

# Arriva Code of Conduct for Business Partners

## 1 Purpose

Arriva Group has defined within this document its requirements and principles for its business dealings with its business partners, in particular those relating to compliance with ethical standards and applicable laws.

Business partners are all non-Arriva Group companies that supply goods and/or services to any company within the Arriva Group. These can, for example, be suppliers, consultants, agents, contractors of our suppliers, other providers of goods and services, and so on. Arriva Group expects its business partners to implement the principles set out in this Arriva Code of Conduct for Business Partners throughout their organizations worldwide and to comply with these.

## 2 Our expectations

Arriva Group is dedicated to sustainability and has committed itself towards complying with the Ten Principles of the United Nations Global Compact (UNGC). We see sustainable and responsible conduct as an important foundation in relation to business dealings with our business partners. We therefore expect our business partners to:

- carry out their business activities with integrity,
- work to ensure that the principles set out in this Code of Conduct for business partners are also respected by their own business partners and promote this accordingly, and
- to act honestly, responsibly and fairly.

### 3 Our principles

We are convinced that social responsibility is a key factor for the long-term success of our company and consequently an indispensable element of our value-driven corporate management. We require our business partners to align their conduct with the following principles:

#### 3.1 Human Rights (Guided by Principles I and II of the UN Global Compact)

Business partners must respect the human rights endorsed in the International Charter of Human Rights of the United Nations and in the fundamental Conventions of the International Labour Organization (ILO) and must avoid any form of complicity, even if indirect, in the abuse or violation of human rights.

Business partners must:

- Prohibit discrimination in any form, including but not limited to race, colour, gender, sexual orientation, ethnicity, nationality, religion, disability, or age.
- Provide equal opportunities for employment, training and career advancement.
- Prohibit behaviour, gestures, expressions or physical contacts of a sexual or coercive nature or that could constitute a threat, abuse or exploitation.
- Respect the dignity, privacy and the employment, civil, political, economic, social and cultural rights of every individual.
- Promote and respect universally recognised human rights within their respective areas of influence.

#### 3.2 Labour (Guided by Principles III, IV, V and VI of the UN Global Compact)

Business partners commit to provide their employees with working conditions that comply with applicable regulations, protecting workers' rights and promoting a productive, safe and healthy environment.

Business partners must:

- Uphold the freedom of association and effective recognition of the right to collective bargaining. They also respect the right of workers to freely choose their own representatives and to negotiate collectively (ILO Conventions 87 and 98).
- Eliminate all forms of forced and compulsory labour with their business and their supply chain. This means that our business partners are prohibited from using or tolerating, in any form whatsoever, slave labour, forced or indentured labour, bondage, human trafficking or involuntary labour. They must ensure that employees are not subject to inhuman or degrading treatment, corporal punishment etc. (ILO Conventions 29 and 105).
- Support the effective abolition of child labour. This means that all necessary preventative measures must be taken to ensure that nobody is employed under the applicable minimal age of employment. (ILO Conventions 138 and 182).

- Support the elimination of discrimination in respect of employment and occupation. Our business partners must promote diversity in their companies by not discriminating on the basis of race, religion, age, nationality, social or ethnic origin, disability, sexual orientation, gender identity, marital status or political affiliation.
- Not tolerate discrimination in the employment or occupation of staff (ILO Conventions 100 and 111).
- That employee wages comply with the relevant law pertaining to minimum wage and prevailing industry standards. Benefits must be awarded to employees to which they are legally entitled.
- Employees must not be required to work in excess of the relevant legal limits on working hours. All overtime work must be performed and compensated in accordance with the law, your employee's employment contract and any other applicable contract or collective agreement.
- Work must be carried out on the basis of a regular employment contract as established under national laws and industry standards.
- Minimise occupational injuries and accidents, including through appropriate awareness-raising, information, education and training programmes for workers to encourage responsible and safe behaviour.

### **3.3 Environment** (Guided by Principles VII, VIII and IX of the UN Global Compact)

Business partners commit to recognise and manage their environmental impact and are required to indemnify those parties affected by any damage caused to the environment and to people as a result of their activities.

Business partners must:

- Encourage the development and diffusion of environmentally friendly technologies.
- Implement measures to prevent pollution and minimize environmental footprint, including reducing emissions, effluents and waste generation.
- Monitor, control and reduce the use of natural resources, minimizing waste and prioritizing the use of renewable and recycled materials wherever feasible.
- Treat, store, transport, unload and dispose of solid waste and by-products safely.
- Take environmental concerns into account at every stage of production, development and service provision, promote the development of products that have a reduced environmental impact, are safe for their intended use, are efficient in consumption and can be safely reused, recycled or disposed of.
- Maintain contingency plans to prevent, mitigate and control serious environmental and health damage resulting from their operations.

- Assess and minimize impact on biodiversity through responsible land use practices and biodiversity offsetting where necessary.
- Collaborate with industry partners, government agencies and other stakeholders to address environmental challenges collectively

### **3.4 Anti-Corruption** (Guided by Principle X of the UN Global Compact)

Our business partners must work against corruption in all its forms, including extortion and bribery. This includes a commitment to:

- Not tolerate any form of corruption or economic crime by their own employees or employees in the supply chain etc.
- Ensure that any remuneration paid to consultants, agents, brokers and/or other intermediaries must not serve to provide business partners, customers and other third parties with unfair advantages.
- Choose their consultants, agents, brokers and other intermediaries diligently and on the basis of appropriate selection criteria.
- only accept invitations or grant invitations if they are appropriate, not in anticipation of any improper benefits in return or any other preferential treatment and do not violate applicable laws (in particular anti-corruption laws). The same applies to the acceptance or granting of any gifts or other considerations or advantages of any kind.
- Avoid conflicts of interest that may lead to corruption.
- Not tolerate any form of unlawful tangible and intangible benefits (including their offering) to public officials or persons comparable to these (irrespective of whether these are made directly or indirectly through third parties).
- Not offer any unlawful tangible and intangible benefits of any kind to political parties, their representatives or to holders of public offices or candidates for political offices must not be tolerated by our business partners.
- Take suitable measures within their companies to prevent money laundering and the financing of terrorism in those companies.

## **3.5 Corporate Governance**

### **3.5.1 Data Protection**

Our business partners must comply with all applicable laws for the protection of personal data, particularly of employees, business partners and customers.

### **3.5.2 Competition and Cartel Laws**

Our business partners must comply with all relevant competition laws. In particular, they must not make agreements and arrangements that influence prices, conditions, strategies or customer

relations, especially regarding participations in tender procedures. The same applies to the exchange of competitively sensitive information or for any other conduct that unlawfully restricts or may restrict competition.

### **3.5.3 Export and Import Controls**

Particularly with regard to global business activities, our business partners must ensure compliance with all effective laws on the import and export of goods, services and information as well as to the applicable embargoes and sanctions.

## **4 Compliance with the Arriva Code of Conduct for Business Partners**

### **Compliance**

Our business partners **must** ensure that the principles set out in this Arriva Code of Conduct for business partners are complied with.

When requested by Arriva, business partners should provide evidence demonstrating their compliance to the Arriva Code of Conduct for business partners, in an open and transparent manner. Such requests should not be unreasonably refused.

Our business partners must choose their suppliers (which they retain in relation to their business activities for Arriva Group) diligently, communicate the principles set out in this Arriva Code of Conduct for business partners or equivalent principles to them, and must be able to demonstrate their compliance to these principles on request.

### **Reports to Arriva Group**

Our business partners must report on crimes that were committed in the course of their business activities for the Arriva Group and which may have effects on Arriva Group.

### **Protection of Whistleblowers**

Our business partners must not tolerate any retaliation against persons who report violations of the principles set out in this Arriva Code of Conduct for business partners. Any Arriva business partner can raise a concern if they believe this policy is being, or at risk of being, breached. Concerns can be raised confidentially via the Arriva Group's Integrity Line service, please visit [Arriva plc | Home \(integrityline.com\)](https://www.integrityline.com) for more information or to make a report.

### **Consequences**

Arriva Group emphasizes cooperative business dealings with its business partners. For **minor violations** of this Arriva Code of Conduct a business partner is given the possibility to implement appropriate corrective actions within a reasonable time, if the business partner is principally willing to remedy the violation and improve. For **serious violations** (particularly in case of crimes committed), Arriva Group reserves the right for adequate sanctions against the respective business partner. This can also lead to an immediate termination of the business relationship and the assertion of claims for damages and other rights.



## 5 Where to find further information

In case of doubt or questions, please contact the Arriva Group Compliance at [supportc@arriva.co.uk](mailto:supportc@arriva.co.uk).

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