

Procurement in the ÖBB Group

Code of Conduct
for Suppliers

Version 2, February 2025



Preamble

In the course of their business activities, the companies within the ÖBB-Group (hereinafter referred to as “group companies” or “ÖBB-Group”) attach great importance to adhering to a number of ethical values and general principles that determine their business dealings and represent the key elements of their company culture.

These principles are defined in the ÖBB-Group’s Code of Conduct (hereinafter “Code of Conduct”). Point 9 of the Code of Conduct contains general information on collaborations with suppliers. This Code of Conduct for Suppliers sets out this information and describes the requirements that the ÖBB-Group places on the business activities of its suppliers.

This Code of Conduct for Suppliers is reviewed annually for relevance and appropriateness by ÖBB-Holding AG. Changes must be approved by the Board of Directors of ÖBB-Holding AG.

Expectations towards ÖBB-Group suppliers

Corruption

The ÖBB-Group insists that its suppliers avoid any kind of corruption. Please note, according to the StGB (Austrian Criminal Code), employees of the ÖBB-Group are treated as officials acting on behalf of the ÖBB-Group as a general rule and as such are subject to specific legal regulations as explained in the Code of Conduct.

Competition

The ÖBB-Group asks its suppliers to avoid all anti-competitive behaviour. Our suppliers are also required not to facilitate, either directly or indirectly, any type of money laundering or terrorism. The ÖBB-Group regularly checks the validity of sanctions and embargoes; our suppliers must not be listed on the applicable sanction lists and lists of terrorist organisations nor be controlled by companies on these lists. The ÖBB-Group categorically refuses to work with any people and companies listed.

Foreign trade restrictions

The ÖBB-Group insists that all foreign trade regulations are adhered to. This is especially applicable to the import and export of goods that are subject to approval, including so-called dual use goods. Suppliers to the ÖBB-Group are instructed to take suitable measures to avoid infringing sanctions of this kind.

Data protection and intellectual property rights

The ÖBB-Group expects its suppliers to adhere to data protection regulations and intellectual property laws.

Upholding human rights

The ÖBB Group is committed to human rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the compliance with the international labour standards of the International Labour Organization (ILO). In particular, the ÖBB Group rejects any form of discrimination (ILO 100, 111, 135, 190, see also points 2.6 and 2.9), any form of violence against employees, especially torture (ILO 29), as well as child labour (ILO 138, 182) and forced labour (ILO 29, 105) (see also point 2.7). The ÖBB Group is committed to safety and health protection at work (ILO 155, 187, see also point 2.8) and recognizes the right to employee representation and collective bargaining (ILO 87, 98, see also point 2.10).

The ÖBB-Group expects this commitment to human rights and compliance with international labour standards from its suppliers as well. Therefore, the ÖBB-Group requires its suppliers to treat their employees with dignity and respect at all times and to uphold the internationally recognised human rights.

The ÖBB Group accepts its corporate responsibility in relation to human rights and expects its suppliers to do the same.

Diversity and equality

Suppliers to the ÖBB-Group promote equality and the fair treatment of their employees, regardless of their:

- gender, sexual identity or orientation,
- age,
- race, nationality, skin colour, cultural heritage or ethnicity,
- social background or political affiliation,
- religious or world beliefs,
- physical or mental disabilities,
- family status or pregnancy
- membership of employee organisations, including trade union.

The ÖBB-Group does not tolerate any form of harassment in the workplace by its suppliers. Suppliers to the ÖBB-Group must also ensure that measures are taken to prevent the sexual harassment of their employees and to ensure that people are treated with dignity in the workplace at all times.

Ban on forced labour

The ÖBB-Group strongly rejects all forms of modern slavery, forced labour, human trafficking and restrictions on the personal freedom of movement of their employees within their own company and the companies of their suppliers.

Furthermore, the ÖBB-Group does not tolerate any child labour, be it within its own company or within companies in its supply chain. Child labour is defined as stipulated in the International Labour Organization's (ILO) Labour Standards.

Occupational health and safety

The ÖBB-Group calls upon its suppliers to provide a safe and healthy working environment for its employees, placing particular emphasis on fire protection in their facilities. For this reason, suppliers are expected to comply with applicable health and safety laws and to integrate and continuously improve health and safety standards in their business processes.

Working hours and remuneration

Suppliers to the ÖBB-Group are requested to adhere to the applicable statutory regulations on working hours. The ÖBB-Group expects that employees within our supply chain are remunerated fairly, regularly, in a timely fashion and in full for their work, and that suppliers to the group companies adhere to all applicable wage and remuneration regulations.

Freedom of association (collective bargaining)

Suppliers to the ÖBB-Group must ensure that their employees have the right to form trade unions of their choosing, to join these trade unions, nominate worker representatives, form a workers' council and carry out collective bargaining in accordance with local legislation and international agreements

Environmental protection and climate protection

The ÖBB-Group expects its suppliers to take active steps to protect natural resources and minimise their own negative impact on the environment, and to act in a responsible and sustainable manner.

Suppliers to the ÖBB-Group are required to identify, apply and monitor adherence to the relevant environmental and climate protection regulations and standards.

The ÖBB-Group sets great store by suppliers adopting externally certified environmental management systems and

can explicitly request their introduction through concrete award procedures in order to facilitate an ongoing assessment of processes and products in view of their negative impact on the environment and the climate.

The ÖBB-Group expects its suppliers to use resources sparingly, efficiently and safely, and to support the application of generally recognised standards in the field of sustainability. Negative environmental consequences caused by our suppliers themselves or companies within the supply chain should be minimised or avoided. In particular, this includes the active reduction or avoidance of emissions, as well as the avoidance, recycling and reusing of waste and wastewater.

Furthermore, suppliers to the ÖBB-Group are urged to use renewable energy for their business activities wherever possible and to increase the proportion of renewable energy used on an ongoing basis. By doing so, we can all play our part in the continuous reduction of our joint ecological footprint.

Subcontractors

The ÖBB-Group sees itself as an integral part of an international value creation chain and expects its suppliers to ensure that the behavioural principles listed in this Code of Conduct are passed onto all actors within their supply chain.

Sanctions

In the case of infringements to statutory regulations, T&Cs or other contractual obligations attributable to suppliers, the group companies reserve the right to take appropriate action within the framework of the legal and contractual stipulations. This may include the immediate termination of the business relationship and/or the assertion of claims for damages.

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