

Code of Conduct for business partners of ELL Group

Introduction

ELL sees sustainable and responsible action as an important basis for cooperation and for its business relationships and wants to take responsibility for it. To be able to live up to this responsibility, ELL acts in full compliance with legal regulations and ethical standards as well as general principles that guide its business activities (ELL Group Code of Conduct).

Scope

The ELL Group (also referred to as “ELL”) expects its business partners and their employees to adhere to the principles set out in this Code of Conduct for business partners (“Code”) in all business areas, to communicate the Code appropriately within their organization and thus to ensure compliance with the Code.

Responsibility

The management and supervision of the Code is the responsibility of the CEO of ELL Group, who has delegated the ongoing implementation of the Code to the Compliance Officer, who has delegated communication with all interested parties to the Group Sustainability Manager. The Compliance Officer regularly reports to the CEO on the measures and implementation of the Code.

Revision cycle

The policy is regularly updated by the Compliance Officer. The changes are communicated to all interested parties by the Group Sustainability Manager. If any questions arise regarding the policy, they should be directed to the Compliance Officer.

Social responsibility

ELL acknowledges 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. ELL therefore expects that its business partners will act accordingly to the following principles:

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| Human Rights | In all their activities, ELL’s business partners comply with internationally recognized human and fundamental rights in accordance with the principles set out in the UN Global Compact. |
| Child labor | ELL’s 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. ELL’s 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)

ELL's 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

ELL's 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

ELL's 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

ELL is committed to respecting and protecting the safety and health of all workers in the value chain. ELL expects its 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.

ELL's 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 ELL's business partners comply with all applicable legal requirements and the implementation of best safety practices.

Ecological responsibility

With its fleet strategy of offering only electric or e-hybrid locomotives, ELL has been committed to sustainability from the very beginning. Since its founding as a locomotive leasing company, ELL has made a significant contribution to shifting traffic to rail, thereby reducing greenhouse gas emissions. As a result, the company's business activities save considerably more greenhouse gases than are generated through its operations.

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

ELL expects its 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

ELL encourages its business partners to take proactive measures to reduce environmental harm and to continuously improve the sustainability of their operations. ELL expects its 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, ELL relies on fair, transparent and long-term relationships with its business partners. ELL does not tolerate any form of corruption or other unfair business practices.

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| Free competition | ELL's 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 | ELL's 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 | ELL's 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 | ELL's 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 | ELL's business partners comply with the applicable laws on the protection of personal data. |
| Confidential information | ELL's business partners handle business correspondence with confidence and take appropriate precautions to protect business secrets. |
| Ethical use of Artificial Intelligence | ELL expects its business partners to use artificial intelligence systems responsibly and ethically. The use of AI must comply with applicable laws and respect data protection and confidentiality obligations. |

Compliance with the Code

ELL's business partners are responsible for ensuring compliance with this code during their business activities. They are committed to reporting any violations of this code that directly or indirectly affect the business relationship with ELL.

Reporting to ELL ELL encourages its 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 ELL's business activities.

All reports are thoroughly investigated, and appropriate actions are taken. ELL does not tolerate any actions directed against people who report such violations.

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 ([contact – ELL Group](#)). ELL investigates every suspected violation of the code.

Consequences In the case of minor violations, ELL encourages the business partner to implement appropriate remedial measures in a timely manner. 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).

The code is available to all business partners electronically on the homepage in the currently valid version and can be accessed at [ELL Group](#). Locally stored documents and printouts may be out of date.