

SBB Code of Conduct



1. Our principles and values.

SBB's mission statement shapes our actions and conduct. We aim to rank among Switzerland's top companies in terms of customer satisfaction. We therefore focus on customer requirements as well as ensuring that we achieve top results and keeping our finances secure. Shared values help us to achieve this.

On this basis, this Code of Conduct lays down the rules of how to behave correctly as we carry out our daily business activities, which should comply with legal requirements as well as high ethical standards. We are aware of our responsibility to be a fair and correct partner to our employees, customers, suppliers, business partners and the public. We comply with applicable legal provisions 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. As 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

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

foundations for a working environment characterised by integrity and we promote and protect SBB's good reputation.

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

We do not tolerate any violations of legal provisions, of this Code of Conduct or of any other regulations. Violations will be sanctioned in accordance with applicable legislative and contractual provisions and may lead to the termination of the existing contractual relationship with the relevant employee, customer, supplier or business partner.

2. Our conduct.

2.1 Dealing with people.

- **Protection of personality:** We are decent, fair and respectful towards one another. We protect employees' personal rights and do not tolerate any exclusion.
- **Discrimination and harassment:** We do not tolerate discrimination, sexual or personal harassment or verbal abuse of employees, customers, suppliers or business partners based on their sex, race, religion, age, origin, sexual orientation, disabilities or political or union activities.
- **Health and labour legislation:** 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 individuals always comes first. In addition to protecting our employees, customers, suppliers and business partners as a matter of priority, we also protect our works, facilities, buildings and equipment. We avoid damage by being constantly safety-conscious and risk-aware.
- **Safety legislation requirements:** Safety is one of our main concerns. We comply with the relevant safety legislation requirements and standards.

2.3 Dealing with information.

- **Confidentiality:** We do not share confidential information about SBB or its customers, suppliers and business partners with third parties.
- **Communication:** We maintain an open dialogue with all stakeholder groups and shoulder our responsibility towards the environment, society and Switzerland as a whole. We communicate with our employees,

customers, suppliers and business partners, as well as with the supervisory authorities, politicians, the interested public and the media, in a transparent, honest, understandable, targeted and appropriate manner.

- **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.

2.4 Dealing with competition.

- **Competition law:** We do not make any deals with competitors or business partners which aim to achieve or bring about an illegal limitation of competition. We do not impede competitors or exploit any business partners. Our business understanding is based on the principle of good faith.
- **Awarding contracts:** When awarding contracts, we adhere to the legal requirements of public procurement as well as to the corresponding regulations of SBB. We treat all sellers and suppliers equally and ensure a fair and transparent process.
- **Conflicts of interest:** We avoid all situations in which personal interests conflict with the completion of tasks within the company and do not compete with the company. If a conflict of interests arises or we are unsure about it, we will notify our supervisor immediately without being asked.

2.5 Dealing with assets.

- **Third party assets:** We respect third party assets. In particular, we also observe the laws governing the use of third party intellectual property.
- **SBB's assets:** We handle work equipment, furnishings and all of SBB's other assets carefully. 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.
- **Bribery and corruption:** We do not tolerate bribery or corruption of any kind. Public and private func-

tionaries and decision-makers may not – either directly or indirectly – be given gifts or offered other benefits which infringe the statutory penal provisions on bribery and corruption. We reject gifts or benefits from third parties. Gifts are understood to include all contributions which either directly or indirectly provide an advantage, be it financial or otherwise. Exceptions relating to minor contributions are determined in internal directives.

2.6 Dealing with finances.

- **Money laundering:** We comply with the relevant statutory obligations to prevent 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. We make sure that all transactions are recorded correctly from a financial point of view.

2.7 Dealing with the environment.

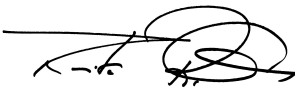
- **Dealing with resources:** We are committed to preserving and developing the environmental advantage of rail. We use natural resources economically and are committed to further reducing our impact on the environment. We make sure that we create all our value in the most environmentally friendly way possible. When we make decisions, we weigh up economic, social and environmental factors in a balanced way and thus focus our actions on the long-term success of SBB.
- **Environmental law:** We comply with the applicable environmental laws and standards.

3. Confidential Compliance Reporting Office (whistleblowing).

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). The Reporting Office may also be contacted by customers, suppliers and business partners.

Reported incidents are received and investigated according to a standardised process. All information provided, including the identity of the informant, will be treated confidentially.

Employees who report suspected or actual violations in good faith will not be disadvantaged in any way.



Monika Ribar
Chairwomen of the Board of Directors



Vincent Ducrot
CEO