DSB's Ethical Guidelines for suppliers and business partners (Code of Conduct)

1. Purpose

DSB is an independent public enterprise owned by the Danish state. This gives DSB a special obligation to have a high degree of ethics and correctness in the daily work and in the way we run our business.

DSB is also committed to promoting sustainability and accountability in all aspects of our business. We prioritize ESG principles and expect that our suppliers and partners (hereinafter referred to as 'Suppliers') share this commitment. We work together with our Suppliers to ensure that our procurement and collaborations support our goals for a sustainable future and a positive societal impact**.**

DSB's suppliers act as ambassadors for DSB when they collaborate with us and perform tasks on our behalf. This entails that our suppliers:

- Comply with these guidelines and actively participate in ensuring that the principles within these guidelines are upheld throughout the value chain.
- Use common sense and good judgement in commercial decisions and interactions.

2. Integrity

	DSB has clear principles on how our Suppliers should act in work-related connections.
Anti-corruption	DSB does not tolerate any kind of payment or receipt of bribery - neither at the giver's nor the receiver's - whether or not DSB is involved in the relevant bribery
Fair trade	Good conduct of business is important for DSB. Our Suppliers must act as fair and responsible actors on the market and comply with the relevant competition laws
Loyalty & confidentiality	Our Suppliers are obliged to be loyal and handle DSB's interests in the best possible way. This means that information about DSB's business activities, which is not published, or general knowledge is treated as confidential.
Money laundring & terrorism financing	DSB does not tolerate financial crime including money laundering or financing terrorism. Our Suppliers do not engage in businesses that could lead to direct or indirect involvement by DSB in financial crime including money laundering.
Sanctions	Our Suppliers comply with applicable laws concerning economic sanctions avoiding actions which might cause

themselves or DSB being guilty of violating applicable economic sanctions.

Whistleblowing

DSB's whistleblower scheme aims to enhance the opportunities for, among others, Suppliers and their employees to report on questionable conditions as part of their work for DSB without fearing negative consequences, to protect individuals who provide information to the whistleblower scheme, and to detect errors and omissions, thereby raising the standard of DSB's services.

DSB's suppliers must inform the employees working for DSB about DSB's whistleblower scheme, which can be found at www.dsb.dk. Alternatively, the Supplier must have its own whistleblower scheme.

3. Human Rights

DSB aims to take active responsibility for societal challenges and for our planet. We expect our Suppliers to support this initiative and to take their own social responsibility seriously too.

UN Global Compact

DSB has joined the UN Global Compact. Our Suppliers must - whether or not they have joined the UN Global Compact – act in compliance with the initiative's 10 universal principles about human- and labour legislation rights and contribute to achieving the 17 sustainable development goals in their work.

Human rights

Our Suppliers must secure compliance with fundamental human rights, see the UN Human Rights Declaration and the European Human Rights Convention including the prohibition against:

- Child labour
- Forced labour exploitation involuntary workforce
- Human trafficking

4. Working conditions

	Our Suppliers provide safe and secure workplaces for their employees where no form of intimidation, harassment nor discrimination is tolerated.
Labour law compliance	Our Suppliers comply with existing labour laws focusing on the compliance with maximum working hours, wage- and pension conditions and respect of the right of privacy.
Anti-discrimination	Our Suppliers do not tolerate discriminatory practices due to race, skin colour, religion or beliefs, political opinion, sexual orientation, age, disability or national, social or ethnic origin.
Equal pay	Our Suppliers pay equal wages for equal work performed by equally qualified individuals irrespective of gender or other discriminatory factors.
"On track safety" Course ("Pas på, på Banen")	If, during the performance of their work, the Suppliers' employees walk, stay or work less than 4.00 metres from the nearest rail or work at platforms, they must hold a valid certificate verifying that they have attended the "On track safety" course, and they must observe the safety instructions set out in the track safety plan/track safety instruction for the specific task and the safety provisions laid down in the safety publication "On track safety". Our Suppliers are responsible for ensuring that the above is emphasized to all employees and other persons who on behalf of and at the request of our Suppliers walk, stay or work less than 4.00 metres from the nearest rail or work at platforms. "On track safety" course can be downloaded from www.bane.dk.
Freedom of association	Our Suppliers respect their employees' right to associate freely, form or join organisations of their choosing and to bargain collectively in full freedom.
Alcohol, drugs and smoking policy	When working at DSB's locations, our Suppliers are obliged to comply with DSB's zero tolerance policy on use of alcohol and drugs, and to emphasize this to its employees. Smoking and vaping are strictly prohibited at DSB locations, both indoors and outdoors. This applies on and off DSB premises, as well as in DSB company cars, trains, platforms, track areas, in front of station buildings, and in or near offices and commercial rental properties.

Bullying and Sexual Harassment	Our Suppliers do not accept bullying or sexual harassment.
ILO-convention	Our Suppliers must ensure that all employees performing work under the Suppliers' agreement with DSB are secured – in compliance with ILO Convention No. 94 (1955) - pay (including special payments), working hours and other working conditions which are not less favourable than those applicable to work of the same nature performed under a collective agreement entered into between those labour market parties in the area where the work is performed that best represent the relevant professional field. If the Supplier fails to comply with the requirements set out above and such failure results in a lawful claim for additional pay from the employees of the Supplier or potential sub-suppliers, DSB may withhold payments to the Supplier in order to secure the said employment conditions.
Work Environment	DSB follows the guidelines set out in the occupational health and safety assessment standard DS/ISO 45001 and demands that its Suppliers of products and services follow similar guidelines. Suppliers working at DSB's locations must during the entire term of the agreement comply with DSB's working environment policy, which is available at DSB's website www.dsb.dk. Our Suppliers must have a formulated working environment policy. Our Suppliers must always be able to prove that the company prioritizes the working environment and works systematically and properly on its own working environment, e.g. by presenting a working environment objectives and action plans which are continuously monitored by the Supplier. In addition, the Supplier must have established routines that ensure compliance with legislation and other regulations regarding occupational health and safety at the Supplier's premises. Finally, the Supplier must have designated a person within the Supplier's organization who is responsible for occupational health and safety. DSB must be notified as soon as possible by email to arbejdsmiljo@dsb.dk in the event of a workplace accident or if the Danish Working Environment Authority issues an improvement notice to the Supplier during the Supplier's performance of work for DSB.

5. Environment

Environment	Our Suppliers will be required to have an environment policy and to maintain, during the entire term of the business cooperation, an officially approved environmental management system (ISO 14001, EMAS or the like). Alternatively, the Suppliers must always be able, upon request, to provide documentation of a non-certified environmental management system. A non-certified environmental management system implies, as a minimum, that our Suppliers must have an environment policy containing environment objectives and action plans that are regularly followed up by the Suppliers. Furthermore, the Suppliers must have permanent routines ensuring the Suppliers' compliance with legislation and environmental rules. Finally, the Suppliers must have a designated person who is responsible for the environmental work.

6. Value Chain Responsibility

Responsibility for Subcontractors	These ethical guidelines must be complied with by all of DSB's Suppliers and the Suppliers must ensure that the principles within these guidelines are upheld throughout the value chain.