human rights and environmental duty of care obligations are being observed and whether the Lufthansa Group's risk management is appropriate. The audits are primarily conducted by the Internal Audit department. They can be carried out as needed or also by external auditors due to the required specialist knowledge. Audits are conducted by external auditors on a risk basis for direct suppliers and on an ad hoc basis for indirect suppliers.

3.4 Remedial measures

Should Lufthansa Cargo AG or the Lufthansa Group become aware of an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay.

If the immediate termination, prevention, or minimization of a violation at a supplier is not possible, Lufthansa Cargo AG will draw up and implement an appropriate remedial and/or preventive concept. When creating and implementing the concept, particular consideration is given to, (i) the joint development and implementation of a plan to end or minimize the breach

with the company causing the breach, (ii) joining forces with other companies as part of industry initiatives and industry standards to increase the opportunity to influence the perpetrator and (iii) temporarily suspending the business relationship while efforts are made to minimize the risk.

As a last resort, Lufthansa Cargo AG reserves the right to terminate business relationships.

3.5 Effectiveness monitoring and continuous improvement

Should Lufthansa Cargo AG or the Lufthansa Group become aware of an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay.

This involves evaluating information from those affected, obtaining feedback from target groups, and conducting spot checks and audits. There will also be an actively sought exchange with internal interest groups such as employee initiatives and employee representatives as well as external stakeholders.

3.6 Complaints options

Lufthansa Cargo AG relies on information to protect those affected and to recognize structural risks at an early stage.

Any individual - whether Lufthansa Cargo AG employees or external whistleblowers such as employees of a supplier or affected parties - can report human rights and environmental risks or violations caused by Lufthansa Cargo AG or one of its suppliers to the Human Rights Team or the responsible key account. For example, this can be done directly by e-mail, via an electronic whistleblower system or via an external ombudsman. The complaints channels are available in a variety of languages.

Every report is examined impartially and with strict confidentiality. Reports can also be submitted anonymously via the electronic reporting system or via the ombudsperson. Lufthansa Cargo AG expressly professes its commitment to protecting whistleblowers from reprisals and discrimination.

The Lufthansa Group reviews the effectiveness of the complaints procedure at least once a year and as needed, e.g. regarding the necessary communication of the complaints procedure.

All information on the complaints procedure, including the reporting channels, is summarized in the Rules of Procedure and published on the Lufthansa Group website.

3.7 Documentation and reporting

Lufthansa Cargo AG continuously documents the fulfillment of its human rights and environmental duty of care obligations in accordance with the requirements of the LkSG. The procedure by which Lufthansa Cargo AG fulfills its duty of care obligations, the priority risks and



the expectations of employees and suppliers are reported by Lufthansa Cargo AG in this policy statement, which is updated annually and as required.

It also reports each year in its annual report. As a globally operating company, it also issues an annual UK Modern Slavery Act Statement, a report on combating forced labor and child labor in supply chains and reports on its progress in sustainable corporate governance as part of the UN Global Compact Communication on Progress. All reports are published on the Internet Human rights related statements.

4 Contact

If you have any questions or comments about this policy statement or other human rights or environmental issues, please contact humanrights-governance@dlh.de.

Further information is published on the Lufthansa Group website Human Rights.

Frankfurt, January 28th, 2025

A handwritten signature in black ink, appearing to read 'Frank Bauer', with a long horizontal stroke extending to the right.

Frank Bauer
Member of the Executive Board
Chief Financial Officer and Chief Human Resources Officer LCAG