

EMPLOYEE POLICY

Document Number 002
Valid from 2011-01-10



Public

POLICY
Category Company Governance
Edition 2
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Approved by The Board
Page 1 of 6

Introduction

Describes the relation between the company Hector Rail and its employees

Target Group

- All staff at Hector Rail

Table of Contents

Employee policy	3
General	3
Scope of application.....	3
Freedom of association.....	3
Diversity.....	3
Elimination of Discrimination	4
Progress	4
Health and Safety	4
Behaviour	4
Fellow colleagues	4
External contacts	4
Harassment	4
Public statements	5
Drugs and alcohol.....	5
Legal Compliance.....	5
Loyalty	5
Confidential information	5
Conflict of interest.....	5
Misuse of company property	5
Management.....	5
Complaints	6
Validity	6

Employee policy

General

“Everybody who works for Hector Rail should be proud of working for the company and should be proud of his/her co-workers.”

Hector Rail has the ambition to be an attractive employer and recruit talented and ambitious employees for all positions. To be attractive, Hector Rail focuses on openness, involvement and personal development. An important cornerstone at Hector Rail is the “Hector Rail model”, in which the customers have a central position. The customers are linked to the drivers and to the locomotives in a “central triangle”. This reflects the fact that Hector Rail focuses very much on the employees engaged in the daily delivery of a high quality service to customers.

Hector Rail enjoys a high reputation for corporate trustworthiness, based on business activities characterised by honesty, integrity and responsibility. Hector Rail expects its employees to act in line with this reputation and to be loyal to Hector Rail and dedicated to support Hector Rail in its development.

This policy is not all-inclusive and any employee at Hector Rail who is in doubt whether a possible action is in line with standards of Hector Rail should seek advice from his/her supervisor before taking the action.

Scope of application

In principle, Hector Rail assumes no responsibility for one’s private life and has no opinion about how an employee acts on his or her hours off duty. However, actions might be taken if an employee off duty is revealed to have exhibited criminal activities which, considering the fact he/she is employed at Hector Rail, might influence the credibility of Hector Rail.

Confidential information is never allowed to be transferred outside Hector Rail. This is valid also after the termination of employment.

In the following situations an employee must act and behave in a representative way regardless of whether being on or off duty: when on Hector Rail premises or property, when dressed in Hector Rail designated clothing, or in other situations where appearance indicates the fact that you are a Hector Rail employee or where other people expect that you are a Hector Rail representative.

Freedom of association

Hector Rail recognizes the right of employees to decide whether to be represented by recognized unions of their choice or not. Hector Rail accordingly provides the right for its employees to engage in collective bargaining.

Diversity

Hector Rail strives to achieve diversity with regard to gender, age and nationality, as well as in other respects that contribute to a stimulating equal opportunities workplace. Hector Rail shall also strive to facilitate good working conditions for the disabled.

Hector Rail shall work proactively for gender equality, which increases job satisfaction and quality of life for all employees. Satisfied employees will be a credit to our customers, and this will also have a positive effect on results.

Elimination of Discrimination

No kind of discrimination is allowed at Hector Rail, such as, but not limited to, discrimination based on race, colour, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age or union membership.

Progress

Progress at Hector Rail is based on the possibility to contribute to the development of Hector Rail, through personal abilities and ambitions. No regard shall be given to other causes such as, but not limited to, gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age or disability.

Health and Safety

Hector Rail aims to offer a safe working environment for its employees and strives to work for continuous improvement within this field. In addition, special consideration shall be given to train drivers confronted with severe or lethal accidents or suicides.

Behaviour

Fellow colleagues

Every employee within Hector Rail shall be treated with attention to his or hers individual personality, encouraging the fostering of his/her self-esteem.

External contacts

Statements regarding contacts with different external bodies are described in the related policy statement.

Harassment

Harassment is an individual phenomenon. People may feel harassed by slurs, intimidating or aggressive acts or words, derogatory jokes, inappropriate gestures or by unwelcome physical or verbal conduct. Harassment can also be the communication or display of offensive material linked to any of the aspects of diversity mentioned above, such as gender, religion, race, nationality, sexual orientation or physical ability.

Harassment is never tolerated in any form such as, but not limited to, face-to-face, written, electronic or verbal harassment. An action plan describing how to handle harassment situations shall be present.

Public statements

Only supervisors with special permits may make public statements in the name of Hector Rail.

Drugs and alcohol

The working environment at Hector Rail shall be free of alcohol and drugs. All non-medical use of medicine, all use of drugs or anabolic androgen steroids and acting under the influence of alcohol at work within Hector Rail is forbidden and must be prevented. If, despite this, misuse should be identified, the offender shall be given the possibility to rehabilitate and return to his/her position.

Legal Compliance

Hector Rail always obeys the applicable laws for its operations. No employee has the right to break any law or regulation in the name of Hector Rail, not even in cases when the violation is negligible and the advantages for Hector Rail would be considerable. The individual employee must in such a situation bear all consequences for such a violation.

Loyalty

Confidential information

All information within Hector Rail that is not explicitly public shall be regarded as confidential. Confidential information is never allowed to be spread outside Hector Rail; this includes to friends, members of one's family, etc. This should also be considered when discussing issues between colleagues or using mobile phones in public places, e.g. public transport.

Conflict of interest

Conflicts of interests should be avoided as much as possible. As examples of conflicts of interests, but not limited to these, the following could be mentioned: employment in another company within the business sector of Hector Rail, employment of people you have a personal relation with, buying from or selling to companies where people you are related to have a position or ownership, investments in companies within the business sector of Hector Rail or hold assets within the business sector of Hector Rail or hold board positions in companies within the business sector of Hector Rail.

If you are confronted with a conflict of interest you must immediately inform your supervisor. Not to do this is regarded as a considerable breach of loyalty towards Hector Rail.

Misuse of company property

All Hector Rail property (from locomotives to mobile phones or printing paper) is procured by Hector Rail to be used to support Hector Rail's operations and activities. This also applies to mobile phone subscriptions, email accounts, computer IP addresses, etc. In general, all other use is not allowed and it is absolutely forbidden to use such resources in a way that Hector Rail's credibility could be questioned.

Management

The cornerstones of Hector Rail's management are (GHICAT)

- Acting as a **Good example**
- **Honesty** and integrity
- **Involvement** of employees in the continuous, joint development of our business
- **Coaching** of employees to meet personal and corporate development objectives
- **Availability**, openness and **Transparency**; information shall not be held back at any management level

Complaints

Any employee aware of a violation of applicable law or any of Hector Rail's policies or who suspects such a violation must immediately report this to his/her supervisor. If the supervisor is involved the situation should be reported to the next level in the organization. Such a report will be handled with the highest possible confidentiality. Hector Rail will support each individual who in good faith makes such a report.

It is a breach of this policy not to report a violation or a suspected violation.

Validity

This policy is valid until further notice, but shall be reviewed by the Board every calendar year. The Managing Director is responsible for this.