Business Travel Policy

DSB

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Department responsible: Executive Vice President, HR

Approved by: The Executive Team **Date**: 28 October 2025

1. Introduction

DSB's Business Travel Policy contributes to making DSB a more efficient, responsible and sustainable company, which is in line with DSB's overall goal of reducing the company's CO_2 emissions and environmental impact. We strive to create a culture where sustainability is a natural part of our employees' decision-making processes when choosing mode of transport for meeting activities. In addition, we want to ensure financial responsibility by optimising travel costs and creating clear, uniform procedures that ensure consistent and efficient operations.

DSB's Business Travel Policy governs the following sustainable focus areas:

- Reducing CO_2 emissions: Encouraging the use of public transport
- Efficient resource utilisation: Reducing unnecessary travel
- Financial responsibility: Establishing clear guidelines for travel planning, booking and settlement in order to optimise business travel costs

2. Purpose

The purpose of DSB's Business Travel Policy is to promote sustainability by encouraging employees to use public transport and reducing unnecessary travel. At the same time, the policy aims to create transparency and ensure financial responsibility by establishing clear guidelines for the entire organisation for travel planning, booking and settlement, which help to optimise business travel costs.

3. Our ambition and targets

DSB's ambition with the Business Travel Policy is to integrate sustainability into all aspects of its travel activities and ensure that, as a company, we contribute to a more sustainable future. Our goal is to reduce CO_2 emissions by promoting the use of environmentally friendly means of transport and eliminating unnecessary travel.

Employees at DSB are encouraged to work every day to ensure a sustainable way forward with room for all of us. Sustainability should therefore be reflected in your choice of transport to attend meetings, no matter where the meeting takes place.

In the following, we will highlight the considerations that employees should take into account when planning a business trip:

1. **Choosing mode of transport**
   The general rule is that you should always use trains or other public transport when you travel for business purposes.

- If the meeting is at a time and place that makes it impossible to use public transport, or if you have difficulty using public transport due to a disability, your immediate superior may allow you to use your own car.
- If personal reasons require you to have a seat during the transport, you will be able to get a seat ticket for public transport regardless of the length of the journey.
- Domestic flights and high-speed ferry services will not be approved[1].
- International flights must be approved by a deputy director.
- In the event of force majeure, accidents, etc., the travel rules may be deviated from subject to executive approval.

2. Before you make your choice

Sustainability must be a natural priority when choosing mode of transport. You should therefore always consider the following:

- Are you sure that the journey is even necessary for your work?
- Are you sure the number of participants is appropriate?[2]
- Are you sure you have chosen the most sustainable way possible for your journey?[3]

Please note that the procurement system must always be used when booking airline tickets and hotel accommodation so that we may find the most climate-friendly and cheapest travel options and be able to provide climate compensation.

3. Special rules for using your own car

When you choose to use your own car, you also have to consider sustainability and take into account what is mentioned in clauses 1 and 2 above.

- If your immediate superior allows you to use your own car for transport, please note that mileage allowance is paid at the lowest rate.
- If a company car is available at your place of work, you should always use that car.
- Parking and bridge fees are refunded if use of your own car has been approved by your immediate superior.

4. Taxi

The following guidelines apply to the use of taxis:

- Paid transport during working hours usually means public transport between stations.
- Taxis may only be used if no better or cheaper alternatives are available in the situation at hand. This means that using a taxi must be the most economical transport solution taking into account the time spent, the number of passengers, price, etc.
- If you take a taxi, always try to "fill up the car" (carpooling).
- Use of taxis must always be approved by your immediate superior – or booked by the operations centre.

[1] It should be noted that travels to Bornholm may take place by high-speed ferry

[2] For example, if others are also attending the same event, you should consider whether it is necessary for everyone to attend the same event.

[3] In this context, you also need to consider the urgency of getting to the destination. For example, it would not be acceptable to travel by plane to InnoTrans in Berlin, as this is an event that allows you to plan your journey well in advance and take the train.

- Under normal operating conditions, DSB will only pay for taxis booked with Dantaxi via phone, internet or app with a DSB login.
- However, for onboard staff, taxis from other providers than Dantaxi may be used for agreed transport, if using Dantaxi is not possible for reasons of time. The trips to be carried out by taxi will most often appear in the work sheet generated in the scheduling system.

4. How we achieve our ambition and/or reach our targets
HR Negotiation & Employment Law is responsible for maintaining and developing DSB's Business Travel Policy and ensures that the policy complies with applicable legislation and regulations and that it is continuously evaluated in joint consultation committees and adapted to meet the needs of DSB and its employees. Managers at all levels of DSB are responsible for maintaining the Business Travel Policy at all times, and all employees working at DSB are responsible for acting in accordance with the policy guidelines.

DSB has launched several initiatives to incorporate sustainability into its travel activities and contribute to the objective of reducing CO_2 emissions, including the following:

- We are currently investing heavily in new electrically operated trains
- We are deploying new planning systems to optimise operational planning and thereby reduce the need for using taxis
- We are working to make rail transport the employees' preferred mode of transport – to and from work as well – by extending the offer of free transport/train passes to more employees, regardless of seniority

4.1. Impacts, risks and opportunities
HR Negotiation & Employment Law identifies, prioritises and initiates strategic and cross-functional initiatives in terms of risks and opportunities.

Without a clear Business Travel Policy, there is a risk that our employees will not support DSB's climate targets. Furthermore, as an independent public company and primary supplier of passenger rail transport in Denmark, DSB has a great potential to influence ethical business conduct both positively and negatively, and we are aware that we have a responsibility to ensure that our government grants are managed and allocated in a financially sustainable manner.

We have a strong focus on identifying new sustainable transport options and technological solutions that may reduce the need for physical travel.

5. Organisation, responsibility and approval
This policy covers all employees of DSB and all wholly-owned companies, including managers, employees and temporary workers working at DSB.

The Executive Team of DSB has the overall responsibility for approving the policy.

The Executive Vice President, HR is the owner of the policy.

The policy is to be reviewed once annually.

Changes to the Business Travel Policy will be communicated clearly to all employees, and effective implementation of new measures will be ensured.

6. Interaction with other policies and guidelines
DSB's Business Travel Policy interacts closely with several other key policies, including the following:

- Staff Policy
- Corporate Social Responsibility Policy
- Environmental Policy

Together, these policies form a holistic approach, ensuring that all travel activities are aligned with DSB's values and climate targets.