



Sustainability Management

Management systems and ESG



Preface

Dear Reader,

Economic performance, the protection of the basis for our existence and social responsibility must go hand in hand. Aware of this, VTG GmbH adopts a rigorous approach to sustainability management around the three core topics of environment (E), social (S) and governance (G). Our profound commitment to mitigating climate change is rooted not only in our core business: Beyond that, we have resolved to become a climate neutral company by 2040.

The responsibility we feel toward our company, the society and the environment combines with the values we live out each day to shape everything we do. This involves respectful dealings with our employees, upholding human rights and proactively serving society. We welcome and support the diversity of our staff, recognizing that variety drives innovation and is the most fruitful source of groundbreaking ideas. Our open corporate culture promotes equal opportunities, inclusion and diversity.

Since 2017, our inclusive apprenticeship program VTG RailTrain has been providing high-quality vocational training to youngsters and young adults who have less attractive prospects elsewhere, giving them a springboard to an autonomous life and financial security.

Privacy, data protection and information security are also practiced at VTG as a matter of course. Not satisfied to merely comply with legal requirements, we strive to regularly raise awareness among our staff of the challenges resulting from issues such as the growing and globalized threat of cyber-crime.

As an international asset owner and logistics company with a strong focus on rail, we bear a huge responsibility for ensuring safe transportation of the goods entrusted to us. More than that, we collaborate closely with all stakeholders on the basis of clearly defined principles: transparency, partnership, responsibility and ethical guidelines.

To keep our customers satisfied in the long term and thus safeguard VTG's successful business performance, we have no choice but to continually review our products, services and processes, striving to improve them by combining structured and systematic planning with constant monitoring.

This publication outlines and explains our approach to sustainability management and the management systems we use in this context. Wherever it makes sense or is quite simply essential, we underscore

the maturity of these systems by acquiring and maintaining the relevant external certifications. All our systems comply with international standards and norms and have attained a high level of maturity.

This document also lays a binding foundation for everything we do to safeguard our products and services, our processes and organizational procedures. As such, it gives us a valuable tool to protect the environment, guarantee occupational health and safety and protect data, privacy and information while also ensuring the operational safety of our equipment and the rolling stock at our disposal at all times. This document further describes the philosophy on which we base our approach to managing sustainability.

This document (in the version dated September 2024) was resolved by the Executive Board and is binding for all employees of VTG. The measures announced herein are now in force. All staff are therefore called on to play their part in implementing these policies and achieving the stated goals.

The document can also be made available to our business partners and stakeholders.

Kind regards,



Alberto Nobis

Chief Executive Officer
of VTG GmbH

Last updated 12/2024

- Quality
- Occupational health and safety
- Operational safety, technology, wagons, buildings
- Hazardous goods
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About VTG

Headquartered in Hamburg, Germany, VTG GmbH is an international assets and logistics company with a strong focus on rail. The Group leases rail freight wagons and tank containers, flanking these activities with multimodal logistics services and integrated digital solutions. Its fleet comprises around 84,800 rail freight wagons, most of which are tank cars, intermodal freight wagons, standard freight wagons and sliding-wall wagons. The company also operates roughly 3,900 tank containers.

Whatever freight our customers want to move, we make sure it reaches its destination safely and efficiently. VTG gives customers access to the largest private-sector wagon fleet in Europe, but also to a diverse array of superstructures and tank containers. All the equipment they need for short-term and long-term deployments can be leased from us. We also take care of everything customers' need to maximize the efficiency of this equipment. Our leasing activities are complemented by fleet services, wagon maintenance and wagon building services.

Logistics is about more than just getting goods from A to B. Our wealth of experience and expertise covers every facet of our customers' freight logistics needs, leaving them free to concentrate on their core business.

Customers naturally want to know every detail of their transports: exactly where their consignment is right this minute, when

a wagon needs maintenance, actual wagon mileage, and where equipment is available and can be leased at short notice. Digital solutions from VTG make transports smart, helping to find answers to all these questions. Our innovative digital services enable freight transports to be planned efficiently and at as short notice.

Our diversified service portfolio gives VTG customers a robust platform for international freight transport, including the development of individually tailored logistics solutions for all industries. Our detailed knowledge spans the entire transport chain and is backed by smart technology. Whether liquid or gaseous, granular or compact – VTG has the right solution for all transportation needs: from agriculture, automotive, building materials, chemicals, disposal, gases, commodities, timber, food, to mineral oil and steel.

ACTIVE IN	AT	APPROX.	APPROX.
21	33	2.100	84.800
COUNTRIES¹	LOCATIONS¹	EMPLOYEES¹	RAIL FREIGHT WAGONS¹

¹Data from 12/2023



Managing sustainability at VTG

The future is rail

Tremendous challenges confront our society. Combating climate change, improving air purity, reducing noise pollution and developing sustainable mobility and transport concepts are global tasks that can only be mastered if we work together.

The rail system is a key factor in crafting a sustainable future. Our motto – “Innovating together for a green and connected Europe” – reflects our goal of making rail freight simple and efficient. At the same time, we need to ensure that the rail system in general and VTG in particular remain able to attract, develop and retain top-quality staff: dedicated high performers who are committed to lifelong learning with a view to advancing multimodal and digitalized freight transport.

Company management

The Executive Board manages VTG GmbH and represents it externally. The company's organizational structure, starting at management level, is clearly aligned with the relevant focus areas: Customer Service, Commercial, Operations, People & Culture, Financial as well as Transformation. Overall corporate responsibility lies with Chief Executive Officer Alberto Nobis. Each department is responsible for the respective activities across Europe, coordinates them centrally and manages the employees in the countries.

At VTG, the issue of sustainability is an integral element of management responsibility on all levels. To ensure seamless coordination within the Group, a Corporate Sustainability Manager has been appointed to communicate and liaise closely with Corporate Communications.

In addition, a Sustainability Committee – comprising the chief executive responsible plus staff of the Management Systems & Safety and Corporate Communications units – has been set up. Experts

from individual units are called in as and when they are needed to accompany the implementation of measures at the individual business units, workshops and departments. The Sustainability Committee reports directly to the Executive Board. It is responsible for overseeing VTG-internal sustainability measures at Group level and supports communication on sustainability matters to the outside world.

Genuine sustainability can be lived out only with the full backing of every employee, so it is critically important to cultivate awareness on all levels. We do this by regularly using a variety of communication channels such as information events, our social intranet and the staff magazine to share details of our strategy and goals, but also of successes in achieving these goals. Ideas submitted by our employees are a further crucial factor in the ongoing development of our sustainability strategy. Via our suggestions scheme, staff thus use various instruments to play an active role in driving forward VTG's sustainability process.

Values and principles

Since VTG's activities have an international reach, we encounter behaviors and mentalities that are as varied as the people who work for us. To enable this organization to work smoothly, we apply a set of values that are binding throughout the Group. Our Code of Conduct sets out the framework and provides guidance on how all employees are to behave and act in keeping with the law. Our company values and principles thus lay the foundation for all dealings with employees, business partners and society in general. They also form the bedrock of our business success.

Respectful dealings with each other are a fundamental tenet of our corporate culture. Honest and respectful dialogue builds trust and fosters job satisfaction. This includes creating fair working conditions, promoting equal opportunities and rejecting any and all forms

of discrimination. The responsible handling of confidential information and the protection of personal and sensitive data is likewise binding for all employees. In our capacity as a company with an international reach and a highly diverse array of employees and business partners, we attach great importance to the security of our staff, the safety of our products and the protection of our environment. As a matter of course, therefore, we ensure that our company fully complies with all relevant occupational health, safety and environmental regulations.

Our Code of Conduct is available in German, English and French. The Executive Board is responsible for the Group's values and principles and their ongoing development.

More details of our sustainability management and our integrated management system as they relate to individual sustainability issues are provided on the pages that follow.

Quality

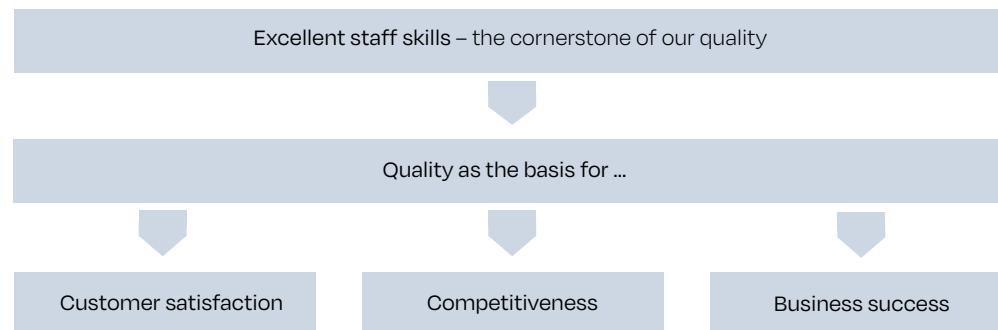


The quality of our services and the capabilities of our people are critical to VTG's business success and our ability to compete. Our commitment to customers is therefore simple: to supply them with services, equipment and rolling stock of the highest quality, always responding to their individual needs and preferences in order to continually improve our performance. All our processes cycle through four defined steps: plan, do (including testing), check and act. Adopting this approach, we regularly review customary procedures and constantly take steps to improve them.

Much of what we do involves the hazardous goods sector. For us, quality therefore also means strict compliance with and consideration of all relevant norms and regulations. In particular, this involves aspects of hazardous goods law, occupational health and safety, environmental protection and both the safety and suitability of our services.

We also give top priority to the careful selection of suitable professional suppliers.

VTG enhances the professional qualifications and personal skills of its employees by providing them with focused training and development opportunities. To satisfy the quality demands of our broad spread of customers, staff are specifically taught to be aware of quality issues, alongside general safety, occupational health and safety and environmental protection concerns.



Occupational health and safety



Successful occupational health and safety cannot be achieved simply by complying with laws and regulations and implementing measures following an incident.

Preventive safety work, the creation of a culture of responsibility at all levels and the introduction of behaviour-based safety (BBS) for all employees at all sites are the guarantee of success for sustainable occupational safety at VTG.

On the corporate side, VTG is committed to ensuring safe and healthy working conditions for all employees and to developing these further.

Moreover, occupational health and safety applies not only to our own employees, but also to third parties who carry out work for us or on our behalf.

VTG is also committed to ensuring that no one in the value chain organised by us is harmed by our equipment or our services.

Health protection at VTG is reflected not only in the mandatory occupational health check-ups, but also in the additional preventive measures, such as vaccinations, which have proven their worth in the pandemic situation.

Successful occupational health and safety through:

- Compliance with laws and regulations
- preventive work on occupational health and safety (e.g. through near miss reporting)
- creating a culture of responsibility at all levels
- the introduction of behaviour-based safety (BBS) and
- the consideration of all employees in the value chain

Operational safety, technology, wagons, buildings



For VTG, operational safety means ensuring that our equipment, wagons, tank containers and the way we deploy them fully comply with all statutory standards, rules and regulations, but also with the requirements of our integrated management system.

This principle applies to all our services, including the completion of goods transports when we act as a railway company.

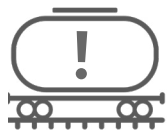
We take great care in selecting, monitoring and providing suitable qualifications for those suppliers who handle transports, maintain and repair our vehicles and make either operating resources or personnel available.

Safety requirements surrounding our operations, the maintenance of our equipment and rolling stock and the performance of rail transport assignments are constantly changing. We rise to this challenge by always providing appropriate resources and continually monitoring and adapting our safety and maintenance management systems.

To maintain building security, VTG takes all necessary steps to ensure the preventive and graded physical protection of buildings, offices, archives, workshops, storage space, land and all other company real estate, guarding them against unauthorized access. Technical, organizational and personnel measures taken in compliance with local regulations ensure the safety of employees, suppliers and guests of VTG at all times.



Hazardous goods



Organizing legally compliant dangerous goods transports involves close cooperation between internal and external parties. This being the case, VTG always plays a hands-on role in implementing new transport business and in constantly improving ongoing transports.

To create the necessary conditions, VTG supports external partners (such as customers and suppliers) in the build-up of dangerous goods management systems and provides training that is specially tailored to the needs and concerns of the individual partner. In consultation with our customers, VTG can also perform dangerous goods audits at their loading and unloading facilities and/or at border crossings.

All relevant VTG staff receive instruction once a year in matters relating to dangerous goods. Internal checks are performed in relation to specific positions to identify and eliminate any areas of weakness at an early stage.

Additionally, our employees are actively involved in drawing up new solutions and processes to further improve safe working practices at VTG. Bringing together the expertise possessed by dangerous goods management teams, sales staff and operational staff lays a firm foundation on which employees of the VTG Group can discharge their duties safely and professionally.

In the context of remedying any anomalies in dangerous goods transportation, advice provided by VTG's dangerous goods specialists to customers, suppliers and their vicarious agents is a central element of our own approach to dangerous goods management. Lastly, active participation in those bodies that shape and oversee rail-based dangerous goods transport adds the finishing touches to our portfolio of activities to promote legal compliance in the transportation of dangerous goods.

Environment and energy



As a global player, we have a responsibility to do whatever we can to actively tackle the major ecological challenges of our day. As an assets and logistics company with a strong focus on rail freight transport, developing sustainable solutions and concepts for our customers is one way in which we act on this responsibility. We see climate change as the pivotal challenge – one that must be contained by effective measures to reduce harmful emissions.

One key tool is our energy management system, which is certified pursuant to ISO 50001 and which enables us to continually improve our energy performance. Within our value chain, we also collaborate with partner companies to further shrink our ecological footprint.

Electricity is our most important source of energy and thus makes a substantial contribution to our greenhouse gas emissions. We seek to combat this trend by systematically migrating to the use of electricity from renewable sources.

The sparing use of natural resources is likewise central to what we do, as evidenced in the longevity of our rolling stock and the large extent to which it is recycled. We act in accordance with the principles of the circular economy: in the way we handle water, which is reused several times over in many of our processes; and in the way we handle scrap and waste, a large proportion of which is fed back into the recycling loop.

Social responsibility



VTG shoulders its social responsibility through a combination of extensive programs for its own staff and constantly growing commitments in society at large.

Our aim is to deploy the best-qualified and most highly motivated people in meeting the needs of our customers. Alongside ongoing efforts to position VTG as an attractive employer, we therefore strive to provide our employees with attractive social and working conditions, as well as offering them adequate opportunities to develop professionally and as individuals.

Compliance with the strictest standards of occupational health and safety is key to our efforts to ensure that our people consistently enjoy a safe working environment.

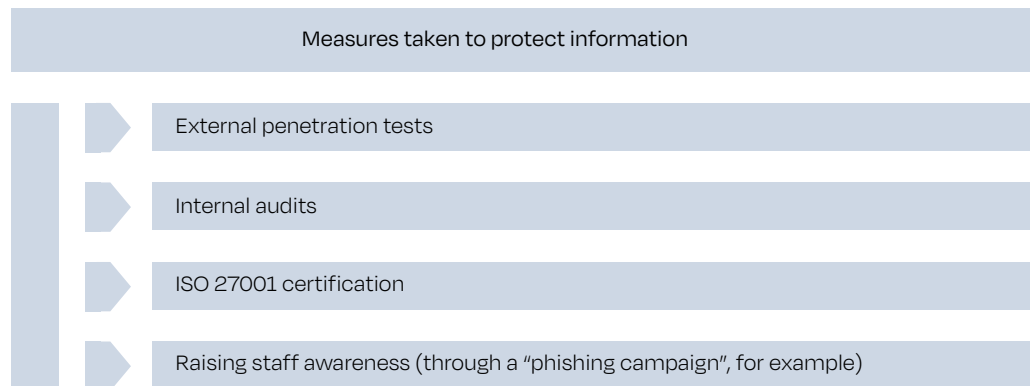
Mutual respect, too, is deeply ingrained in VTG's corporate culture. We are committed to fair working conditions and equal opportunities. No discrimination of any kind is tolerated at VTG.

Information security and data protection



If VTG is to function smoothly – especially in the digital age – then technical and organizational protection for its information and communication systems is vital.

Data and information must not only be guarded against disclosure and tampering, but must also be kept available and accessible at all times. VTG continually monitors the need for protection and the measures that this entails, basing its actions on statutory requirements and the demands of other stakeholders. VTG accommodates these requirements by means of multi-level active and passive security measures that are subject to regular review.



Our data protection management system safeguards the privacy of every individual who has anything to do with the company, guarding against unauthorized access to, storage of or transmission of their personal data. The responsible handling of personal data commands top priority, in full compliance with the principles enshrined in the European Union's General Data Protection Regulation (GDPR).

Whether they are working in the office, from home or on the premises of business partners, this policy has the following implications for our employees:

- Personal data is stored and processed only if it is absolutely essential to business operations.
- Personal data is never passed on to third parties.
- Screens must be locked when not in use.
- Passwords must be kept in a safe place.
- Confidential phone calls must take place with no one else in the room.
- Staff are required to take part in data protection training courses.
- All statutory requirements and internal data protection regulations must be observed.

Compliance



In the shape of the Code of Conduct, the Executive Board of VTG GmbH has set out clear guidelines on how governing bodies, executives and employees are to deal with issues such as conflicts of interest, the fight against corruption, fair business relations, anti-discrimination, security and the environment.

Compliance with current law is fundamental to everything VTG does anywhere in the world. Staff are under obligation to keep themselves informed about all legal requirements of relevance to their sphere of influence. Conversely, managers bear a special responsibility for passing on information to their teams.

Without reservation, VTG is committed to upholding fair competition and expects the same of its business partners. For VTG, complying with the provisions of competition law and antitrust law in dealings with our customers, suppliers and competitors is standard practice. No employee may offer, demand or accept benefits that may be conducive to unfairly influencing any business decision.

Suspected violations of legal provisions and/or internal VTG guidelines can be reported via the [VTG Integrity Line](#) whistleblowing system. Anonymous reports can also be submitted.

VTG undertakes to act transparently, responsibly and in accordance with ethical principles in all its interactions with stakeholders.

Company representative



VTG has appointed a series of company representatives in order to pool available knowledge and ensure compliance with statutory requirements and norms. These representatives are endowed with special rights and serve as advisors to the company in their respective areas of specialization.

Examples of their responsibilities include:

- Monitoring and inspection duties
- Providing employees with information and clarification
- Incorporating relevant topics in operational processes
- Reporting to the company management
- The right to make statements and go over the head of their immediate superiors

At VTG, a corporate department appoints company representatives for the management systems (including quality management, energy management, information security, occupational health and safety, dangerous goods and data protection). These representatives are assisted by local staff at individual locations.

At the own workshops, company representatives have also been appointed for matters relating to waste, water conservation, emission control and radiation safety.

Code of Conduct

VTG's international activities bring its companies into contact with all kinds of different rules and legal systems. In the Code of Conduct reproduced below, the Executive Board of VTG GmbH has formulated guiding principles for the behavior of governing bodies, executives and employees. This Code of Conduct is complemented by a set of Group guidelines also promulgated by the Executive Board. If you have any doubts about how to interpret the points laid out below, please contact your superior for advice.



Compliance with current valid law
Complying with current valid law is fundamental to everything the VTG Group does anywhere in the world. The staff of the VTG Group are required to constantly stay informed about the legal prescriptions that apply to their sphere of responsibility. Management staff in particular are responsible for passing on relevant information to their people.



Fair competition
VTG commits itself unreservedly to competition by fair means and expects the same of its business partners. For us, complying fully with the rules of competition and antitrust law in our dealings with customers, suppliers and competitors is standard practice. No employee of the VTG Group may offer, demand or accept any benefits that may be conducive to unfairly influencing any business decision.



The group and its employees
Mutual respect is part of the bedrock of our corporate culture. VTG upholds fair working conditions and equal opportunities. Discrimination of any kind will not be tolerated.

Conflicts between the interests of the VTG Group and the personal interests of the staff are to be avoided. Should any such conflicts arise, they must be disclosed and resolved. All employees are under obligation to deal prudently with and protect the property and assets of the Group.



Information and data protection
All employees are contractually obliged to treat trade secrets and other information pertaining to VTG and its business partners in the strictest confidentiality. The unauthorized dissemination or use of confidential information is strictly prohibited.

VTG upholds all legal provisions regarding the protection of personal data and expects this of its employees.



Safety and environment
Health and safety are given high priority at VTG, in relation to both the operational safety of our rail freight wagons, tank containers and workshop facilities, but also with regard to occupational health and safety. VTG attaches equal importance to protecting our environment. Accordingly, the companies in the VTG Group comply in particular with all safety-related measures for our operating equipment and workshops, the provisions of dangerous goods law and all legal provisions on occupational safety, health and environmental protection.

VTG's certifications



VTG accepts its ecological, economic and social responsibility and, in so doing, is committed to protecting the environment (E), working to improve social issues (S) and promoting fair business practices (G). Our commitment to these issues is reflected in our certifications, each of which has been examined and audited by independent third parties.

All certificates are reproduced on the VTG website (www.vtg.de) in the "Company" section, under the "Company Profile" menu item and then under "Certifications".

Overview of our certifications


- ISO 9001 – Quality Management System
- ISO 27001 – Information Security Management Systems
- ISO 50001 – Energy Management System
- ECM Certification pursuant to Commission Regulation (EU) 2019/779
- GMP+ (Feed Safety)
- SQAS (CEFIC)



Policies behind our management systems


Our understanding of quality expresses itself in the commitment we live out day after day, in our people's awareness of their responsibility for the services and rolling stock we provide. We expect every VTG employee to identify with our values and goals, as these lay the basis for our business success and for relationships of trust with our customers.

Quality




[Click here to see our quality policy.](#)

Environment & energy




[Click here to see our environment and energy policy.](#)

Information security and data protection



[Click here to see our information security and data protection policy.](#)

Occupational Safety and Health



[Click here to see our Occupational Safety and Health policy](#)

Quality policy



What is our vision?

Quality is integral to everything we do. We provide our customers with top-quality services and rolling stock, living out this commitment in every process throughout the company.

By satisfying quality demands and the associated expectations and requirements, we deliver lasting customer satisfaction. This satisfaction in turn underpins our own success.

How do we realize this vision?

Our processes and the descriptions thereof are based on legal requirements, international standards, customer demands and our own knowledge and experience. Our understanding of and rigorous compliance with these demands underpin our commitment to quality.

For us, quality means doing everything we do the right way from the outset and continually improving our processes. Individual goals are derived from this policy for each unit and location. Measures are defined to achieve these goals, the necessary resources are made available, and the effectiveness of the measures is verified. At VTG, avoiding mistakes takes precedence over remedying mistakes.

These principles also apply to the transportation of animal feed, for which special handling is required. In all such activities, we ensure full compliance with the strict quality standards of the animal feed and food industries and with the GMP+ standard. We underscore this commitment by operating certified management systems and subjecting them to regular internal and external audits. Our suppliers, too, make a significant contribution to the quality of our services and rolling stock. We therefore impose the same quality demands on them as on ourselves.

Strategic goal

We commit ourselves to consistently raising the level of customer satisfaction and continually improving our management systems. Key performance indicators such as the following have been defined to measure our success in achieving this goal.

1. Complaint quota
2. Rolling stock availability
3. Safety metrics on various issues
4. Level of customer and employee satisfaction

Environmental and energy policy



What is our vision?

The cleanest and most affordable energy is the energy that is not consumed in the first place. Following this principle, we have set ourselves the goal of reducing our environmental impact and energy consumption as far as sensibly possible. Only through the sustainable and efficient use of the required energy sources and resources can we actively contribute to environmental protection and the achievement of our shared climate goals. In doing so, we aim to be climate neutral by 2040 and use our energy efficiently.

How do we realize this vision?



Where energy and resources are indispensable, we aim to use them even more efficiently – true to our motto, “Better before Bigger.” Our approach is to produce the same quantity of goods and services with as little energy and resource expenditure as possible while minimizing environmental impacts. Furthermore, we strive to increasingly rely on renewable energy and environmentally friendly technologies, always considering the latest state of the art. We have already made progress but continue to work on the ongoing

improvement of energy efficiency, energy use, and overall environmental performance to maximize our contribution to a sustainable future. We aim to enable our customers to conduct low-emission and low-pollution transport by shifting traffic from road to rail. As an internationally operating company, we are committed to our shared responsibility for the environment and our corporate duty of care.

Our objective is to combine profitable production and service provision with continuous improvement in environmental and energy performance. This includes avoiding environmental pollution and energy waste wherever technically, organizationally, and economically feasible. Efficient use of resources and energy is not only an obligation toward the environment but also a crucial factor for the long-term success of our company.

We strive for continuous improvement in environmental and energy performance. This means aiming for measurable results concerning environmental aspects, energy efficiency, energy use, and energy consumption. Every optimization in these areas not only conserves natural resources but also enhances the competitiveness of our company. To achieve this, we rely on modern technologies, innovative management methods, and clear objectives. We regularly identify and assess our environmental aspects and impacts, monitor our progress, and continuously adapt our measures based on the results. This ensures that our company stays up-to-date with the latest technologies and adopts the best available practices.

To ensure continuous improvement in environmental and energy performance, the management is committed to providing sufficient resources. This includes financial resources as well as personnel capacities necessary for implementing environmentally friendly and energy-efficient measures. Consequently, the resource requirements are regularly reviewed, evaluated, and adjusted if needed. This approach ensures that our company achieves its environmental and energy goals and makes sustainable progress.

A key factor in the success of our environmental and energy policy is an efficient organization with clear objectives and advanced management methods. We rely on a clear structure of responsibilities, where managers play a central role. They are responsible for applying the applicable management practices in their areas, continuously monitoring their effectiveness, and promoting innovations in all directions. Moreover, keeping up-to-date with the latest technologies and continuously developing expertise are essential drivers of environmental improvements and gains in energy efficiency. Our managers are encouraged to stay informed about developments in their fields and, where appropriate, integrate them into operational processes.

In addition to managers, every employee in our company is responsible for contributing to the achievement of our environmental and energy goals. This requires environmentally and energy-conscious behavior in the daily work environment and active participation in identifying and eliminating circumstances leading to unnecessary energy consumption or environmental impact. To promote this, we provide our employees with individual information and training. These measures aim to raise awareness of environmental protection and energy efficiency and enhance skills so that each employee can contribute to environmentally friendly and energy-efficient practices. We firmly believe that the success of our environmental and energy policy is only possible through the commitment and active involvement of all employees.

An essential part of our corporate duty of care is compliance with all relevant legal and regulatory requirements as well as additional obligations we have undertaken. Our goal is to meet these requirements and, where possible, exceed them. This not only ensures compliance but also strengthens our position as a responsible and forward-looking company. Our internal processes and control mechanisms ensure strict compliance with all legal requirements related to environmental protection and energy consumption and allow us to continuously look for opportunities to exceed minimum requirements where feasible and sensible. We are committed to preventing environmental pollution and minimizing our environmental impact.

Preface

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Open and transparent communication is key to successful environmental and energy management. All employees are regularly informed about the progress and challenges related to our environmental and energy objectives. This not only raises awareness but also encourages active participation in improving our environmental and energy performance. Additionally, we provide employees with opportunities to submit suggestions for improvement, which are carefully evaluated and implemented where appropriate. At the same time, we communicate our environmental and energy policies and achievements externally to demonstrate our commitment to sustainability, environmental protection, and energy efficiency to our customers, partners, and the public.

Our environmental and energy policy is an integral part of our corporate strategy and an expression of our long-term commitment to sustainability, environmental protection, and efficiency. By continuously improving environmental and energy performance, providing necessary resources, complying with legal requirements, involving all employees, and maintaining transparent communication, we ensure that our company remains economically and ecologically successful in the future. This policy is regularly reviewed and adjusted to changing circumstances.

All managers and employees are encouraged to actively support this environmental and energy policy and contribute to achieving our shared goals. In doing so, we not only promote climate and environmental protection but also secure VTG's future viability.

Strategic goal

In addition to local environmental and energy metrics at the level of our workshops and rail transport companies, VTG is committed to regularly publishing at least the following metrics:

1. Energy consumption in kilowatt-hours*
2. Energy generation in kilowatt-hours*
3. Energy intensity in kilowatt-hours per euro* revenue and FTE
4. Share of renewable energy in kilowatt-hours of total energy consumption
5. Emissions in metric tons of CO₂ equivalents for Scope 1, 2, and 3
6. Number of reportable leaks
7. Waste volumes by type and disposal method
8. Water consumption and wastewater volumes

* or a multiple of the aforementioned units

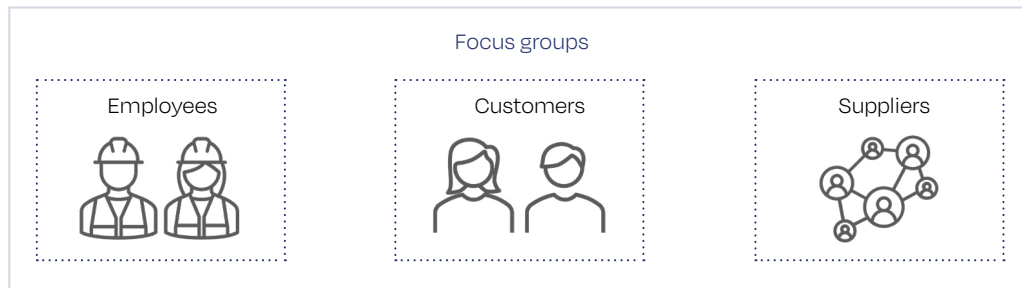
Last updated 12/2024

Information security and data protection policy



What is our vision?

To enable our business to function smoothly – especially in the digital age – VTG commits itself to guaranteeing the confidentiality, availability and integrity of the information that we administer or that is supplied to us. We do the same for all the information and communication systems that we use. We give top priority to protecting the personal data of our:



How do we realize this vision?

We take appropriate technical and organizational measures to protect our information. Data is not only guarded against disclosure and tampering, but is also kept available and accessible at all times. The need to protect our systems, processes and people and the measures we take to do so are subject to continual review and are rooted in both statutory requirements and the demands of other stakeholders.

VTG accommodates these requirements by means of multi-level active and passive security measures that are likewise subject to regular review. Internal audits, external penetration tests and ISO 27001 certification audits are all performed to verify our compliance. We also use various communication channels to continually raise staff awareness of how to deal with issues such as phishing e-mails, for example.

Our data protection management system safeguards the privacy of every individual who has anything to do with the company, guarding against unauthorized access to, storage of or transmission of their personal data. The management system is regularly inspected to ensure ongoing compliance with all relevant regulations. The responsible handling of personal data commands top priority in line with the

principles enshrined in the General Data Protection Regulation (GDPR). VTG has defined rules to ensure that our employees effectively protect themselves and others, whether they are working in the office, from home or on the premises of business partners.

Strategic goal

We are committed to continually and sustainably improving the information security and data protection we provide. The following key performance indicators have been defined to measure our success in achieving this goal:

1. Increase in awareness in the context of a phishing campaign
2. Maintenance of our ISO 27001 certification
3. Successful repulsion of external and internal attacks
4. Continuous evaluation of the data protection and information security risks that affect us
5. Absence of incidents needing to be reported

Occupational safety and health policy



What is our vision?

The safety and well-being of our employees, partners, and the public are of the highest priority at VTG. As a company, we are responsible for minimizing occupational risks and creating a safe working environment where hazards are systematically identified and addressed. Our goal is to prevent accidents and

work-related illnesses while promoting a safety culture that strengthens the awareness and diligence of all involved.

How do we realize this vision?

Core principles of occupational safety:

Commitment to Safety

VTG is committed to ensuring compliance with the highest safety standards and applicable local laws while fostering continuous improvement. Safety considerations always take precedence over business or other concerns.

Training and Awareness

All employees and contractors receive regular training on occupational safety and the specific risks of rail transport. Only with a comprehensive understanding of hazards and safety procedures can safe working conditions be ensured. We aim to maintain an open culture of learning from mistakes and continuously promote awareness among our stakeholders.

Risk Analysis and Prevention

We rely on regular and systematic risk assessments to identify, evaluate, and address hazards early on, as well as to identify opportunities for improvement. Preventive measures are developed and implemented to prevent accidents and minimize incidents. Safety requirements are regularly reviewed and adapted to current conditions.

Maintenance and Inspection of Equipment

Our operational facilities are inspected and maintained at regular intervals to minimize technical failures and prevent accidents. Employees are encouraged to use all equipment properly and pay attention to its condition to ensure a safe working environment for all involved.

Communication and Reporting System

We promote an open communication culture where all employees are encouraged to report potential hazards or safety concerns without hesitation. Incidents and „near-misses“ are documented and analyzed to improve preventive measures and reduce future risks.

Emergency Management

Emergency plans and rescue procedures are established, regularly tested, and continuously improved. All employees are trained in emergency procedures to ensure a swift and safe response and to minimize potential damage.

Responsibility and Continuous Improvement

Occupational safety is the responsibility of every individual in the company. Every employee and manager is required to act with safety in mind, set an example for others, and contribute to the development of our safety measures. Our occupational safety standards are regularly reviewed and continuously improved.

Strategic goal

VTG is committed to regularly collecting the following key figures:

- 1. Number of days lost (DAFW)
- 2. Accident frequency per 1 million work hours (LTIFR)
- 3. Accident severity (AS)
- 4. Accident-free days
- 5. Incident frequency (TRIR)

Implementation

This occupational safety policy is actively implemented and adhered to by our employees in all areas. Violations of safety guidelines are investigated and lead to targeted actions to strengthen safety awareness.

Conclusion

At VTG, safety is always our top priority and an integral part of our corporate strategy. We are confident that through collective commitment and responsibility, a safe and healthy workplace is achievable for everyone.



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