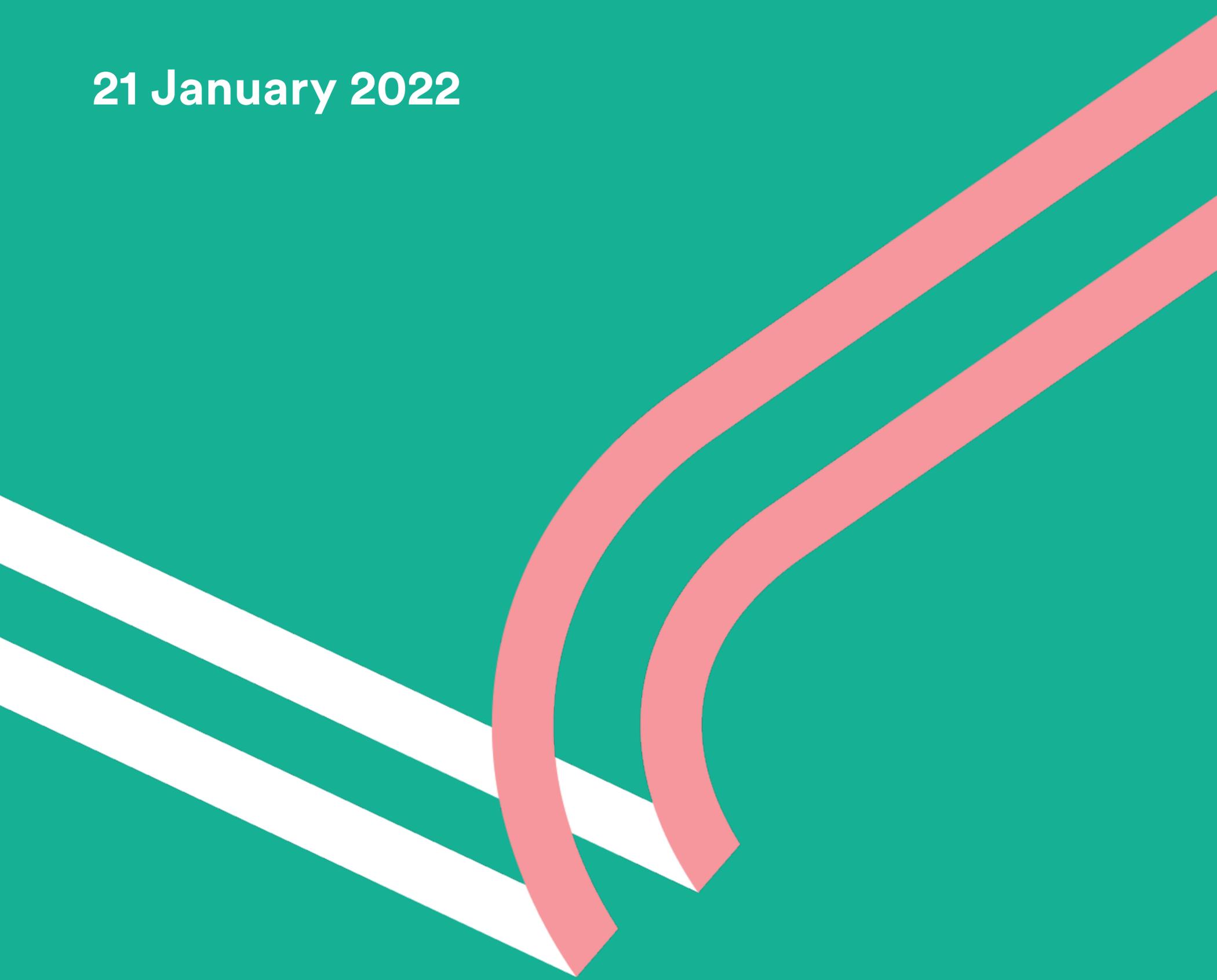




Trainline Supplier Code of Conduct

21 January 2022



Trainline plc Supplier Code of Conduct Policy

Our business

Trainline is a rail and coach travel platform selling tickets for rail and coach carriers in and across 45 countries via its website and app. We employ over 600 people across our offices in London, Edinburgh and Paris. Our mission is to make rail and coach travel easier, enabling and encouraging our customers to make more sustainable travel choices.

Trainline is committed to the highest standards of business and ethical behaviour, as well as adherence with all relevant legislation and regulation.

Trainline is committed to working in a fair, ethical and sustainable way, ensuring that the suppliers we work with adhere to the same high standards and ethics. It is Trainline's aim to develop long term relationships with our suppliers, partners and affiliates based on mutual respect, integrity and honesty.

As a travel platform Trainline's supplier base fits into the following procurement categories:

Categories

Infrastructure / Technology

Brand / Marketing

HR

Customer Services

Facilities

Professional Services

Products and Services

- 100% cloud hosted data centre
- IT hardware and software providers
- Infrastructure and application monitoring
- Cyber security threat services

- Online
- Television/Radio
- Media/Brand Agencies
- Social media

- Recruitment services/Agencies
- Corporate Travel
- Learning & Development platforms

- CRM platform
- Ticketing
- Telephony

- Property Management
- Maintenance
- Cleaning

- Legal
- Finance
- Insurance
- Consultancy

What do we expect from our suppliers?

As a supplier, partner or affiliate to Trainline we expect you to comply with our standard contracts and policies

Our contracts include:

- **Modern Slavery Act 2015** – Trainline has a no-tolerance approach to modern slavery and human trafficking. All suppliers to Trainline must ensure the same.
- **Anti-Bribery** – Bribery is unlawful activity. Trainline and its employees do not accept or condone any behaviour connected with accepting, requesting or offering any bribe or inducement.
- **Data Protection Schedule** – Trainline is committed to ensuring that it adheres with all relevant data protection policies, including GDPR. Our suppliers are required to do the same.
- **Tax** - Trainline expects suppliers to have reasonable procedures in place to comply with relevant tax requirements.
- **Security Schedule** – Trainline is committed to ensuring all suppliers have robust security procedures in place, to protect our data.



Trainline policies include:

Sustainability:

At Trainline, we are driven by our aim to make rail and coach travel easier, and to help customers make more environmentally sustainable travel choices. Across our own operations, we ensure we have practices in place to limit our greenhouse gas emissions and waste and to improve energy efficiency.

Trainline expects our suppliers to have a written sustainability policy appropriate to the size and nature of their business. In this way, Trainline expects all suppliers to ensure that they are minimising adverse effects on the environment and looking at ways to reduce their environmental impact. We may ask suppliers to complete a self-assessment with information on their environmental and sustainability policies.

Human Rights:

In line with the United Nations Guiding Principles on Business and Human Rights, Trainline is committed to upholding the principles of the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

Trainline's suppliers are expected to:

- Never infringe on human rights; and
- Be alert to any evidence, suspicion or suspected infringements of human rights whether in Trainline operations or in the operations of any of their own suppliers, partners or affiliates.

Respecting a competitive marketplace

Trainline is committed to conducting business fairly, competitively and in compliance with laws and regulations. We will not enter into agreements with any suppliers to divide, control or otherwise manipulate a market.

Labour rights and working conditions

Trainline suppliers are expected to comply with:

- The International Labour Organisation Minimum Age Convention and Forced Labour Convention;
- Relevant local and international requirements regarding freedom of association, discrimination, harassment, health and safety, wages and working time

In addition, Trainline expects suppliers to take the physical, mental and financial wellbeing of their employees into consideration, as part of their standard business practices.

Payment Practices

Trainline is committed to paying its suppliers on time. Our standard payment terms are 30 days from invoice, and we work continually to ensure invoices are paid on time. Our payment practices are reported annually to HMRC.



This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation.

By working with Trainline, you agree to adhere to this Code of Conduct.

If you wish to report any violation of this Code of Conduct, whether by a supplier or Trainline employee, please speak with your Trainline contact or if it would not be appropriate to do so you should contact Safecall (our external whistleblowing service provider) via email on trainline@safecall.co.uk, via telephone on 0800 915 1571 or via their website <https://www.safecall.co.uk/report/>.