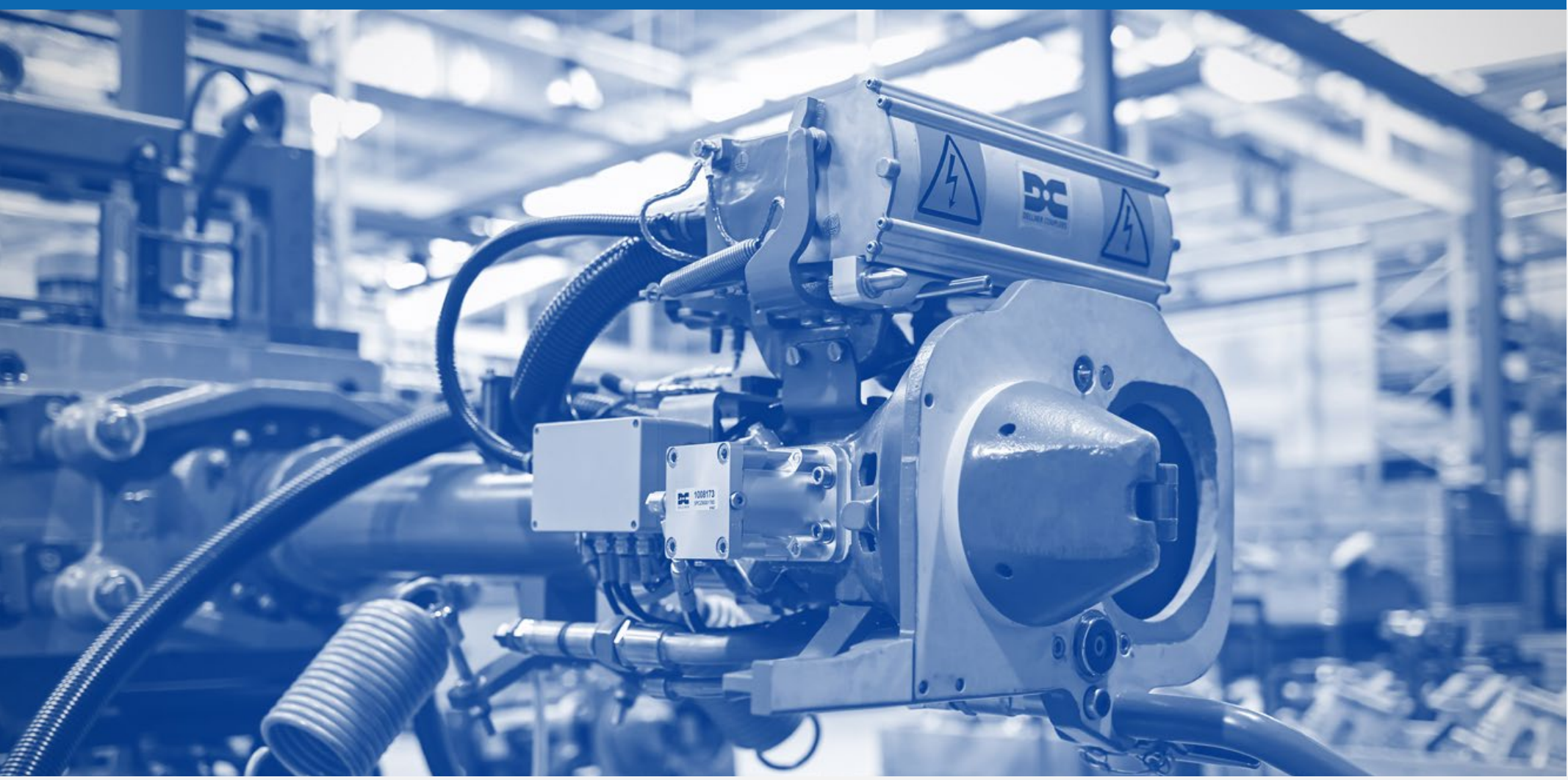




TRAIN CONNECTION SYSTEMS



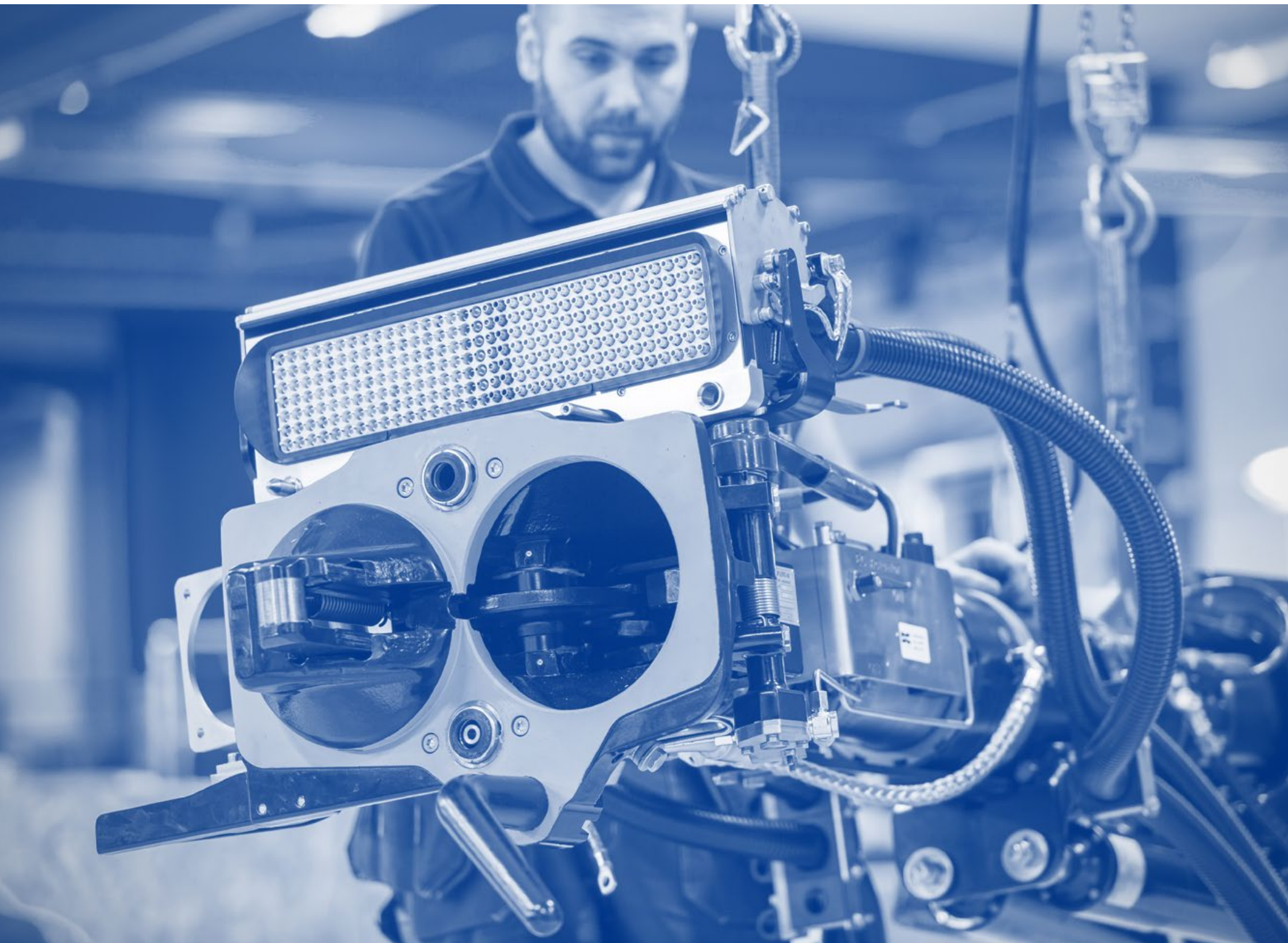
SUPPLIER **CODE** OF **CONDUCT**

VERSION 1.0 | SEPTEMBER 2020

DELLNER'S COMMITMENT

Dellner's commitment to corporate responsibility and sustainable business practices is essential for managing the challenges and opportunities in the global rail industry. Dellner's Supplier Code of Conduct (Supplier Code) integrates the principles of the United Nations Global Compact, and Dellner wants to ensure adherence by its suppliers, consultants, agents and representatives (Suppliers) to these principles. Dellner expects its Suppliers to apply the standards in the Supplier Code through their own supply chain.

Dellner always strives to conduct business in the highest ethical manner. The Supplier Code lays out the minimum level of ethical business behavior which Dellner expects its Suppliers to display when conducting business. Suppliers must also always comply with laws and regulations of the countries in which they operate.



STANDARDS

Fraud and Anti-Corruption

All Suppliers to Dellner must abide by national and international regulations on preventing and detecting economic crimes including fraud, money laundering and extortion. Suppliers must comply with all applicable anti-corruption laws when conducting business. Suppliers must not make so-called “facilitation” or “grease” payments and must not make donations or sponsorships as bribery. When dealing with third parties such as customers, suppliers, or any government or statutory authority, Suppliers must ensure that all decisions are made with utmost integrity, honesty, independence, transparency and objectivity. Suppliers to Dellner must have zero tolerance for corruption, bribery and extortion.

Fair Competition and Anti-Trust laws

Suppliers must also ensure full compliance with all anti-trust and fair competition laws when conducting business. Suppliers must avoid all potential conflicts of interest between Dellner and the Supplier and must immediately inform Dellner if they become aware of any such potential conflict of interest.

Confidentiality and Intellectual Property

Suppliers must treat information received from Dellner confidentially, and in particular, any information which, if disclosed, risks placing Dellner at a competitive disadvantage, must be kept strictly confidential by the Supplier. Suppliers must respect and protect the intellectual property rights of Dellner and third parties. This includes, but is not limited to, patents, trademarks, copyright, know-how, innovations, unique solutions and industrial processes and secrets.

Economic Sanctions

Suppliers must ensure compliance with all applicable economic sanctions, including any trade, economic or financial sanctions laws, embargoes, freezing provisions, or restrictive measures enacted, enforced or administered by a sanctions authority or otherwise imposed by law or regulation of the European Union (EU), the EU Member States, the United Kingdom, the United States of America (U.S.), or any other applicable jurisdiction.

Trade Controls

Suppliers must comply with any export and other trade control laws that may apply to restrict export of certain items to any third country destination or to military end-users, including those administered and enforced by the EU and its EU Member States, the UK Department for International Trade, the U.S. Department of Commerce’s Bureau of Industry and Security, and all other relevant government authorities.

Human Rights and Labor Laws

Suppliers must support and respect the protection of internationally proclaimed human rights. All Suppliers must protect the fundamental human rights, which shall be known, understood and applied equally.

Suppliers must respect the personal dignity, privacy and rights of each individual, and not tolerate behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Suppliers must ensure fair labor conditions. The employees of the Suppliers must be compensated fairly, and both the Supplier and its employees must comply with all relevant labor laws, including those relating to wages, insurance and working hours. Forced, exploited, bonded and child labor are strictly forbidden.

As a primary principle, employees shall have the right to a periodic holiday with pay and the right to equal pay for equal work and must not be forced to work more than the stated regular and overtime hours in the law of the country in which they are employed.

Suppliers must respect the rights of employees to freely associate and bargain collectively according to the laws of the country in which they are employed.

Discrimination based on gender, age, sexual orientation, ethnicity, nationality, religion, disability, union membership or political affiliation is strictly forbidden.

Environment, Health and Safety

Dellner expects its Suppliers to conduct business in a sustainable way. Suppliers must also ensure a safe working environment for themselves, their colleagues and all workplace visitors. Suppliers are also expected to take adequate steps to prevent accidents and injury to health, and to minimize workplace hazards and risks. The Suppliers shall provide appropriate safety equipment and make sure it is used appropriately. Suppliers must ensure that each of their employees working on Dellner matters comply with all applicable local laws and regulations pertaining to the use of drugs and alcohol.

Dellner expect its Suppliers to always meet environmental legal requirements. Suppliers should take a precautionary approach to environmental challenges. Suppliers should undertake initiatives to promote greater environmental sustainability and encourage the development of environmentally friendly technologies and strategies to improve the overall environmental impact of its operations.

Conflict minerals

Dellner will comply with all legal requirements, as well as customer requirements, regarding the restriction and prohibition of conflict minerals. Suppliers must therefore ensure that the goods they supply to Dellner are in full compliance with all such applicable legal requirements.

Personal Data

Dellner complies with the GDPR and any other laws and regulations applicable to the use and protection of Personal Data. All Suppliers to Dellner must comply with the laws and regulations regarding the use and protection of Personal Data that are applicable in the country in which they operate.

MONITORING AND ENFORCEMENT

Monitoring

Compliance with this Supplier Code is vital to Dellner's Supplier selection process. In order for Dellner to be able to verify that its Suppliers comply with the requirements of this Supplier Code, Dellner may request that Suppliers conduct a self-evaluation and reserves the right to conduct audits at the Supplier's premises. Such audit will be conducted after giving appropriate notice. It is the responsibility of the Supplier to ensure that its sub-suppliers comply with the Supplier Code or comparable requirements. We require our Suppliers to evaluate and monitor their supply chain and collect relevant information regarding the supply chain's compliance to be given to Dellner upon request.

Reporting




Suppliers may report any suspected violation of this Supplier Code confidentially and anonymously through Dellner's Whistleblowing system. To make a report, Suppliers should visit wb.2secure.se and fill in Dellner's reporting code **ozk910** when prompted to do. Suppliers may also report a violation of this Supplier Code to 2Secure via telephone by calling +46 771-77 99 77. Alternatively, Suppliers may make a report by contacting Dellner directly.

Enforcement

If Dellner discovers that a Supplier is not fulfilling the requirements of this Code, Dellner may work together with the Supplier to come up with a corrective plan, or may exercise its right to take action against the Supplier including terminating any ongoing contracts Dellner may have with the Supplier.

CONTACT INFORMATION

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