



Routine for Responsible Business Practice

ROUTINE FOR RESPONSIBLE BUSINESS PRACTICE

At Norske tog, we work to ensure responsibility and decent conditions in all parts of our value chains. Through our operations, we impact society and the environment around us. We therefore strive to have responsible and sustainable business practices that minimise negative impacts on people, society and the environment. These guidelines, including our Code of Conduct for employees and suppliers, form the basis for our responsible business practice.

Norske tog shall respect fundamental human and labour rights by safeguarding the people who work in our own operations and in our value chains, and contribute to good resource use that limits negative impacts on the environment, climate and society. We are therefore committed to, and base our business practices on, the principles and rights enshrined in the Universal Declaration of Human Rights, the International Labour Organization's (ILO) declarations on fundamental principles and rights at work, the UN Guiding Principles on Business and Human Rights (UNGP, 2011), the OECD Guidelines for Multinational Enterprises (OECD 2011/2023) and the UN Sustainable Development Goals. Conventions, guiding principles and declarations as referred to in Code of Conduct for our suppliers, also apply for Norske tog's own operations.

1. DUE DILIGENCE ASSESSMENTS

Norske tog works continuously to have effective due diligence for human and labour rights, environment and society in place. This is to avoid contributing to rights violations and negative impacts in our operations and our supply chain.

We conduct due diligence assessments and report on these publicly, in line with the expectations of the Transparency Act, to which we are subject, and the OECD's guidance on due diligence for responsible business conduct (OECD, 2023).

Norske tog focuses on further developing our system to identify, stop, prevent and mitigate risks related to negative impacts on people, the environment and society. Where our activities cause or contribute to a negative impact on people, the environment or animals, we will endeavour to stop this activity and restore the damage. Norske tog's restoration procedure has clear guidelines for handling and following up breaches and damage.

Recovery measures are prepared in an action plan together with stakeholders, and the effect of the measures is assessed and communicated to affected parties. Where the supplier is responsible for the negative impact/damage, the supplier is also responsible for restoration. Norske tog shall use our influence to ensure that the organisation causing the damage works to reduce the risk of damage continuing or occurring in its operations and in contracts with Norske tog. Norske tog's recovery procedure is an integral part of our corporate governance.

2. RESPONSIBLE PROCUREMENT

Norske tog has large procurements. We consider responsible procurement to be one of our most important tools in our efforts to promote sustainable business practices. Norske tog shall adapt

our procurement so that we strengthen, and not undermine, suppliers' ability to deliver on requirements to ensure good conditions for people, society and the environment.

Norske tog complies with the Public Procurement Act and the Supply Regulations. The basic principles of competition, transparency, equal treatment, predictability, verifiability and proportionality apply to all our suppliers, even in the event of a confirmed or suspected breach of the guidelines for responsible business practice. Norske tog follows the state's rules for emphasising the environment, climate, human rights and other social considerations. We have prepared procurement guidelines and procedures that are integrated into Norske tog's project model.

Norske tog's ethical guidelines for employees require that employees do not cause or contribute to violations of general and special competition rules.

REQUIREMENTS FOR SUPPLIERS

We expect our suppliers and partners to work purposefully and systematically to comply with our Code of Ethical Conduct for Suppliers, which covers basic requirements for human rights, labour rights, anti-corruption, animal welfare and the environment. We expect our suppliers to:

- Comply with our Code of Ethical Conduct for Suppliers on decent working conditions, the environment, anti-corruption, animal welfare, and works actively with due diligence, i.e. conduct its own risk assessments for negative impacts on people, the environment and animals, and stop, prevent and reduce such impacts.
- Demonstrate a willingness and ability to continuously improve for people, society, the environment and animals through co-operation.
- At Norske tog's request, be able to document how they themselves, and any subcontractors, work to comply with the guidelines and other contractual requirements.

ANTI-CORRUPTION AND MONEY LAUNDERING

Norske tog has a policy of zero tolerance for corruption in any form. Norske tog shall work actively against all forms of corruption and to ensure that this does not occur in the company's business activities. Corruption includes all types of bribery and improper gifts.

Our Code of Conduct for Employees clarifies that employees must not contribute to actions that may place them in a dependent relationship with the company's customers, suppliers or other company associates that may prevent objective behaviour. The guidelines provide clear guidance on anti-corruption, gifts, representation and private offices. Employees must distance themselves from any unethical business practices.

Good corporate governance means that Norske tog must ensure that the organisation is run in a responsible manner, also with regard to money laundering issues and corruption. Norske tog shall at all times ensure that adequate procedures and measures to avoid corruption and money laundering are integrated into the organisation and that we set requirements and check compliance with our suppliers based on a materiality assessment.

3. CLIMATE AND ENERGY

Norske tog must have up-to-date knowledge of our greenhouse gas emissions. We have identified opportunities for emission

reductions in both our own operations and in the value chain, which shall be followed up through measures, cooperation and supplier dialogue, for example. Norske tog shall also conduct regular climate risk analyses to ensure that climate-related risks and opportunities are taken into account in Norske tog's decisions and projects.

When procuring new trains, Norske tog shall ensure that our trains are ready to use renewable energy sources as the infrastructure makes this possible. We shall seek continuous improvement and reduction of energy consumption as part of our management of the train fleet.

4. ENVIRONMENT, CIRCULARITY AND RECYCLING

Norske tog minimises its environmental impact by ensuring recycling of materials and waste in the management and phasing out of our trains. We will think circularly throughout the train's life cycle; from our procurement, to how we manage the train fleet and phase out trains. Our trains must be disposed of in accordance with the waste hierarchy, and when procuring trains, we endeavour to achieve a reuse and material recycling rate of more than 90% when disposing of trains.

We will set clear requirements related to circularity and life cycle costs in our projects and contracts.

Supplier documentation on how aspects related to the environment and significant impacts on the environment shall be reviewed and assessed by Norske tog. Norske tog shall request documentation of relevant standards to show that suppliers of the goods and services purchased are working on continuous improvement and management of their operations.

Norske tog shall use recognised standards to the extent possible to enable efficient processes among our suppliers and contract partners. We will set supplier requirements for ISO 14001 environmental certification in all procurements where this is relevant.

We communicate openly about our environmental, circularity and recycling impacts and how we manage them in our annual sustainability report.

5. UNIVERSAL DESIGN OF TRAINS

Norske tog does not accept any form of harassment and works actively to promote equality and combat discrimination in the way we fulfil our mission to procure and manage trains.

The opportunity to choose train transport is also important for passengers with disabilities, and Norske tog shall therefore satisfy the TSI PRM regulation and strive for universal design of trains in all train procurements in order to facilitate access to trains for all people, regardless of disabilities. Norske tog shall ensure user participation in all significant phases of the procurement projects.

6. EQUALITY, DIVERSITY AND INCLUSION

Norske tog shall offer its employees a working environment where people thrive and can develop both professionally and personally. This means having a clear and favourable framework for our employees. Norske tog does not accept any form of harassment and works actively to promote equality and combat discrimination in all forms. In particular, we work against discrimination on the basis of gender, pregnancy, maternity or adoption leave, caring responsibilities, ethnicity, religion, beliefs, disability, sexual orientation, gender identity and gender expression, as well as combinations of these grounds.

We shall prevent discrimination and ensure equal treatment in recruitment, promotion and competence-giving continuing and further education.

Our ethical guidelines for employees set out clear expectations for employees in relation to human dignity, equality and integration.

7. UNIONISATION AND WORKER REPRESENTATION

Norske tog supports the right to free unionisation and other forms of democratically elected worker representation. We shall involve labour representatives in our work on sustainable business practices.

COUNTRIES UNDER TRADE BOYCOTT

Norske tog, including our suppliers and partners, shall avoid trading partners that have activities in countries that are subject to a trade boycott by the UN and/or Norwegian authorities.

STAKEHOLDER INVOLVEMENT

Norske tog works to continuously improve and further develop dialogue with our stakeholders and take responsibility in the value chain to obtain information about whether our activities and our supply chain have negative impacts and how we should address these. In our recovery procedure, stakeholder mapping and dialogue is a prerequisite for implementing adequate measures.

In the procurement phase, we ensure stakeholder mapping and dialogue by conducting thorough due diligence assessments and by setting clear and high requirements in procurement. In Norske tog's project model, we have routines for stakeholder mapping. The mapping shall identify which stakeholders (individuals, groups, organisations) may be affected by any measures/projects and identify possible conflicts of interest.

WHISTLEBLOWING

Norske tog has established a joint whistleblowing service in collaboration with an external organisation. The whistleblowing service can be used by both internal and external stakeholders, and notifications can be made verbally or in writing to Norske tog or an external whistleblowing service. Norske tog shall communicate its whistleblowing procedures. Whistleblowing shall be handled professionally, neutrally and independently in line with the requirements and intentions of the Working Environment Act. The whistleblowing service shall further contribute to safety and security for whistleblowers, particularly with regard to confidentiality and anonymity, and shall be able to be used without fear of consequences and retaliation.

COOPERATION AND DIALOGUE IN THE RAILWAY SECTOR

In addition to Norske tog, the railway sector in Norway consists of the Norwegian Railway Directorate, the infrastructure manager Bane NOR, Entur, the train companies and a number of contractors. A good dialogue between the players in the railway sector is important in order to agree on common issues that can best be solved together. Norske tog shall therefore be a constructive and proactive player in the sector, and we shall benefit from cooperation to address important topics that concern Norske tog's work on climate, environment and social sustainability.

In our sustainability work, collaboration in the sector has been identified as particularly important in our efforts to ensure a long service life for the trains through good maintenance, to reduce greenhouse gas emissions, to increase the degree of circularity and material recycling, both in maintenance and disposal of trains, and to achieve safety in, and universal design of, train transport.

Participation in research and development projects and in professional networks enables us to collaborate on, keep abreast of and influence developments in the railway sector.

COMMITMENT AND FOLLOW-UP OF ROUTINE

Norske tog's employees and Board of Directors commit annually to ethical guidelines and routine for responsible business practices.