

TIMELINE



The German Supply Chain Due Dilligence Act (LKSG), although being simplified, is still active and must be followed. Furthermore, it will be amended in the future by EU regulation (CSDDD).

2021

The German
Bundestag passed the
Supply Chain Due
Diligence Act (LkSG)
on 11 June 2021.

2024

Threshold lowered to include companies with ≥1,000 employees in Germany. Significantly broadens the law's scope to cover hundreds more firms.

2025

The Federal Office for Economic
Affairs and Export Control (BAFA)
monitors compliance, conducts
audits, and can impose penalties of
up to €8 million or 2% of annual
global turnover for major violation

2023

Initially applied to companies with ≥3,000 employees in Germany (including foreign firms with German branches). These companies must establish risk management, conduct risk analysis, and issue annual reports

2024

Aurelius ESG teams runs the AUR Portfolio III wide risk analysis of suppliers with the partner Ecovadis covering almost 10k suppliers, drafting the first annual report and providing the LKSG whistleblower platform.

2025-26

Review of regulatory changes and risk assessment of new suppliers of core materials or services.

12/12/2025 LKSG 2

SCOPE



Affected AUR Portfolio III companies

Company	ESG contact person	Contact email	AUR contact
CalaChem	Douglas Fraser	douglas.fraser@calachem.com	Gerhard Engleder
Conaxess	Louise Roos	louise.roos@conaxesstrade.com	Uwe Thellmann
Convertec / SEG	Stanislaw Elagin	stanislaw.elagin@convertertec.com	Kieran May
EIG	Stefanie Groh	stefanie.groh@european-imaging-group.com	Stefanie Groh
Gastro Hero	Anna-Lena Opara	anna-lena.opara@gastro-hero.de	Lorenz Luhmann
НÜРРЕ	Michael Bruns	michael.bruns@hueppe.com	Raffael Rogg
moveero	Sylvain Michel	Sylvain.Michel@aurelius-group.com	Julian Pötzl
Remi Claeys	Christiaan Delbecque	christiaan.delbecque@remiclaeys.com	Marco Winkens
Pullmann	Guillaume Thomazi	Guillaume.Thomazi@aurelius-group.com	Magnus Zuther
Scholl	Noemi Biscaldi	noemi.biscaldi@h-fshoes.com	Mike Schiewer
Silvan	Niels Høg	nih@silvan.dk	Michael Lange
Unilux	Stefan Zissner	stefan.zissner@unilux.de	Konrad Eltz
Zentia	Jonathan Wake	jwake@zentia.com	Guido Hild
ZIM	Markus Kortmann	markus.kortmann@zim.aero	Raffael Rogg

12/12/2025 LKSG

COLLABORATION MODEL



The AUR ESG team is responsible for the execution of all necessary actions. But we require your input and support!

Responsibilities - ESG team

- Constant review of regulatory requirements and changes and information to portfolio companies
- Establishing and running the LKSG whistle blower platform and hotline ("Compliance One")
- Engaging with 3rd party ESG providers that help us meet our regulatory requirements
- Advisory of portfolio companies in various ESG matters (e.g. EUDR)
- Sharing of tools and templates, e.g. supplier onboarding checklist
- **...**

Responsibilities - Portfolio company

- Nominate an ESG responsible (e.g. within QM or SCM)
- Homepage link to the AUR LKSG whistle blower platform
- Request and check Supplier Code of Conducts
- Conduct regular and on demand supplier audits and inform us about critical findings
- Thorough check of especially new suppliers
- Regular check-in with AUR ESG team (marc.hetzer@aureliusinvest.de)



Immediate next steps:

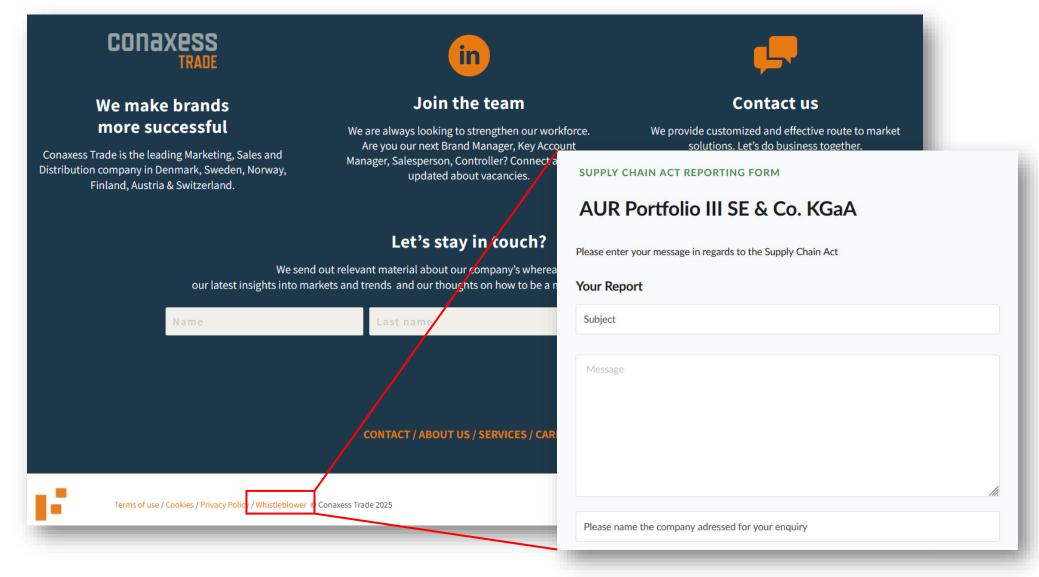
Make sure that all direct material suppliers onboarded in 2025 have SCoC and completed sustainability checks.

12/12/2025 LKSG

AUR WHISTLE BLOWER PLATFORM



Please ensure that your website refers to the AUR Compliance One platform. See example from Conaxess Trade:



12/12/2025 AURELIUS Templates 5

AURLIURS ESG TEAM



Your ESG contacts at Aurelius WaterRise



Marc Hetzer
Senior Manager
ESG practice
marc.hetzer@aureliusinvest.de

→ First point of contact for all matters



Jan Voß
Senior Legal Council
Legal practice
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→ Regulatory and compliance matters



Johannes Noll Manager Procurement practice johannes.noll@aureliusinvest.de

→ Supplier and supply chain matters