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**Handläggare**Lindström, Mia , Head of Customer  
Service, Communication & Sustainability**Gäller fr.o.m.**

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Zetterberg, Magnus , CEO

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# Sustainability Policy

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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 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 the community surrounding our operations, 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, in addition to our internal Code of Conduct.

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

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to deliver sustainable transportation 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;
- commit to reducing its direct and energy-related emissions to align with the Paris Agreement, targeting a limit on global warming to 1.5 °C and aiming for Net Zero by 2050 with decarbonization targets for 2030 already in place;
- monitor exposure to physical risks, evaluate the associated financial implications and costs to mitigate those risks, as well as identifying and capitalizing on associated opportunities;
- 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;
- handle hazardous substances and chemicals in a legal and responsible manner and, whenever possible, substitute such substances for less hazardous ones; as well as
- Strive to reduce our impact on biodiversity and wildlife, ensuring disclosure of impacts and mitigation measures, as regulated by our internal governance documents in the area.

### 3.3 Social aspects

**"Sustainable operations"** at A-Train rely on a dual foundation: ensuring the safety and security of our employees and all our stakeholders and fostering an inclusive and engaging workplace. By prioritizing both these aspects, A-Train creates a supportive environment where employees, passengers, contractors, and our community can thrive. These efforts are essential to achieving the company's broader sustainability objectives while promoting safety, well-being, and inclusivity across all levels of operation.

#### Health, Safety, and Well-Being

A-Train shall ensure occupational health and safety, for our employees, contractors and suppliers, as well as prioritizing the security of all individuals who engage with our operations, including passengers, and others in areas controlled by A-Train.

To ensure a safe environment and promote well-being, A-Train shall:

- maintain and implement safety management systems and procedures for systematic work environment management, encompassing all stakeholders; including contractors and supply chain partners, in accordance with applicable requirements as defined in our Management System Safety;
- carry out regular safety rounds, audits, inspections, of all areas of its business operations to proactively identify and address potential hazards;
- provide necessary training, high-visibility clothing, and protective equipment to employees and contractors working on our premises;
- perform continuous health checks for employees with safety-critical tasks;
- conduct continuous fire training and cardiopulmonary resuscitation (CPR) training; and
- enhance infrastructure and maintain high accessibility standards on and around train premises, to promote safety and accessibility for passengers and the community.

### **Engagement, Inclusion, and Fair Practices**

A-Train strives to create an attractive and inclusive workplace that supports employee well-being, growth, and engagement. In this regard, A-Train shall:

- Foster a corporate culture based on diversity, equity, and inclusion (DEI), that promote cultural and ethnic diversity, broad age representation, and gender equality among employees, as regulated in our Diversity and Inclusion policy.
- Develop and follow an equal treatment plan that outlines how to address and prevent abusive treatment, harassment, and discrimination, as well as the procedures for reporting, investigating, and rectifying such incidents, as defined in our Employees Code of Conduct;
- Promote local employment by adhering to national regulations, such as the requirement for train drivers to speak Swedish, ensuring integration and alignment with local Training and qualifications of staff in railway operations.
- Regularly assess employee satisfaction and well-being through surveys, analyzing the results, and taking the necessary measures for improvement to ensure a positive and engaging work environment;
- Ensuring the implementation of robust systems to safeguard information and uphold compliance with GDPR data protection regulation as detailed in the organization's Privacy Policy.
- Respect employees' rights to freedom of association and collective bargaining, in line with national standards; and
- Uphold high labour standards and safe working conditions, ensuring fair wages, and respect for all labour rights, as regulated in our Working Environment Policy.

In relations with employees, business partners and customers, A-Train shall also in all other respects promote and respect internationally proclaimed human rights, as regulated in our Supplier Code of Conduct.

### 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. To strengthen this position, A-Train shall regularly assess customer satisfaction through surveys and actively implement improvements based on feedback, ensuring a high-quality, customer-centred travel experience.

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 external impact and are of great importance to stakeholders,

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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 CSRD (Corporate Sustainability Reporting Directive) 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, as regulated in our Whistleblowing Policy.

This Sustainability Policy refers to internal policies regulating the mentioned issues in depth, including:

- Code of Conduct (ATF 00:2)
- Supplier Code of Conduct <https://www.arlandaexpress.com/about-us/about-atrain>
- Management System Safety (ATF 00:1)
- Diversity and Inclusion Policy (ATF 02:4.12)
- Working Environment Policy (ATF 02:6)
- Management of Maintenance, Railway Infrastructure (ATF 05:0)
- Traffic Safety Instruction (ATF 06:1)
- Training and qualifications of staff in railway operations (ATF 02:2)
- Whistleblowing Policy (ATF 00:11)
- Privacy Policy <https://www.arlandaexpress.com/about-us/privacy-policy>

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

Date	Content of Update	Updated by	Approved by
2023	Creation of the Sustainability Policy	Head of Sustainability	CEO
2024	Reformulation of the Environmental and Social sections	Head of Sustainability	CEO