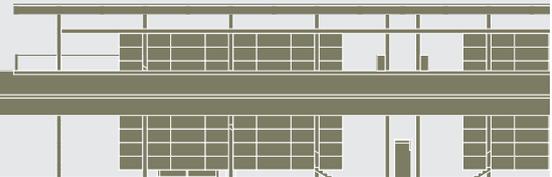


# Code of Ethics



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# 1. Foreword

Dear colleagues

Since the establishment of Metro Service in 1999, the company's social responsibility has been an integral part of the way the company operates. Our purpose is to operate and maintain the Copenhagen metro and other public transportation in Denmark as well as any other activities related thereto.

Metro Service wants to actively participate in a global, sustainable development, where social responsibility and care for the environment walk hand in hand with a healthy development of our business.

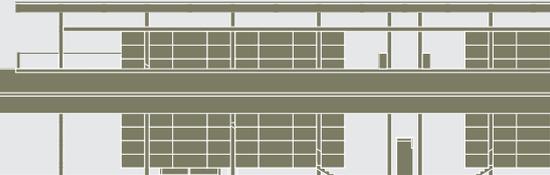
Our name shall always be associated with respect for human rights, acceptable working conditions, social engagement, anti-corruption and an environmentally sound operation. Metro Service has made a commitment to report annually on the company's progress and activities related to our corporate social responsibility principles. The reporting will take place in a CSR report, which will be published on the intranet and on our website m.dk.

In addition to our principles for corporate social responsibility, we have developed a Code of Ethics to help us set the standard for our work and to ensure that we adhere to the Code of Ethics of the ATM group, since we are part of this group. As a member of the ATM group, we are required to contribute to the welfare, the quality of life and the growth of the community in which we work by providing efficient, technologically advanced and socially relevant environmentally friendly services that respect public health.

The Code of Ethics shall be incorporated in our business policies and practices and every employee shall comply in order to contribute to our integrity and overall success.



*Claudio Cassarino, CEO*



## 2. Business vision and values

Metro Service wants to be the company that

- Will operate all metro lines in Copenhagen
- Will be considered the centre of excellence for O&M of driverless metros
- Will be able to exploit its knowledge and expertise to develop new business in public transportation in Denmark

We must constantly develop our ability to provide everyday excellent results to meet and exceed the expectations of our passengers, the employees, Metroselskabet and our owners.

Therefore we will focus on

- Awareness of safety and environment
- Customer orientation
- Professional expertise
- Teamwork

### **Awareness of safety and environment**

As an operator of public transport, we actively support sustainability in the areas where we operate. Environmental and technical improvements go hand in hand with economy and we will constantly strive, within our capabilities, to reduce the negative impact on the environment.

We fulfil our obligations by constantly trying to minimize the environmental impact, reduce non-renewable energy-resources and wastage and ensure proper waste management. Maintaining certification by ISO9001 and following the standard in ISO14001 help us to ensure a systematic approach and management of these areas.

### **Employee health and safety**

We want to promote the health and safety of all our employees through information and dialogue, and by offering active parti-



icipation in health promotion. We strive to raise standards where we can. Our staff-handbook provides detailed information about: health and safety at the workplace, work life balance, abuse of alcohol and drugs, smoking etc.

Our staff's main responsibility is to protect themselves, their colleagues and third parties against all forms of injuries, violence and incidents that may arise in connection with our operation and activities.

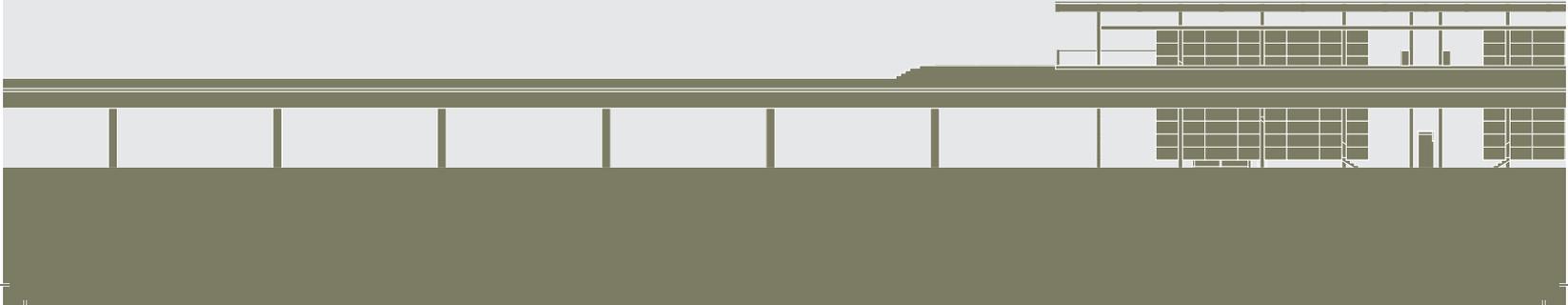
### **Customer orientation**

Our customers' expectations are met by clear messaging, service availability and safety. That is why we always strive to improve the service and operation of our trains and staff, together with information and dialogue with our passengers, through optimisation of various communication channels.

### **Professional expertise**

Expertise is essential to the individual's professional and personal development and applies throughout the company. This is reflected in the fact that we show respect for each other's skills and time, and deliver excellent results for our stakeholders.

Training of professional and social competences is an important prerequisite for the company's on-going development and success. Therefore, we offer our employees excellent opportunities for professional education. It is however also the individual's responsibility to continually improve their skills and seek the necessary knowledge so that we are all able to perform our current tasks and also undergo a progressive development by sharing knowledge.



## Teamwork

Teamwork is reflected in our willingness to listen to others, to inform, share knowledge, explain and engage in an appreciative dialogue, as well as in the way we provide feedback and communicate across the organisation.

Appreciative inquiry also means that employees can express dissatisfaction or give constructive criticism in an open and fair manner about their working conditions, without the use of reprisals to prevent this from happening.

Continuous improvement is applied using the company's safety management system, its ISO 9001 quality management certification including an incident reporting system. Using these provides the basis for an environment of trust, rather than malice in case of deviations, and an analytical approach to reducing nonconformities.



### 3. Corporate Social Responsibility (CSR) principles

*The CSR principles define the overall business standards for us and set the general framework within which we operate.*

Metro Service has developed and chosen to embody a set of principles to facilitate the work with Corporate Social Responsibility (CSR) - and communicate accordingly. The principles cover the main areas which we find relevant for business and social reasons.

The business vision and values together with the corporate social responsibility principles reflect our attitudes and behaviours and show how we run our business.

We as a company must make a profit in order to contribute positively to maintaining and creating jobs. This must however be done in an ethical manner where we acknowledge our social responsibility.

#### **Human rights and labour conditions**

Human rights in a business perspective also include labour rights, and a healthy and safe working environment. In Denmark these areas are to a great extent regulated by law and collective agreements.

We must all, without limitation, respect the right of employee's freedom of association, membership of professional clubs and collective bargaining in accordance with local laws and regulations. We also recognize our employees' right to refrain from collective representation, and we respect freedom of expression, whereas we do not accept any form of propaganda in our company.

Metro Service and our employees must refrain from any use of forced or child labour as defined in the relevant ILO Conventions, be it directly or indirectly or through subcontractors.



We want to promote equality and do not accept discrimination, harassment or ridicule because of e.g. race, colour, sex, sexual orientation, age, disability, language, religion, political or other opinion, cultural background or ethnicity.

Specifically, this means that we will promote an active dialogue among our employees. We believe this is the most effective way to work since our differences are our strengths in our daily work. Metro Service doesn't accept violent behaviour and we have a zero tolerance policy towards violence.

We wish everyone to enhance their competences both professionally and personally and we work actively with different surveys and dialogue tools to enhance our employees' skills, health and work-life balance. Specific instructions and procedures guide us in our management of people and they are described in the staff-handbook.

Metro Service will within its technical and economic feasibility continuously prevent accidents and minimize the company's workloads and improve the working environment efforts in accordance with the standard OHSAS 18001.

Further Metro Service will contribute actively to prevent incidents and accidents and improve the safety performance, ensuring safe operation and maintenance for both passengers and employees.

Metro Service complies with applicable laws and contractual provisions and will prioritise safety considerations in all decisions.

### **Environment**

In 2012 Metro Service introduced and implemented an environmental management system based on ISO 14001.



With this system we strive to improve our environmental impact by integrating environmental considerations in our daily work.

The practical environmental projects are primarily related to reduction of waste water, waste, noise, dust and energy through both technical and behavioural activities and initiatives. Where we have, or can have significant environmental impact, we will use our management system to verify and report our results.

### **Unfair behaviour and anti-corruption**

Compliance with both the applicable national and international law goes without saying.

As an active and responsible member of the community in which we operate, we are obliged to respect and adhere to the laws and commonly accepted ethical principles of transparency, correctness and loyalty.

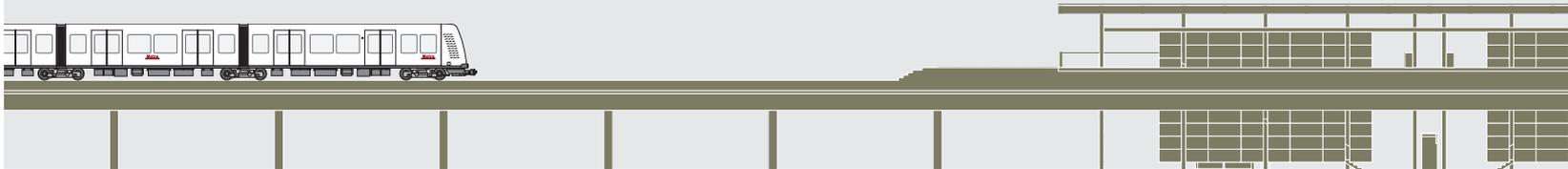
During the course of business negotiations, commercial requests or relations with the public administration or with private partners, it is not permitted to promise or grant cash payments or propose employment and/or commercial opportunities, which may provide advantages for employees of the public administration or a private partner.

We reject all forms of active or passive corruption, extortion or bribery. This must not be offered, promised, given, accepted, condoned, or deliberately taken advantage of in our relation with partners, customers, suppliers, institutions and public administrations.

### **Third party relations**

#### *Suppliers*

Metro Service wishes to cooperate with our suppliers in a transparent and compliant manner. A purchase and compliance



policy is established and implemented in our daily business to secure transparency, in all third party relations. All major purchases in Metro Service must be done through a tender of different suppliers. The selection of suppliers is based on fixed criteria and is done by a person independent from the requester. In this way we wish to ensure that purchase in our company is fair and objective and thereby reduce corruption and fraud risks associated with third parties relations to a minimum. Furthermore we wish to contribute to the maintaining of a healthy competition between our suppliers.

Metro Service expects our suppliers and their sub-suppliers to comply with both the applicable national and international law and expect their ethical behaviour to comply with this Code of Ethics. For material suppliers of goods and services, contracts are established which include the requirement to fulfil the Code of Ethics.

#### *Relations with parties, movements, political and union organisations*

Metro Service wishes to be socially responsible both in relation to the local society and in relation to charity.

Charity is given directly to support various initiatives which are in compliance with our values and the values of our stakeholders. These charities should improve travel experience, so as to enhance and increase the use of the metro.

Secondly, support is also provided through commercial partner activities of Metro Service which provide free advertising space for charities, non-profit associations, NGO's and others. We do not provide direct or indirect support to individuals, organisations or events that support political, religious or ethically controversial issues.

Industrial relations are regulated by appropriate protocols and relations with union organisations - where outlined by the National Contract and by the National, Regional or company Protocols - they are based on transparency and good faith.

## 4. Obligations and General framework

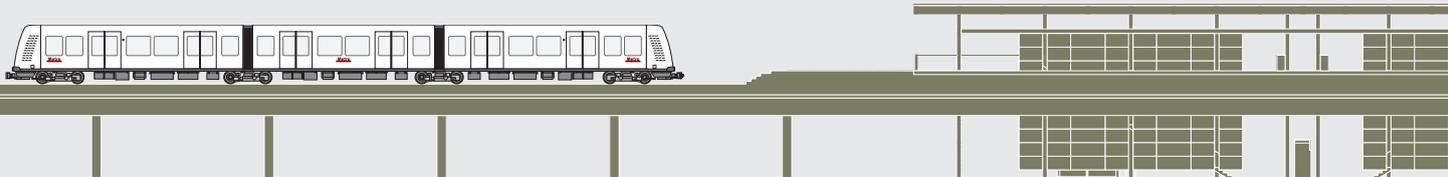
### Obligations

Employees and anybody who directly or indirectly, permanently or temporarily collaborate with or work in the interest of Metro Service are obliged to know and respect this Code of Ethics and our principles for corporate social responsibility.

Each middle manager and senior manager is obliged to lead by example, respect the Code of Ethics, ensure that these principles are complied with, immediately establish corrective measures if required, and report to senior management in case of conflict between this Code of Ethics and operation in Metro Service.

### General framework

Our Code of Ethics is instrumental in creating a framework, in which we all cooperate in order to maintain a good working environment with mutual respect for individual dignity, honour and reputation.





Pekema A/S - January 2015

