

### 1 Code of Conduct

Metro Service is a limited company, owned by International Metro Service, which is a joint venture between ATM (Azienda Trasporti Milanese) and Hitachi Rail STS. Since the establishment of Metro Service in 1999, social responsibility has been an integral part of our company operations. We want to actively participate in a global, sustainable development, where social responsibility and care for the environment go hand in hand with a healthy development of our business. To achieve this,

Metro Service works systematically to live up to the ten principles of the UN Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)), which are based on internationally recognized conventions on human rights, labor rights, the environment and anti-corruption ([www.unglobalcompact.org](http://www.unglobalcompact.org)). We want our name to always be associated with respect and responsibility for these principles.

In continuation of the ten principles, we have developed this Code of Conduct to set the standard for our work and to ensure that we comply with the Code of Conduct established by our owners and contract partners. In this case, ATM, Metroselskabet and Hovedstandens Letbane A/S. The Code of Conduct is incorporated into our business policies and daily practice.

All the company's direct and indirect contractors have an obligation to and an opportunity to handle these challenges. This code of conduct must therefore be complied with by all companies involved in the performance of a contract entered with Metro Service to ensure the company's accountability obligation and success.

For the purposes of this Code of Conduct, the "Supplier" is considered Metro Services' contracting party, while a "Subcontractor" is considered any contractor, supplier or service provider who has been entrusted work by the supplier related to the performance of the contract, including providing labor for the performance of the contract, regardless of whether the subcontractor has a direct contractual relationship with the supplier.

The supplier shall comply with the obligations arising from Principles 1-10 below and shall ensure that these principles are also complied with by its subcontractors.

#### 1.1 METRO SERVICE'S EXPECTATIONS

Metro Service expects that the supplier will cooperate in a positive and transparent manner as well as enter a constructive dialogue to solve challenges related to human rights, labor rights, the environment and anti-corruption. In addition to complying with national and international laws, regulations and collective agreements, the supplier is expected to recognise their responsibilities and actively apply and comply with this Code of Conduct.

The supplier shall, at the request of Metro Service, document how the supplier fulfills its social and environmental responsibility in accordance with this Code of Conduct. The supplier must inform about how the supplier works with social and environmental responsibility. If the supplier becomes aware of a breach, or potential or current breaches are identified, the supplier must contact Metro Service and propose and agree on appropriate measures for improvement. The supplier as well as the subcontractor must accept that audits and inspections of the supplier's or subcontractor's sites or manufacturing sites can be performed by Metro Service, or an independent external agency designated by Metro Service.

If the supplier intentionally or repeatedly neglects to comply with this Code of Conduct to an unreasonable degree, or if the supplier refuses to participate in due diligence activities or shows a reluctance to cooperate in resolving any issues, Metro Service may terminate the contract with the supplier.

### 1.2 HUMAN RIGHTS

**Principle 1:** The supplier must support and respect the protection of internationally declared human rights.

Human Rights refer to the internationally proclaimed human rights described in the International Bill of Human Rights and the fundamental rights expressed in the Labor Organization's Declaration on Fundamental Principles and Rights at Work.

The supplier must respect human rights in all activities and in a broader perspective within the supplier's areas of influence. The supplier must protect personnel and property in a manner that minimises the risk to employees and the local community in accordance with the human rights principles. If the supplier has activities in countries where human rights are generally not at a satisfactory level, the supplier shall support the development by introducing necessary human rights standards and conducting training in understanding the standards.

**Principle 2:** The supplier must ensure that they do not contribute to human rights violations.

The supplier must ensure a healthy and safe working environment where production and work are carried out. The supplier must not in any way violate human rights, support or benefit from, including the economic benefits of others violating human rights. If the supplier suspects or becomes aware of human rights violations in the supply chain, the supplier is obliged to notify relevant authorities.

### 1.3 WORKER RIGHTS

**Principle 3:** The supplier must maintain the freedom of association and recognize the right to collective bargaining.

The supplier must respect the right of staff or other workers to organise freely in any legal workers' organisation or collective bargaining community, or - if this is limited - alternative forms of independent and free workers' representation in accordance with Danish or international labor laws, rules and standards. There must be no discrimination against workers, whether they choose to organize or not.

**Principle 4:** The supplier must support the abolition of all forms of forced labor.

The supplier's staff must have a written contract of employment which describes the conditions in a language which the worker understands.

The supplier must comply with laws, regulations and collective agreements for minimum wage and upper working hours. Each employee must have a paycheck stating the number of hours of work during the period and the payment for the work. Whether employed directly or through an intermediary, the supplier must perform due diligence to prevent direct or indirect participation in human trafficking. The supplier may not in any way contribute to forced labor, including for example the use of involuntary prison work. The supplier shall allow personnel to terminate their employment with the supplier with reasonable notice, and the supplier may not retain original identification papers, deposits or withhold pay in addition to legally agreed.

**Principle 5:** The supplier must support the effective abolition of child labor.

The supplier must not in any way be involved in the use of child labor. Child labor is defined as the employment of persons of school age or younger than 15 years (or 14 years, in developing countries where it is permitted in accordance with the ILO Conventions; the Minimum Age Convention No. 138 and the Worst Forms of Child Labor Convention No. 182). If local regulations and laws establish a higher age, this must be complied with. The supplier must protect young workers up to the age of 18 from any kind of work that could endanger their health or safety.

**Principle 6:** The supplier must abolish discrimination in relation to working and employment conditions.

The supplier must promote equality and must not discriminate based on employment, remuneration, access to education, promotions, dismissals, pensions, working conditions, work assignments or disadvantages based on personal characteristics such as race, skin color, sexual orientation, religion, gender, health, age, disability, political beliefs, nationality, ethnic origin, cultural background or membership of a workers' organization. All workers must be treated with respect and must not be subjected to harassment or bullying in the workplace.

### 1.4 ENVIRONMENT

**Principle 7:** The supplier must support a precautionary approach to environmental challenges in accordance with Principle 15 of the 1992 Rio Declaration.

The supplier must act responsibly in relation to environmental risks and environmental impacts. As a minimum, the supplier must comply with all relevant local and national environmental regulations and maintain all applicable licenses, registrations or permits. The supplier must minimize negative impacts on the environment, human health, and their livelihoods. This includes actively addressing key challenges such as biodiversity loss and long-term impact on ecosystems, atmospheric pollution and the consequences of climate change, the impact on the aquatic environment, the impact of chemicals and waste products, waste treatment and the use of non-renewable energy sources, where possible. The supplier must have established emergency response procedures with immediate action and best practices for the protection of the environment and human health.

**Principle 8:** The supplier must take the initiative to promote greater environmental responsibility.

The supplier must have a structured and systematic approach to environmental aspects, including delimitations and follow-up of goals, as well as the opportunity to demonstrate ongoing efforts to monitor and reduce the environmental impact.

**Principle 9:** The supplier is encouraged to develop and disseminate environmentally friendly technologies.

The supplier must choose modern, efficient and environmentally friendly technologies that help promote greater environmental responsibility in general and help support the sustainable development of society. This includes limiting pollution from the entire supply chain from hazardous substances, waste, wastewater, and air pollution.

### 1.5 ANTI-CORRUPTION

**Principle 10:** The supplier must counteract all forms of corruption, including extortion and bribery.

The supplier must comply with applicable national and international laws and regulation, including UN Convention against Corruption (UNCAC). The supplier is, as an active and responsible member of the community in which they operate, obliged to maintain a high ethical standard and respect accepted ethical principles of transparency, correctness, and loyalty, which are not limited to compliance with laws and agreements. The supplier must avoid conflicts of interest that may affect their credibility with Metro Service, as well as activities that may affect Metro Services' credibility with third parties.

The supplier may not engage in any form of corruption, which means misuse of trusted power and funds for their own gain. Corruption includes bribery, nepotism and conflict of interest, embezzlement, fraud and extortion. Bribery is the most common form of corruption and is defined as payment intended to get someone to do something that is dishonest, illegal or contrary to the person's duties in order to obtain an

unjustified advantage. Paying or accepting payment is corruption in its purest form. It can be cash or other valuables, extraordinary entertainment, and other services.

### 1.6 METRO SERVICE WHISTLEBLOWER SCHEME

Metro Service has a Whistleblower-scheme, where persons with a professional connection to the company, including suppliers and current or former employees, can use the scheme to report offenses and other serious matters in a safe and confidential manner.

The scheme can be used to report on matters relating to for example:

- Financial crime and violations of accounting rules
- Bribery
- Fraud
- Forgery
- Corruption
- Theft
- Unlawful instructions and violations of occupational safety
- Sexual harassment or systematic bullying
- Violence
- Other serious personal conflicts in the workplace that may affect the lives and health of others

Suppliers can report via this link ([metroservice - frontpage \(integrityline.com\)](https://metroservice-frontpage.integrityline.com)).