



CORPORATE **SUSTAINABILITY**

DECLARATION OF PRINCIPLE

on compliance with human rights and environmental
due diligence obligations in accordance with Section 6
(2) of the Supply Chain Due Diligence Act (LkSG)

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FOREWORD BY THE EXECUTIVE BOARD OF RHEINMETALL AG

Rheinmetall AG has been operating as an integrated technology group for over 135 years. We take responsibility for our business activities, for our products and for our employees. As a company having its roots and headquarters in Düsseldorf on the Rhine, this responsibility forms part of our self-image. And yet, in our case, it is a special responsibility. For more than three years, Europe and the democratic world have been confronted by a new threat, prompting a shift in awareness within our homeland. Many Germans and Europeans are only now realizing that an arms company plays a pivotal role in safeguarding our democracy's freedom and security.

We at Rheinmetall have been convinced of this fact for a long time. We are a company with a rich tradition and long history, which we have examined critically. In today's world, we see our role in our military business alongside the Bundeswehr, our NATO partners and Ukraine. The origins of our civilian business are found in the automotive industry. Like all our competitors, we are currently undergoing a major transformation process. With our innovations, we are also playing our part in managing the energy transition. This is what we stand for. And this is why our corporate mission is: "Taking responsibility in a changing world".

We are very much aware of our corporate responsibility to respect human rights and the environment. It is clear to us that we can only be successful as a business in the long term if the impact of our business activities is in harmony with people and the environment to the greatest degree possible.

To this end, we have also implemented the requirements for fulfilling our due diligence obligations under the Supply Chain Due Diligence Act in our company. The present declaration of principle is part of this, outlining the steps we take to protect human rights and fulfill our environmental obligations.

The Executive Board of Rheinmetall AG



Armin Papperger



Klaus Neumann



Dr. Vera Saal



René Gansauge

COMMITMENT TO HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION

We as a responsible corporate group respect human rights and strive to make a sustainable contribution to environmental protection. As such, we expect our employees, customers, shareholders, and business partners to follow our approach and support our suppliers in their efforts to do so.

Rheinmetall's business activities are guided by the following national and international standards:

- United Nations Universal Declaration of Human Rights
- United Nations International Covenant on Political and Civil Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- Ten Principles of the United Nations Global Compact
- Guidelines of the Organization for Economic Cooperation and Development for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Diversity Charter

The following guidelines and regulations also form the binding framework for our employees, business partners and suppliers:

- Mission statement with vision, mission and ambition
- Code of Conduct
- Supplier Code of Conduct
- Principles of social responsibility (International Framework Agreement Fair2All)
- Instructions within the framework of LkSG Diversity Policy
- Diversity Policy
- Position paper on the internationality and transformation of the Rheinmetall Group

This declaration of principle on human rights and environmental due diligence applies to all Rheinmetall AG Group companies. We strive to promote the same principles in companies in which Rheinmetall AG holds an interest but which are not affiliated with the Group.

In our own business activities, we are committed to fulfilling our human rights and environmental due diligence obligations. However, should a breach of due diligence occur as a result of our actions or omissions, we will use the means and measures at our disposal to take targeted and effective action to remedy the cause.

We expect our direct suppliers to have a similar understanding of our social principles. We also expect our business partners to establish effective processes for the fulfillment of due diligence obligations in their own business areas and to pass these requirements on to their own suppliers.

PROCESS FOR COMPLIANCE WITH DUE DILIGENCE OBLIGATIONS

We see compliance with human rights and environmental due diligence obligations as an ongoing task that requires clear responsibilities and effective risk management.

RESPONSIBILITIES

The Executive Board and the executives of the Group companies are responsible for compliance with this declaration of principles.

To implement the LkSG, the necessary operational responsibilities were delegated to the relevant departments. The Chief Compliance Officer of Rheinmetall AG acts as Group Social Compliance Officer, assuming the functions of Human Rights Officer within the meaning of the LkSG.

His rights, duties, responsibilities, and tasks are documented in an internal guideline of Rheinmetall AG. The Social Compliance Office supports the Group Social Compliance Officer in performing this function. The task of the Group Social Compliance Officer comprises monitoring the appropriateness and effectiveness of risk management for compliance with the due diligence obligations under the LkSG. The officer is also responsible for external reporting on the fulfillment of human rights and environmental due diligence obligations. He reports on his activities to the Executive Board of Rheinmetall AG regularly, at least once a year.

Involvement of stakeholders

Beyond its own Group, Rheinmetall is involved in associations and initiatives focusing on relevant topics. We are a member of the UN Global Compact and the Human Rights Working Group of the German Institute for Compliance e.V., and are also involved in the "Automotive Industry Dialog" forum, which is made up of representatives from companies, politics and NGOs. Representatives of our company chair the "Corporate Responsibility" and "REACH" working groups in the Federal Association of the German Security and Defense Industry. We are also active in the "Sustainability in the supply chain" working group of the German Association of the Automotive Industry.

RISK MANAGEMENT

We are aware of the fact that our global business activities and our supply and value chains can potentially be the cause of adverse effects on human rights and environmental protection. This holds true, especially considering that the respect for human rights and the advancement of environmental protection rely significantly on the implementation and oversight of effective regulations and measures by the governments of individual countries.

We carry out annual and ad hoc risk analyses in our own business area and at our direct suppliers. The analyses include both abstract and specific risk assessments. As part of risk minimization, we are in dialog with those potentially affected along our supply chains and from our own business area.

Together with our employees: risk analysis in our own business area

We carry out ongoing abstract and specific risk analyses to ensure holistic risk management in our own business area.

The abstract risk is considered on the basis of sector and country risks. In the specific risk analysis, potential human rights and environmental risks are individually identified, weighted and prioritized. We employ a variety of methods to achieve this, including Group-wide employee surveys, complaint management, evaluation of specific key figures and qualitative information from various locations, as well as conducting certifications and audits. Together, the results determined in this way form the basis for the risk weighting.

Potential risks are prioritized and weighted according to defined criteria, such as probability of occurrence, severity of the injury, number of people affected, irreversibility of an injury, possibilities of exerting influence and contribution to causation.

Together with our suppliers: risk analysis in the supply chain

In Purchasing, Rheinmetall has established the "ESG Supply Chain" department, which conducts an annual risk analysis based on the individual risks from the LkSG in order to identify human rights and environmental risks in the supply chain and minimize them as far as possible.

The risk analysis in this area follows a prioritization approach as well. In the first step, we analyze the risk profile of suppliers on the basis of industry- and country-specific data and a different weighting of the individual LkSG risks, taking appropriate account of the scope of our business activities with the respective supplier.

Based on the result of this abstract risk analysis, all high-risk suppliers are contacted and asked to complete a detailed questionnaire based on the individual LkSG risks for the purpose of an in-depth risk analysis. Prioritization is based on the identified risk, our contribution to causation, the degree of influence we have on the respective supplier and the respective industry. The result of this specific risk analysis is a supplier-specific sustainability rating.

Findings on indirect suppliers are taken into account in the risk analysis on an ad hoc basis.

Rheinmetall did not identify any systemic or structural risks in its own business area or among its direct suppliers in fiscal year 2024.

PREVENTIVE MEASURES

In order to fulfill our duty of care, we are obliged to develop, implement and monitor appropriate preventive measures in our own business area and in purchasing.

Prevention measures in our own business division

In our own business division, guidelines, works agreements and site regulations form the framework for action for all employees. Our Code of Conduct is a binding code of conduct for all employees.

Other preventive measures include integrated management systems and certifications in accordance with international standards, regular mandatory training and voluntary training opportunities, raising employee awareness through internal communication, seminars and e-learning, further training and personnel development training for managers, and the specification of and compliance with high technical standards. We also have external audits carried out at selected locations on human rights due diligence and environmental aspects.

Preventive measures at our suppliers

The Supplier Code of Conduct (SCoC) forms the basis of the prevention measures for our supply chains. The SCoC defines the requirements for our suppliers with regard to relevant social and environmental aspects such as human rights, working conditions, environmental protection and business integrity. Acceptance of the SCoC and thus compliance with the environmental, human rights, occupational health and safety and other binding requirements of the SCoC are the basis for business relationships and a binding basis for cooperation.

We expect that the requirements specified there are fulfilled and that the suppliers also pass them on along their own supply chains within their sphere of influence. Based on the SCoC, both we and our suppliers have comparable goals with regard to respecting human rights and protecting the environment. In the interests of partnership and sustainable cooperation, we conduct regular supplier training courses as well as on-site audits of our suppliers. We are convinced that the active exchange with our suppliers is suitable for identifying and minimizing potential risks at an early stage.

COMPLAINTS PROCEDURE

Another important component of risk management is the anonymous whistleblower system, which is used to uncover potential or actual incidents and take remedial action. The Compliance Organization's complaints management can be contacted via the electronic "Integrity Line" whistleblower system or directly by email, post, fax or telephone. In addition, an external ombudsman can be contacted via e-mail and telephone. The contact details can be found on our website.

We do everything in our power to ensure that whistleblowers and complainants are effectively protected from discrimination and punishment in connection with the reports they submit.

Regardless of the communication channel, all information is documented and checked for plausibility, to be then systematically analyzed and processed according to a standardized procedure that is transparent, balanced and comprehensible for all parties involved. A management guideline for the confidential handling of suspected cases and for the standardized processing of compliance cases is intended to ensure that information is always processed independently, transparently and fairly. Based on this foundation, targeted investigations are conducted, and when necessary, external specialists are consulted. Appropriate measures are then taken to thoroughly clarify the facts. Confidentiality and discretion are our top priorities. If necessary, we involve the relevant authorities and cooperate fully with them. The complainants will be informed of the progress of the proceedings as part of the investigation.

Based on the results, effective measures are identified, introduced and their implementation monitored. The systematic handling of complaints and the knowledge gained from them also serves to continuously raise awareness of and optimize our approach to human rights and environmental issues. The effectiveness of complaints management is reviewed annually and on an ad hoc basis.

REMEDIAL MEASURES

If we receive substantiated knowledge that Rheinmetall itself or one of our suppliers is violating human rights and/or environmental due diligence obligations or that such a violation is imminent, we will take immediate remedial action to prevent or end these violations or to minimize the extent of the violation.

We promptly develop a corrective action plan for suppliers identified with high-risk potential through specific risk analysis. We then closely monitor the supplier's swift execution and implementation of this plan.

Rheinmetall reserves the right to contractually obligate its suppliers to support the clarification of the facts and to cooperate fully within a reasonable time frame. Depending on the extent and severity of the breach, we reserve the right to respond appropriately. This may include requesting immediate rectification of the grievance, taking legal action, or imposing sanctions such as temporary suspension or termination of the business relationship.

If we gain substantiated knowledge of the (imminent) violation of a human rights or environmental due diligence obligation by indirect suppliers based on well-founded suspicions or concrete indications from continuous media monitoring, we first carry out an event-related risk analysis. If the facts under investigation are confirmed, we will immediately take measures within the scope of the legal and actual possibilities available to us to prevent or end these violations or to minimize the extent of the violation.

REPORTING AND DOCUMENTATION

We share information on our human rights and environmental due diligence obligations through our Sustainability Report, the Communication on Progress Report on the implementation of the Ten Principles of the UN Global Compact, and on our publicly accessible website.

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Version 3 | 2025

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