

Policy Statement of Lufthansa CityLine

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1 Declaration for the respect of human rights

Lufthansa CityLine GmbH is part of the Lufthansa Group. The Lufthansa Group connects people, cultures, and economies every day. We are a company that stands for open-mindedness, tolerance, and diversity, and we believe we have a responsibility to uphold human rights and operate in a sustainable manner.

Unfortunately, the protection of human rights is not guaranteed in all countries in which we operate as a company. We cannot control the political development of these countries. However, we can contribute to respect for human rights in our business division and also in our supply chain by identifying risks relating to human rights and the environment and by preventing violations.

We therefore select our suppliers carefully and contractually oblige them to comply with human rights, labor and health standards, and environmental protection. We check in cases of doubt.

Embedding human rights and sustainability in our business processes and our supply chain is an ongoing task. In doing so, we follow key international conventions and declarations such as

- the Universal Declaration of Human Rights,
- the International Covenant on Civil and Political Rights,
- the International Covenant on Economic, Social and Cultural Rights,
- the core labor standards of the International Labor Organization (ILO),
- the UN Guiding Principles on Business and Human Rights,
- the 10 principles of the UN Global Compact,
- the OECD Guidelines for Multinational Enterprises,
- the IATA Resolution on Combating Human Trafficking
- and environmental agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Transboundary Movements of Hazardous Wastes and their Disposal.

They form the framework for our actions in conjunction with the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG).

Lufthansa CityLine GmbH always complies with applicable national law. Where international human rights are restricted by local laws, we strive to comply with internationally recognized standards while not clashing with local laws. If local laws exceed international standards, then Lufthansa CityLine GmbH will comply with local laws.

2 Expectations of employees and suppliers

Lufthansa CityLine GmbH expects its employees and suppliers to respect human and environmental rights and to support Lufthansa CityLine GmbH in preventing, minimizing, and/or ending risks and violations related to human and environmental rights.

The expectations placed on the employees and managers of Lufthansa CityLine GmbH are specifically set out in the [Lufthansa Group Code of Conduct](#). The expectations regarding the conduct of suppliers are summarized specifically in the [Code of Conduct for Suppliers](#).

Lufthansa CityLine GmbH also expresses its expectations, particularly with regard to priority risks, in the form of further preventive and remedial measures (see below).

3 Procedures to fulfill due diligence obligations

3.1 Risk management

The Lufthansa Group has established a risk management system for its companies that aims to identify, prevent, and eliminate human rights and environmental risks and violations in its own business division and along the supply chain.

Two teams within the Lufthansa Group are responsible for implementing the LkSG. The Human Rights & Non-Discrimination Team comprehensively coordinates the activities of the Lufthansa Group with regard to its human rights responsibility. The Group Procurement team is responsible for risk management regarding our suppliers and the supply chain. The two teams are supported by contacts from departments such as Occupational Health and Safety, Human Resources, as well as by the so-called Human Rights Key Accounts in individual prioritized Lufthansa Group companies such as Lufthansa CityLine GmbH. This network can be continuously expanded based on the results of each risk analysis.

To monitor risk management, the function of a Human Rights Officer was created in the "Human Resources and Infrastructure" Executive Board division at Lufthansa Group level with a direct reporting line to the divisional board. This is exercised by the Vice President Labor Relations Ground, Robert Müller. The Human Rights Officer informs the Group Executive Board about the work of the responsible persons at regular intervals and as warranted.

At the level of Lufthansa CityLine GmbH, the function of the Human Rights Key Account was created which in turn informs the Board of Lufthansa CityLine GmbH in this matter.

3.2 Risk analyses and priority risks

Lufthansa CityLine GmbH carries out risk analyses relating to human rights and the environment every year and as warranted. 1.295 suppliers were included in the annual risk analysis in 2024. Software is used to assist in the appropriate identification, weighing, and prioritization of risks given the large number of suppliers. They are screened by country, sector, and media references. In addition to external data sources, internal findings such as information received via reporting channels, including the anonymous whistleblower system, are also taken into account.

The identified risks are then weighed and prioritized, while taking into account the appropriateness criteria of the LkSG, such as the Lufthansa CityLine's ability to influence a supplier.

With companies and suppliers that have a prioritized human rights or environmental risk, Lufthansa CityLine GmbH takes preventive measures to avoid violations. If violations are identified, Lufthansa CityLine GmbH stops the violation as quickly as possible or creates a remedial concept - depending on the type of violation and where it occurs. Lufthansa CityLine GmbH considers the prohibition of disregarding freedom of association and collective agreements, as well as the prohibition of disregarding occupational health and safety to be particularly relevant in the supply chain.

Each year, the Human Rights Key Account informs the Lufthansa CityLine's Board about the results of the risk analysis. The results are also communicated to the Economic Committee.

Lufthansa Cityline GmbH addresses these risks primarily through the preventive measures described below.

3.3 Preventive measures

Lufthansa CityLine GmbH pursues a two-pronged strategy for the protection of human and environmental rights: First, it seeks to prevent risks from arising in the first place. Second, it seeks to respond to structural risks identified during the risk analysis with appropriate measures and prevent, or at least minimize adverse human rights and environmental impacts.

Risks should be prevented from arising in our own business division by means of regular campaigns to raise global awareness, a wide range of grievance mechanisms and a broad range of advisory services provided by the Lufthansa Group's Human Rights & Non-Discrimination Team and by the internal Human Rights Key Account.

Lufthansa CityLine GmbH has also adapted its purchasing processes so that sustainability criteria, for example, already play an important role in the selection of suppliers and that suppliers are generally checked for compliance with human rights, labor and environmental standards and integrity before contracts are concluded. Suppliers are also contractually obliged to protect human rights and the environment.

A portfolio of measures has been developed in particular to prevent, eliminate, or mitigate Lufthansa CityLine's priority risks, which especially includes the following measures:

3.3.1 Training measures and dialog

Online, as well as hybrid formats conducted by the Lufthansa Group's Human Rights & Non-Discrimination Team and the Group Procurement Team are used to raise awareness of human rights and environmental due diligence obligations.

An online training course on human rights was developed which must be completed on a risk basis by relevant business divisions such as Purchasing and Human Resources, as well as by identified suppliers. In addition, a new risk-oriented online training course has been developed to promote diversity, inclusion, and intercultural competence.

To firmly establish measures in the supply chain, the Group Procurement team maintains a close exchange with risk-prioritized suppliers. These are specifically surveyed with the help of standardized questionnaires, among other methods

3.3.2 Codes of conduct and contractual measures

Lufthansa CityLine GmbH's expectations (as part of the Lufthansa Group) with regard to respecting human rights and protecting the environment are summarized in two [Codes of Conduct](#): a code addressed to managers and employees of the Lufthansa Group and a code addressed to suppliers.

Both Codes are communicated accordingly. The employment contracts of managers are also extended to include an annex that obliges them to ensure respect for human rights and environmental obligations in their area of responsibility. Supplier contracts include a detailed corporate social responsibility clause that combines the expectations of the Lufthansa Group with rights and obligations that suppliers are requested to pass on further down the supply chain.

3.3.3 Control measures

The Lufthansa Group uses audits to check for compliance with human rights and environmental due diligence obligations and whether the risk management of the Lufthansa Group, and in particular of Lufthansa CityLine GmbH, is appropriate. The audits are primarily carried out by Internal Audit. They can also be carried out by external auditors as warranted or on the basis of required specialist knowledge. Audits are carried out by external auditors on a risk basis for direct suppliers and as warranted for indirect suppliers.

3.4 Remedial measures

If Lufthansa CityLine GmbH becomes aware of an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay. If a supplier is unable to immediately terminate, prevent, or minimize a violation, Lufthansa CityLine GmbH will draw up and implement an appropriate remedial and/or preventive concept.

When creating and implementing the concept, particular consideration is given to (i) the joint development and implementation of a plan to end or minimize the violation with the company causing the violation, (ii) joining forces with other companies as part of industry initiatives and industry standards in order to increase the possibility of influencing the originator and (iii) temporarily suspending the business relationship while efforts are made to minimize the risk. As a last resort, Lufthansa CityLine GmbH reserves the right to terminate business relationships.



3.5 Effectiveness monitoring and continuous improvement

For the effective prevention of negative human rights or environmental impacts, Lufthansa CityLine GmbH reviews the effectiveness of its preventive and remedial measures and makes any necessary adjustments. This includes evaluating information from affected parties and obtaining feedback from target groups.

3.6 Complaints options

Lufthansa CityLine GmbH relies on information to protect those affected and to recognize structural risks at an early stage. Regardless of whether they are Lufthansa CityLine`s employees or external whistleblowers, such as employees of a supplier or affected parties, any person can report risks or violations relating to human rights and the environment that were caused by Lufthansa CityLine GmbH or one of its suppliers to the Lufthansa Group`s Human Rights & Non-Discrimination Team. These can be reported directly by e-mail, via an electronic whistleblower system, or via an external ombudsperson. The channels for complaints are available in a variety of languages.

Every report is examined impartially and with due regard for confidentiality. Information can also be submitted anonymously via the electronic whistleblower system or the ombudsperson. The Lufthansa Group and Lufthansa CityLine GmbH are expressly committed to protecting whistleblowers from reprisals and discrimination.

The Lufthansa Group reviews the effectiveness of the complaints procedure at least once a year and as warranted, e.g. with regard to the necessary communication of the complaints procedure.

All information regarding the complaints procedure, including the reporting channels, is summarized in the Rules of Procedure and published on the Lufthansa Group [website](#).

3.7 Documentation und reporting

Lufthansa CityLine GmbH continuously documents the fulfillment of its human rights and environmental due diligence obligations in accordance with the requirements of the LkSG. In this Policy Statement, which is updated annually and as warranted, Lufthansa CityLine GmbH reports on the procedure by which it fulfills its due diligence obligations, on the priority risks, and on the expectations of employees and suppliers.

All reports of the Lufthansa Group are published on the [Internet](#).

4 Contact

For questions and comments on this Policy Statement or other human rights or environmental issues, please contact humanrights.cityline@dlh.de.

Further information is published on the Lufthansa Group [website](#).