



Policy

Environmental, Social and Governance

This Policy is effective from 1st February 2023 and is subject to periodic review. The next review is due in January 2025.

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The Board of Alpha Trains (Luxembourg) Holdings S.à r.l. recognises that environmental, social and governance (**ESG**) issues have a material effect on the performance of the total Alpha Trains group including all its subsidiaries (**Alpha Trains**). Our aim is to ensure that such issues are considered at all levels of the company's business activities, and in accordance with International and National Codes and Principles.

Generally, Alpha Trains aims to achieve this by:

- Ensuring that our vision, mission values and ESG objectives are relevant, understood and communicated and that our employees demonstrate alignment to them.
- Adopting high standards of governance and ethics in our business conduct.
- Identifying all material risks in the business activities undertaken by the group companies and ensuring that the risks are fully considered and managed in a responsible and ethical way.
- Developing, implementing and maintaining a best practice, process oriented, integrated management system, which will be continuously re-examined through audits and a continuous improvement process.
- Setting targets for environmental, social and governance matters which will be reported, monitored, reviewed and disclosed to our employees and shareholders.
- Ensuring that key decisions are only taken after full consideration of all environmental, social and governance issues and risks.
- Providing appropriate information, instruction and training and ensuring that this policy is communicated to all persons working for Alpha Trains.
- Working together with our customers, suppliers and business partners to encourage them to adopt the principles or similar policies with the same outcomes.
- Aspiring to achieve benchmark levels in environmental, social and governance performance and making these themes core to what we do.

Environment

- Recognising that modal shift onto Rail contributes positively to reduce the overall environmental impact and that this presupposition is consistent with our business planning.
- Committing to the protection of the environment and to a “Net Zero” approach through continuously reducing the environmental footprint of our business, supporting certified carbon offset projects and developing a sustainable supply chain.
- Adopting relevant international standards such as ISO 14001 or frameworks like UN Global Compact.
- Encouraging all staff to consider the environmental consequences of their actions and to seek to minimise the impact where reasonably practicable.

Social

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- Embracing a culture of diversity, equity and inclusion where we expect the highest ethical standards, respect human rights, promote gender equality and act against any grievances like discrimination, harassment or child and forced labour.
- Supporting a culture in which stakeholders including employees, suppliers, contractors and visitors are valued and respected.
- Promoting the group and its subsidiary companies' commitment to the wider society, social enterprise partnering and community development.

Governance

- Ensuring compliance with regulations governing the protection of human rights, operational and occupational health and safety, environmental, social and business practices in the jurisdictions in which we operate
- Ensuring compliance with rights and regulations enshrined in the shareholders' agreement.
- Identifying the relevant legislative and regulatory requirements and ensuring that rolling stock is compliant with these requirements, and where practicable meeting them in a safe and environmentally responsible manner.
- Enabling our management to act responsibly and in an exemplary manner.

Direction and oversight of the Environmental, Social and Governance Policy is the responsibility of the Alpha Trains (Luxembourg) Holdings S.à r.l. Board which has delegated day-to-day management responsibility to the Chief Executive Officer of the Alpha Trains group who shall report back to the Board on a regular basis.

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