

**POLICY STATEMENT
OF VOLKSBANK KRAICHGAU EG
ON DEALING WITH HUMAN
RIGHTS AND ENVIRONMENT-
RELATED RISKS IN THE SUPPLY
CHAIN AND IN ITS OWN BUSINESS
AREA**

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Change history

Version	Release date	Changes
1.0	01/01/2024	Initial publication
2.0	01/06/2024	Supplemented by subsidiaries
3.0	09/12/2025	Name of the Deputy Supply Chain Compliance Officer changed

1 Preamble

Our customers, our business partners, our members and our employees as well as the Federal Office for Export and Economic Control (*Bundesamt für Ausfuhr und Wirtschaftskontrolle*, BAFA) and the public rightly expect us to operate responsibly within our own business area and in our supply chain. For us as a cooperative regional bank that is closely rooted in the region, this is part of our self-image.

We have therefore decided to publish this Policy Statement, according to which we are committed to the German Supply Chain Due Diligence Act (SCDDA; in German: *Lieferkettensorgfaltspflichtengesetz*, *LkSG*) and the due diligence obligations listed therein with regard to human rights and the environment as well as all the conventions listed in the annexes.

This Statement is subject to continuous further development to include the aspects specified in Section 6 (2) SCDDA, which will be supplemented after the required risk analyses have been carried out.

2 Scope of due diligence obligations according to Section 3 SCDDA

This Policy Statement applies to our own business area of Volksbank Kraichgau eG and to our suppliers. Our own business area includes not only our employees, but also companies affiliated with us over which we exert a decisive influence. These include:

- Kraichgau Immobilien GmbH
- Kraichgau Reisen GmbH
- Maulbronner Immobiliengesellschaft mbH
- W3 Goethestraße GmbH & Co KG
- W3 Goethestraße Verwaltungs-GmbH
- WAL Grundbesitz GmbH & Co KG
- WAL Holding GmbH

We expect both our employees and our direct suppliers to comply with the due diligence obligations under the SCDDA. In consequence, we expect our direct suppliers to comply with their due diligence obligations in their own supply chain.

In terms of content, this Policy Statement covers all human rights and environment-related risks in accordance with Section 2 SCDDA.

3 Risk management according to Section 4 SCDDA

From January 1, 2024, we will establish an appropriate and effective risk management system to comply with due diligence obligations by integrating risk management in all relevant business processes through appropriate measures.

The aim of our risk management is to identify potential human rights and environment-related risks at an early stage, reduce their likelihood of occurrence and prevent the occurrence of a violation of due diligence obligations. Should a breach of duty nevertheless occur, our primary objective is to minimize the extent and remedy the breach that has occurred.

4 Risk analysis according to Section 5 SCDDA

We will carry out an adequate risk analysis once a year and on an ad hoc basis to determine the human rights and environment-related risks in our own business area and at our direct suppliers. In a first step, an abstract risk analysis is carried out based on defined parameters to identify potential human rights and environment-related risks. If risks are identified, a specific risk analysis follows in a second step. It may be necessary to obtain further information for a conclusive risk analysis.

5 Preventive measures according to Section 6 SCDDA

If we identify a risk during the risk analysis, we will immediately take appropriate preventive measures. These include:

Preventive measures in our own business area	Preventive measures vis-à-vis direct suppliers
Implementation of the human rights strategy set out in the Policy Statement in the relevant business processes	Consideration of human rights and environment-related expectations when selecting the contractual partner
Development and implementation of suitable procurement strategies and purchasing practices that prevent or minimize identified risks	Contractual assurance that the human rights and environment-related expectations required by the company's management are met and adequately addressed along the supply chain
Conducting training courses in the relevant business areas	Implementation of (further) training programs to enforce contractual assurances



Implementation of risk-based control measures to verify compliance with the human rights strategy	Agreement on appropriate contractual control mechanisms and their risk-based implementation to verify compliance with the human rights strategy
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We will review the effectiveness of the preventive measures once a year and on an ad

hoc basis, taking into account findings from the processing of information in accordance with Section 8 SCDDA. If necessary, we will update the measures immediately.

6 Remedial measures according to Section 7 SCDDA

If we determine that a violation of a human rights or environment-related obligation has already occurred or is imminent in our own business area or at one of our direct suppliers, we will immediately take appropriate remedial action to prevent, eliminate or minimize the extent of the violation.

In our own business area, the remedial measure must lead to an elimination of the violation. In the case of our direct suppliers, a concept including a schedule for remediation or minimization must be drawn up and implemented without delay, unless remediation can reasonably be expected in the foreseeable future. If no other milder means promise success, the business relationship may be temporarily suspended or the contractual relationship may be terminated completely.

We will review the effectiveness of the remedial measures once a year and on an ad hoc basis, taking into account findings from the processing of information in accordance with Section 8 SCDDA. If necessary, we will update the measures immediately.

7 Complaints procedure according to Section 8 SCDDA

From January 1, 2024, we will establish an appropriate complaints procedure. All information on the complaints procedure and the various contact options is available on our website:

[Volksbank Kraichgau - LkSG](#)

8 Documentation and reporting obligation according to Section 10 SCDDA

We will continuously document the fulfillment of the due diligence obligations, e.g. for the identification of risks and the measures taken, and ensure that the documents are retained for seven years.

We will prepare an annual report on the fulfillment of our due diligence obligations in the past financial year, submit it to the Federal Office of Economics and Export Control and make it publicly available free of charge on our website for a period of seven years.

9 Data protection

All our activities in connection with this Policy Statement and the contents of the SCDDA are carried out in compliance with data protection regulations.

10 Contact

If you have any questions about the SCDDA, please contact:

Jochen Koch
Supply Chain Compliance Officer

[Kerstin Martin](#)
Deputy Supply Chain Compliance Officer

compliance@vbkraichgau.de