

# Code of Conduct for Business Partners

30 June 2024

## Preamble

Stadler Rail Group supplies rail vehicles, infrastructure, service and the associated automation technology from a single source, across all segments and with the highest level of innovation. The market presence of Stadler Rail Group is primarily in Europe and North America. Further regions are being developed as part of a targeted segment and market strategy. Stadler Rail Group is committed to fair and cooperative business relations as well as to social and ecological sustainability. This Code of Conduct serves Stadler Rail Group and its suppliers, subcontractors, partners, etc. (hereinafter "business partner") to respond to the different conditions in the global market and to meet the challenges of social responsibility.

## 1. Scope of Application

This Code of Conduct applies to the business partner irrespective of where the business partner and/or its branches and/or its business units are located. The business partner undertakes to comply with the requirements of this Code of Conduct.

## 2. Core Principles

This Code of Conduct is based on the principles of international standards, such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Conventions and the ICESCR, as well as country-specific laws and regulations, in particular Swiss law. It reflects the fundamental values of Stadler Rail Group: integrity and legality, ethical behaviour and a sense of responsibility.

### 2.1 Compliance with Laws

The business partner agrees to comply with the applicable laws and other legal provisions of the countries in which it operates. If the legal regulations of a country set lower standards compared to the requirements determined by this Code of Conduct, the business partner undertakes to meet the higher standards set out in this Code of Conduct.

The business partner complies with all applicable trade and export control regulations. It obtains, among other things, all necessary permits, licenses and certificates before exporting or transferring any products, technologies or software.

## **2.2 Prohibition of Corruption**

The business partner shall take all necessary measures to prevent corruption and bribery. It avoids any actions in connection with public authorities and private partners which are deemed to be “passive corruption” or “active corruption” and which could lead to improper benefits.

## **2.3 Prohibition of Unfair Competition**

The business partner shall comply with antitrust and other competition laws and shall take all necessary measures to avoid unfair competition. It refrains in particular from illicit market allocation, price fixing or other illicit agreements, as well as from making incorrect statements about Stadler or Stadler's products and about competitors of Stadler or their products.

## **2.4 Prohibition of Money Laundering**

The business partner is obliged to adhere to any applicable laws, regulations or directives regarding Anti-Money Laundering (AML) requirements.

## **2.5 Protection of Intellectual Property**

The business partner respects the intellectual property and property rights of Stadler Rail Group and of third parties (patents, designs, know-how, copyrights, proprietary information, trademarks, etc.) and protects such rights from unauthorized access and use.

## **2.6 Privacy and Data Protection**

The business partner protects privacy, including personal data. It treats confidential information as such and keeps it secret. It takes necessary measures to comply with applicable privacy and data protection laws, regulations and standards.

## **2.7 Ethics**

The business partner's actions are based on generally accepted ethical and moral standards and principles. It avoids conflicts of interest that may affect its business relationships or decisions made thereunder.

## **2.8 Human Rights**

The business partner respects and protects all human rights provided for by law and international standards.

## **2.9 Respect and Dignity / Prohibition of Discrimination / Equal Opportunities**

The business partner treats its counterparts with respect and dignity. It treats others equally, fairly and politely. It does not tolerate discrimination or any forms of degrading behaviour. It ensures equal opportunities for all and equal treatment for all individuals, irrespective of their colour, race, national origin, social or economic background, physical/mental limitations, sexual orientation, marital status, political or religious beliefs, gender or age. It complies with all applicable laws, legal requirements and international standards in this regard.

## **2.10 Freedom of Speech**

Freedom of speech and expression of opinion are respected and protected by the business partner.

## **2.11 Workers' Rights**

The business partner complies with country-specific workers' rights. This also applies to secondments of employees. Furthermore, the business partner undertakes to employ all employees under fair working conditions. The fundamental right of employees to join trade unions and employee representative bodies is recognized.

## **2.12 Health and Safety**

The business partner assumes responsibility towards its employees to ensure health and safety at the workplace and to prevent work-related accidents and illnesses, and complies with all applicable regulations and standards.

## **2.13 Harassment Prevention**

The business partner rejects any inappropriate behaviour (e.g. mental cruelty, sexual harassment, discrimination, etc.). It prohibits behaviour such as gestures, language and physical contact that may be sexual, coercive, threatening, offensive or exploitative.

## **2.14 Prohibition of Forced Labour**

The business partner strictly rejects any forced or compulsory labour and other forms of slavery or human trafficking and does not benefit from them.

## **2.15 Prohibition of Child Labour**

The business partner rejects any exploitation of children and follows all applicable child labour guidelines, rules, laws and regulations.

## **2.16 Compensation and Working Hours**

The business partner offers fair remuneration, guarantees the country-specific applicable minimum wage and complies with the applicable regulations on maximum working hours.

## **2.17 Environmental Responsibility**

The business partner is aware of its obligations towards the environment and complies with all applicable environmental laws, conventions and regulations. It assumes responsibility for environmental protection and shall minimize environmental pollution and achieve continuous improvements with regard to environmental protection.

## **2.18 Material Compliance**

The business partner shall comply with all applicable regulations and requirements relating to product safety, including those relating to labelling and packaging and the use of hazardous substances and materials. It also undertakes to avoid processing minerals and metals (including tin, tantalum and tungsten, their ores and gold) from conflict and high-risk areas in its products in accordance with applicable international and country-specific regulations and requirements. Upon request, the business partner must provide information about the origin of the minerals and metals used.

## **2.19 Supply Chain**

The business partner communicates the requirements of this Code of Conduct throughout its entire supply chain and to other partners. It demands compliance in the agreements with its suppliers and partners and monitors such compliance in an appropriate manner. Upon request, Stadler Rail Group must be provided with corresponding evidence. The business partner will also inform Stadler Rail Group immediately if it suspects a violation of these requirements in its supply chain and will work with its suppliers and partners to avoid any further violations and to remedy any negative events from the past.

## **3. Enforcement**

Stadler Rail Group has the right to make appropriate changes to the provisions of this Code of Conduct in the event of changes to laws and/or standards and/or the Stadler Compliance Program. The business partner must acknowledge any such changes.

Stadler Rail Group is entitled at all times and with the measures it deems appropriate to check compliance with the Code of Conduct and/or to consult third parties for this purpose.

For violations of this Code of Conduct, Stadler Rail Group reserves the right for adequate sanctions against the respective business partner. This can also lead to an immediate termination of the business relationship and a possible assertion of claims for damages and of other rights.

Questions regarding the Code of Conduct for Business Partners should be directed to the following address: [compliance@stadlerrail.com](mailto:compliance@stadlerrail.com). Reports can also be submitted via the reporting channel listed on the Internet: <https://stadlerrail.com/en/compliance>.

Family name: .....

First name: .....

Company: .....

Position: .....

Place and date: .....

Signature of the business partner:

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