

## **Policy Statement**

### **Enterprise Autovermietung Deutschland B.V. & Co. KG**

Responsible, sustainable and lawful behaviour is important to us and we strive to implement those behaviours through both strategy and action. This includes, as far as applicable to our company, compliance with the human rights and environmental due diligence obligations of the Supply Chain Due Diligence Act (LkSG) so that violations or imminent violations of the following prohibitions are prevented, stopped or minimised (together "human rights and environmental risks"):

- prohibition of child labour;
- prohibition of forced labour and all forms of slavery;
- disregard for occupational health and safety and work-related health hazards;
- disregard for freedom of association, freedom of unionisation and the right to collective bargaining;
- prohibition of unequal treatment in employment;
- prohibition of withholding an appropriate wage;
- destruction of natural resources through environmental pollution; unlawful violation of land rights;
- prohibition of hiring or using private/public security forces that could lead to impairment due to lack of instruction or control;
- prohibition of an act or omission in breach of duty that goes beyond the above, which is directly capable of impairing a human rights position in a particularly serious manner and the unlawfulness of which is obvious on a reasonable assessment of all the circumstances in question;
- prohibited production, use and/or disposal of mercury (Minamata Convention);
- prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs;
- prohibited import/export of hazardous waste within the meaning of the Basel Convention.

### **Expectations**

In accordance with the LkSG, we expect our employees and suppliers to respect human rights and the environment and to provide us with the best possible support in order to appropriately prevent the human rights and environmental risks described in the LkSG and to end or minimise violations of same; this applies in particular to the priority human rights and environmental risks. Our expectations for employees are expressed, for example, in the Employee Code of Conduct and our expectations for suppliers, for example, in the Supplier Code of Conduct.

### **Risk management**

Our risk management system helps us to identify and minimise human rights and environmental risks and to prevent, end or minimise the extent of violations of human rights or environmental obligations if we have caused or contributed to these risks or violations within our supply chain.

Risk management is anchored in particular in the business processes through the following measures:

- Compliance & Ethics Committees
- Environmental, Health & Safety audits
- Safety Committee meetings

- Supply Chain Risk Management

We have also appointed a human rights officer who has a defined responsibility for monitoring risk management.

Our management is informed regularly, at least once a year, about the work of the responsible persons.

### **Risk analysis and priority risks**

We carry out annual and ad hoc risk analyses in accordance with the LkSG. The risks identified are evaluated and prioritised. We communicate the results of our risk analyses to the relevant decision-makers and take them into account appropriately. In our risk analyses, we take into account findings from the processing of information received via the complaints procedure. The risk analysis procedure is essentially as follows.

In our own business area, we monitor compliance with human rights and environmental obligations by means of questionnaires, which are answered by the responsible departments.

To identify and manage relevant risks in our supply chain, we have implemented a third-party risk assessment tool. This risk assessment tool allows us to identify suppliers that present a potential risk and further substantiate risks via an LkSG specific supplier questionnaire. If, following the application of all appropriateness criteria, there are suppliers that need to be further investigated, we share findings and recommendations (i.e. proposed preventive / remedial measures) with the relationship owners within our organisation. We would then reach out to those suppliers directly to address the risk and agree on a solution or phase out supply.

Due to the nature of our business, we prioritise the following categories in our supply chain:

- **Vehicle manufacturers:** While we are aware of potential risks in the supply chain, we have no substantiated knowledge. These companies are required to report under the LkSG and are subject to audits by the BAFA. We continuously monitor these companies in our risk assessment tool.
- **Logistics providers:** There are potential risks in the supply chain due to the international nature and the common outsourcing to contractors. All logistics providers are being asked to complete the LkSG questionnaire to further substantiate risks. If necessary, we take additional measures.

### **Preventive measures**

In order to avoid human rights and environmental risks, we have introduced various preventive measures in our own business area and in relation to suppliers, the effectiveness of which we will monitor on an ongoing basis and adjust as necessary.

These preventive measures currently include the following regulations in particular:

- [Employee Code of Conduct](#) – The Employee Code of Conduct explains the standards of integrity team members are expected to uphold in daily business interactions.
- [Supplier Code of Conduct](#) – The Supplier Code of Conduct outlines our expectations for suppliers to uphold high standards of quality, integrity, excellence, safety, legal compliance and respect for human rights.
- [Supplier Diversity](#) – The Supplier Diversity expectations help increase the number of diverse businesses — including minority-owned, woman-owned, veteran-owned and other socially or economically disadvantaged small businesses — that supply goods and services to our organization.

We expect all our employees to adhere to the Code of Conduct for employees. To this end, we train our employees on its content.

We are aiming to include specific LkSG clauses in our agreements with suppliers to ensure suppliers understand and comply with our human rights and environmental expectations.

We obtain assurances from our direct suppliers that they comply with our human rights and environmental expectations and address them appropriately along the supply chain.

We will review the effectiveness of the preventive measures once a year and on an ad hoc basis, particularly if we have to reckon with a significantly changed or significantly expanded risk situation in our own business area or at suppliers; preventive measures will then be updated immediately if necessary.

### **Remedial measures**

If we identify an actual or imminent violation of human rights or environmental obligations, we take appropriate remedial action without delay. If immediate termination, prevention or minimisation is not possible, we draw up a concept with a specific timetable and implement it.

When drawing up and implementing the concept, particular consideration is given to: (1.) the joint development and implementation of a plan to end or minimise the breach with the company causing the breach, (2.) joining forces with other companies as part of industry initiatives and industry standards to increase the possibility of influencing the entity that causes or may cause a harm, (3.) a temporary suspension of the business relationship while efforts are made to minimise the risk.

To date, we have not identified any violation of a human rights or environmental risk and, accordingly, have not yet had to take any remedial action.

We will review the effectiveness of the remedial measures once a year and on an ad hoc basis, in particular if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers; remedial measures are then updated immediately if necessary.

### **Complaints procedure**

We have set up an LkSG-compliant system for complaints and information on human rights and environmental risks and violations of human rights or environmental obligations arising from our business activities or the business activities of our direct or indirect suppliers.

The [complaints system's rules of procedure](#) contains further information, i.a. on complaint channels.

### **Documentation, reporting, updates**

We document and report in accordance with the LkSG. We regularly update this policy statement and the measures specified therein in accordance with the requirements of the LkSG.

Russ Willey

Managing Director

Enterprise Autovermietung Deutschland B.V. & Co. KG

Jason Altman

Corporate Vice President

Enterprise Autovermietung Deutschland B.V. & Co. KG