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1. Preface

We have defined clear responsibilities in order to live up to our commitment to respecting human rights and care for the environment. The management plays a central role in this and ensures that our national and international activities are in line with these principles. Our business activities are characterized by a deep sense of responsibility for human rights and environmental concerns. These principles are firmly anchored in our corporate culture and form the foundation of our sustainability strategy.

The due diligence processes introduced as part of the German Supply Chain Due Diligence Act (LkSG) supplement and strengthen our existing Compliance and Due Diligence system. To ensure responsible business activities, we have integrated binding measures into our risk management that apply to all business units. To implement these obligations, ELA Container has appointed a human rights officer who serves as a point of contact for questions relating to human rights due diligence and reports directly to the management board.

The responsibility on ensuring compliance with human rights and environmental due diligence obligations on an every day basis lies with all employees throughout the company. We are convinced that sustainable and ethically responsible business activities can only be achieved through joint commitment at all levels of our organization.

2. Commitment to upholding human rights and protecting the environment

As a responsible and future-oriented partner in container logistics and infrastructure, ELA Container firmly believes that long-term business success can only be achieved by closely combining economic activity with social and environmental responsibility. The respectful treatment of human rights and the environment forms a central component of our corporate values and is deeply rooted in our strategic orientation. We are committed to upholding the highest standards in the areas of human rights and environmental protection. In doing so, we are guided by internationally recognized principles that guide and shape our actions.

We formulate our expectations and principles clearly and bindingly in our internal [ELA Code of Conduct](#) and in the ELA Code of Conduct for Business Partners. These documents set out what we expect from our employees, suppliers and business partners. They constitute the cornerstone for ensuring that uniform and high standards are maintained in all areas of the value chain.

Our commitments are based on the following leading international frameworks:

- + Universal Declaration of Human Rights
- + International Covenant on Civil and Political Rights
- + International Covenant on Economic, Social and Cultural Rights
- + Core Labor Standards of the International Labor Organization (ILO)
- + UN Guiding Principles on Business and Human Rights
- + OECD Guidelines for Multinational Enterprises

These standards ensure that we meet our due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG).

3. Implementation of the due diligence obligations

3.1 Risk management

ELA Container pursues an integrated and systematic risk management approach, which is managed at a strategic level by the Management Systems department. Operational risk management with regard to human rights and environmental risks along the entire value chain is carried out by CFU Sustainability. The aim is to identify risks at an early stage, assess them appropriately and take suitable measures to effectively avoid or reduce them.

Our risk management comprises both preventive and reactive elements - from early risk detection and the implementation of specific mitigation measures through to the structured elimination of identified risks. This holistic approach makes it possible to systematically manage potential negative effects and continuously ensure compliance with legal and internal due diligence obligations.

3.2 Preventive measures

The prevention of risks is a central component of our risk management. Preventive measures are taken for our own business division and for the supply chain in order to prevent human rights and environmental violations at an early stage.

Irrespective of the risk assessment, we implement basic preventive measures in our own business division. These include communicating the declaration of principles, the internal ELA Code of Conduct and clear regulations, guidelines and procedural instructions on compliance with relevant human rights and environmental due diligence obligations.

We also take preventive measures in the supply chain, which are implemented by Strategic Purchasing. These include obtaining supplier self-disclosures and internal due diligence checks, as well as confirmation of the Code of Conduct for Business Partners. Depending on the supplier's risk classification, additional measures are taken to ensure compliance with human rights and environmental standards (e.g. auditing).

3.3 Remedial measures

If a violation of human rights or environmental obligations is identified, we take immediate remedial action. These are individually tailored to the type and severity of the violation identified.

In our own business area, the necessary remedial measures are defined in cooperation with the responsible parties and their effectiveness is continuously monitored. If it is not possible to rectify a breach immediately, we take additional measures until the breach has been fully rectified.

In the case of business partners, an identified breach is also addressed as quickly as possible. If immediate remediation is not possible, a concept is developed to minimize the breach and a concrete implementation plan is drawn up. If remediation is not successful, up until termination of a business relationship can apply.

3.4 Whistleblower system

ELA Container has implemented a transparent and effective whistleblowing system that offers both public and confidential reporting channels. This procedure enables all affected groups of people – including employees, business partners and third parties – to report human rights and environmental risks arising from our business activities or those of our suppliers at any time. Reports can be made by name or anonymously.

The complaints procedure (whistleblower system) is available on the ELA Container website, where the confidentiality and protection of whistleblowers is guaranteed. In addition, information is provided on the impartiality of the processing and the legal protective measures for whistleblowers. This procedure is not only used to report human rights and environmental violations, but also to report other misconduct or violations of internal guidelines or legal requirements.

4. Effectiveness control

The effectiveness of the due diligence processes within the framework of the Supply Chain Due Diligence Act is reviewed at least once a year, as well as on an ad hoc basis. The aim of these reviews is to identify, prevent, remedy or mitigate potential adverse impacts on human rights and the environment at an early stage. Our policy statement is continuously monitored and regularly updated to ensure that all due diligence measures are up to date and effective.

5. Documentation and reporting

Internally, we document all steps taken to implement our due diligence obligations. Externally, we report annually on the relevant human and environmental risks as well as the preventive and remedial measures taken in our business area and along the entire supply chain. In accordance with legal requirements, we publish the list of questions answered by the Federal Office of Economics and Export Control (BAFA) after the end of each financial year.

6. Expectations towards employees and business partners

ELA Container expects its employees and business partners to strictly observe human rights and the applicable environmental protection regulations. This includes, in particular, the prohibition of child labor, slavery and forced labor, compliance with occupational health and safety regulations, respect for freedom of association and the avoidance of discrimination in employment. We also expect fair wages, the avoidance of environmental pollution such as harmful soil changes, water pollution, air pollution, noise emissions and excessive water consumption, as well as the responsible handling of hazardous waste.

Our business partners are required to adhere to international conventions such as the Minamata Convention, the POP Convention and the Basel Convention to ensure that no banned chemicals are used and that all environmental requirements in the area of waste disposal are met.

This declaration of principles applies uniformly to all companies and business units of the ELA Container GmbH and their employees. It is the responsibility of all those involved to respect these principles and actively integrate them into their daily business processes.

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