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1 INTRODUCTION AND PURPOSE

A-Train AB's ("**A-Train**") goal and purpose of its business is to deliver sustainable transport between Stockholm Central and Arlanda by moving car and bus traffic from the highway to rail traffic.

While A-Train strives to contribute to long-term sustainable development, our operations also have an impact on the environment, wildlife, and people. This occurs, *inter alia*, through transportation that mainly takes place on ground level through the landscape, energy and resource use, and when waste is generated. A-Train also has influence over social aspects in relation to employees, travellers and people related to our business relationships, where key issues include ensuring equal treatment, health, and safety for all individuals.

This sustainability policy sets out A-Train's overall sustainability ambitions with a focus on the areas of environment and climate, social and economic sustainability aspects. A-Train's sustainability work is characterized by an effort to constantly improve and make the business and our train journeys even more sustainable. A-Train has a responsibility not only to contribute to a positive development, but also to continuously identify potential and actual negative impacts on sustainability aspects related to the business and ensure that we use our influence to prevent, avoid and minimize such impacts.

2 THE SCOPE AND APPLICATION OF THE POLICY

This sustainability policy covers all of A-Trains operations and aims to provide guidance to all employees (including any consultants and/or others acting on behalf of A-Train) on A-Train's values and how the business should be conducted with regard to sustainability aspects.

A-Train expects that actors with whom A-Train has a business relationship also act in a long-term sustainable manner, based on accepted guidelines for responsible businesses and with respect for human rights and the environment. In these business relations, A-Train's Supplier Code of Conduct shall as far as possible be used.

3 A-TRAIN'S SUSTAINABILITY AMBITIONS

3.1 General

Without exception, A-Trains operations shall be conducted in accordance with laws, regulations, and applicable standards. In the event of any conflict between these norms and A-Train's policies, the stricter shall prevail.

A-Train's sustainability work shall be based on the needs of our various stakeholders and the result of regular analysis and prioritization of the business's most significant sustainability issues. Based on this materiality assessment, A-Train shall establish, regularly monitor, and revise both long-term and short-term goals that, together with compliance and the precautionary principle, will guide and set the framework for the business. In this way, consideration of material sustainability aspects will be integrated into strategic decision-making.

A-Train's overall sustainability goals are, like the basic perspectives of sustainability, divided into three main areas: sustainable operations (people), sustainable travel (planet) and sustainable business (profit). In other words, a long-term stable economy enables A-Train to deliver sustainable transportation

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while ensuring the well-being of A-Train's staff, passengers and business relations and them operating in a safe and secure environment.

3.2 Environment and climate

Within the area of "sustainable travel", A-Train has a broad objective that environmental work should be reflected in everything we do. A central part of this is A-Train's business concept, which is to increase the share of passengers that travel to Arlanda by rail traffic.

A-Train shall have knowledge and control of its operations environmental and climate impact, observe the precautionary principle for environmental risks and continuously strive to minimize the negative impact on the environment and climate, including its emissions to air, soil, and water.

This means, among other things, that A-Train shall:

- work to continuously improve the efficiency of our energy use, reduce greenhouse gas emissions, and minimize the use of fossil fuels,
- measure, report and evaluate greenhouse gas emissions from its operations, with the ambition to increase the scope and quality of this monitoring over time,
- establish and regularly monitor and revise an implementation plan for emission reductions,
- minimize the generation of waste and manage what is generated in a legal and responsible manner that promotes reuse and recycling.
- as far as possible, choose materials that are better for the environment and minimize the use of new virgin resources, and
- handle hazardous substances and chemicals in a legal and responsible manner and, whenever possible, substitute such substances for less hazardous ones.

3.3 Social aspects

One of A-Train's most important resources are our employees and in the area of "sustainable operations" key issues are their health, safety, and security.

A-Train shall ensure occupational health and safety, also for passengers and others in areas controlled by A-Train. This includes, among other things, that A-Train shall:

- have safety management systems and procedures for systematic work environment management in accordance with applicable requirements,
- provide necessary training, high-visibility clothing, and protective equipment,
- carry out regular safety rounds, audits, and inspections of all areas of its business operations,
- perform continuous health checks for employees with safety-critical tasks,
- conduct continuous fire training and cardiopulmonary resuscitation (CPR) training; and
- ensure accessibility on and around trains.

Furthermore, A-Train shall strive to create an attractive workplace by, *inter alia*, working for an inclusive, equal and gender-equal corporate culture that promotes cultural and ethnic diversity, broad age distribution and equal gender distribution among employees. A-Train shall follow an equal treatment plan that describes our approach to abusive treatment, harassment, and discrimination, as well as the procedures for how events are to be reported, investigated, rectified, and monitored.

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A-Train shall monitor well-being and satisfaction by regularly conducting employee and customer surveys, analyzing the results, and taking the necessary measures for improvement.

In relations with employees, business partners and customers, A-Train shall also in all other respects promote and respect internationally proclaimed human rights.

3.4 Economic aspects

A-Train shall conduct its operations in an ethical and long-term sustainable manner that contributes to stability and a sustainable economic growth. The area of "sustainable business" also means that A-Train shall have a sustainable strategy where we, by taking care of employees, customers, and the environment, become the obvious choice for transportation to and from Arlanda. This creates conditions for good profitability.

A-Train's operations shall be conducted in accordance with laws, regulations, and accepted principles of corporate social responsibility. This includes a zero-tolerance approach to bribery and other forms of corruption, that the business will be conducted in a manner that safeguards free competition, that the necessary measures will be taken to ensure that A-Train does not facilitate or participate in money laundering, terrorist financing or other financial crimes, and that all economic, financial, and trade-related sanctions applicable to our business will be complied with.

4 IMPLEMENTATION AND MONITORING

4.1 Responsibility and implementation

This policy has been approved by the CEO and the management is responsible for its implementation. However, all of A-Trains employees are individually responsible for reading, understanding, and complying with the policy.

The implementation shall include, *inter alia*, establishing more detailed guidelines when necessary regarding specific issues covered by this policy or for specific business functions, communicating the policy and guidelines to the relevant people within the organization, monitoring the compliance with the policy and the results of taken measures, and taking any other measures required to achieve the purpose of the policy and the short-term and long-term sustainability goals set out by A-Train.

4.2 Continuous improvement

A-Train's sustainability work shall be an ongoing process where opportunities, risks, and negative impacts are continuously identified and evaluated, and the measures taken to seize opportunities and manage risks or actual negative impacts are monitored to ensure that they are adequate and effective.

As part of this work, A-Train shall conduct regular and structured dialog with its stakeholders, such as employees, customers, suppliers, and other business relations, as well as owners. This includes taking into account the views and experiences that emerge in the daily work and contacts and in other ways such as through meetings, interviews, surveys, in internal and external communication and through A-Train's whistleblowing function.

Furthermore, A-Train shall regularly conduct and, if necessary, reassess its materiality assessment whereby A-Train's most significant sustainability issues, i.e. where our operations have the greatest

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external impact and are of great importance to stakeholders, are identified and prioritized. The materiality assessment should form the basis for A-Train's sustainability work and sustainability reporting.

A-Train shall handle complaints and deficiencies concerning its sustainability work systematically and promptly.

4.3 Sustainability reporting

Transparency is an important principle to ensure that the sustainability work and its results are documented and can be monitored by both internal and external stakeholders. A-Train shall report on sustainability in accordance with market accepted standards at any given time, such as the Global Reporting Initiative (GRI) framework or equivalent. A-Train shall publish its sustainability reports publicly.

4.4 Monitoring and compliance

All employees are encouraged to report any irregularities or suspected violations of A-Train policies or laws to their managers, the Head of Security, or other superiors. Reports can also be made anonymously through A-Train's whistleblowing system, which is available to both employees and external actors.

For questions or comments regarding this policy or A-Train's sustainability work, please contact the document owner.