

Code of Ethics



Metro Service
TOGETHER ON THE JOURNEY

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Dear colleagues

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, we follow the UN Global Compact principles.

We want our name to always be associated with respect for human rights, acceptable working conditions, social engagement, anti-corruption, and an environmentally sound operation. Therefore, we subject ourselves and our main suppliers to regular audits performed by an external auditor.

Metro Service has made a commitment to report annually on the company's progress

and activities related to our corporate social responsibility principles. The reporting will take place in a CSR report, which will be published on the intranet and on our website metroservice.dk

In addition to our principles for corporate social responsibility, we have formed this Code of Ethics to set the standard for our work and to ensure that we adhere to the Code of Ethics of the ATM group, which we are a part of. As a member of the ATM group, we are required to contribute to the welfare, the quality of life, and the growth of the community in which we work. We do this by providing efficient, technologically advanced, socially relevant and environmentally friendly services that respect the health of the public. The Code of Ethics is incorporated in our business policies and practices and every employee must comply with the code in order to contribute to our integrity and overall success.


CEO Claudio Cassarino

1

Business vision and values

Awareness of safety and environment

As an operator of public transportation, we actively support sustainability in the areas where we operate. Environmental and technical improvements go hand in hand with economy, and we will constantly strive within our capabilities to reduce the negative impact on the environment.

We fulfil our obligations by aiming to minimize the environmental impact, reduce non-renewable energy resources and wastage, and ensure proper waste management. Maintaining certification ISO 9001, ISO 14001 and ISO 27001 helps us to ensure a systematic approach and

Metro Service aims to

- Be the operator of choice for metro and light rail systems in Denmark; and
- Expand the business to new opportunities in Scandinavia

We must continuously deliver the best mobility services to the community by meeting and exceeding our customers' expectations for reliability, safety and comfort.

Because of this, we continuously focus on

- Awareness of safety and environment
- Customer orientation
- Professional expertise
- Teamwork

management within the fields of quality assurance, environmental management and cyber security.

Employee health and safety

We want to promote the health and safety of all our employees through information and dialogue, and by offering active participation in health promotion. We strive to raise standards where we can and have had a completely smoke free workplace since 2017. Our employee handbook provides detailed information about health and safety at work, work life balance, abuse of alcohol and drugs, etc.

Our employees' main responsibility is to protect themselves, their colleagues and third parties against all forms of injuries, violence and incidents that may arise in connection with our operation and activities.

Customer orientation

Our customers' expectations are met by clear messaging, high service availability, and safety. That is why we always strive to

improve the service and operation of our trains and staff, alongside the information and dialogue with our passengers, and optimisation of various communication channels.

Professional expertise

Expertise is essential to the individual's professional and personal development and applies throughout the company. This is reflected in how we show respect for each other's skills and time, and how we deliver excellent results for our stakeholders.

Training of professional and social competences is an important prerequisite for the company's ongoing development and success. Therefore, we offer our employees excellent opportunities within the range of professional education. It is also the responsibility of the individual employee to continually improve their skills and seek the necessary knowledge, so that everybody is able to perform their current tasks and can evolve through shared knowledge.

Teamwork

Teamwork is reflected in our willingness to listen to others, inform, share knowledge, explain, and engage in an appreciative dialogue, as well as in the way we provide feedback and communicate across the organisation.

Appreciative inquiry means that employees can express their dissatisfaction or give constructive criticism about their working conditions in an open and fair environment, without reprisals.

Continuous improvement is applied using the company's safety management system and the ISO 9001 quality management certification including an incident reporting system. These tools provide the basis for a no-blame culture which creates an environment of trust, and an analytical approach to reducing nonconformities.

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Corporate Social Responsibility (CSR) principles

Metro Service has developed and chosen to embody a set of principles to facilitate the work with Corporate Social Responsibility and communicate accordingly. The principles cover the main areas that we find relevant in a business and social context and are aligned with the UN Global Compact principles.

The business vision and values, alongside the corporate social responsibility principles, reflect our attitudes and behaviours and are representative of how we run our business.

We as a company must make a profit in order to contribute positively to maintaining and creating jobs. This must

however be done in an ethical manner where we acknowledge our social responsibility.

Human rights and labour conditions

In a business perspective, human rights also include labour rights, and a healthy and safe work environment. In Denmark, these areas are, to a great extent, regulated by law and collective agreements.

Metro Service is committed to ensure fair conditions for all employees working on our behalf. For this reason, we have developed a compliance model to ensure fair work conditions, fair competition, and complete compliance with Danish and international labour market regulation and standards.

We support and respect the protection of the international human rights. To ensure that we ourselves are compliant, we passed the Sedex Members Ethical Trade Audit (SMETA) in February 2017. The audit was performed by an external company and is based on four areas:

work conditions, work environment, environment, and business ethics.

We must all, without limitation, respect the freedom of association, and the right of the employee to join membership of professional clubs and collective bargaining in accordance with local laws and regulations. We also recognize our employees' right to refrain from collective representation, and we respect the freedom of speech, whereas we do not accept any form of propaganda in our company.

Metro Service and our employees must refrain from and work actively to abolish any use of forced or child labour as defined in the relevant ILO Conventions be it directly or indirectly or through subcontractors.

We want to promote equality and do not accept discrimination, harassment, or ridicule because of e.g. race, colour, sex, sexual orientation, age, disability, language, religion, political or other opinion, cultural background, or ethnicity



in relation to any work or employment condition.

Specifically, this means that we will promote an active dialogue between our employees. We believe this is the most effective way of working together since our differences are our strengths in our

daily work. Metro Service does not accept violent behaviour and therefore has zero tolerance policy towards violence.

We wish everyone to enhance their competences both professionally and personally and we work actively with different surveys and dialogue tools to

enhance our employees' skills, health, and work-life balance.

Specific instructions and procedures guide us in our management of people and are described in the employee handbook.

Within the technical and economic feasibility of the company, Metro Service will continuously prevent accidents and minimize the company's workloads and improve the working environment efforts in accordance with the standard ISO 45001.

Further, Metro Service will contribute actively to prevent incidents and accidents and improve the safety performance, ensuring safe operation and maintenance for both passengers and employees.

Metro Service complies with applicable laws and contractual provisions and will prioritize safety considerations in all decisions.

Environment

In 2012 Metro Service introduced and implemented an environmental management system based on ISO 14001. With this system we strive to improve our environmental impact by integrating environmental considerations in our daily work.

The environmental projects are primarily related to reduction of waste water, waste, noise, dust, and energy through both technical and behavioural activities and initiatives. Where we have, or may have significant environmental impact, we will use our management system to verify and report our results. Working with our contract partners and suppliers, we take a cautious approach to environmental challenges and support the development and spread of more environmentally friendly technologies, promoting greater environmental responsibility in general.

Unfair behaviour and anti-corruption

Compliance with both the applicable

national and international law goes without saying.

As an active and responsible member of the community in which we operate, we are obliged to respect and adhere to the laws and commonly accepted ethical principles of transparency, correctness, and loyalty.

During business negotiations, commercial requests, or relations with the public administrations or private partners, it is not permitted to promise or grant cash payments or propose employment and/or commercial opportunities, which may provide advantages for employees of the public administration or private partner.

We reject all forms of active or passive corruption, extortion, or bribery. This must not be offered, promised, given, accepted, condoned, or deliberately taken advantage of in our relationship with partners, customers, suppliers, institutions, and public administrations.

Third party relations **Suppliers**

Metro Service wishes to cooperate with our suppliers in a transparent and compliant manner. A purchase and compliance policy are established and implemented in our daily business to secure transparency in all third part relations. All major

purchases in Metro Service must be done through a tender of different suppliers. The selection of suppliers is based on fixed criteria and carried out by a professional independent from the requester. In this way we wish to ensure that purchase in our company is fair and objective, thereby reducing corruption and fraud

risks associated with third party relations to a minimum.

Furthermore, we wish to contribute to the maintaining of a healthy competition between our suppliers.

We require that all main suppliers sign our standard contract, which includes an obligation to act in accordance with our Code of Ethics. The contract also contains requirements in relation to documentation delivered by the supplier and the consequences of violation of the Code of Ethics.

To follow-up on the compliance of our suppliers and their sub-suppliers, we collect data related to social clauses of our contract suppliers. We have also contracted with an external company to conduct audits of selected suppliers.

Relations with parties, movements, political and union organisations

Metro Service wishes to be socially responsible both in relation to the local society and in relation to charity.



Charity is given directly to support various initiatives that are in compliance with our values and the values of our stakeholders.

Secondly, support is also provided through commercial partner activities of Metro Service, e.g. providing free advertising space for charities, non-profit associations, NGO's and others. We do not provide direct or indirect support to individuals, organisations or events supporting political, religious, or ethically controversial issues.

Industrial relations are regulated by appropriate protocols and relations with union organisations. They are outlined by the National Contract and by the National, Regional or company Protocols and based on transparency and good faith.

Risk management

Running a train operation poses a wide range of risks. Risks that need managing in order to meet our legal and regulatory

obligations, protect our employees, business and shareholders, and aim to deliver a more sustainable growth. For this purpose, Metro Service has established the Enterprise Risk Management framework (ERM), which enables the company to better identify, assess and mitigate the risks that our business poses on areas such as e.g. the environment, human rights and the labour market, the impact of our activities to society and infrastructure, as well as anti-corruption.

It is imperative that everyone – management, as well as employees and suppliers – contribute to this system and to creating a culture of identifying and mitigating risk.

Treatment of information and confidentiality

The business of public transportation is based on trust, and therefore it is imperative that everyone in and related to the company contribute to upholding Metro Service's well-earned, good reputation. A part of this is to guarantee the confidentiality of the information that we have

access to or process while performing our duties.

The company is committed to protecting the information related to its employees and third parties, avoiding misuse of their information, and ensuring the preservation of their privacy.

Relations with media

Metro Service is committed to maintaining a great and transparent media relation. Delivering clear and unambiguous information consistent with Metro Service policies is essential to this commitment.

However, in order to protect our image, it is important that only corporate functions delegated to communication deal with media. To ensure a uniform line of communication employees and suppliers must contact the communications department before commenting on company matters to the media.

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Obligations and General framework

Obligations

Employees and anybody who directly or indirectly, permanently, or temporarily collaborate with or work in the interest of Metro Service are obliged to know and respect this Code of Ethics and our principles for corporate social responsibility.

Each middle manager and senior manager is obliged to lead by example, respect the Code of Ethics, and ensure that these principles are complied with, immediately establish corrective measures if required, and report to senior management in case of conflict between this Code of Ethics and operation in Metro Service.

General framework

Our Code of Ethics is instrumental in creating a framework, in which we all cooperate in order to maintain a good working environment with mutual respect for individual dignity, honour and reputation.

Metro Service

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