

Declaration of principles of DFS Deutsche Flugsicherung GmbH on respecting human rights

Correct at: 1 January 2023



DFS Deutsche Flugsicherung

DFS Deutsche Flugsicherung GmbH (DFS), headquartered in Langen (Hesse), is a State-owned company under private law. The object of the company is the development, provision and execution of the air navigation services delegated to the company by the German Federal Government. In addition, the company can provide air navigation services in Europe as well as carry out related sideline activities in Germany and abroad, provided that this does not directly or indirectly impede the performance of the delegated air navigation services.

Within its Group structure, DFS holds stakes in various companies – some of which operate internationally – that support and promote the Group's range of products and services on the free market. These services are offered worldwide, while air navigation services are currently provided in Europe only. With a few exceptions, the commercial business is not subject to any regulatory requirements.

DFS and its affiliated Group companies are committed to respecting human rights on the basis of the following guiding principles:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
- UN Convention on the Rights of the Child (CRC)
- UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- OECD Guidelines for Multinational Enterprises

We are convinced that respecting and protecting human rights is the basis of all sustainable business practices. This applies to the highest corporate level as well as to the employees of DFS Deutsche Flugsicherung GmbH (DFS) and the DFS Group. As a State-owned company, we are also guided by the Public Corporate Governance Code (PCGK) of the Federal Government as well as the initiatives and guidelines of the Federal Government concerning environmental protection and resource conservation, such as the German Sustainable Development Strategy (DNS).

Our own guidelines and regulations take into account the content of these international principles and guidelines. Our Codes of Conduct (CoC) setting out our compliance principles are the basis of our actions and a binding framework for the staff of the DFS Group. Acting in accordance with the rules is our fundamental position. The CoC are known to everyone in the companies and are actively communicated via our internal media. We endeavour to raise awareness and inform our employees to enable them to fulfil their duty of care with regard to respecting human and environmental rights.

The DFS Human Rights Board is responsible for managing and monitoring our human rights policy. Due to the overarching nature of the topic with an impact on various lines of responsibility, this body is made up of the directors of the Human Resources, Procurement, Communications/Environmental Management divisions as well as the Chief Compliance Officer. They report directly to the Executive Board. The DFS Human Rights Board coordinates and manages activities regarding the respect for human rights and reviews the sector and company-specific risks of the DFS Group in a structured analysis at least once a year and on an ad hoc basis.

In the DFS business area, potential risks of violations of human and environmental rights are monitored through established processes, such as the compliance management or environmental management systems.

DFS suppliers are categorised according to their risk potential using a supply-chain-specific risk analysis. All suppliers are assigned to product group clusters and initially assessed using a risk score, which is made up of a country risk and a risk for the specific product group, and then weighted according to their percentage share of the cluster and the total purchasing volume of DFS. Risks in the areas of occupational health and safety, discrimination in employment as well as the environmentally unsound handling, collection, storage and disposal of waste were identified as particularly significant in the product group clusters with the highest share of the total volume. For suppliers that have an increased risk value based on the risk analysis, suitable measures are identified and customised to the specific case.

The Human Rights Board also ensures that the recognised risks are communicated to the affected areas of the company and ensures that adequate precautions and preventive measures are taken, such as the enforcement of the DFS Supplier Code. Respect for human and environmental rights is also firmly anchored in our [Supplier Code](#), which defines the minimum requirements for our working relationship with our business partners and is a mandatory component of all procurement contracts. Compliance with these is a prerequisite for business relationships with the DFS Group. In addition, we stipulate that, if necessary, agreements on contractual controls, additional training and qualification measures for our working relationship should be defined for suppliers with a corresponding risk level in order to prevent such violations.

DFS also places particular emphasis on reducing environmental impacts in the form of CO₂ emissions, water consumption, waste and noise. DFS therefore ensures that air traffic in German airspace is not only safe and punctual but also as environmentally friendly as possible. When planning flight procedures and managing air traffic, DFS ensures that routes are as efficient as possible and that flight profiles are optimised. In this way, the company supports its partners in aviation in reducing their environmental impact. In order to institutionalise environmental and climate protection within the company and to evaluate our goals and measures, DFS has introduced an environmental management system in accordance with EMAS (Eco Management and Audit Scheme).

If violations of human or environmental rights are disclosed to DFS, we reserve the right to take measures with the aim of remedying the violation of human or environmental rights as far as possible or working towards their elimination.

We have made reporting channels available for our staff as well as for business partners or affected parties to report suspected cases or complaints relating to possible violations of environmental and human rights standards caused by the actions of DFS in its own business area or a direct supplier. While staff can use the DFS compliance whistleblower system, external stakeholders have the opportunity to report information and complaints anonymously by post or via the DFS website in both German and English. We treat reports of violations confidentially and take appropriate measures to ensure proper clarification.

We are aware that the implementation of environmental and human rights compliance is an ongoing process that we must regularly review as conditions change. For this reason, our declaration of principles on respecting human rights is also continuously reviewed and updated as necessary.

Chairman of Board of Directors
DFS Deutsche Flugsicherung GmbH

Members of Human Rights Board
DFS Deutsche Flugsicherung GmbH



Arndt Schoenemann



Maximilian Abel



Alexander Koch



Tim Ordemann



Fabio Ramos

Contact

DFS Deutsche Flugsicherung GmbH

Am DFS-Campus 10

63225 Langen, Germany

www.dfs.de