



Our standards of business conduct





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Who we are

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Arriva – helping to shape a future where passenger transport is the best choice

Our story began in 1938 when the Cowie family opened a second-hand motorcycle shop in Sunderland, UK. Little did we know it would become the first chapter in our incredible story that would see us grow to become a pan-European passenger transport partner.





Arriva is one of the world's leading passenger and logistics companies. We provide bus, train, coach, tram, car and bike-sharing services, as well as on-demand transport solutions so that we can connect people across 10 countries to things that are important to them – friends and family, doctors' surgeries and hospitals, places of work and education, as well as relaxing breaks to the coast or countryside.

Whilst we are spread across 10 countries – all of us are well connected to one 'Purpose' and that is to connect people and communities safely, reliably and sustainably, and to deliver these services in a better way, every day.

It is our daily commitment to this unifying 'Purpose' that ensures we can focus on the things we all care passionately about, whilst also doing the right thing by our colleagues, customers and clients and ultimately enabling us to make the difference.

This is where we derive our strength, how we create value and what gives us the competitive advantage – as a group operating together.

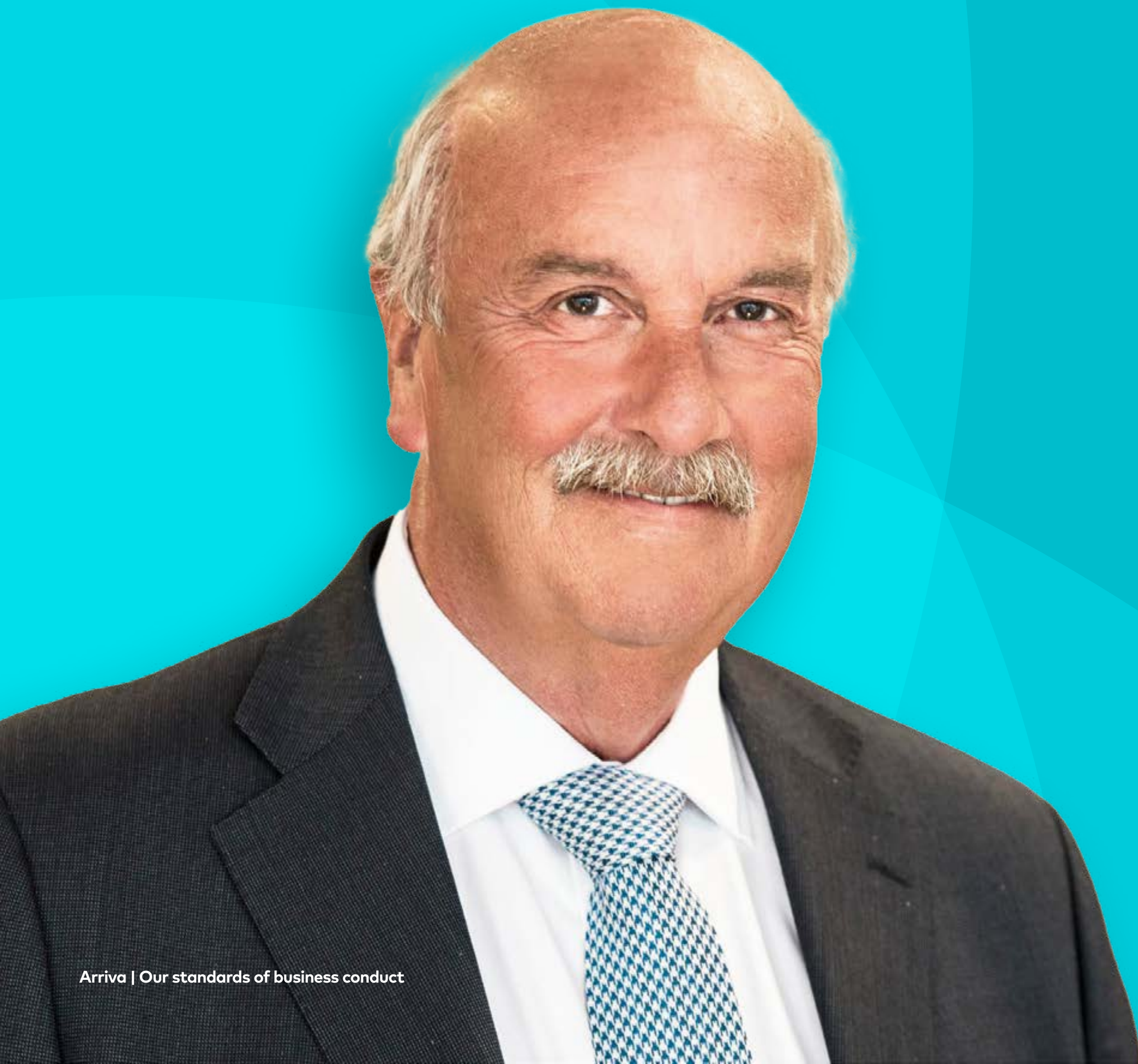
We also have an inspiring and enduring vision for society, and that is to 'help shape a future where passenger transport is the best choice'; a future where people choose to leave their cars at home and use our services, with less congestion on our roads, and cleaner air for the next generation.

This is what inspires and motivates us, and it's also what we know our clients and partners, our governments and supply chain, as well as the people who use our services, want – a more sustainable future.

Arriva – helping to shape a future where passenger transport is the best choice.



We do the right thing at Arriva: **It's up to all of us**



Dear colleagues

This document is here to support you and help everyone who works for Arriva make good decisions. It summarises our standards and explains how we should deal with certain situations, even if the right course of action isn't always clear.

Arriva's reputation is something we all shape every single day – through the decisions we make, through our behaviour with partners and suppliers, and through every single interaction we have with our customers.

Acting with honesty and integrity is also about more than just our company's image. It's about making sure that Arriva is always somewhere we can be proud to work. A place where everybody knows that being honest, treating each other fairly, and doing the right thing is simply the Arriva way.

The most important thing to remember is this: if anything doesn't feel right, speak up straight away.

We take breaches of our standards of business conduct extremely seriously, so please speak to your line manager, speak to your local compliance manager – or, if you'd prefer to speak up anonymously, you can report a concern via the group's speak up facility at arriva.integrityline.com

Together, let's continue to make Arriva a great place to work.

David Martin

David Martin
Chairman

Acting with honesty and integrity is also about more than just our company's image. It's about making sure that Arriva is always somewhere we can be proud to work.

These are the standards we work to

Working at Arriva means working to the highest standards. Governments, customers and taxpayers trust us with significant resources, and it's important that we respect this trust.

We offer our customers travel which is safe, environmentally and socially responsible, and cost effective. Working and behaving in an honest and fair way is an important part of that.

Our standards are binding for everyone who works for Arriva.



At Arriva, it's simple: we do the right thing.
Specifically, that means:

We act legally, fairly and with integrity at all times

We abide by all applicable laws,
regulations and standards. We avoid
conflicts of interest. This applies
equally to everyone we work with
– our customers, business partners,
employees and owners.

At Arriva, it's simple: we do the right thing.
Specifically, that means:

We respect the different cultures in which we work

We show respect for the customs, traditions and social values of the different cultures we impact and the countries in which we operate.



At Arriva, it's simple: we do the right thing.
Specifically, that means:

We make a positive difference

We make decisions and take actions that we believe are sustainable and will have long-term benefits to the world around us – to the environment, and to the economies and communities we work in.



At Arriva, it's simple: we do the right thing.
Specifically, that means:

We expect our business partners to do the same

When working with us, we expect all of our business partners to also comply with our standards of business conduct. We do this by asking them to sign up to a Code of Conduct for Business Partners which encourages them to introduce similar ethical principles across their businesses.



Living our values

Shaped by our people, our values guide our ways of working and help us achieve our mission and realise our vision. It starts with **caring passionately** about our colleagues, our customers, our clients and our planet. It's about **doing the right thing** each and every day, and finding opportunities to **make the difference** in everything we do.



We **care**
passionately



We do the
right thing



We make the
difference



Living our values



We care passionately

- ◆ About creating the best environment for our colleagues to thrive
- ◆ About delivering a great customer experience
- ◆ About being part of a high-performing team, and winning together
- ◆ About our planet, and transforming towns and cities through greener, more sustainable transport.



We do the right thing

- ◆ By putting safety first
- ◆ By striving for improvement in everything we do
- ◆ By embracing diversity and treating people with respect
- ◆ By working to the highest standards and holding each other to account
- ◆ By investing in the wellbeing and development of our people to create a more sustainable workplace.



We make the difference

- ◆ By delivering what matters most to our clients, customers, colleagues and stakeholders
- ◆ By recognising a job well done
- ◆ By finding solutions and not letting challenges get in our way
- ◆ By actively listening and embracing the learning when we get it wrong
- ◆ By innovating and thinking beyond today for a better, more sustainable Arriva tomorrow.

We do the right thing

Working to high ethical standards means always making sure we do the right thing – and doing it in a way that's open and transparent. There are three ways we make sure we do this:

We follow the law

Doing the right thing starts with doing what is legally required. It's the foundation of our customers' trust in us.

We use our policies

Our policies are how we make sure we are applying laws appropriately to our business – and that we have the right processes, training and support in place to do the right thing and to hold each other to account.

We are guided by our values

However, doing the right thing means more than just following the law. The 'Arriva Way' makes sure we are always going further for our customers, and that we have principles to guide us even when things are difficult, or the 'right thing' isn't always clear.



**We do the
right thing**

We're committed to

- ▶ Being an inclusive place to work
- ▶ Promoting human rights
- ▶ Protecting personal information
- ▶ Avoiding conflicts of interest



Keeping everyone safe and healthy

Keeping our people and our customers safe is our main priority. Our customers must be able to trust that they can travel safely at all times, and our employees and partners be confident that they can work without worrying about having an accident or being injured.



Keeping everyone safe and healthy

We are committed to a best practice approach to having safe and healthy working environments, vehicles, equipment and systems. We create this partly through the processes we use, and partly through having a culture where we all take health and safety seriously, look out for each other, and hold each other accountable.

Find out more

Our full policy on health and safety can be found on OneArrivanet.



We do this by...

- **Embedding our ten environment, health and safety guiding principles** into the way we work day in, day out. These principles cover practical environment, health and safety matters such as training, communications, incident management and monitoring mechanisms. You'll find the full list in the Health, Safety and Environmental Matters policy on OneArrivanet.
- **Learning from all successes and incidents** and sharing what we learn with all of our business partners.
- **Setting measurable objectives and targets** and incorporating these into all of our business plans.

You can play your part by...

- **Being informed:** Understand and follow the safety instructions that apply to your role.
- **Setting an example:** If you are a leader or manager, set a positive example of safe working for others to follow.
- **Stepping in:** If you see something unsafe, take action to deal with it, or tell someone straight away.
- **Be comfortable saying no:** Never agree to do anything that can't be done safely.

See FAQs on page 46.

Being an inclusive place to work

We are committed to being a business where everybody has equal opportunities for getting jobs, getting promoted, and getting on. This applies to formal things, like how we select applicants and run interviews, as well as how we work with each other day to day.



Being an inclusive place to work

This is important because we want the best employees. To do that we need to be an attractive employer to everybody, whoever they are, wherever they are from, and however they choose to live their lives. We want to reflect the communities we work in. It not only improves our ability to provide excellent customer service – it's also just the right thing to do.

Find out more

Our Diversity and Inclusion strategy, policy and information about the Global Arriva Inclusion Network (GAIN) can be found on OneArrivanet.



We do this by...

- Building strong relationships with underrepresented groups within the communities we operate in. This helps us to better understand any changes we need to make to our workplace.
- Making sure that there are no exclusive elements to any of our job roles, recruitment practices, development opportunities and career progression assessments.
- Developing our leaders so they can encourage inclusive, welcoming work environments for all employees.

You can play your part by...

- Finding out more about our Diversity and Inclusion strategy, policy and information about the Global Arriva Inclusion Network (GAIN) through OneArrivanet.
- Speaking up if you have a concern, through your line manager, local HR team or anonymously through our whistleblowing facility.

Promoting human rights

In some parts of the world – especially in poor, autocratic or highly informal economies – some people are forced to work in ways that violate their human rights. They might be made to do this against their will, or they might find themselves in situations where there are seemingly no other choices.

These conditions are often called 'forced labour' or 'modern slavery'. Examples include people being paid unrealistically low wages, being forced to pay 'recruitment fees' to be allowed to work, or having their passports taken away to limit their freedom. Forced labour or modern slavery can also include dangerous working conditions, violence, sexual exploitation or the use of child labour.



Promoting human rights

As an ethical company, we respect the human rights of everyone who works for us. However, we often need to rely on companies to deliver some services for us – so it is especially important that we make sure we protect the human rights of those who work on our behalf, and do not do anything which might unintentionally lead to human rights abuses.

Find out more

Our full policy on modern slavery, human rights and human trafficking can be found on OneArrivanet.



We do this by...

- **Helping to prevent human rights abuses:** We all have a responsibility to be vigilant, and speak up if we have concerns about those we do business with, or who do business on our behalf.
- **Making rigorous checks:** We actively engage with third parties who employ people on our behalf to make sure that they are well trained, and work to ethical codes of practice.
- **Working to raise awareness:** We proactively work with our suppliers and government partners to identify areas where there might be risks of human rights abuses.

You can play your part by...

- **Always being vigilant:** We make sure that everyone who works for Arriva, and especially those whose roles might be affected by these issues, understand the risks and are able to spot risk factors and tell-tale signs.
- Finding out more about our Human Rights, Modern Slavery and Trafficking policy through OneArrivanet.
- Speaking up if you have a concern, through your line manager, local HR team or anonymously through our whistleblowing facility.

Protecting personal information

The nature of Arriva's business means that we, and other businesses who work on our behalf, often need to collect personal information (or 'personal data') about people. It is extremely important that our customers, partners and employees trust us to treat this data carefully, store it securely, and use it fairly.

There are strict laws about using and storing personal information. We must be able to show that we comply with the relevant data protection laws including the General Data Protection Regulation (GDPR).



Protecting personal information

These laws make sure that any information about a living person who could be identified from the data – whether this be printed, digital, audible or verbal – is handled appropriately. In particular, that personal data:

- Must be gathered for specific use.
- Should only be gathered if relevant.
- Must be kept accurate and up to date.
- Is only kept as long as is needed.
- Is protected against being lost, damaged or from unauthorised access.

Find out more

If you would like to know how we collect and use your data, our Privacy policy can be found on OneArrivanet.



We do this by...

Adhering to the GDPR laws, making sure:

- We can clearly and readily show that all Arriva Group businesses, and all our third-party suppliers or information and data services, abide by data protection laws.
- Our partners are clear that any personal data gathered on our behalf is being processed correctly and has an identifiable Arriva 'owner'.

You can play your part by...

- Being able to show that the data we store was gathered fairly and in accordance with data protection laws.
- Finding out more about our information security and data protection policies through OneArrivanet.
- Speaking up if you have a concern, through your line manager, local HR team or anonymously through our whistleblowing facility.

See FAQs on page 47.

Avoiding conflicts of interest

A conflict of interest is when something we want personally is different from something that would benefit Arriva. This can make it more difficult for us to act – or to be seen to act – in Arriva's best interests.



Avoiding conflicts of interest

Conflicts of interest could be things like a friend applying for a job that you're conducting the interviews for, a family member working for a company Arriva is competing against or owning shares in a supplier.

We all have a duty to make our decisions at work as impartially as possible and to avoid conflicts of interest if they arise – even if we don't think the conflicts will affect the decisions we make.

Find out more

Our full policy on conflicts of interest can be found on OneArrivanet.



We do this by...

- Requesting that colleagues report any conflicts of interest promptly, via their annual declaration or otherwise, so that we can determine the best way to manage them.
- Maintaining clear guidelines to aid employees in understanding if they have a conflict.
- Providing group-wide training on conflicts of interest to ensure employees are aware of their responsibilities.

You can play your part by...

- Submitting your declaration on time using the guidance: If your family or you would personally benefit – even if only a possibility – this is a conflict which must be declared.
- Finding out more about our Conflicts of Interest policy and guidelines through OneArrivanet.
- Speaking up if you have a concern about any conflicts, whether personal or regarding colleagues, to your line manager, local HR team or anonymously through our whistleblowing facility.

See FAQs on page 48.

Here's how we do things

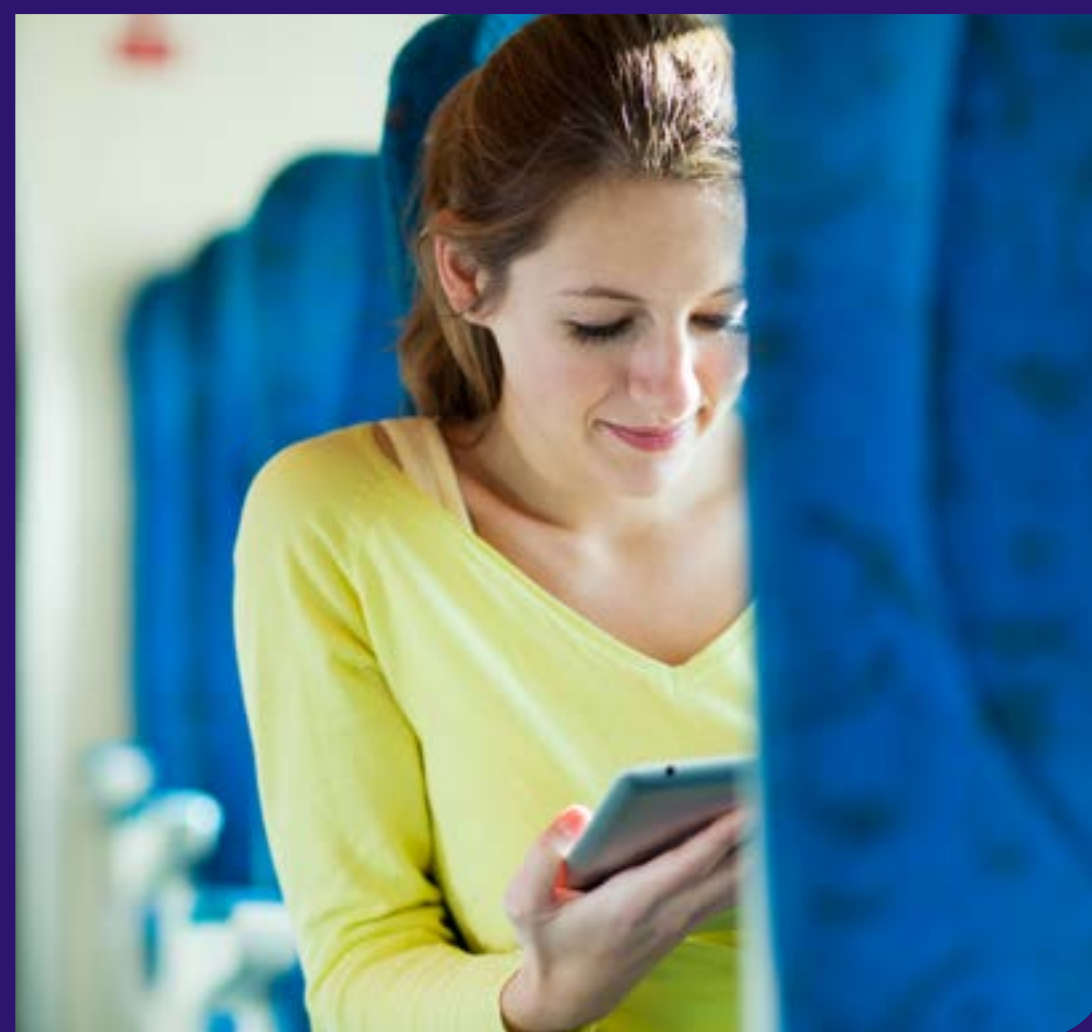
- ▶ Keeping our information safe
- ▶ Bribery and unlawful payments
- ▶ Gifts and hospitality
- ▶ Anti-tax evasion
- ▶ Fair competition is better for all

Keeping our information safe

Arriva creates, stores and shares huge amounts of information. Some of it can be shared freely, whilst some can only be shared with those we trust. And some of it is extremely sensitive and needs very careful handling.

To help us make the right decisions about what we can do with a piece of information, we use a four-stage classification system. It applies equally whether the information is spoken, printed or electronic.

Every piece of information we create should be classified by its author. If it hasn't been, use the classification system yourself to work out how you can share the information.



Our classification system

Open

Information that is in the public domain. **Information is classified as open if...** something we are happy for anyone to know about us and is publicly available information. **Examples include...** marketing materials, websites, and official social media posts.

Internal

Information that is accessible to all employees, trusted third-parties and our subsidiaries. **Information is classified as internal if...** it is not available in the public domain and should be protected from unauthorised disclosure. **Examples include...** management reports, business notes, policies, guidance, handbooks, operational manuals etc. not already available in the public domain.

Confidential

Information of a sensitive nature that is likely to cause damage in the event of unauthorised disclosure.

Information is classified as confidential if... unauthorised disclosure could cause harm either to our reputation or commercially. **Examples include...** negotiating positions, marketing information, competitor assessments and personal data as described in Data Protection Act (DPA) 2018 and GDPR.

Strictly confidential

Information that is assessed to be so sensitive that unauthorised disclosure would cause acute organisational damage and this information needs to be managed in a highly controlled way. **Information is classified as strictly confidential if...** unauthorised disclosure could cause significant harm to our reputation or commercially. **Examples include...** details of major acquisitions, investments or mergers, political or legally sensitive items, sensitive personal data as described in DPA 2018 and GDPR.

Find out more

Our full Information Classification & Handling Standard can be found on OneArrivanet.

Bribery and unlawful payments

We have a zero-tolerance approach to bribery and corruption. It damages economies, businesses and communities; it erodes trust; and it transfers work, resources and money into the wrong hands. As an international business, we are committed to playing our part to reduce its effects around the world.



Bribery and unlawful payments

Bribery is illegal no matter where we work. It is our responsibility to speak up and report any suspect activity.

Find out more

Our Anti-bribery policy can be found on OneArrivanet.



We do this by...

- Providing clear guidance on what constitutes a bribe or unlawful payment.
- Providing training on bribery and unlawful payments.

You can play your part by...

- **Fighting corruption.** There are steps we can take to make sure we avoid situations where bribery or corrupt practices might occur.
- **Knowing your third-party suppliers.** Conduct due diligence into all of our suppliers – especially those that perform services on our behalf. Your procurement team will guide you on how to do this.
- **Never making direct payments to public officials to secure a permit or licence.** Use only legitimate ways to fast-track processes or speed up routine decisions, never 'back-

handlers' – even if it is 'the way business is done around here'. If you are unsure, speak to your local head of legal.

- **Thinking about how your actions might be interpreted.** It's just as important that legitimate actions aren't misinterpreted as being bribes – particularly when giving gifts, arranging hospitality or entertainment, making charitable donations or entering into sponsorship agreements.
- **Being especially careful when dealing with public officials.** Always make sure you conduct yourself openly, honestly and transparently.

See FAQs on page 49.

Gifts and hospitality

Giving and receiving gifts and hospitality can be part of building relationships with people we do business with. But it should never influence – or even appear to influence – the decisions we make.



Gifts and hospitality

Making decisions, awarding contracts or giving promises as a result of exchanges of gifts or entertainment is a form of bribery. We do not do it – no matter what the local business practices might be in the countries where we operate.

Find out more

Our Anti-bribery policy on OneArrivanet provides further information about gifts and hospitality.



We do this by...

- Providing clear guidance on what constitutes the giving and receiving of acceptable gifts and hospitality.
- Providing training around gifts and hospitality.

You can play your part by...

- **Remaining vigilant when you're giving gifts.**
 - **Never give cash.** Or cash-like equivalents, such as gift cards or vouchers.
 - **Be extra careful with gifts to public officials.** Speak to your compliance manager before giving any gift to a public official.
- **Remaining vigilant when you're receiving gifts.**
 - **Keep records.** Know whether a gift needs logging in the local gift register, and do so.
 - **Refuse cash.** Or cash-like equivalents, such as gift cards or vouchers.
 - **Refuse anything lavish.** Unless there is a legitimate business reason, lavish gifts or entertainments are rarely appropriate. If you're not sure, speak to your compliance manager.
 - **Refuse anything that might be seen as a bribe.** If a gift or entertainment could look like a bribe, or appear to be an attempt to influence your decision-making – even if it isn't, or doesn't – turn it down.
 - **Don't compromise your judgement.** If you feel there's a genuine risk that even a legitimate gift or entertainment might sway your decision-making, refuse it.
 - **Double-check anything involving foreign travel.** If a gift involves flights or travel abroad, speak to your compliance manager before accepting.

See FAQs on page 50.

Anti-tax evasion

Tax evasion deprives governments of the revenues they need to provide vital public services. At Arriva we are committed to acting fairly and with integrity in all our business dealings and relationships and to upholding all laws wherever we operate.



Anti-tax evasion

As part of that commitment, we take a zero-tolerance approach to tax evasion and the facilitation of tax evasion. We expect all Arriva employees and others who work with us to operate to the same standards in these areas.

Find out more

Our full policy, standards and guidance on Anti-tax evasion can be found on OneArrivanet.



We do this by...

- Providing clear guidance on what constitutes tax evasion and what to look out for.
- Providing training around Anti-tax evasion.

You can play your part by...

- **Fighting financial crime, including tax evasion.** We should be alert to any suspicious or unusual activity which may indicate that some form of financial crime is being attempted.

Tax evasion (and other financial crimes) usually involve some form of misrepresentation, followed by a flow of funds. If something doesn't seem right to you, we would encourage you to speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, you can do so by using the group's whistleblowing facility Integrity Line (page 42).

- **Knowing your third-party suppliers.** Conduct due diligence into all our suppliers – especially those that perform services on our behalf. Your procurement team will guide you on how to do this.
- **Knowing who your Associated Persons are.** The actions of our Associated Persons can result in criminal prosecutions for Arriva companies in this area. An Associated Person is somebody who performs services for or on behalf of an Arriva business and is somebody who Arriva has a degree of control over. Employees, volunteers, agents, contractors and temporary workers are all examples of Associated Persons. Some suppliers may also be Associated Persons. In considering who might be carrying out tax evasion you need to consider all of the Associated Persons across your business.

See FAQs on page 51.

Fair competition is better for all

We believe in fair and healthy competition. We believe competition gives the best incentives for businesses to be innovative and efficient. It brings about wider and better choices for customers, and ultimately helps customers get the best services at the most competitive prices.

There are laws to both promote competition and prevent anti-competitive behaviour (for example, to stop competitors agreeing with each other to fix prices). These are known as 'competition laws' or 'anti-trust laws'.



Fair competition is better for all

But complying with these laws is about more than just a legal requirement. It is absolutely core to our values, and key to us becoming 'the leading passenger transport partner across Europe'. Although we will continue to compete vigorously to win new business and protect our existing markets, we must also be unmistakably clear to the outside world and all Arriva colleagues that we compete fairly, lawfully and with integrity.

Find out more

Our full policy on competition can be found on OneArrivanet.



We do this by...

- Complying with competition or anti-trust laws.
- Providing a bespoke training module on competing fairly and what this means within the Transport industry.
- Regularly reviewing and updating the policy in line with advancements within competition law.

You can play your part by...

Always acting independently.

Never make agreements with other businesses that could reduce competition. Never agree to fix prices, or agree where we will or will not operate.

Never discussing fares or pricing with competitors.

If competitors ever attempt to discuss fares or pricing, make it clear that Arriva will not take part in such discussions and instigate the pushback process.

Never abusing commercial strength so as to gain an unfair advantage.

Do not deliberately set prices low in an attempt to drive competitors out of the market, or dissuade new entrants from entering the market.

See FAQs on page 52.

Some other important stuff

- ▶ Using social media
- ▶ Using Arriva equipment
- ▶ How we engage in policy making
- ▶ How we treat our suppliers
- ▶ We must keep accurate accounting records and be alert to financial crime



Using social media

Social media sites – that's blogs, chatrooms, sites like Facebook, apps such as Snapchat and other ways of posting online – are part of most people's lives these days.

Social media is a great way for us to talk about the work we do and engage with the communities we serve.

But just like every other communication channel, we need to make sure we use it carefully. This is especially important because of the potential for posts to be shared so quickly and widely, and the way that on social media the boundaries between 'work' and 'personal', 'private' and 'public' can be more easily blurred or forgotten.

Anyone talking about Arriva on social media must follow our best practice for social media guidelines.

Most importantly:

Sharing Arriva content

You need to be authorised and approved to share Arriva information classified as 'open' or 'internal'. Information classified as 'confidential' or 'strictly confidential' must never be published on social media.

Giving your opinion

You must not present personal opinions as being Arriva's opinions when you post something online.

Conducting yourself online

Our values are exactly the same online as anywhere else. You must not send, receive or share anything which is obscene, defamatory or discriminatory, or which is intended to annoy, harass or intimidate others.

Reporting misuse

Treat online misuse, data breach or any other issue as seriously as you would a 'real world' incident. Report it immediately.

Find out more

Our full Social Media policy can be found on [OneArrivanet](#).



Using Arriva equipment

We will supply you with the tools needed to do your job at Arriva. We call these things 'assets'.

Assets include physical equipment (such as uniforms, computers and phones) and also information (such as ID numbers and system log-ins).

If you use Arriva assets, you should:

Keep them safe

Take care to protect equipment and information from being lost or stolen. For equipment, that includes things such as not leaving them unattended in public places. For information, that means things like not sharing log-ins and using strong passwords.

Return them straight away if you're asked

We will always ask you to return our assets when you stop working for Arriva. But we might also ask you to return something to us at other times, too.

Acceptable use of information assets

We have a set of business rules governing fair and acceptable use of Arriva's information assets and systems. This ensures data and systems are protected from damage, loss or inappropriate disclosure, used only for their intended purpose and that we adhere to all local laws and regulations.

Find out more

Please refer to our Acceptable Use policy which can be found on OneArrivanet.



How we engage in policy making

Arriva is a politically neutral business.

We are not affiliated with any political party and we do not make political donations.

In order to provide the best possible transport services for our customers, it's important that we contribute to the debates that shape things such as transport policy and regulation, as well as any other topics that could affect our business, our customers, our employees or the communities we serve.

We do this by making sure we share our views with a wide range of groups – including governments, regulators, trade associations and other bodies. There are strict laws and regulations about political engagement and lobbying. We always comply with these.

If you are involved in lobbying or engaging with policy makers
You must understand the rules about lobbying where you operate, and follow them. This includes requirements about transparency and reporting. Before you speak on behalf of Arriva, make sure you are clear on what our official stance is, and that your views are consistent with this.

If you want to stand as a political candidate or engage in political activity
Communities are stronger when people engage in the democratic process. But you must undertake political activity in a private capacity, with your own resources, and always make clear that your views are personal and not those of Arriva. If you are planning to run for elected office, you must let your manager know.

Find out more

Our full policy on Engaging with Public Officials can be found on [OneArrivanet](#).



How we treat our suppliers

A significant part of the social and environmental impact of our operations derives from our supply chain. Arriva wants to work with suppliers who have the most positive environmental and social impact.

Arriva's Procurement policy ensures that we deliver our mission to become 'the leading passenger transport partner across Europe', and will ensure that:

- We manage risk within our supply chain.
- Our suppliers are treated fairly and we strive to pay them on time.
- We support delivery of Arriva's sustainability objectives.
- All procurement activity shall be conducted in a manner to provide, to the greatest extent practical, open and free competition.
- We will only trade with suppliers who meet our standards, and who commit to observing the Arriva Code of Conduct for Business Partners.
- We will apply additional mandatory standards appropriate to the particular purchase type and risk.
- We strive to maintain long-term and stable partnership with our suppliers, based on fairness, trust, and integrity so that we can deliver the most value for Arriva.

Responsible procurement in action

Driving sustainable environmental practices

To improve road safety and the environmental impact of our vehicles, we have introduced a number of minimum standards which underpin our tenders. These are regularly audited during supplier performance and reinforce changes in legislation.

Supporting social inclusion

As a public transport provider, we have aided the reduction of social exclusion for those without access to a car. This is demonstrated via widening access to labour markets, increasing social mobility and the use of local labour.

Being a catalyst for regeneration

Places that are good to work in and live have good transport systems. Regeneration projects increase the attractiveness to space and assist communities with tackling congestion. Regeneration projects are successful when there is access to high quality sustainable transport.

Find out more

Our Procurement policy can be found on OneArrivanet.



We must keep accurate accounting records and be alert to financial crime

There are strict laws and standards that tell businesses what accounting records they need to keep, and what financial statements they must submit to the relevant authorities in the countries in which they operate.

These financial statements must give a true and fair view of our finances – including things like whether Arriva is making a profit or loss, what investments we hold and what money we've borrowed.

Our annual financial statements are checked by independent auditors.

We must always remain alert to the possibility that criminals may try to use our business to move funds raised from criminal activity through our legitimate financial systems. This is known as 'money laundering'.

It is a crime, and it is important we do not let criminals misuse our services in this way. We have a duty to be vigilant and act swiftly if we think criminals are using Arriva to launder money.

There are also severe financial penalties for companies and individuals who are involved in money laundering and other financial crimes.

What we need to do:

It's extremely important that we keep accurate accounting records, so that we comply with local company law and local/international accounting standards and are able to properly prepare our financial statements.

Being alert to financial crime means that we need to ensure that we undertake appropriate risk assessments and due diligence in relation to the people and businesses we deal with.

We need to be aware that Arriva takes a zero-tolerance approach to all financial crime, whether under UK law or under the law of any other country.

If your role includes keeping financial records:

You must keep clear and accurate records.

If you want more detailed guidance:

Accounting guidelines, which give detailed information about accounting standard compliance, can be found on OneArrivanet. You can also get help and advice from Group Accounts or the Group Tax Team.

If you're concerned about something:

speak up straight away, so we can investigate.

We do the right thing at Arriva: it's up to all of us

Thank you for taking the time to read through this document. It is really important that you understand how it applies to you in your day-to-day work.

We take breaches of our standards of business conduct very seriously and disciplinary action will be taken for behaviour that does not meet these standards.

And remember, if something doesn't look right, speak up about it. It is up to all of us to continue to make Arriva a place where doing the right thing is something we all do every day.



Speaking up

We want everyone who works at Arriva to share our standards. But there might be those few who don't. In order to maintain our reputation for high standards, it's important we all commit to speaking up straight away if we see something that isn't right (this is sometimes called 'whistleblowing').

- ▶ When should I speak up?
- ▶ How can I speak up?

When should I speak up?

If you're not sure about a particular course of action, these six questions can help. Ask them of yourself, or talk them through with someone else:

Q1

Is it legal?

Q2

Is it in line with our policies and guidelines?

Q3

Does it demonstrate our values?

Q4

What would my colleagues, manager or family think?

Q5

If it was a story in the newspapers, how would it portray both me and Arriva?

Q6

How would I feel if it happened to me?

How can I speak up?

Speaking up helps everybody. By speaking up, you're not just protecting Arriva – you're also protecting our customers and your colleagues and doing what's right to stop wrongdoing or even criminal activity.

Remember:

Choose the contact you're most comfortable with

For most people, that's their **line manager**. But it doesn't need to be. You could also speak to your **local compliance manager**, your **local head of legal**, or **someone in the compliance team**.

You don't need to have 'all the facts'

If something doesn't look or feel right – that's enough for us to want to look into it further. Speak up, and talk it through with someone. Don't worry about being mistaken. If it turns out to be nothing, that's fine. It won't reflect badly on you.



You can speak up anonymously if you want

It is important to us that people can raise issues without worrying about it affecting them. There are regulations – which we actively support – that protect your right to raise concerns confidentially. If you want to speak to someone confidentially, you can do so by using the Integrity Line, Arriva's group whistleblowing facility, or use any local whistleblowing facilities that may be in place.

We protect those who speak up

As long as your concerns are genuine and you are acting in good faith, by acting on the information you have available to you, you're doing the right thing by speaking up. We will not tolerate any form of retaliation directed against anyone who raises a concern regarding a breach of these standards.

Integrity Line

You can report any relevant concerns via arriva.integrityline.com.



Frequently asked questions

- Keeping everyone safe and healthy
- Protecting personal information
- Avoiding conflicts of interest
- Bribery and unlawful payments
- Gifts and hospitality
- Anti-tax evasion
- Fair competition is better for all

Keeping everyone safe and healthy

Q+A

Q

The policy links to a group policy and does not refer to my employer or workplace. Where can I find out how health and safety is managed in my workplace?

A

Each Arriva business has its own local policy and procedures for safe working. You can find out more by asking your line manager, safety manager or safety representative.

Q


If I believe that something isn't safe, can I really stop it?

A

Yes. The law in all our operating countries is clear. If you have been asked to do something that you believe at the time is dangerous, you do not have to do it. If you see somebody else doing something that you think is dangerous, you can ask them to stop. As soon as it is safe to do so, you can stop working and – although it is sometimes difficult – tell your line manager right away about your concerns.



Protecting personal information



Q+A

Q

I am at the photocopier and notice that someone has left a print-out which includes personal data. Shall I leave it there?

A

No. If it is not clear who owns the printing, dispose of it in a shredder or use the confidential bins provided if one isn't available. This should also be raised as an incident.

Q

I overheard a conversation recently where two colleagues were talking about some information that I am sure they shouldn't have access to, but I'm not 100% certain. Should I report it?

A

Yes. You don't need to have all the facts; if there's a suspicion, you must report it. All information security incidents should be reported immediately as any delay could result in a bigger issue later. You can raise this directly with Arriva's data protection officer or your local compliance manager.


Q

I think I'm going to retain all my documents in case they are needed in the future. Is that OK?

A

No. You need to be selective and use the Retention policy to understand what you should keep and what should be disposed of. Some documents need to be retained for audit, tax or legal purposes – the policy will show you the different retention periods for these. You can find this policy on OneArrivanet.

Avoiding conflicts of interest

A large purple speech bubble containing the white text 'Q+A'.**Q**

Arriva is negotiating a contract with a supplier. My husband works for them and is close to their negotiating team.

A

Stop working on the project and discuss the situation with your line manager as soon as possible. It is likely that there could be a direct conflict of interest here because the interests of your family member may conflict with the interests of Arriva.

Q

I own shares in one of Arriva's suppliers.

A

If you hold less than a 5% shareholding you are able to continue to work on the project. If you hold more than 5%, you must stop working on the project and discuss the situation with your line manager as soon as possible.

Q

My partner works for a transport company which is bidding against Arriva for a contract to provide public transport services.

A

Discuss this with your line manager as soon as you become aware of the situation. If necessary, appropriate safeguards can be put in place, such as allocating you to a particular part of the project in order to reduce your exposure to commercially sensitive information.

Bribery and unlawful payments

Q+A

Q

In my local country it is common practice to pay the local official a small amount of money to get my paperwork stamped. Is this a problem?

A

Yes. You should refuse to pay as this would be considered a 'facilitation payment', a small bribe that is illegal under UK law, the standard we have adopted in our Anti-bribery policy. Like all bribes, payments like this must be refused and reported to your local compliance manager.

Q

Who is a government official?

A

It has a broad definition; have a look at the list below:

- Officials and employees of all branches of government including military and police.
- Officials and employees of government-owned or controlled businesses, including charities, and any state-funded print or broadcast media.
- Political party officials, employees and candidates for political office.

- Officials, employees and individuals working, permanently or temporarily, in an official capacity for or on behalf of governments or public international organisations whose officials are afforded diplomatic immunity (e.g. the United Nations), including embassy staff.
- Members of a royal family.
- Any family members or any individuals acting in official capacity on behalf of any of the above.

Gifts and hospitality

Q+A

Q

I have received a £50 gift card from a supplier. Can I accept it?

A

No. You may not accept a gift card, certificate or voucher, whatever the value, from any business partner, because it counts as a cash equivalent, and our policy is not to offer or accept cash or cash equivalents as gifts. You should politely decline the gift card, and explain to the supplier that Arriva's policy means you are unable to accept it.

Q

I have been invited to a golf day by my supplier. I know I need to report this in the gifts and hospitality register if it's over a certain amount but feel awkward asking the supplier what it costs, it feels impolite. What should I do?

A

It is important that you record the total value of the hospitality you're receiving and therefore it is correct to ask the supplier. You shouldn't feel awkward; the supplier will understand that you need to do this to follow company policy. If in doubt, always consult your local compliance manager.



Anti-tax evasion

Q+A

Q

What is tax evasion and facilitation of tax evasion?

A

Tax evasion involves the illegal non-payment or underpayment of tax and is a criminal offence. Facilitation of tax evasion involves assisting someone else to commit tax evasion. This is also a criminal offence where it is done deliberately and dishonestly with the intention of supporting another person in the evasion of tax.

Q

Why is this important to Arriva?

A

If an Arriva employee (or any other person associated with Arriva) commits tax evasion or helps (i.e. facilitates) another person to commit tax evasion then that represents a criminal offence, and that person becomes exposed to criminal sanctions.

Furthermore, if an Arriva company fails to prevent persons associated with it (including employees) from facilitating tax evasion in the course of their engagement with Arriva, then that Arriva company can also be found guilty of a criminal offence. In these circumstances Arriva can be criminally prosecuted; subjected to unlimited fines; excluded from tendering for public contracts and publicly 'named and shamed'.



Fair competition is better for all

Q+A

Q

My colleague used to work for a competitor. She told me that she still has her old employer's pricing strategy for next year on her personal laptop and asked if I would like to see it. What should I do?

A

Do not accept the offer. Remind your colleague that we should not discuss or accept any information relating to competitor pricing and that the information should not be disclosed to anyone.

Q

I have been asked to attend a transport network meeting. Can I participate?

A

Yes. It is important that we stay up to date with the latest trends and market developments in the transport sector. Where meetings like this can become problematic is when commercially sensitive information is discussed. Do not engage in these discussions. When you return to the office you must record your attendance at this meeting, with details on what was discussed. Your local compliance manager can show you how to do this.



