



Statement

Policy Statement of Deutsche Bank AG – Supply Chain Due Diligence Act (SCDDA)

Deutsche Bank

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1. Introduction

Deutsche Bank AG (hereinafter “Deutsche Bank”) has a long-standing commitment of respecting human rights and has voluntarily endorsed and aligned with international standards. More details relating to Deutsche Bank’s commitment can be found in the Deutsche Bank [Statement on Human Rights](#). Deutsche Bank also maintains an active oversight on the human rights performance of its direct suppliers.

This Policy Statement is made pursuant to Section 6(2) of the [Lieferkettensorgfaltspflichtengesetz](#)¹ (known as the [Supply Chain Due Diligence Act](#)², hereinafter “SCDDA”). Its purpose is to detail Deutsche Bank’s human rights strategy, and it describes the procedure for fulfillment of SCDDA obligations, its priority human rights and environment-related risks, and the expectations placed on its own employees and within its supply chain. The terminology used in this statement is intended to align with the defined terms used within the SCDDA. The human rights and environment-related risks referred to in the SCDDA are detailed in the list of prohibitions in Annex 1.

2. Deutsche Bank’s risk management framework

Management of human rights and environment-related risks is embedded within Deutsche Bank’s risk management framework and processes, its organizational divisions, its governance framework, its internal control framework, and its compliance management framework, as well as within Deutsche Bank’s internal and external policies and procedures. Deutsche Bank’s framework is designed to manage risks and complexities that can arise within its own business area or its supply chain.

In accordance with its obligations under the SCDDA, Deutsche Bank integrates within its risk management framework the following:

- a) A dedicated Head of Human Rights, who oversees human rights risk management
- b) Annual risk analysis (ad hoc where applicable) undertaken for its own business area and for Deutsche Bank’s direct suppliers
- c) Identification, weighting, and prioritization of human rights and environment-related risks
- d) Establishment of preventative measures (and/or remedial actions where applicable) in its own business area and vis-à-vis direct suppliers with the aim of preventing or minimizing any human rights and environment-related risks or ending the violation of human rights or environment-related obligations
- e) Annual (and ad hoc where applicable) monitoring and assessment of the effectiveness of the preventative measures and/or remedial actions undertaken with respect to the human rights and environment-related risks or violations
- f) Triggering of risk analyses and/or establishment of preventative measures with regard to indirect suppliers in circumstances where Deutsche Bank comes into substantiated knowledge of human rights and environment-related risks
- g) Complaints procedure, which enables persons to report human rights and environment-related risks as well as violations of human rights and environment-related obligations that arise within its own business area and supply chain
- h) Internal monitoring, compliance documentation, and annual public disclosure

¹ Gesetz über die unternehmerischen Sorgfaltspflichten zur Vermeidung von Menschenrechtsverletzungen in Lieferketten.

² Act on Corporate Due Diligence Obligations in Supply Chains

Deutsche Bank presents the implementation of these measures to the Economic Committee, which represents the interest of its employees.

If Deutsche Bank has actual indications that suggest a violation of a human rights or environment-related obligation at indirect suppliers may be possible (substantiated knowledge), it carries out an ad-hoc supplier risk analysis; lays down appropriate preventive measures vis-à-vis the party responsible; draws up and implements a prevention, cessation, or minimization concept; and updates this Policy Statement, if necessary.

3. Deutsche Bank's SCDDA risk analysis process

Deutsche Bank gathers external reliable data to make a high-level assessment of human rights- and environment-related risks and to identify high-risk areas and profiles. Deutsche Bank undertakes due diligence to identify and assess the nature of the actual and potential adverse human rights- and environment-related risk that it may cause or contribute to through its own business area, or which may be linked to its supply chain. These assessments are further enhanced by direct engagement with suppliers and consultants, and through participation in multiple external initiatives (e.g. Thun Group).

At least annually, Deutsche Bank performs an SCDDA risk analysis of its own business area and direct suppliers. The outcome of the analysis provides an overview of the human rights- or environment-related risks and guides the development and continuous improvement of Deutsche Bank's management of these risks.

Risk analysis own business area

Deutsche Bank follows a three-step approach during the performance of its annual own business area SCDDA risk analysis:

1. An abstract own business area risk analysis was conducted on subsidiaries with a decisive influence of Deutsche Bank and own operations based on country- and sector-specific risks, by making use of both external and internal reliable data. The outcome of this analysis was the prioritization of 22 subsidiaries in countries with medium/high/very-high abstract risks. Only two out of the 22 subsidiaries were classified with a higher risk based on the service they provide.
2. A concrete own business area risk analysis was performed on prioritized subsidiaries to identify, weight, and prioritize them based on the severity of the outcome, number of people affected, irreversibility, and likelihood. None of the prioritized subsidiaries have shown a material number of human rights and environment-related complaints.
3. As all prioritized subsidiaries apply the relevant Deutsche Bank Group policies which are in line with SCDDA requirements, no further preventive measures were required to properly address those human rights and environment-related risks identified in Deutsche Bank's own business area.

Risk analysis direct suppliers

Deutsche Bank follows a three-step approach during the performance of its annual suppliers SCDDA risk analysis:

1. An abstract supplier risk analysis was conducted on its direct supplier portfolio based on country- and sector-specific risks, by making use of both external and internal reliable data. The outcome of this analysis was the prioritization of 234 suppliers in countries and/or sectors with specific human rights or environment-related risks.

2. A concrete supplier risk analysis was performed on prioritized suppliers to identify, weight, and prioritize them based on the severity of the outcome, number of people affected, irreversibility, and likelihood. Additionally, it was considered whether the prioritized suppliers meet our minimum ESG score and/or Sustainability Control Assessment requirements. The outcome of this analysis was the prioritization of 128 suppliers.
3. The 128 prioritized suppliers were subject to one of the following preventive measures to properly address the human rights and environment-related risks identified: The review of the contracts of suppliers with an annual spend volume larger than € 10,000 was triggered to seek the inclusion of SCDDA contract clauses based on their residual sustainability risk rating. Adverse media screening was performed on suppliers with an annual spend volume below € 10,000. As no negative news was identified, the inclusion of SCDDA contract clauses based on their residual sustainability risk rating will be sought during the regular review cycle.

4. Deutsche Bank's preventative measures

Deutsche Bank takes appropriate preventive measures in its own business area and vis-à-vis direct suppliers, with whom the bank takes active steps to engage and support in order to prevent adverse human rights and environment-related risks.

Deutsche Bank has developed a comprehensive portfolio of measures to prevent adverse human rights- and environment-related risks that may arise from time to time. The following are examples of these measures:

- Maintenance of a Code of Conduct to articulate the expectations towards its employees
- Maintenance of a [Supplier Code of Conduct](#) to articulate its expectations towards suppliers
- Training to facilitate an understanding of its human rights expectations
- Seeking agreement on risk-based contractual assurances in Deutsche Bank's direct supplier contracts that ensure compliance with the human rights- and environment-related due diligence obligations and appropriately address them in its own business area and along the supply chain; additionally, Deutsche Bank reserves the right to appropriately audit the supplier's compliance with obligations
- Performance of an enhanced due diligence risk assessment for those suppliers identified as having a very-high or high sustainability risk profile
- Appropriate controls and measures tailored to its direct suppliers to verify compliance with their human rights strategies at their onboarding or renewal of contracts
- Review the effectiveness of implemented preventative measures at least once a year or on an ad-hoc basis if a significantly changed or significantly expanded risk situation in its own business area or at its direct supplier is expected
- Documentation of the fulfillment of the due diligence obligations under SCDDA
- Annual report on the fulfillment of its due diligence obligations in the previous fiscal year

5. Deutsche Bank's remedial actions

Deutsche Bank has established a set of remedial actions to address and end or minimize discovered violations of human rights- or environment-related obligations that have already occurred or are imminent in its own business area or at a direct supplier.

If violations of human rights- or environment-related obligations are discovered or are imminent, Deutsche Bank's Head of Human Rights must be informed and the relevant functions responsible for addressing the concerns (i.e. Human Resources, Global Procurement, Group Legal, and Group Sustainability) involved to handle them and take action, including tracking the effectiveness of their actions. The process includes background research and consultation on the alleged concerns to assess the violation and the extent and impact of Deutsche Bank's involvement. Measures for ending or minimizing the violation without undue delay are developed, implemented, and tracked. Depending on the severity of the violation, there may also be consultation with impacted third parties (including NGOs, affected communities, and human rights defenders) as may be appropriate to assess the effectiveness of the concept. Deutsche Bank also gives due consideration to what alternative actions can be undertaken to prevent a future recurrence.

If the violation of a human rights- or environment-related obligation at a direct supplier is such that Deutsche Bank cannot end the violation in the foreseeable future, Deutsche Bank seeks specialist advice, joins forces with other enterprises involved, and engages with the suppliers causing the violation to jointly develop and implement a concept to end or minimize it within an agreed timeline. Deutsche Bank may also consider a temporary suspension of the business relationship while efforts are made to minimize the risk or terminate it if it has no other less severe means at its disposal and increasing the ability to exert influence has no prospect of success.

As of now, no violation of a human rights- or environment-related obligation has been identified, and hence no measures for ending or minimizing the violation were developed.

An effectiveness review of remedial actions is performed at least once a year or on an ad-hoc basis if a significantly changed or significantly expanded risk situation in its own business area or at its direct supplier is expected.

6. Deutsche Bank's complaint procedure

Deutsche Bank encourages all duly concerned stakeholders to report human rights- and environment-related risks, as well as adverse human rights and environment-related incidents that have arisen as a result of the economic actions of an enterprise in its own business area or of a direct supplier, through its dedicated complaint procedure.

Deutsche Bank is committed to making its complaint procedure accessible particularly to stakeholders most vulnerable to potential adverse impact. Deutsche Bank has dedicated communication channels (e-mail and telephone) available to raise concerns on human rights and environment-related risks internally and externally.

Upon receipt of any concern via the dedicated channels described in the complaint procedure, Deutsche Bank (as appropriate):

- Acknowledges the report within seven days
- Reaches out to the reporter, if allegations are not sufficiently specific to allow the effective assessment of a report
- Conducts its own risk assessment (as appropriate)
- Provides proactively high-level status updates within a timely fashion (Deutsche Bank's own target objective is to react approximately within three months of receiving any report)
- Where the review of a concern takes extensive time to complete, Deutsche Bank aims to provide quarterly status updates

Employees, non-employees³, and suppliers' staff can make complaints through the channels described in the "Raising Concerns (including Whistleblowing) Policy", a Compliance-owned global Group-wide policy approved by the Group Chief Compliance Officer that governs the Raise a Concern framework. The policy, which is available on the policy portal and reviewed at a minimum annually, sets out the bank's internal approach for raising concerns. It actively encourages employees to report possible violations of laws, rules, regulations, bank policies, and conflicts of interest, and it requires employees to raise concerns about possible criminal activity by the bank, its employees, clients, or third parties. Employees may do so by reaching out to the Whistleblowing Central Function, a ringfenced team within the bank's Anti-Financial Crime function specialized in concerns related to potential misconduct by Deutsche Bank Group, those who work for Deutsche Bank Group, or any other entity or individual acting on behalf of Deutsche Bank Group. All reports are taken seriously and managed sensitively and confidentially. Quarterly reporting on trends and topics, including substantiation rates and fact patterns, is provided to senior management as well as to the Supervisory Board's Audit Committee. In addition, the chair of the Supervisory Board's Audit Committee is informed of the highest risk rating concerns via ad-hoc notifications pursuant to a defined escalation procedure.

Up-to-date information on external channels is accessible on Deutsche Bank's [human rights website](#), including details of the SCDDA complaint procedure.

If any human rights concerns are raised, Deutsche Bank's Head of Human Rights must be informed and the relevant functions responsible for addressing the concerns are involved to handle them and take action, including tracking the effectiveness of their actions. After an initial internal assessment, justified and credible concerns trigger a remediation process that includes background research, and consultation on the alleged concern. Depending on the outcomes of this due diligence, appropriate measures are agreed upon and implemented to remediate existing impacts. These measures are monitored over time and include the involvement of the Head of Human Rights. Complainants of human rights concerns are updated regularly about the progress and implementation of remedial actions, if applicable.

Deutsche Bank reviews the effectiveness of the complaint procedure at least once a year or on an ad-hoc basis, or if a significantly changed or significantly expanded risk situation in its own business area or at its direct supplier is expected.

³ External expertise and short-term support

7. Deutsche Bank's fulfillment of the SCDDA obligations

Deutsche Bank's risk management framework includes the monitoring and documentation of the fulfillment of obligations under the SCDDA. Deutsche Bank's Head of Human Rights oversees Deutsche Bank's management of human rights, and coordinates processes and communication channels to evaluate the effectiveness of the bank's human rights management approach. Deutsche Bank documents internally and reports publicly in compliance with its obligations.

8. Deutsche Bank's priority human rights- and environment-related rights

Deutsche Bank offers banking services and is present with own operations in 44 countries worldwide. According to the German Federal Ministry of Labour and Social Affairs, the financial services sector presents human rights risks of particular relevance in the downstream value chain and regular risks related to human rights for Deutsche Bank's supply chain and own business area⁴. This was also confirmed by the SCDDA risk analyses performed by Deutsche Bank in 2024.

The following are the risks with the highest risk score in Deutsche Bank's own business area (including affiliated enterprises):

- M3 (occupational health and safety)
- M7 (destruction of natural resources by environmental pollution)
- U2 (production and/or use of substances within the scope of the Stockholm Convention)

The following are the risks with the highest risk score in Deutsche Bank's supply chain:

- M3 (occupational health and safety)
- M4 (freedom of associations)
- M6 (adequate wages)

These risks are appropriately prevented and minimized by Deutsche Bank's established risk management framework and preventive measures.

⁴ See heat map of the financial services sector included in [Forschungsbericht 543](#)

9. Human rights and environment-related expectations placed by Deutsche Bank on its employees and suppliers in the supply chain

Employees

Deutsche Bank's Code of Conduct defines the minimum standards of behavior and conduct to which the bank expects all its employees, non-employees, and the bank as an organization to adhere to. The purpose of the Code of Conduct is to ensure that the bank's workforce conducts itself ethically, with integrity, and in accordance with the bank's policies and procedures as well as applicable laws and regulations. Beyond mere compliance, however, the bank is committed to always doing what is right and proper. Deutsche Bank requires its own workforce and the members of its Management Board to follow the letter and the spirit of this code, as well as all other applicable policies and procedures to promote compliance with high ethical standards.

The Head of Human Rights supports and oversees how the following functions define strategic and operational standards for the fulfillment of SCDDA human rights- and environment-related due diligence obligations in own business area: Human Resources, Global Real Estate, and Corporate Security.

Deutsche Bank has voluntarily endorsed and aligned with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work⁵ and is committed to complying with applicable labor laws in the different jurisdictions in which it operates. Deutsche Bank has policies and processes in place to ensure, among other things, that:

- Child labor, forced labor or human trafficking are never accepted within its business operations
- Workplace accidents and job-related illnesses are reduced through a prevention-oriented workplace protection system focusing on both physical and mental health
- Individual employee data is handled in line with applicable privacy laws
- Harassment, discrimination, and retaliation are not tolerated
- Deutsche Bank's workforce is diverse to bring different experiences and an inclusive culture that values different perspectives and to best help Deutsche Bank serves its clients, reflecting the communities in which Deutsche Bank operates
- Adequate compensation packages are offered to attract and retain talent

Deutsche Bank is committed to complying with all applicable laws, rules, and regulations of the countries in which it operates. This includes sovereign state legislation on collective agreements, bargaining, and freedom of association.

Suppliers

The way Deutsche Bank procures products and services has a significant influence on its sustainability footprint. For this reason, Global Procurement plays a key role in delivering the bank's sustainability commitments, including respecting human rights. The bank is committed to the ongoing development and continuous improvement of its risk management practices of human rights and environmental risks.

⁵ The latest version of the ILO Declaration on Fundamental Principles and Rights at Work includes five core principles: (a) freedom of association and the effective recognition of the right to collective bargaining, (b) the elimination of all forms of forced or compulsory labour, (c) the effective abolition of child labour, (d) the elimination of discrimination in respect of employment and occupation, and (e) a safe and healthy working environment

Suppliers are required to meet a range of requirements, including respect of human rights, financial health, anti-fraud and corruption, and compliance checks, to engage with Deutsche Bank.

Deutsche Bank's **Supplier Code of Conduct** (hereinafter "Code") sets out the core values and standards of behavior that Deutsche Bank expects its suppliers to conform to when providing goods and services. It is acknowledged by direct supplier responding to a request for proposal and on starting an engagement with Deutsche Bank. Additionally, direct suppliers are expected to provide a copy to their personnel involved in the supply of the goods and services. Deutsche Bank gives preference to suppliers whose policies and practices are consistent with those of Deutsche Bank, including human rights, health and safety, environmental sustainability, treating employees fairly without discrimination, ethics, and other responsible business practices.

To underscore the bank's commitment to sustainability and its responsiveness to evolving standards, Deutsche Bank increased the ESG score threshold for suppliers with an annual volume of over € 500,000 – from 25 to 45 out of 100 on the EcoVadis scoring scale (or the equivalent score from other approved rating agencies such as MSCI, Sustainalytics, ISS, S&P, and CDP). This was implemented in May 2024 to encourage suppliers to attain enhanced standards of ESG performance, to support delivery of evolving best practices and regulations in ESG, and to drive positive impact throughout the value chain.

Deutsche Bank expects its direct suppliers to ensure that human rights and environmental standards are upheld within their own operations and to make reasonable efforts to ensure the same within their supply chains. Direct suppliers are expected to implement appropriate measures to prevent human rights and environmental risks or to remedy any violations of human rights or environment-related obligations, as outlined in the list of prohibitions in Annex 1.

Furthermore, Deutsche Bank expects its suppliers to cooperate in conducting both annual and ad-hoc SCDDA risk analyses, as well as in identifying and addressing human rights and environmental risks or violations. Direct suppliers must provide all necessary information, facts, and documentation to facilitate this cooperation. They are also expected to make best efforts to establish a corresponding duty of cooperation with their own suppliers whenever there are indications of human rights or environment-related violations within the supply chain.

Deutsche Bank seeks agreement upon risk-based contractual assurances in its direct supplier contracts, requiring compliance with human rights and environment-related due diligence obligations as set forth in the SCDDA. Suppliers must also appropriately address these obligations within their own operations and along the supply chain. Additionally, Deutsche Bank reserves the right to appropriately audit suppliers' compliance with obligations.

10. Approval

This Policy Statement was approved by the CEO and Management Board on May 28, 2025.



Christian Sewing
Chief Executive Officer



Rebecca Short
Chief Operating Officer

Annex 1

Human rights and environment-related risks according to the SCDDA are a condition in which, on the basis of factual circumstances, there is sufficient probability that a violation of the following prohibitions is imminent:

Human rights risks

1. The prohibition of the employment of a child under the age at which compulsory schooling ends according to the law of the place of employment, provided the age of employment is not less than 15 years, except where the law of the place of employment so provides in accordance with Article 2(4) and Articles 4 to 8 of Convention No. 138 of the International Labour Organization of June 26, 1973 concerning the Minimum Age for Admission to Employment (Federal Law Gazette II, pp. 201, 202)
2. The prohibition of the worst forms of child labor for children under the age of 18, in accordance with Article 3 of Convention No. 182 of the International Labour Organization of June 17, 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II, pp. 1290, 1291), which includes:
 - a. All forms of slavery or practices similar to slavery, such as the sale of and trafficking of children, debt bondage, and serfdom, and forced or compulsory labor, including the forced or compulsory recruitment of children for use in armed conflicts
 - b. The use, procuring, or offering of a child for prostitution, for the production of pornography, or for pornographic performances
 - c. The use, procuring, or offering of a child for illicit activities, in particular for the production of or trafficking in drugs
 - d. Work that, by its nature or because of the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children
3. The prohibition of the employment of persons in forced labor, which includes any work or service performed by a person under the threat of punishment and for which they have not made themselves available voluntarily, for example as a result of debt bondage or trafficking in human beings; excluded from forced labor are any work or services that comply with Article 2(2) of Convention No. 29 of the International Labour Organization of June 28, 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 1956 II, pp. 640, 641) or with Article 8(3) (b) and (c) of the International Covenant of December 19, 1966 on Civil and Political Rights (Federal Law Gazette 1973 II, pp. 1533, 1534)
4. The prohibition of all forms of slavery, practices akin to slavery, serfdom, or other forms of domination or oppression in the workplace, such as extreme economic or sexual exploitation and humiliations
5. The prohibition of disregarding the occupational health and safety obligations applicable under the law of the place of employment if this gives rise to the risk of accidents at work or work-related health hazards, in particular, due to:
 - a. Obviously insufficient safety standards in the provision and maintenance of the workplace, workstation, and work equipment
 - b. The absence of appropriate protective measures to avoid exposure to chemical, physical, and biological substances
 - c. The lack of measures to prevent excessive physical and mental fatigue, in particular due to inappropriate working hours and rest breaks
 - d. Inadequate training and instruction of employees

6. The prohibition of disregarding the freedom of association, according to which:
 - a. Employees are free to form or join trade unions
 - b. The formation, joining, and membership of a trade union must not be used as a reason for unjustified discrimination or retaliation
 - c. Trade unions are free to operate in accordance with applicable law of the place of employment, which includes the right to strike and the right to collective bargaining
7. The prohibition of unequal treatment in employment, for example on the grounds of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, or belief, unless this is justified by the requirements of the employment; unequal treatment includes, in particular, the payment of unequal remuneration for work of equal value
8. The prohibition of withholding an adequate living wage; the adequate living wage amounts to at least the minimum wage laid down by the applicable law and, apart from that, is determined in accordance with the regulations of the place of employment
9. The prohibition of causing any harmful soil change, water pollution, air pollution, harmful noise emissions, or excessive water consumption that:
 - a. Significantly impairs the natural bases for the preservation and production of food
 - b. Denies a person access to safe and clean drinking water
 - c. Makes it difficult for a person to access sanitary facilities or destroys them
 - d. Harms the health of a person
10. The prohibition of unlawful eviction and the prohibition of unlawful taking of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters, the use of which secures the livelihood of a person
11. The prohibition of the hiring or use of private or public security forces for the protection of the supplier's project if, due to a lack of instruction or control on the part of the enterprise, the use of security forces:
 - a. Is in violation of the prohibition of torture and cruel, inhumane, or degrading treatment
 - b. Damages life or limb
 - c. Impairs the right to organize and the freedom of association
12. The prohibition of an act or omission in breach of a duty to act that goes beyond Nos. 1 to 11, which is directly capable of impairing a protected legal position in a particularly serious manner, and the unlawfulness of which is obvious upon reasonable assessment of all the circumstances in question

Environment-related risks

1. The prohibition of the manufacture of mercury-added products pursuant to Article 4(10) and Annex A Part 1 of the Minamata Convention on Mercury of October 10, 2013 (Federal Law Gazette 2017 II, pp. 610, 611) (Minamata Convention)
2. The prohibition of the use of mercury and mercury compounds in manufacturing processes within the meaning of Article 5(2) and Annex B, Part 1 of the Minamata Convention from the phase-out date specified in the Convention for the respective products and processes
3. The prohibition of the treatment of mercury waste contrary to the provisions of Article 11(3) of the Minamata Convention
4. The prohibition of the production and use of chemicals pursuant to Article 3(1)(a) and Annex A of the Stockholm Convention of May 23, 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II, pp. 803, 804) (POPs Convention), last amended by a decision from May 6, 2005 (Federal Law Gazette 2009 II, pp. 1060, 1061), in the version of Regulation (EU) 2019/1021 of the European Parliament and of the Council of June 20, 2019 on Persistent Organic Pollutants (OJ L 169 of May 26, 2019, pp. 45–77), as last amended by Commission Delegated Regulation (EU) 2021/277 of December 16, 2020 (OJ L 62 of February 23 pp.1–3).
5. The prohibition of the handling, collection, storage, and disposal of waste in a manner that is not environmentally sound in accordance with the regulations in force in the applicable jurisdiction under the provisions of Article 6(1) (d) (i) and (ii) of the POPs Convention
6. The prohibition of exports of hazardous waste within the meaning of Article 1(1) and other wastes within the meaning of Article 1(2) of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Federal Law Gazette 1994 II, pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of March 22, 1989 of May 6, 2014 (Federal Law Gazette II, pp. 306, 307) and within the meaning of Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of June 14, 2006 on shipments of waste (9OJ L 190 of July 12, 2006, pp. 1–98)(Regulation [EC] No. 1013/2006), as last amended by Commission Delegated Regulation (EU) 2020/2174 of October 19, 2020 (OJ L 433 of December 22, 2020, pp. 11–19):
 - a. To a party that has prohibited the import of such hazardous and other wastes (Article 4[1] [b] of the Basel Convention)
 - b. To a state of import as defined in Article 2, number 11 of the Basel Convention that does not consent in writing to the specific import, in the case where that state of import has not prohibited the import of such hazardous wastes (Article 4[1] [c] of the Basel Convention)
 - c. To a non-party to the Basel Convention (Article 4[5]) of the Basel Convention)
 - d. To a state of import if such hazardous wastes or other wastes are not managed in an environmentally sound manner in that state or elsewhere (Article 4[8], sentence 1 of the Basel Convention)
7. The prohibition of the export of hazardous wastes from countries listed in Annex VII to the Basel Convention to countries not listed in Annex VII (Article 4A of the Basel Convention, Article 36 of Regulation [EC] No. 1013/2006)
8. The prohibition of the import of hazardous wastes and other wastes from a non-party to the Basel Convention (Article 4[5] of the Basel Convention)



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Feedback improves further development of the Policy Statement of Deutsche Bank – Supply Chain Due Diligence Act (SCDDA) and can be a source of new impetus. The bank looks forward to hearing your opinions. Please contact us at: sustainability.inquiries@db.com

Online

Further details on the bank's commitment to respect human rights can be found on our human rights [website](#).

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