



# **Corporate Social Responsibility Policy**

DSB

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**Department responsible:** DPO & Compliance

**Approved by:** The Board of Directors

**Date:** 14 November 2024

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## **1. Introduction**

DSB is owned by the Danish State and thus by the people of Denmark. As a result, we have a special responsibility to build a relationship of trust with the wider community and to demonstrate socially responsible behaviour.

## **2. Purpose**

DSB's purpose is 'A sustainable way forward with room for all of us'.

We focus on our customers and play an active part in the movement towards a more sustainable Denmark, free of congestion and with a balance between consumption and resources; we want to promote mobility that does not have a negative impact on the climate.

## **3. Our ambition and targets**

Achieving our purpose requires confidence from the general public – confidence that is built when we demonstrate socially responsible behaviour etc.

This policy is based on our core values and provides the framework for how we all – DSB's employees, management and Board of Directors – demonstrate socially responsible behaviour, make the right decisions on a day-to-day basis, and treat each other, our customers and our stakeholders in general.

## **4. How we achieve our ambition and/or reach our targets**

In order to achieve our ambition of being a socially responsible company and maintaining the relationship of trust in-house and with the wider community, we must all comply with the principles of this policy.

In order to ensure that we are all familiar with these principles, all employees are required to complete the Corporate Social Responsibility e-learning module, and annual awareness campaigns are conducted to provide training in all relevant subjects.

### **Corporate social responsibility, sustainability and responsibility towards employees**

- **Corporate social responsibility:** As Denmark's largest mobility provider, DSB has a major impact on Danish society. We want to build 'A sustainable way forward with room for all of us'.

We welcome everyone to take the train – a safe and sustainable mode of transport providing equal access for all at affordable prices. We provide for the needs of different groups of people, including children, people with disabilities and older adults. Our customer-driven and attractive value proposition allows more and more passengers to travel free of congestion, safely and sustainably throughout Denmark.

- **Safety:** Safety is a principal requirement for all of us, and everyone at DSB is responsible for ensuring that safe conduct is firmly embedded in our corporate culture. Our customers must be able to take safety for granted – but we must never do so!

We address risks and work proactively with emergency management focused on our customers and our business. Commercial considerations must never take priority over rail safety.

- **Sustainability and climate:** We acknowledge that we have a responsibility for ensuring environmentally friendly and sustainable public transport. We work proactively to reduce our company's climate impact and to promote our direct contribution to assist the country in achieving the ambitious targets defined in the Danish Climate Act. We are committed to reducing our climate impact in accordance with the Paris Agreement, and our targets have been defined based on scientific principles and validated by the independent organisation SBTi.

We respect all resources included in our production, and we will specifically minimise waste through prevention, reduction, recycling and reuse, also with a focus on our suppliers' climate impact in accordance with the definitions of the Greenhouse Gas Protocol.

- **ESG:** We incorporate targets and guidelines for environmental, social and economic sustainability (ESG) in our business strategy as a baseline for our reporting and follow-up (CSR).
- **UN Sustainable Development Goals:** We work proactively with several of the 17 UN Sustainable Development Goals (SDGs) and have selected the strategic SDGs where we can make the biggest difference in the period to 2030.
- **UN Global Compact:** DSB has signed up to the UN Global Compact and acts in accordance with the initiative's ten universal principles on human rights and labour rights.
- **Human rights:** We respect fundamental human rights in all aspects and relations, see the UN Declaration of Human Rights and the European Convention on Human Rights, including the prohibition on the use of child labour and of forced labour or the exploitation of involuntary labour.
- **ILO convention:** We support ILO Convention no. 94 (1955) and ensure that all employees who perform work for DSB are guaranteed wages, working hours and other working conditions which are no less favourable than those applying for work of the same kind under a collective agreement entered into by the most representative labour market partners in Denmark within the trade or industry concerned.
- **Anti-discrimination:** We do not tolerate discrimination on the basis of gender, race, colour, religion or belief, political opinion, sexual orientation, age, disability, or national, social or ethnic origin.
- **Diversity:** We work proactively with diversity because we believe that is the approach that makes sense to the individual, to our business and to society at large. We want to have a workplace where differences thrive and contribute to providing high-quality services and results.

Through our purpose – 'A sustainable way forward with room for all of us' – we set the direction for our diversity efforts. We want to create a diverse workplace in terms of gender, age, ethnicity, education, etc. and with equal access and opportunities for all employees. We want our employees to feel a sense of community with DSB as a workplace and to feel respected for their views. Our objective of equal pay is achieved through our remuneration policy.

- **Health and safety:** A good working environment, both physically and psychosocially, serves to promote the development of our employees and our company, and it is one of our key priorities. There is a clear correlation between strong performance and employee wellbeing.

DSB's many locations involve different health and safety risks and needs, which are prioritised and handled locally. However, our common approach is always that we are committed to a secure and, from a health perspective, safe working environment for all our employees.

- **Social engagement:** DSB collaborates with a number of organisations and businesses. These partnerships are intended to bring us closer to our customers and our value chain and support our corporate social responsibility efforts.

### **Our conduct**

At DSB, we have defined clear principles for our conduct in a work context:

- **Anti-corruption:** We do not tolerate bribery in any form – whether on the part of the donor or the donee.

To ensure that our personal interests do not influence, or could be suspected of influencing, our work or safeguarding of DSB's interests, we generally do not accept gifts or any other benefits.

- **Competition:** We treat our competitors in a fair and proper manner, and we do not engage in anti-competitive practices.
- **Conflicts of interest:** Proper corporate conduct is essential to DSB. Everyone at DSB must therefore loyally safeguard DSB's interests in the best possible way and act in a manner that will not weaken the confidence of customers, business partners and the general public in DSB.

Decisions may not be influenced by personal interests, such as personal financial gain, family connections or for any other reason which is irrelevant to DSB.

- **Customer service:** We meet our customers at the station, on the platform, in our trains, at our sales and service centres, at our stores or when our customers call us or write to us. Common to these encounters is that we want our customers to experience the same good and uniform service no matter the time or place. We have therefore drawn up a service manual, which sets the framework for our service culture and three service pledges: Polite and ready to help. Clean, tidy and safe. Clear communication.

We collaborate with the other transport companies and private players to promote sustainable mobility and provide a seamless travel experience for our customers.

- **Confidentiality and communication:** We are committed to loyally safeguard DSB's interests in the best possible way – in-house and to the wider community. This implies that we keep confidential information about DSB's business activities which is not commonly known or publicly available.

Communication is crucial to a good reputation and to inspiring confidence in DSB. For external communications, we have a clear structure for which spokespersons speak about what and who handles which stakeholders.

- **Bullying and sexual harassment:** We do not accept bullying or sexual harassment at DSB. We encourage employees experiencing bullying or sexual harassment to react, whether they themselves are being bullied or sexually harassed or whether they witness acts of bullying or sexual harassment.
- **Whistleblower scheme:** DSB wants to be an open, trustworthy and transparent company. It is essential that information on irregularities at DSB be brought to light. Employees are often the first to discover irregularities, fraudulent behaviour and the like. However, even an open corporate culture is not always sufficient to ensure that the information is passed on to the correct recipient.

A whistleblower portal enables DSB's employees and business partners to anonymously submit reports on objectionable matters or transactions etc. that could result in financial loss for DSB or inflict damage on DSB's reputation. This portal is managed by an external provider. The reports are encrypted and sent anonymously to the head of the internal audit department, who investigates all reports submitted.

DSB does not tolerate reprisals against individuals who do the right thing by speaking out against irregularities. Raising a concern about an actual or potential violation, helping someone raise a concern or collaborating to investigate a violation in good faith should not have any adverse consequences. Employees should be able to trust that they will not be punished or lose their jobs, if they speak out against irregularities. All reports of alleged reprisals will be investigated confidentially and, where relevant, may have consequences for the employment relationship of the individual in question.

#### **4.1. Impacts, risks and opportunities**

DSB's reputation and success hinge on all of us acting in accordance with the highest ethical standards, relevant legislation and in a sustainable manner.

Our corporate social responsibility policy and the supporting policies provide the foundation that we must all adhere to as a natural part of our day-to-day activities.

- **Laws and regulations:** We have an obligation to know of applicable laws and regulations and to comply with them. In addition, we are all required to comply with DSB's policies and guidelines, and we are all expected to:
- Adhere to policies and guidelines
- Comply with DSB's common values: Be cooperative, positive and dedicated

- Exercise common sense and good judgment in business decisions and interactions
- Ask questions if in doubt
- **External parties:** Our policy also covers persons outside DSB, because external persons and organisations play a key role in the work we do. Subcontractors, suppliers and consultants are required to comply with our Ethical Guidelines for Suppliers and Business Partners (Code of Conduct).

## 5. Organisation, responsibility and approval

This policy applies to everyone in the DSB Group, including employees, management and the Board of Directors, when they act in a DSB context.

- **Management responsibility:** The individual manager has a special responsibility for ensuring that the employees in his or her department are familiar with the contents of the policy and act accordingly. The managers are also responsible for assessing whether more detailed rules are required in their specific fields.
- This policy is reviewed and updated once annually to ensure efficient maintenance of the relationship of trust with the wider community.

The Board of Directors of DSB has overall responsibility for approving the policy.

## 6. Interaction with other policies and guidelines

The Corporate Social Responsibility Policy is an overarching policy that sets the framework for all of DSB's other policies.