

Code of Conduct

Greater Copenhagen Light Rail I/S



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Code of Conduct for Contractors

Greater Copenhagen Light Rail - Hovedstadens Letbane - is an independent company owned by the Danish State, the Capital Region and the 11 municipalities along the light rail. Social responsibility is a fundamental value in all of the Greater Copenhagen Light Rail's business operations. This necessitates having high integrity in business relationships and acting with care for the communities and environments in which the Greater Copenhagen Light Rail operates as well as cooperating with government agencies.

The Greater Copenhagen Light Rail supports and works systematically to implement the ten principles of the UN Global Compact containing universally accepted standards for human rights, labour rights, environment and anti-corruption (www.unglobalcompact.org). The Greater Copenhagen Light Rail finds that all contractors engaged directly or indirectly by the Greater Copenhagen Light Rail shall have an obligation, and an opportunity, to address these challenges. This Code of Conduct must therefore be observed by all Contractors and Subcontractors participating in the performance of a contract with the Greater Copenhagen Light Rail.

In this Code of Conduct, a "Contractor" is deemed to be the Greater Copenhagen Light Rail's contracting party pursuant to this contract. A "Subcontractor" is deemed to be any subcontractor, supplier or service provider to whom work has been assigned for the performance of the contract, including the manpower provided for the performance of the contract regardless of whether the subcontractor, supplier or service provider has a direct contractual relationship with the Contractor.

Expectations

The Greater Copenhagen Light Rail expects the Contractor to have a collaborative mind-set as well as a constructive approach to resolve all issues related to human rights, labour rights, environment and anti-corruption. In addition to adherence to national laws, regulations and collective labour agreements, the Contractor is expected to acknowledge his responsibilities and actively apply and comply with this Code of Conduct. The Contractor shall upon request from the Greater Copenhagen Light Rail provide documentation for fulfilling his obligations under this Code of Conduct and information on how the Contractor is working with social responsibility as well as the place where main products are manufactured. If potential non-compliances are identified,



the Contractor shall contact the Greater Copenhagen Light Rail and propose and agree appropriate improvement measures. The Contractor as well as the Subcontractor shall accept that checks and inspections of the Contractors' or the Subcontractors' premises or manufacturing sites may be conducted by the Greater Copenhagen Light Rail or its representatives.

If the Contractor by intention or repeated negligence fails to adhere to this Code of Conduct to an unreasonable extent, or if the Contractor demonstrates a continual refusal to engage in due diligence activities or a lack of commitment to progress on issues identified, the Greater Copenhagen Light Rail may terminate the contract with the Contractor.

The Principles

Human Rights

01 The Contractor shall support and respect the protection of internationally proclaimed human rights

The Contractor shall respect human rights in all of his operations and in wider perspective in the Contractor's

area of influence. The Contractor shall safeguard employees and property in a manner that minimises risk to employees and communities in accordance with relevant human right principles. If the Contractor has activities in countries where human rights are generally not at a satisfactory level, the Contractor shall support development by implementing necessary human rights standards and conduct training to understand them.

02 The Contractor shall ensure that he is not complicit in human rights abuses

The Contractor shall ensure a healthy and safe working environment where production and works are carried out. The Contractor shall not in any way violate human rights, or support or take advantage, such as financial gain, of the violation of human rights by others. If the Contractor suspects or become aware of violation of human rights in the supply chain, the Contractor must also involve the relevant authorities.

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The Greater Copenhagen Light Rail supports and works systematically to implement the ten principles of the UN Global Compact containing universally accepted standards for human rights

Labour Rights

03 The Contractor shall uphold the freedom of association and the effective recognition of the right to collective bargaining

The Contractor shall not prevent employees or other workers from associating freely with any lawful worker's or collective bargaining association, or if restricted, alternative forms of independent and free workers' representation. There shall be no discrimination of employees who choose to affiliate or not.

04 The Contractor shall uphold the elimination of all forms of forced and compulsory labour

The Contractor's employees shall have a written employment contract outlining the conditions in a language understood by the employee. The Contractor shall comply with laws, regulations and collective agreements for minimum remuneration and maximum working hours. Each employee must receive a wage statement with hours of work in the period and the rate of compensation. Whether hired directly or by a labour broker, the Contractor shall



conduct due diligence efforts to prevent direct or indirect involvement in human trafficking. The Contractor shall not in any way contribute to forced labour including the use of involuntary prison labour. The Contractor shall allow employees to terminate their employment with the Contractor with reasonable notice, and Contractor shall not retain original identification documents, deposits or withhold wages beyond legal contractual agreement.

05 The Contractor shall uphold the effective abolition of child labour

The Contractor shall not in any way be involved in use of child labour. Child labour is defined as employment of young people of school age or younger than 15 years of age (or 14 years where it is allowed according to ILO convention 138). If local regulations or laws establish a higher age, this must be observed.

The Contractor shall protect young workers, up to 18 years of age, from any type of work which is likely to jeopardise their health or safety.

06 The Contractor shall eliminate discrimination in respect of employment and occupation

The Contractor shall not discriminate in recruitment, compensation, access to training, promotion, termination, retirement, working conditions, job assignments and benefits based on any personal characteristics such as race, religion, sex, health, age, handicap, political orientation, nationality, ethnic origin or labour association membership. All employees shall be treated with respect and not experience harassment at work.

Environment

07 The Contractor shall support a precautionary approach to environmental challenges

The Contractor shall act responsibly in relation to environmental risks and environmental impact. As a minimum the Contractors shall meet all relevant local and national environmental regulations and maintain all applicable licenses, registrations, or permits. The Contractor shall



minimise adverse impact on the environment, human health and livelihoods. This includes actively taking into account key challenges like loss of biodiversity and long-term impact on ecological systems, pollution of the atmosphere and consequences of climatic change, impact on water ecology, impact by chemicals and waste products, waste treatment and use of non-renewable energy sources wherever practicable. The Contractor shall have procedures in place to respond to emergency situations with immediate measures and best available practises for environmental protection as well as human health.

08 The Contractor shall undertake initiatives to promote greater environmental responsibility

The Contractor shall have a structured and systematic approach to environmental aspects including definition of goals, follow-up and be able to demonstrate continuous efforts to monitor and reduce environmental impact.

09 The Contractor shall encourage the development and diffusion of environmentally friendly technologies

The Contractor shall select modern, effective and environmental friendly technologies and contribute to development that supports sustainable development of society. This includes limitation of pollution throughout the supply chain from hazardous substances, waste, effluents and air emission.

Anti-Corruption

10 The Contractor shall work against corruption in all its forms, including extortion and bribery

The Contractor shall not in any way engage in any form of corrupt practices, which means abuse of entrusted power and means for private gain. Corruption includes bribery, facilitation of payments, nepotism and conflict of interest, embezzlement, fraud, extortion, participation in a criminal organization and money laundry. Bribery is the most common form of corruption and is a payment that is intended at getting someone to do something that is



dishonest, illegal or in breach of the duties concerned for the purpose of obtaining an undue advantage. To pay or accept bribe is corruption in the purest form. This may be cash or other valuables, extraordinary entertainment and other services. The Contractor shall maintain a high ethical standard which is not limited to compliance with laws and contracts. The Contractor shall avoid conflict of interest that can impact his trustworthiness with the Greater Copenhagen Light Rail as well as activities that may impact the Greater Copenhagen Light Rail's trustworthiness with third parties.

A handwritten signature in black ink, appearing to read 'Henrik P. Olsen', written in a cursive style.

Henrik Plougmann Olsen

CEO

Greater Copenhagen Light Rail I/S



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