
CORPORATE SOCIAL RESPONSIBILITY POLICY

As the leading system integrator of Train Connection Systems, Dellner's vision is to be the number one global supplier of safe and high quality Train Connection Systems and Services, supporting the most environmentally friendly way of travelling.

By developing Dellner's products and promoting the safe and environmentally friendly use of trains as public transportation, the company contributes to the sustainable development of society.

Responsibility and ethics

Dellner strives to uphold the highest standards of conduct and business ethics in all of its operations with objective and independent employees. We respect basic freedoms and rights and comply with local and international laws and regulations. We are against corruption and give consideration to the religions, cultures, working conditions and traditions of different countries and regions. During daily operations, each employee will ensure that:

- We do not engage in any activity that might create a conflict of interest for the company or ourselves individually.
- We observe that fair dealings are the foundation for all our transactions and interactions.
- We will protect all company, customer and supplier assets and use them only for appropriate company approved activities.
- Without exceptions, we will comply with all applicable laws, rules and regulations.
- All customers and suppliers shall be treated with the outmost respect and common courtesy.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations to the CSR Policy. Reports can be done with guaranteed anonymity through our whistleblowing system where all reports are received and investigated by a third party.

To be a socially responsible corporate citizen in every way, Dellner works to continuously enhance employee awareness of the Group's attitudes towards ethical conduct. Our Code of Conduct defines these expectations and outlines guidelines for employees in all transactions, interactions and business opportunities. All directors, officers and employees are required to adhere to the Code of Conduct. If local laws and regulations are more stringent than our Code of Conduct, the local ones are to be followed. Our Supplier Code of Conduct defines our expectations and requirements on suppliers and is integrated into our standard contracts.

Quality and environment

Dellner strives to ensure sustainable customer satisfaction and superior economic efficiency throughout the life of our products.

Our quality and product safety policy defines the guidelines to ensure manufacturing of safe and high-quality products.

To prevent pollution to the environment from our products and our processes and minimize our environmental footprint Dellner has identified critical environmental aspects. Our environmental policy defines the guidelines to ensure the organization as far as possible reduce its environmental impact.

Working environment

Dellner strives to maintain a working environment where our employees can develop and thrive in a climate of physical and emotional well-being. Because a good working environment and business success go hand in hand, we take a structured approach to investigating, conducting and monitoring operations in such way as to prevent illness and accidents on the job and otherwise achieve a sound working environment. At Dellner, performance reviews are an important component of the Group's systematic working environment activities.

Because we all contribute to the mutual working environment, it is vital that both managers and staff lead and participate in efforts to create a good working environment.

A good working environment means:

- active leadership.
- clearly defined goals that create consistency and meaning for the group and individual
- opportunities for the individual to influence his or her own work situation

- a constructive dialogue within the group and between managers and staff
- effective communication in the organization
- a good physical work environment with regard to safety, ergonomics, noise, air quality, and chemical health hazards

Achieving this working environment requires awareness, openness, ambition and planned development initiatives. Through systematic management of the working environment we can improve the quality of our services and increase the share of satisfied employees and clients.

Incidents and accidents, related to work environment, shall be reported and investigated through our global IA-system. Our vision is zero lost time accidents and a firm target is set for each subsidiary which is followed up monthly.

To measure and follow up the employee satisfaction and organizational health Dellner perform employee surveys on a yearly basis.

Equality

Dellner does not discriminate between women and men with regard to salary, career advancement or promotion. All employees are given equal opportunities for professional development both within their existing fields and in new areas.

Salary disparities may not exist for identical or similar work duties unless they can be justified. Disparities that are not objectively justified will be corrected immediately.

When choosing staff for projects and other tasks, Dellner strives for an even gender distribution.

Dellner's policy for recruitment of managers and employees is always to appoint the most qualified individual.

All employees shall be treated with respect. Sexual harassment is never acceptable.

Dellner takes the greatest possible consideration to the allocation of work duties and parenthood. Managers are obligated to ensure that employees on parental leave maintain contact with their place of work in an appropriate manner. The commitment to equality is an active and integral part of Dellner's operations.

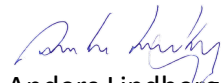
Diversity

Within the framework of our operations, Dellner takes active measures to promote the equal rights and opportunities of employees in the workplace regardless of their race, gender, nationality, ethnic origins or religious beliefs in order to create better conditions for an innovative and inspiring work environment.

Dellner strives to:

- create employee groups made up of diverse competencies, genders, ages and nationalities through the use of conscious hiring practices.
- maintain a work climate that is characterised by the company's lead words; **Respect, Action, Joy and Team.**
- effectively utilise the employees' knowledge of different cultures, languages and religions when assembling work teams, dealing with customers, etc.
- give all employees equal opportunities for professional development both within their existing fields and in new areas.

Falun, 28 September 2021


Anders Lindberg
CEO & President