

1. Our principles and values.

SBB's mission statement shapes our actions. Our aim is to ensure that customers and partners can rely on SBB. We therefore focus on customer needs while simultaneously ensuring that we achieve top results and secure financing. Our values support us in taking responsibility together, in questioning our own behaviour and in reporting any violation identified.

On this basis, this Code of Conduct lays down the rules of how to behave correctly as we carry out our daily business activities. Our behaviour should comply with legal requirements as well as high ethical standards. Each and every person is aware of their responsibility and committed to fair, respectful and proper conduct with customers, employees, suppliers, other business partners and the public. We comply with the relevant external and internal regulations.

This Code of Conduct has been adopted by the Board of Directors and the SBB Management Board and is based on the ten principles of the Global Compact of the United Nations¹.

¹ United Nations Global Compact, www.unglobalcompact.org.

As members of the Board of Directors and employees of SBB and its group companies, we all commit to respecting the rules in this Code of Conduct as a basis for all our daily business activities. We therefore guarantee safety, quality and sustainability in the interest of our customers, we lay the foundations for a working environment characterised by integrity and we promote and protect SBB's good reputation.

We expect our business partners to share these SBB values and to ensure that their activities comply with the principles of this Code of Conduct.

2. Our conduct.

2.1 Dealing with people.

- Protection of personal rights: We are decent, fair and respectful towards one another. We protect the individual and do not tolerate any exclusion.
- Discrimination, bullying and harassment: We offer all employees equal opportunities in their professional development. We do not tolerate discrimination, bullying or harassment of a sexual or personal nature against employees, customers, suppliers or business partners, whether on the basis of gender, race, religion, age, origin, sexual orientation, disability or political or trade union activity.
- Health and labour legislation guidelines:
 We protect the health of our employees. We comply with the relevant legal requirements and regulations and provide irreproachable working conditions.

2.2 Dealing with safety.

 Protection and prevention: In all our activities, the safety of the individual always comes first.
 In addition to prioritising the protection of employees, customers, suppliers and business partners, we also protect our plants, facilities, buildings and rolling

- stock. We avoid damage by being constantly and proactively safety-conscious and risk-aware.
- Safety requirements: Safety is our top priority.
 We comply with the relevant safety requirements and standards.

2.3 Dealing with information.

- Communication: We maintain an open dialogue with all stakeholder groups and recognise our responsibility towards the environment, society and Switzerland as a whole. We communicate transparently, honestly, comprehensibly and in a way that is appropriate to the goals and levels of our employees, customers, suppliers, business partners, the supervisory authorities, the owner, politicians, the interested public and the media.
- Data protection: We handle data relating to employees, customers, suppliers and business partners with all due care and confidentiality. This data is processed exclusively in accordance with legal provisions and internal regulations.
- Information security: We handle information and data with care. We do not disclose any confidential

information about SBB, its customers, suppliers or business partners to third parties and we use SBB's contractually regulated IT services for the internal or confidential storage of information or data.

2.4 Dealing with vested interests and benefits.

- Conflicts of interest: We avoid all situations in which personal interests conflict with the completion of tasks within the company and we do not compete with the company. If a conflict of interest arises or if we are unsure, we will notify our superior immediately and without being asked to do so.
- Bribery and corruption: We do not tolerate bribery or corruption of any kind. Benefits such as gifts, invitations, payments, favours or other advantages from or to third parties are not permitted. Exceptions relating to minor benefits are determined in internal directives.

2.5 Dealing with competition.

- Competition law: We do not make any agreements with competitors or business partners, which aim to achieve or bring about an inadmissible restriction of competition or aim to do so. We do not impede competitors or exploit any business partners.
- Awarding contracts: When awarding contracts, we adhere to the relevant legal requirements and internal regulations. We treat all providers and suppliers equally and ensure a fair and transparent process.

2.6 Dealing with assets.

- **Third party assets:** We respect third party assets. In particular, we also observe the statutory regulations governing the use of third-party intellectual property.
- SBB's assets: We handle work equipment, furnishings and all of SBB's other assets with care. We only use the work equipment and tools that are made available to us for business or other authorised purposes and do not tolerate misuse or intentional damage. We ensure that the intellectual property of SBB is appropriately protected and respected by third parties.

2.7 Dealing with finances.

- Money laundering: We comply with the relevant statutory regulation regarding money laundering.
- Taxes: We adhere to the applicable tax rules. We will not help our employees, customers, suppliers, business partners or third parties to evade tax or commit tax fraud.
- Accounting and reporting: We ensure that our accounting and reporting is carried out properly in accordance with recognised principles and legal requirements. We make sure that all business transactions are financially correctly recorded.
- **Subsidies:** Compliance with legal requirements regarding subsidies is our top priority. We ensure that both statutory and regulatory requirements are applied.

2.8 Dealing with the environment.

- Climate and energy: We are making a significant contribution to curbing global warming, increasing our energy efficiency and using renewable energy.
- Dealing with resources: We are economical, efficient, responsible and environmentally friendly in our procurement and use of resources. Together with our partners and suppliers, we design our entire value chain to be environmentally friendly and keep materials within the material cycle wherever possible.
- **Environmental law:** We comply with the applicable environmental laws and standards.

3. Confidential Compliance Reporting Office (whistleblowing)

SBB does not tolerate any violations of legal provisions, of this Code of Conduct or of any other regulations. Violations will be sanctioned in accordance with the applicable legal and contractual provisions and may lead to the termination of the existing contractual relationship and/or to criminal proceedings.

Employees report suspected or actual violations of this Code of Conduct or other internal regulations, as well

as illegal activities, to their superior or to SBB's Confidential Compliance Reporting Office (internet address: compliance.sbb.ch). This office is also available for such reports from customers, suppliers and business partners. Reported incidents are received confidentially – and anonymously, if desired – and investigated confidentially in accordance with a standardised proscess. Individuals who report suspected or actual violations in good faith will not be disadvantaged in any way.

Monika Ribar
Chair of the Board of Directors

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