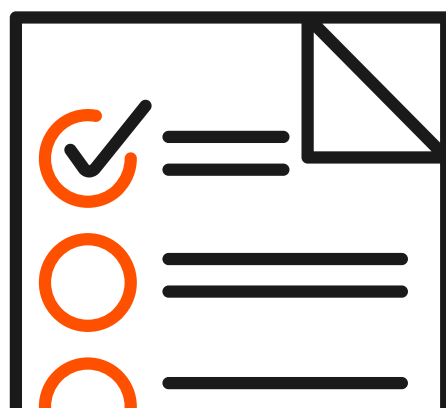
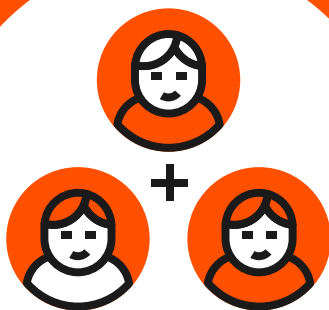
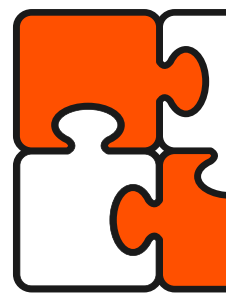
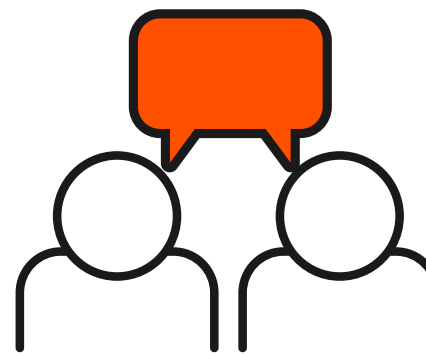




# POLICY STATEMENT

**REGARDING SIXT'S HUMAN RIGHTS  
STRATEGY**



## COMMITMENT TO RESPECT FOR HUMAN RIGHTS AND INTERNATIONAL STANDARDS

SIXT<sup>1</sup> is an international provider of high-quality mobility solutions. Together with our franchisees and partners, we are present for our customers worldwide. SIXT strives for responsible and sustainable value creation across the entire business spectrum.

SIXT is committed to its human rights responsibility, as laid down -among others- in the Act on Corporate Due Diligence Obligations in Supply Chains. SIXT also aligns its business activities with the following internationally applicable standards and guidelines in order to underline the anchoring of human rights and environmental standards within its own business area and in global supply relationships:

- the International Charter of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the ten principles of the UN Global Compact,
- the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up,
- the ILO core labour standards,
- the OECD Guidelines for Multinational Enterprises,
- the prohibition of the manufacture, use or treatment of mercury or mercury-added products (Minamata Convention),
- the prohibition of the production or use of particularly harmful pollutants (cf. Art. 3 para. 1 POPs Convention, 6 para. 1 lit. d) POPs Convention) and
- the prohibition of the import and export of hazardous waste in accordance with the Basel Convention.

<sup>1</sup>The designation SIXT includes SIXT SE and its subsidiaries within the meaning of § 290 HGB.

## SCOPE AND EXPECTATIONS FROM EMPLOYEES AND SUPPLIERS

This policy statement sets out the overarching principles for respect of human rights and environmental standards that SIXT has anchored in its operations. We have communicated our expectations of ethical conduct in detail in the internal SIXT Code of Conduct and our Code of Conduct for Suppliers and Service Providers. The principles described apply wherever we operate. We want to behave ethically, socially and fairly everywhere.

The Sixt Code of Conduct obliges all employees, functions and managers to comply with it. It applies worldwide, even if in another country other principles are customary or tolerated. We expect our suppliers and service providers to follow the same principles. They should internalize our principles and promote them as actively as we do. Business partners who tolerate forced or child labor, discriminate against employees, violate legal requirements or fundamental moral principles will not be tolerated by us.

For this reason, SIXT has adopted the Code of Conduct for Suppliers and Service Providers, which reflects SIXT's basic principles and sets minimum standards for business relationships with SIXT.

It is available under <https://about.sixt.com/en/responsibility/#compliancee>

### RISK ANALYSIS

SIXT is fully committed to all human rights and the above-mentioned environmental standards and undertakes to comply with them. However, due to our business, some rights are at greater risk than others. We examine possible negative effects of our business activities annually and on a case-by-case basis. The findings from this risk analysis serve as a basis for defining and, if necessary, adapting effective prevention and remedial measures.

In our own business unit and at our franchisees, the risk analysis is carried out using a questionnaire. When analysing the risk for our suppliers, we proceed in two steps. We first assess supplier risk abstractly by country and industry, with regard to a variety of human rights and specific environmental risks. If a certain threshold is reached from the combination of this risk assessment and from a certain purchasing volume, we also consider and analyse our suppliers individually.

Based on its business model and supplier structure, SIXT has currently identified certain overriding human rights risks:

- Disregard for occupational health and safety and work-related health hazards
- Violation of the prohibition of withholding a reasonable wage
- Infringement of the prohibition of unequal treatment in employment
- Preventing modern slavery

Regarding environmental risks, potentially higher risks were identified to a limited extent in individual business relationships in the area of vehicle purchasing.

## **PREVENTIVE AND CORRECTIVE MEASURES**

SIXT uses preventive and corrective measures to prevent human rights and environmental risks, prioritizing the above-mentioned risks. Among other things, we sensitize our employees and franchisees to our corporate values and principles. Central to this is the SIXT Code of Conduct. All employees are familiarized in writing via the intranet and through training programs with the Code of Conduct and the other internal requirements relevant to their area and their practical handling. In addition, we carry out special, regular training and inspections in the field of occupational safety in the office, in the branches and when travelling. In addition, regular compliance training courses are held.

In our purchasing practices, we take social and environmental concerns into account by assessing our suppliers' approach to human rights and the environment, and consider this in our selection decisions. A key instrument for making supply chains more sustainable is the Code of Conduct for Suppliers and Service Providers. It is SIXT's goal to oblige all business partners to comply with it. SIXT expects that the obligations and standards from the Code of Conduct for Suppliers and Service Providers will also be passed on to the business partner's suppliers. By raising awareness and committing suppliers, concrete rules are created to implement human rights and certain environmental concerns throughout the supply chain. In order to maintain this claim, SIXT checks its suppliers on a risk-based basis and will make use of appropriate control mechanisms (e.g. information rights / on-site inspections). Depending on the identified risk, further measures are also developed and implemented (e.g. special termination rights, regular exchange with suppliers, agreement of special action plans or implementation of individual training courses).

In addition to the complaint procedure mentioned below, cooperation with relevant stakeholders is also an important component on which SIXT will place an increased focus.

The process by which we ensure compliance with our due diligence obligations to uphold human rights and the above-mentioned environmental rights is continuously expanded, improved, monitored, and reviewed against the background of the development of our business activities or on a case-by-case basis (e.g. in the event of concrete indications of violations or changes in international laws and standards). If necessary, we adapt the process and this policy statement accordingly.

If we determine that a violation of human rights or environmental standards in our own business or at a business partner has already occurred or is imminent, we will promptly take appropriate remedial action to prevent, terminate or minimize the extent of the breach.

In addition, we are working towards reparation. For this purpose, processes are further developed that determine how to proceed in these cases. The minimum benchmark for this is the Act on Corporate Due Diligence Obligations in Supply Chains.

An appropriate and effective complaint management system is an important part of SIXT's human rights strategy. Compliance with human rights and environmental due diligence obligations can only succeed through open and clear communication and addressing grievances. We strive to raise awareness and knowledge about human rights issues among our employees and business partners, and encourage them to voice their concerns without fear of reprisal.

Indications of misconduct can be reported, among other things, via SIXT's reporting system. This is possible by stating one's name or reporting anonymously. The reporting system can be reached here: <https://sixt.integrityline.com/>. It is available to SIXT employees, suppliers and other third parties and is communicated internally and externally.

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## RESPONSIBILITIES AND REPORTING

This policy statement was adopted by the Management Board of SIXT SE.

The areas of Corporate Procurement, Vehicle Purchasing, Franchise and People & Culture are primarily responsible for operational implementation. They are supported by Global GRC and ESG, which define, implement and track due diligence processes across departments. The implementation and review of human rights and environmental due diligence obligations is accompanied and supported by the Human Rights Officer of SIXT SE. She is a member of the ESG division and regularly informs the Management Board of SIXT SE on relevant human rights issues and any incidents.

SIXT is aware that the implementation of human rights and environmental due diligence obligations is an ongoing process. SIXT provides regular and transparent information on implementation and further developments as part of its annual sustainability reporting and in the publicly accessible human rights report to the Federal Office of Economics and Export Control (for the first time in 2024).