



Code of Conduct for Suppliers

// Rhomberg Sersa Rail Group

**RHOMBERG
SERSA** // **RAIL
GROUP**

Preface

The Rhomberg Sersa Rail Group (RSRG) sees it as its corporate mission to create sustainable added value for customers, employees, partners and society as a whole. In order to ensure that this status is also guaranteed within our supply chain, this Code of Conduct is intended to be the basic rules for fair, open and integrative behaviour for our suppliers.

This Code of Conduct is intended to ensure that our suppliers act in accordance with our internal policy (RSRG Compliance Guideline). We also expect our suppliers to comply with national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the Rio Declaration on Environment and Development and the International Labour Standards of the International Labour Organisation (ILO). This particularly relates to compliance with the following standards:

- Social standards - recognising human rights and ensuring adequate working conditions for employees
- Environmental standards - minimising environmental impact
- Governance standards - applying high ethical and moral business standards to comply with applicable law (compliance)

It is up to the suppliers to ensure that they and all their sub-suppliers comply with these minimum standards at all times. The RSRG reserves the right to randomly check the processes and specifications of its suppliers. Documentation of the measures carried out with regular checks is recommended.

Compliance with this Code is a mandatory component of any business relationship between the RSRG and its suppliers.

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1 Social Standards



Human rights support

Suppliers should support and respect the protection of international human rights and ensure that they are not complicit in human rights abuses.

Occupational safety and health protection in the workplace

Suppliers must ensure occupational safety and health protection for their employees in compliance with applicable laws and regulations. All hazards and resulting health risks to which employees are exposed are assessed appropriately and the necessary protective measures are taken. Employees shall furthermore be continuously instructed in general safety regulations.

No child or forced labour

No child or forced labour or other involuntary labour will be tolerated in accordance with the conventions of the International Labour Organization (ILO).

No discrimination or harassment

Each and every employee is treated with respect and dignity. No discrimination based on age, gender, religion, national or ethnic origin, marital status, disability, culture, political opinion, sexual orientation or social affiliation will be tolerated. Employees will not be physically, psychologically, sexually or verbally harassed or abused.

Transparency of working hours and remuneration

Working hours shall be in accordance with applicable laws. All employees shall be provided with employment contracts that specify working hours and remuneration. All compensation shall be paid without delay and in accordance with applicable laws.

Freedom of association and right to collective bargaining

Suppliers shall respect the right of their employees to freedom of association and collective bargaining within the framework of applicable laws and ILO conventions.

2 Environmental Standards

Treatment and drainage of industrial wastewater

Wastewater from operations, manufacturing processes and sanitary facilities must be classified, monitored, inspected and, if necessary, treated in accordance with legal requirements prior to discharge or disposal. Measures should also be introduced to reduce the generation of waste water.

Handling of hazardous substances

The safe handling, movement, storage, reuse or disposal of substances (substances, preparations and products) that are classified as hazardous when released into the environment shall be ensured according to applicable law.

Reduction in the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This shall happen either directly

at the point of origin or through processes and measures, e.g. by modifying the production and maintenance processes or workflows within the company, by using alternative materials, through savings, through recycling or through the reuse of materials.

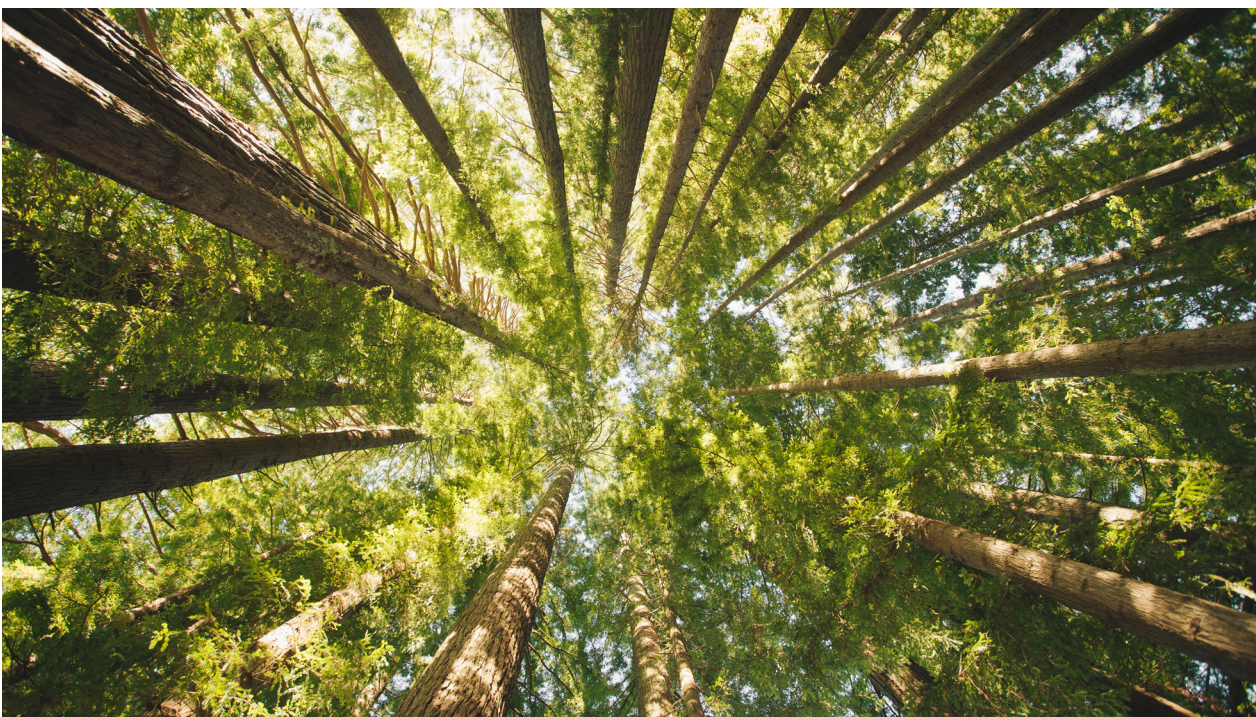
Managing energy consumption/efficiency

Economic solutions to improve energy efficiency and minimise energy consumption shall be found.

The reduction of CO₂ emissions is desirable and has a positive impact on the supplier evaluation.

Environmental law

The supplier shall comply with applicable environmental laws and standards.



3 Governance Standards

Fair Competition

The standards of fair business, fair advertising and fair competition shall be observed. The applicable antitrust laws shall furthermore be applied, which in particular prohibit agreements and other activities influencing prices or conditions with regard to competitors. Suppliers shall moreover not enter into any agreements with competitors or business partners which are aimed at or result in an inadmissible restriction of competition.

Integrity/Bribery, Personal Gain

The highest standards of integrity shall be applied to all business activities. The supplier must pursue a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. This also applies to our employees. To ensure compliance with anti-corruption laws, procedures shall be in place to monitor and enforce the statutory penalty condition.

Money laundering activities

The relevant legal obligations regarding money laundering prevention shall be complied with.

Data protection and confidential information

The supplier shall treat confidential business documents or information as confidential and protect them against unauthorised access. To avoid misuse as best as possible, data will be deleted or shredded in due time as soon as this is permitted by law.

Personal data will be collected, processed, stored or used by the supplier within the framework of the applicable laws insofar as this is necessary for business relations or special operational purposes.



4 Acknowledgement and Consent of Supplier

By signing this document, the supplier undertakes to act responsibly and to comply with the principles listed.

In the event of violations of the principles stipulated in this Code, the RSRG expects its suppliers and subcontractors to immediately take appropriate measures in order to sustainably avoid comparable violations in the future. Should the RSRG learn that a supplier does not take sufficient measures to avoid violations of the principles laid down in this Code, all further steps on behalf of the RSRG shall be reserved.

Company:

Name 1:

Function:

Date and Place:

Signature:

Name 2:

Function:

Date and Place:

Signature:

Requirement: 2 legally valid signatures registered in the Commercial Register.



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