

Code of Conduct for business partners of the ELL-Group

Introduction

We see sustainable and responsible action as an important basis for cooperation and for our business relationships and want to take responsibility for it. In order to be able to live up to this responsibility, we act in full compliance with legal regulations and ethical standards as well as general principles that guide our business activities (ELL-Group Code of Conduct).

The ELL-Group expects its business partners and their employees to adhere to the principles set out in this Code in all business areas, to communicate the Code appropriately within their organization and thus to ensure compliance with the Code.

Social responsibility

We know that business success is only possible with healthy and respectfully treated employees and that assuming social responsibility is an essential factor for sustainable business success. We therefore expect our business partners to act according to the following principles:

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| Human Rights | In all their activities, our business partners comply with internationally recognized human and fundamental rights in accordance with the principles set out in the UN Global Compact. |
| Child labor | Our business partners condemn any form of child labor and comply with local laws regarding the age limit. They follow the recommendations of the ILO "International Labor Organization " conventions (ILO 138 and 182). This age limit should not be less than 15 years and not less than the age at which compulsory education ends. |
| Forced labor | All employment is voluntary and therefore any form of forced labor is prohibited. Our business partners do not use any form of physical, psychological, verbal or sexual threats, harassment or abuse, nor do they use physical punishment or forced labor in their business activities (ILO 29 and 105). |
| Working conditions (working hours and remuneration) | Our business partners ensure fair and equitable working conditions and comply with all applicable laws and industry standards regarding working hours and remuneration. They provide fair remuneration, which is never below the legal minimum wage, in accordance with all applicable laws and industry standards. |
| Freedom of expression and assembly | Our business partners grant the right to freedom of opinion and expression. They recognize the right to freedom of assembly and to form interest groups for their employees. They also respect the right of employees to organize unions. This applies to all their companies and branches. (ILO 87 and 98) |
| Equal Opportunities & Diversity | Our business partners are committed to diversity in their company, grant equal rights and opportunities for all employees and do not tolerate discrimination or harassment of any person, in particular on the basis of gender, age, nationality, origin, religion, sexual orientation, disability or political or trade union activity (ILO 100 and 111). |

Health and Safety We are committed to respecting and protecting the safety and health of all workers in our value chain. We expect our business partners to comply with all laws and standards on occupational health and safety, to offer their employees a safe and healthy working environment and to promote the safety of their employees through appropriate precautions and training.

Our business partners should ensure that also appropriate measures by their suppliers and sub suppliers are taken to prevent workplace accidents, injuries, and health risks. This includes that all suppliers and sub suppliers of our business partners comply with all applicable legal requirements and the implementation of best safety practices.

Ecological responsibility

With our fleet strategy of only offering electric (or e-hybrid) locomotives, we have committed ourselves to sustainability from the very beginning, which also forms the basis for our growth. Since our founding as a locomotive leasing company, we have made a significant contribution to by shifting traffic to rail and thus reducing greenhouse gas emissions. Our business activities therefore save significantly more greenhouse gases than we cause through our operational activities.

Nevertheless, we see it as our duty to promote environmental improvements over which we can influence – in particular, reducing and minimizing greenhouse gas emissions and water consumption and improving and optimizing energy and resource efficiency, waste management and air quality.

We expect our business partners to comply with the laws and regulations applicable to them as well as internationally recognized standards for environmental protection.

Resource consumption and avoidance of environmental pollution

We expect our business partners to take responsibility for the environment in the course of their activities. This means that they strive to reduce the impacts over which they can influence. We expect our business partners to:

- ▶ optimize the consumption of natural resources (especially energy and water),
- ▶ Minimize the generation of greenhouse gases, waste and wastewater
- ▶ Avoid harmful soil changes, water pollution, air pollution and harmful noise emissions
- ▶ Promote biodiversity
- ▶ Support activities and measures that serve the above objectives

Ethics and business conduct

To ensure sustainable economic success, we rely on fair, transparent and long-term relationships with our business partners. ELL does not tolerate any form of corruption or other unfair business practices.

Free competition Our business partners are committed to fair and free competition and to complying with the applicable antitrust laws. They do not participate in agreements that violate antitrust law and do not exploit any dominant market positions that may exist.

Corruption Our business partners do not tolerate any form of corruption, economic crime or unfair business practices by their employees in their supply chain.

Conflicts of interest Our business partners avoid conflicts of interest that could lead to unfair business practices as well as conflicts of interest that could illegitimately influence business relationships.

Politics and Lobbying	Illegal donations of any kind to state bodies and their representatives, public officials and candidates for political office or lobbying activities are generally prohibited.
Money laundering	Our business partners take all necessary measures to prevent money laundering within their sphere of influence and do not participate in transactions that serve to conceal criminal or illegally acquired assets.
Data protection	Our business partners comply with the applicable laws on the protection of personal data.
Confidential information	Our business partners handle business correspondence with confidence and take appropriate precautions to protect business secrets.

Compliance with the Code

Our business partners are responsible for ensuring that this code is complied with in the course of their business activities. They undertake to report any violations of this code that directly or indirectly affect the business relationship with ELL.

Whistleblower protection system

ELL has set up an anonymous whistleblower protection system. This offers the possibility to report observations anonymously and confidentially via the whistleblower platform (<https://www.ell.co.at/>). We investigate every suspected violation of the code.

Reporting to ELL	We encourage our business partners to report any violations of the Code that have occurred in the course of their business relationship with ELL or that have an impact on our business activities.
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All reports are thoroughly investigated, and appropriate action taken. We do not tolerate any actions directed against people who report such violations.

Consequences	In the case of minor violations, we will ask the business partner to implement appropriate remedial measures within a reasonable period of time. In the case of serious violations of the code (in particular criminal offenses), ELL reserves the right to impose appropriate sanctions against the business partner (up to and including immediate termination of the business relationship and assertion of claims for damages).
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The code is available to all business partners electronically on the homepage in the currently valid version and can be accessed at <https://www.ell.co.at>. Locally stored documents and printouts may be out of date.