



Policy

Supplier Code of Conduct

This Policy is effective from 27th November 2024 and is subject to periodic review. The next review is due in January 2027.

Responsible: ATLH	Status: Approved	Page 1 of 5
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Alpha Trains (Luxembourg) Holdings S.à r.l. including all its subsidiaries (**Alpha Trains**), is committed to conducting business in accordance with its core values: Respect, Trust, Integrity, Passion, and Diversity. Alpha Trains also expects its suppliers (individuals, companies, or organizations providing goods or services to Alpha Trains) to reflect these values and adhere to the highest standards of ethical conduct and business practices.

This Code of Conduct outlines the principles and standards we require our suppliers to maintain in their operations.

1. Compliance with Laws and Regulations - Sanctions

Suppliers must comply with all relevant laws, regulations, and industry standards in the countries where they operate, including those related to labour rights, health and safety regulations, environmental protection, and anti-corruption laws.

Suppliers must also comply with all the sanctions laws and regulations applicable to its business. They shall not enter into contracts with entities or individuals included from time to time in the lists of sanctions published by the European Union, the United Kingdom and the United States of America.

The Supplier shall keep Alpha Trains informed at all times of all relevant information on: (i) any changes in circumstances relevant to compliance with sanctions; (ii) actual or potential breaches of Supplier's obligations in relation to sanctions.

For the purpose of this clause 'sanctions' shall refer to all economic, trade and financial sanctions laws, regulations, embargoes or restrictive measures of any of the countries mentioned above.

2. Labor and Human Rights

Suppliers must uphold the fundamental rights and dignity of all workers, ensuring fair and humane treatment in all aspects of employment.

This includes:

- **Respect for Human Rights:** Suppliers must respect and promote human rights as outlined in the Universal Declaration of Human Rights and the International Labour Organization.
- **No Forced or Child Labor:** Suppliers must ensure that no forced, bonded, involuntary, or child labour is used in their operations.
- **Non-Discrimination:** Suppliers must treat workers with respect and dignity, avoiding any form of discrimination, harassment, or abuse. This includes non-discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital status.

Wages and Benefits: Suppliers must pay workers at least the minimum wage required by applicable laws and provide all legally mandated benefits. Compensation should be fair and sufficient to meet basic living needs. Working hours must comply with local laws and industry standards.

3. Health and Safety

Suppliers must provide a safe and healthy work environment and take necessary precautions to prevent accidents and injury to health.

This includes:

- **Workplace Safety:** Ensuring proper maintenance of equipment and facilities and providing appropriate safety training, taking all necessary measures to safeguard their own employees, as well as the employees of Alpha Trains and its customers, where applicable.
- **Emergency Preparedness:** Implementing emergency plans and response procedures.
- **Health and safety compliance:** Conducting regular health and safety audits or inspections to ensure compliance.

For more detailed information on our commitment to Labor and Human Rights as well as Health and Safety, please refer to our Labor Rights, Human Rights, and Occupational Health and Safety Policy.

4. Environmental Responsibility

In alignment with Alpha Trains' Environmental, Social and Governance Policy, suppliers shall endeavour to operate in an environmentally responsible manner and strive to minimize adverse impacts on the environment.

This includes:

- **Environmental Permits and Reporting:** Securing and adhering to necessary environmental permits, approvals, registrations, and their operational and reporting obligations.
- **Pollution Prevention:** Minimizing environmental impact through efficient and sustainable resource use, including waste reduction, wastewater treatment, emissions control.
- **Resource Reduction:** Implementing improved processes for conservation, recycling, and re-use.
- **Emission Reduction Targets:** Establish and work towards measurable emission reduction targets, with the aim of continually reducing greenhouse gas emissions and other pollutants.
- **Hazardous Substances:** Managing chemicals and other hazardous materials to ensure safe handling, movement, storage, recycling, reuse, and disposal.
- **Environmental goals:** Setting and disclosing measurable environmental goals.

5. Business Integrity

Suppliers must conduct their business ethically and transparently. They should implement adequate controls to prevent and detect unethical behaviour.

This includes:

- **Anti-Corruption:** Prohibiting corruption, extortion, or embezzlement, including refraining from offering or accepting bribes. Implementing policies and procedures to prevent corruption and comply with anti-corruption laws.
- **Conflict of Interest:** Disclosing any situation that may appear as a conflict of interest that might compromise their ability to act in the best interest of Alpha Trains.

- **Confidentiality and Data Protection:** Protecting intellectual property and confidential information of Alpha Trains and other business partners, ensuring sensitive data is secure from unauthorized access or disclosure by suppliers.
- **Fair Competition and Anti-Trust Compliance:** Upholding fair business practices, including truthful advertising and merit-based competition. Suppliers should avoid any practices that restrict competition, create unfair advantages, or violate anti-trust and competition laws.
- **Preventing Money Laundering and Terrorist Financing:** Alpha Trains expects its suppliers to comply with all applicable statutory obligations related to the prevention of money laundering and terrorist financing, and to refrain from becoming directly or indirectly involved in any money laundering activities or terrorist financing.

For comprehensive details on our commitment to ethical business practices, please refer to our Ethics in Business Policy.

6. Supply Chain Management

To ensure the integrity and quality of our supply chain, we expect our suppliers to enforce and promote high standards throughout their own networks.

This includes:

- **Supplier Responsibility:** Suppliers are expected to uphold and enforce this Code of Conduct throughout their supply chains, ensuring that their suppliers also adhere to similar ethical, labour, environmental, and business standards.
- **Continuous Improvement:** Suppliers should aim for ongoing enhancement in their ethical, social, and environmental performance, regularly updating practices to meet evolving standards and maintaining a code of conduct for their own suppliers.

7. Documentation, Monitoring, and Reporting

To ensure transparency and accountability in our supplier relationships, Alpha Trains emphasizes thorough documentation, monitoring, and reporting processes.

This includes:

- **Documentation and Record Keeping:** Suppliers must maintain accurate and complete records such as audit reports, compliance certificates, etc., to demonstrate compliance with this Code of Conduct and all applicable laws and regulations. Records should be available for review by Alpha Trains upon request.
- **Monitoring and Compliance:** Alpha Trains reserves the right to monitor and evaluate suppliers' adherence to this Code of Conduct. Non-compliance may result in corrective action, up to and including termination of the business relationship.
- **Communication:** We highlight the significance of transparency and the avenues for anonymous reporting. Suppliers and their personnel are encouraged to promptly notify Alpha Trains of any concerns or potential breaches of this Code of Conduct.
- **Whistleblower Protection:** Suppliers are encouraged to establish a whistleblower mechanism in line with the legal requirements that enables their employees to report concerns or breaches of this Code of Conduct without fear of retaliation. If suppliers do not have a

whistleblowing tool themselves, they may submit information through Alpha Trains' whistleblower channel (available at the bottom of Alpha Trains' homepage) if a violation could potentially affect Alpha Trains.

Alpha Trains values its partnership with suppliers and believes that adherence to this Code of Conduct will lead to mutual benefits. We are committed to working with our suppliers to ensure compliance and continuous improvement in our supply chain.

By working together, we can achieve a sustainable, ethical, and successful business partnership.

This Supplier Code of Conduct should be reviewed and updated periodically to reflect changes in laws, regulations, and business practices.