
CORPORATE SOCIAL RESPONSIBILITY POLICY

As the leading system integrator of Train Connection Systems, Dellner's vision is to deliver excellence in all that we do. By developing Dellner's products and promoting the safe and environmentally friendly use of trains as public transportation, the company contributes to the sustainable development of society.

Responsibility and ethics

Dellner strives to uphold the highest standards of conduct and business ethics in all of its operations with objective and independent employees. We respect basic freedoms and rights and comply with local and international laws and regulations. We are against corruption and give consideration to the religions, cultures, working conditions and traditions of different countries and regions. During daily operations, each employee will ensure that:

- We do not engage in any activity that might create a conflict of interest for the company or ourselves individually.
- We observe that fair dealings are the foundation for all of our transactions and interactions.
- We will protect all company, customer and supplier assets and use them only for appropriate company approved activities.
- Without exceptions, we will comply with all applicable laws, rules and regulations.
- All customers and suppliers shall be treated with the outmost respect and common courtesy.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations to the CSR Policy. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

To be a socially responsible corporate citizen in every way, Dellner works to continuously enhance employee awareness of the Group's attitudes towards ethical conduct.

Quality and environment

Our products are crucial for the safety of rolling stocks. Decisions in daily operations are based on the following order of priorities; **Safety, Quality, Delivery** and **Cost**. The company's standpoint is described in a separate document, the Dellner Quality Policy.

Dellner recognises the impact that its businesses have on the environment and, as a minimum standard, comply with current applicable legislation in the countries in which it operates.

By strengthening the R&D resources and by utilizing cutting-edge technology, our products will have a positive impact on the environment. By continuously reducing the weight, this means less use of raw material and energy during manufacturing. Lower weight means also that less energy is needed during acceleration and deceleration of the train.

Dellner is committed to continuous improvement in the environmental performance, the prevention of pollution and to improving efficiency in the use of resources including energy, water, packaging and other raw materials.

Working environment

Dellner strives to maintain a working environment where our employees can develop and thrive in a climate of physical and emotional well-being. Because a good working environment and business success go hand in hand, we take a structured approach to investigating, conducting and monitoring operations in such way as to prevent illness and accidents on the job and otherwise achieve a sound working environment. At Dellner, performance reviews are an important component of the Group's systematic working environment activities.

Because we all contribute to the mutual working environment, it is vital that both managers and staff lead and participate in efforts to create a good working environment.

A good working environment means:

- active leadership.
- clearly defined goals that create consistency and meaning for the group and individual
- opportunities for the individual to influence his or her own work situation
- a constructive dialogue within the group and between managers and staff
- effective communication in the organization
- a good physical work environment with regard to ergonomics, noise, air quality, and chemical health hazards

Achieving this working environment requires awareness, openness, ambition and planned development initiatives. Through systematic management of the working environment we can improve the quality of our services and increase the share of satisfied employees and clients.

Equality

Dellner does not discriminate between women and men with regard to salary, career advancement or promotion. All employees are given equal opportunities for professional development both within their existing fields and in new areas.

Salary disparities may not exist for identical or similar work duties unless they can be justified. Disparities that are not objectively justified will be corrected immediately.

When choosing staff for projects and other tasks, Dellner strives for an even gender distribution.

Dellner's policy for recruitment of managers and employees is always to appoint the most qualified individual.

All employees shall be treated with respect. Sexual harassment is never acceptable.

Dellner takes the greatest possible consideration to the allocation of work duties and parenthood. Managers are obligated to ensure that employees on parental leave maintain contact with their place of work in an appropriate manner. The commitment to equality is an active and integral part of Dellner's operations.

Diversity

Within the framework of our operations, Dellner takes active measures to promote the equal rights and opportunities of employees in the workplace regardless of their race, nationality, ethnic origins or religious beliefs in order to create better conditions for an innovative and inspiring work environment.

Dellner strives to:

- create employee groups made up of diverse competencies, genders, ages and nationalities through the use of conscious hiring practices.
- maintain a work climate that is characterised by the company's lead words; **Respect, Action, Joy and Team.**
- effectively utilise the employees' knowledge of different cultures, languages and religions when assembling work teams, dealing with customers, etc.

- give all employees equal opportunities for professional development both within their existing fields and in new areas.

Falun, 7th May 2018

David Pagels
CEO & President

