



**Lufthansa Technik**

# HUMAN RIGHTS POLICY STATEMENT



December 2025

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# Lufthansa Technik AG's commitment to observing human rights

Lufthansa Technik AG is a subsidiary and part of the Lufthansa Group. Due to the uniform implementation of the LkSG within the Group, this policy statement by Lufthansa Technik AG largely refers to the **policy statement of the Lufthansa Group**.

The Lufthansa Group connects people, cultures, and economies every day. As a company that stands for open-mindedness, tolerance, and diversity, we consider it our responsibility to observe human rights and to act in as sustainable a manner as possible.

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 observing human rights by identifying human rights and environmental risks in our business area and in our supply chain and preventing violations.

That is why we select our suppliers carefully and contractually oblige them to comply with human rights, labor and health standards, and environmental protection. We check any cases of doubt.

Embedding human rights and sustainability in our business processes and our global supply chain is an ongoing task.

## We are guided by

- 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 environment-related agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Transboundary Movement of Hazardous Wastes.

In conjunction with the requirements of the Supply Chain Duty of Care Act, they form the framework for our corresponding actions.

Lufthansa Technik AG always complies with applicable national law. Wherever international human rights are restricted by local laws, we endeavor to comply with internationally recognized standards without coming into conflict with local laws. Where local laws go beyond international standards, Lufthansa Technik AG will comply with local laws.

## What Lufthansa Technik AG expects of employees and suppliers

Lufthansa Technik AG expects its employees and suppliers to observe human and environmental rights and to support Lufthansa Technik AG in preventing human rights and environmental risks and in preventing, ending or minimizing violations.



What Lufthansa Technik AG expects of its own employees and managers is specifically set out in the [Code of Conduct- Lufthansa Group Investor Relations](#).

The expectations for supplier conduct are summarized specifically in the [Code of Conduct- Lufthansa Group Investor Relations](#).

Lufthansa Technik AG also expresses its expectations, especially in terms of priority risks, through further preventive and remedial measures (see below).

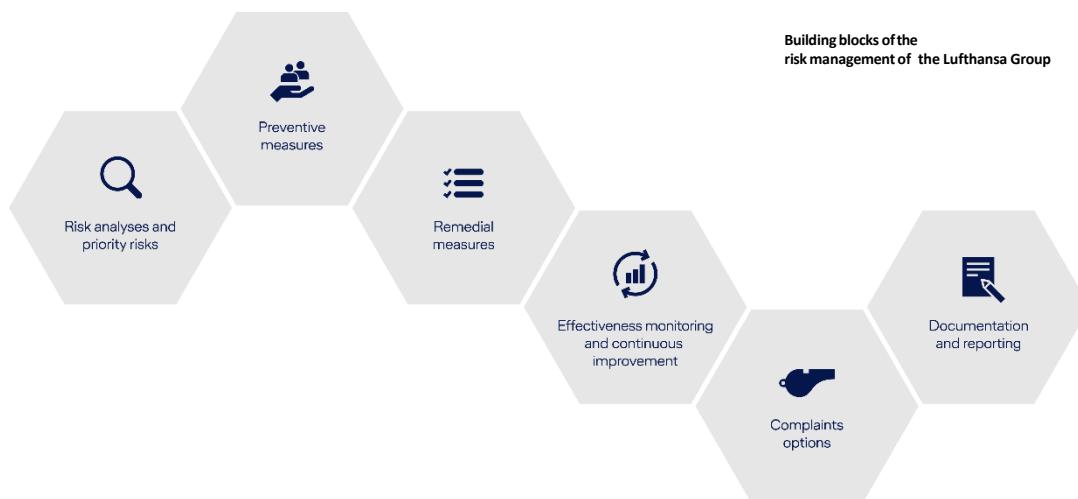


# Lufthansa Technik AG's procedure to fulfill their duties of care

## 1. Risk Management

Lufthansa Technik AG, as part of the Lufthansa Group, is part of the risk management system set up by the Lufthansa Group. The aim of this risk management is to identify and prevent or end human rights and environmental risks and violations of legal interests in its own business area and along the supply chain.

As a subsidiary of the Lufthansa Group, Lufthansa Technik AG utilizes the risk management system introduced by the Lufthansa Group. The Lufthansa Technik AG has therefore established key accounts to implement the processes introduced by the Lufthansa Group.



**The Lufthansa Group has therefore specifically set up the following clear internal responsibilities:**

Two teams within the Lufthansa Group are responsible for implementing the LkSG. The Human Rights & Non-Discrimination Team coordinates the observance of human rights and environmental obligations within the Lufthansa Group.

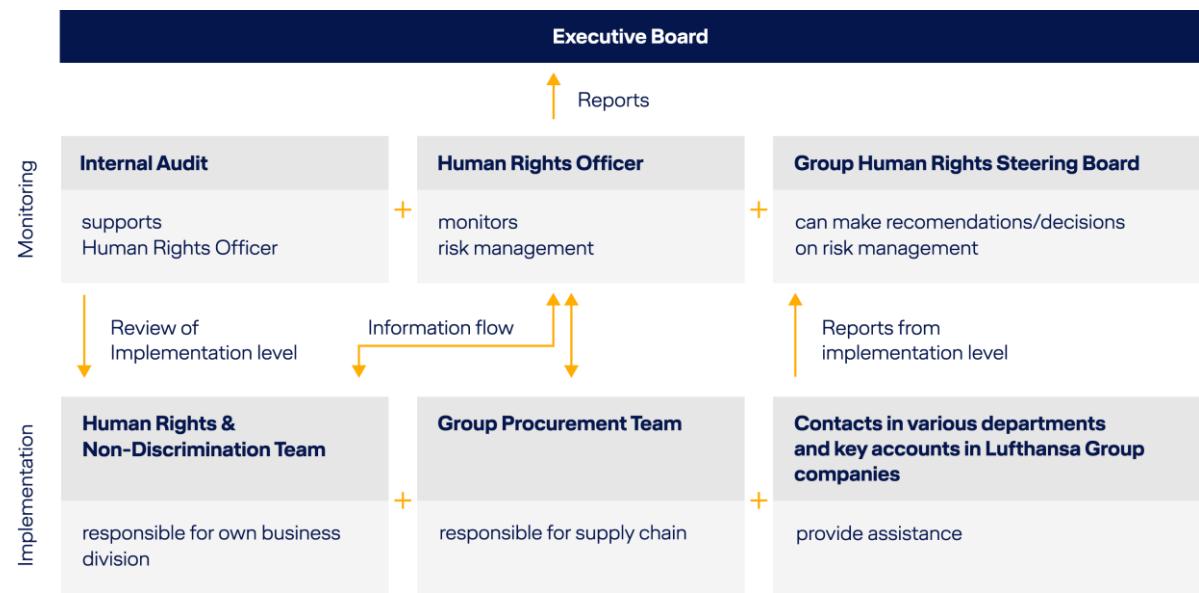
The Group Procurement team is responsible for these processes regarding our suppliers and the supply chain. The two teams are supported by contacts from specialist departments such as Occupational Health and Safety, Human Resources, Compliance and Purchasing, as well as by key accounts in individual prioritized Lufthansa Group companies. This network can be continuously expanded based on the results of the risk analysis.



Astrid Neben, Human Rights Officer of the Lufthansa Group

In order to monitor risk management, the position of Group Human Rights Officer was created within the Executive Board department 'Human Resources and Infrastructure' with a direct reporting line to the departmental board member. This position is held by Astrid Neben, Chief Human Resources Officer Lufthansa Airlines and Head of the group-wide HR Management DLH & Learning division. The Human Rights Officer in turn informs the Group Executive Board at regular intervals and as required about the work of the responsible persons. The Key Account Manager at Lufthansa Technik AG informs the Lufthansa Technik Executive Board accordingly about risks and measures in its own business area and in the supply chain of Lufthansa Technik AG.

The Internal Audit department is used to support the Human Rights Officer and to carry out checks at the implementation level. In addition, the Group Human Rights Steering Board has been created as a steering committee that can make recommendations and decisions on risk management. It is chaired by the Human Rights Officer and consists of the heads of the sustainability, compliance, audit, purchasing and occupational safety departments.



## 2. Risk analyses and priority risks

Lufthansa Technik AG conducts annual and ad hoc human rights and environmental risk analyses. Thirty branches and operating sites and approximately 15.000 suppliers were included in the annual risk analysis in 2025.

Software is used to support the appropriate identification, weighting and prioritisation of risks across the large number of branches and suppliers. The branches and suppliers are screened for country, industry and media references. For the branches, the identified risks are validated on the basis of surveys and company statistics. In addition to external data sources, internal findings, such as information received via the Group's reporting channels, including the anonymous whistleblower system, are also taken into account.

The identified risks are then weighted and prioritised, taking into account the adequacy criteria of the LkSG, such as Lufthansa Technik AG's ability to influence a supplier.

Lufthansa Technik AG takes preventive measures to prevent violations at branches and suppliers that present a prioritised human rights or environmental risk. If violations are identified, Lufthansa Technik AG stops the violation as quickly as possible or draws up a remedial plan, depending on where and what kind of violation has occurred.

The Human Rights Officer informs the Lufthansa Group Executive Board annually about the results of the risk analysis. The results are also communicated to other key decision-makers, such as the

Group Works Council and the Group Economic Committee. In addition, the Executive Board of Lufthansa Technik AG is also informed annually about the results of the risk analysis of Lufthansa Technik AG. Here, too, the results are communicated to key decision-makers such as the Economic Committee.

Lufthansa Technik AG considers the prohibition of forced labour and slavery as well as the prohibition of environmental pollution to be particularly relevant in its own business area. Lufthansa Technik AG considers the prohibition of harmful soil alteration, water pollution, air pollution, harmful noise emissions or excessive water consumption to be particularly relevant in its supply chain.

Lufthansa Technik AG addresses these risks primarily through the preventive measures described below.



### 3. Precautions measures

Lufthansa Technik AG pursues a two-pronged strategy to protect human and environmental rights: on the one hand, it aims to prevent risks from arising in the first place. On the other hand, it aims to respond to structural risks identified in the risk analysis with appropriate measures and to prevent or at least minimise adverse human rights and environmental impacts.

The emergence of risks in our own business area is to be prevented primarily through regular global awareness campaigns, a wide range of reporting and complaint options, and a broad range of consulting and training services provided by the Human Rights & Non-Discrimination Team established by the Lufthansa Group.

Lufthansa Technik AG has also adapted its procurement processes so that, for example, sustainability criteria play a key role in the selection of suppliers and each supplier is checked for compliance with human rights, labour and environmental standards, and integrity before a contract is concluded.

Suppliers are also contractually obliged to protect human rights and the environment.



**A portfolio of measures for prevention, termination or mitigation was used, particularly with regard to the priority risks of Lufthansa Technik AG. This portfolio of measures was developed by the Human Rights & Non-Discrimination Team. The portfolio of measures includes the following measures in particular:**

#### Training measures and dialogue

To raise awareness of human rights and environmental due diligence obligations, we rely on online training courses as well as face-to-face training and dialogue formats conducted by the Human Rights & Non-Discrimination Team and the Group Procurement Team.

For example, a Group-wide online training course on human rights has been developed, which is to be completed on a risk-based basis by relevant business areas such as Purchasing and Human Resources, as well as by identified suppliers. A newly developed online training course to promote diversity, inclusion and intercultural competence is also being used on a risk-oriented basis.

One focus of the Human Rights & Non-Discrimination Team is on providing face-to-face training for identified target groups in human rights-related due diligence and on the continuous development of training and communication concepts.

The Human Rights & Non-Discrimination Team and the Group Procurement Team continue their own education by regularly participating in the UN Global Compact Network Germany's 'Peer Learning Group on Human Rights' and econ-sense's 'Forum for Sustainable Development of the German Economy,' for example.

Lufthansa Technik AG has a long tradition of working with social partners at the operational and collective bargaining level, as well as in co-determined supervisory boards. The aim is to act in a manner that is based on shared interests. The joint development of solutions in the interests of the companies involved and their employees is based on an understanding of the value of freedom of association and is part of the corporate culture. In order to anchor measures in the supply chain, the Lufthansa Technik AG Procurement Team maintains close contact with risk-prioritised suppliers. These are surveyed in a targeted manner using standardised questionnaires, among other things.

### **Codes of conduct and contractual measures**

The Lufthansa Group, of which Lufthansa Technik AG is a part, has summarised its expectations regarding respect for human rights and protection of the environment in two **codes of conduct**: one aimed at managers and employees of the Lufthansa Group and one aimed at suppliers. Both codes have been revised to fully comply with the requirements of the LkSG. The rules of conduct are actively communicated to companies within the Group's own business area and to suppliers that have been prioritised in the risk analysis.

In addition, the employment contracts of executives at priority companies will be supplemented by an annex obliging them to ensure compliance with human rights and environmental obligations within their area of responsibility. A detailed corporate social responsibility clause is negotiated in supplier contracts, which links the expectations of the Lufthansa Group with rights and obligations and in which suppliers are also required, among other things, to pass on the expectations placed on them to their own suppliers.

### **Control measures**

Audits are used within the Lufthansa Group to check whether human rights and environmental due diligence obligations are actually being complied with and whether the Lufthansa Group's risk management is adequate. The audits are primarily carried out by the Internal Audit department. They can also be carried out by external auditors on an ad hoc basis or when specialist knowledge is required. For direct suppliers and, on an ad hoc basis, for indirect suppliers, risk-based audits can be carried out by external auditors.



## 4. Remedial measures

Should Lufthansa Technik AG or the Lufthansa Group become aware of any actual or imminent violation of human rights or environmental obligations, it shall take appropriate remedial action without delay.

If it is not possible to immediately terminate, prevent or minimise a violation at a supplier, Lufthansa Technik AG shall draw up and implement an appropriate remedial and/or preventive concept.

In developing and implementing the plan, particular consideration shall be given to (i) jointly developing and implementing a plan to end or minimise the violation with the company causing the violation,

(ii) joining forces with other companies within the framework of industry initiatives and industry standards in order to increase the influence on the perpetrator, and (iii) temporarily suspending the business relationship while efforts to minimise risk are underway. As a last resort, Lufthansa Technik AG reserves the right to terminate business relationships.



## 5. Effectiveness monitoring and continuous improvement

In order to effectively prevent negative human rights or environmental impacts, Lufthansa Technik AG or the Lufthansa Group reviews the effectiveness of its preventive and remedial measures and makes any necessary adjustments.

To this end, information provided by affected parties is evaluated, feedback is obtained from target groups, and random checks and audits are carried out. In addition, active dialogue is sought with internal interest groups such as employee initiatives and employee representatives, as well as external stakeholders.



## 6. Complaints options

In order to protect those affected and identify structural risks at an early stage, Lufthansa Technik AG relies on information provided by others.

Any person – whether a Lufthansa Technik AG employee or an external whistleblower such as an employee of a supplier or affected party – can report human rights and environmental risks or violations caused by Lufthansa Technik AG or one of its suppliers to the Human Rights & Non-Discrimination Team or the responsible key account manager. This can be done directly by e-mail, via an electronic whistleblower system or through an external ombudsperson. The complaint channels are available in a variety of languages.

Every report is examined impartially and confidentially. Reports can also be submitted anonymously via the electronic whistleblower system or the ombudsperson. Lufthansa Technik AG is 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 on an ad hoc basis, e.g. regarding the necessary communication of the complaints procedure.

All information on the complaints procedure, including reporting channels, is summarized in the rules of procedure and published on the **Lufthansa Group website**.

For its part, Lufthansa Technik AG refers on its website to the information on the complaints procedure published on the **Lufthansa Group website**.



## 7. Documentation and reporting

Lufthansa Technik AG continuously documents its compliance with human rights and environmental due diligence obligations in accordance with the requirements of the LkSG.

Lufthansa Technik AG reports on the procedures it uses to fulfil its due diligence obligations, on priority risks and on expectations of employees and suppliers in this policy statement, which is updated annually and as required. As a globally operating company, it also issues an annual UK Modern Slavery Act Statement and a Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Report. All reports are published on the [Internet](#).



## Contact

If you have any questions or comments about this policy statement or other human rights or environmental issues, please contact [human-rights@dlh.de](mailto:human-rights@dlh.de).

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