



# Procurement Policy

DSB

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**Department responsible:** Group Procurement

**Approved by:** The Executive Team

**Date:** 14 November 2024

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## **1. Introduction**

Group Procurement has overall responsibility for procurement matters at DSB and sets the framework for procurement and contract management processes at DSB.

## **2. Purpose**

The Procurement Policy sets the framework for how we at DSB make purchases in a socially responsible and sustainable manner.

The Procurement Policy covers all purchases of goods and services in DSB and wholly-owned companies.

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

Group Procurement provides professional purchasing, tender law and contract management advice. Procurement is carried out in Group Procurement in collaboration with the business areas. Contract management is carried out by Contract Managers, who are located either in Group Procurement or in the business areas.

All purchases must be made through our procurement system and contract management processes.

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

Group Procurement works closely with the business when entering into contracts, so we ensure that the needs of the business are met. Corporate Procurement facilitates that relevant specialists are involved, and that purchases are made and followed up according to the legal requirements on tendering and the management of procurement.

To support this, Group Procurement works with:

- Category-based procurement
- Fact-based data
- Structured system-supported processes for contracting, ordering and contract management described in DSB's management system
- Procurement compliance targets
- Sustainability and other CSRD requirements in the value chain

This is done by:

- The business registers their purchasing needs via the purchasing portal on ABC
- Group Sourcing Managers follow Group Procurement's purchasing guidelines and the Sourcing-model during the purchasing process. Thereby ensuring that all mandatory requirements are met and contracts are concluded via tendering and competitive bidding, cf. the threshold values for this
- Group Sourcing Managers hand over the contract to a Contract Manager once the contract is signed

- Category Managers monitor purchasing in their category on an ongoing basis to follow up on goals and plans
- Group Procurement provides purchasing and KPIs

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

DSB's procurement procedures and associated contract requirements and obligations affect the value chain. Group Procurement uses a segmentation model that identifies the largest and most important suppliers, including those with the highest risk, e.g. by impacting our operations, and those we have the greatest impact on, e.g. where suppliers' employees are impacted by working at our locations. We always seek good, constructive and proactive cooperation with our suppliers.

As a public company, DSB has a special responsibility to uphold high ethical and moral standards. Therefore, our objectivity and professionalism in connection with making a purchase, concluding a contract or managing the contract during the contract term must never be called into question. Every employee has an obligation to inform his or her immediate superior of any impartiality issues or suspicion of other breaches of DSB's Ethical Guidelines. All supplier contracts must contain DSB's Ethical Guidelines, and measures must be taken to follow up in the event of a suspected breach of these guidelines.

#### **5. Organisation, responsibility and approval**

The Executive Vice President of Procurement & Legal Affairs is responsible for the Procurement Policy, which is approved by the Executive Team. Likewise, it is the Executive Vice President of Procurement & Legal Affairs who, with the involvement of other relevant executives, is responsible for approving any necessary deviations from the Procurement Policy and the procurement guidelines.

#### **6. Interaction with other policies and guidelines**

- Corporate Social Responsibility Policy
- Ethical Guidelines for Suppliers and Business Partners (Code of Conduct)
- Decision-making powers of DSB SOV and DSB's subsidiaries, respectively
- Policies and guidelines on rail safety, IT security, GDPR, environment and health and safety
- Rules regarding gifts and other benefits