



# Our standards of business conduct

a  company



# Contents

It's up to all of us	01
These are the standards we work to	02
Doing the right thing	03
Living our values	04
Speaking up	05
Keeping everyone safe and healthy	06
Our journey to Destination Green	08
Protecting personal information	10
Bribery and unlawful payments	12
Gifts and hospitality	14
Fair competition is better for all	16
Avoiding conflicts of interests	18
We are an inclusive place to work	20
Using social media	21
Using Arriva equipment	21
Keeping our information safe	22
How we engage in policy making	22
How we treat our suppliers	23
Promoting human rights	23
We must keep accurate accounting records and be alert to financial crime	24

## Mobility partner of choice

Our journey began in 1938 when the Cowie family opened a second-hand motorcycle shop in Sunderland, in the North of England. Little did we know then it would be the first chapter in an incredible story that would see us grow to operate right across Europe.

Today, Arriva is part of Deutsche Bahn AG and is one of the largest providers of passenger transport in Europe. We employ more than 60,000 people, and deliver more than 2.2 billion passenger journeys across 14 European countries each year.

While we have many businesses in 14 different countries, there are many ways in which we are connected and there is real strength, value and a competitive advantage to us operating together as a group.

*Together we are Arriva* is our promise to all Arriva employees, regardless of which country they operate in, mode of transport they provide, or job they do. We promise to give all our employees a great experience in return for their commitment to Arriva and for doing an excellent job.

By making improvements in the way we work, by reducing our waste and by focusing on customer needs, we will become the partner that our PTAs and clients want to work with.

Arriva – mobility partner of choice.

# Doing the right thing at Arriva: It's up to all of us

**Dear Colleague,**

**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.**

But 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.

This document, in conjunction with the DB Code of Conduct, is here to help. Collectively, it's here to guide us in making the right decisions even if the right course of action isn't always clear. It explains how we should deal with situations that might be damaging to each other or to our company if they do arise.

The most important thing to remember is this: if anything doesn't feel right, speak up straight away. Speak to your line manager, speak to your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580** (or if outside the UK **00 44 191 528 5322**) or email: **inconfidence@arriva.co.uk**. We take breaches of our standards of business conduct extremely seriously.

Please read these pages and take the time to understand how the content applies to the work you do. Together, we can continue to make Arriva a place where doing the right thing is something we all do every day.

**Mike Cooper**  
CEO Arriva



**/// 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: those we set ourselves and those expected of us by Deutsche Bahn, our parent company. 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: all board and executive members, managing directors and employees globally.

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

Use this document, in conjunction with the DB Code of Conduct (you'll find this on One Arrivanet), to guide you to make the right decisions.



## 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.

## We respect the different cultures in which we work

We show respect for the customs, traditions and social values of the countries and cultural groups in which we operate.



## 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.

## We expect our business partners to do the same

When working with us, we expect all of our business partners (e.g. contractors, temporary staff) 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.



# Doing 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 them 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.



**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:**

1. Is it legal?
2. Is it in line with our policies and guidelines?
3. Does it demonstrate our values?
4. What would my colleagues, manager or family think?
5. If it was a story in the newspapers, how would it portray both me and Arriva?
6. How would I feel if it happened to me?

## **Got a question?**

**Get in touch 0800 587 7580**  
**[inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)**

# Living our values

Working at Arriva means doing business the 'Arriva Way' no matter where we work – the way we interact with colleagues, customers, suppliers and other third parties such as contractors and other temporary staff should all come from our values.

## One Arriva

### One Arriva

We work as one team – 'together we are Arriva'

#### That means we...

Respect each other and our differences, say thank you and praise each other and give each other feedback to help us improve.

## Doing the right thing

### Doing the right thing

We look after our customers, colleagues and the environment, and always put safety first

#### That means we...

Keep colleagues, customers and ourselves safe. We act with honesty and integrity and take responsibility for our actions. We are the best we can be and do our job with passion, pride and positivity.

## Great customer experience

### Great customer experience

We keep our customers happy every day

#### That means we...

Put our customers at the heart of everything, seeing things from their view to help us make the right decisions and deliver great service. We are proactive about improving things, and we take ownership for making those things happen. We continuously raise our standards.

## Thinking beyond

### Thinking beyond

We are curious and inspired to think beyond today, for an even bigger and better Arriva tomorrow

#### That means we...

Always try to see the bigger picture. We understand how we contribute to the aims of Arriva. We look for ways to improve things and are open to change and new ideas – not just in our own areas, but right across the business.

# 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'.)**

**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, someone in the compliance team – or call one of the confidential telephone lines.

**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, contact the group's confidential line on **0800 587 7580** (or if outside the UK **00 44 191 528 5322**) or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk) or use any local whistleblowing facilities which may be in place\*. You won't need to leave your name if you don't want to but it does help us to have contact with you in case we need any follow-up information.

**We protect those who speak up**

As long as your concerns are genuine and you're acting on the information you have available to you, you're doing the right thing by speaking up. We wholeheartedly support people who raise concerns, and there is never any question of there being reprisals against you or the possibility of you losing your job.

*\*The DB Group speak up facilities are also available to Arriva employees if you'd prefer to speak to someone outside of Arriva, the details of which can be found at [www.deutschebahn.com/en/group/compliance/whistleblowing-1212468](http://www.deutschebahn.com/en/group/compliance/whistleblowing-1212468)*



**Got a question?**

**Get in touch 0800 587 7580**  
**[inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)**

# Keeping everyone safe and healthy

Keeping our customers and people safe is hugely important. 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.

We are committed to having 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.

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 group health and safety policy referenced below.

**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.

And we can all play our 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 you don't have the knowledge or training to do safely.

#### Find out more

Our full policy on Health and Safety can be found on One Arrivanet.

#### Have a concern? Speak up

Speak to your line manager, your local compliance manager, your health and safety representative – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**





## 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.

# Our journey to Destination Green

The world we live in is under pressure: populations are growing, cities are expanding, resources are being depleted and the climate is changing. Public transport plays a key role in helping to address these challenges and allowing societies to thrive.

As well as working to provide the most environmentally sustainable shared transport services, we must also make sure that as a business, we are doing everything we can to reduce our own negative impacts on our environment – particularly with regard to five key areas we can directly influence in all our businesses: fuel, energy, water, waste and pollution. This is 'our journey to Destination Green'.

As a business, we have committed to

- Striving to prevent pollution to air, soil and water, and minimise sound and light pollution from our operations.
- Being efficient in our use of energy and water, and smart about how we consume products and services – from paper to vehicle parts.
- Creating as little waste as possible and reusing or recycling everything we can.
- Encouraging increased use of public transport as a more environmentally friendly alternative to private transport.

We can all make a personal difference

We all have a duty to help prevent pollution to the environment. By thinking about the themes of Destination Green – fuel, energy, water, waste and pollution – we will be able to spot areas we can improve. Some of these might be strategic or process-related (such as 'always use our most efficient vehicles first'), others might be simple, personal things (like 'I'll switch off my monitor when I'm away from my desk').

Why not make a personal pledge right now?

- **Fuel:** I will drive efficiently to minimise emissions, accelerating and braking gently, and not letting my engine idle unnecessarily.
- **Energy:** I will make sure equipment and lighting is switched off when it's not needed, especially evenings and weekends.
- **Water:** I will look out for water leaks and dripping taps, and make sure they are fixed quickly.
- **Waste:** I will always put waste in the right bin, maximising recycling.
- **Pollution:** I will make sure any oil or chemical spill is cleaned up quickly and safely, to prevent pollution.

Find out more

Our full environmental policy can be found on One Arrivanet.

Have a concern? Speak up

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**



# Destination Green



## Fuel

Our aim is to use as little fossil fuel as possible.



## Water

Our aim is to conserve water, using as little as possible.



## Pollution

Our aim is to prevent pollution to land, water or air.



## Waste

Our aim is to create less waste, and recycle everything we can.



## Energy

Our aim is to be efficient with the energy we use in our buildings.

# 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 both The Data Protection Act (DPA), and from May 2018, the General Data Protection Regulation (GDPR). These laws make sure that any information about a living person who could be identified from the data – both printed and digital – is handled appropriately. In particular, that personal data:

- Must be gathered for specific use.
- Only relevant information is gathered.
- Must be kept accurate and up to date.
- Is only kept as long as is needed.
- Is protected against being lost or damaged.



## What this means for us

We must be able to 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.

## Those who work with Arriva partners

must be clear that any personal data gathered on our behalf is being processed correctly and has an identifiable Arriva 'owner'.

## Anyone who holds personal data

must be able to show that the data was gathered fairly and in accordance with data protection laws.

## Find out more

Our privacy policy can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local compliance manager, Arriva's data protection officer or data protection champion – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580** (or if outside the UK **00 44 191 528 5322**) or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)



## Protecting personal information Q&A

**Q. I am at the photocopier and notice that someone has left a print-out of salary 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 One Arrivanet.

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

#### **We all play a part in fighting corruption**

There are steps we can take to make sure we avoid situations where bribery or corrupt practices might occur.

#### **Know 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 make 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-handers' – even if it is 'the way business is done around here'. If you are unsure, speak to your local head of legal.

#### **Think 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, or making charitable donations or sponsorship agreements.

#### **Be especially careful when dealing with public officials**

Always make sure you conduct yourself openly, honestly and transparently.

#### **Find out more**

Our full policy on bribery and unlawful payments can be found on One Arrivanet.

#### **Have a concern? Speak up**

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**





## Bribery & 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

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

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.

## 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.

## 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.

## Find out more

Our full policy on Gifts and Entertainment can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**





## Gifts & 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.

# 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'.

But complying with these laws is about more than just a legal requirement. It is absolutely core to our values, and key to us being the 'mobility partner of choice'. 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.

## Examples of how we behave fairly

### Always act 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 discuss fares or pricing with competitors.

If fares or pricing are ever discussed with competitors, make it clear that Arriva will not take part in such discussions. If discussions continue between others, cease to be involved in the discussions.

### Never abuse 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.

## Find out more

Our full policy on Competition can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your legal manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on 0800 587 7580 (or if outside the UK 00 44 191 528 5322) or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)





## **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.

# 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.

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.**

**If you feel you're in a conflict of interest situation:**

**Remove yourself.** Take yourself away from the situation straight away.

**Speak to someone.** Raise the conflict with your line manager as soon as possible.

**If you're not sure whether you're in a conflict of interest or not, ask yourself:**

**Would you or your family personally benefit?** If they would – or even if it's only a possibility – there's a conflict.

**How might this look to someone on the outside?** If it's possible they might see a conflict of interest, then you must act as though there is one.

**Then speak to your line manager.**

Don't make the decision by yourself.

You'll need specific approval to keep working in that area, and may need to look at the potential conflict again in the future if things change.

**Find out more**

Our full policy on conflicts of interest can be found on One Arrivanet.

**Have a concern? Speak up**

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580** (or if outside the UK **00 44 191 528 5322**) or email: **inconfidence@arriva.co.uk**



## Avoiding conflicts of interest 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.



## Doing the right thing at Arriva

Further guidance

Got a question?  
Get in touch 0800 587 7580  
[inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)

# We are 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 is regardless of their age, race, gender, disability, sexual orientation, religion – or anything else other than their skills and abilities. 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.

## 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.

### We make this happen by:

**Building strong relationships with minority 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.

**Develop our leaders** so they develop inclusive, welcoming work environments for all employees.

### Find out more

Our full equal opportunities policy can be found on One Arrivanet.

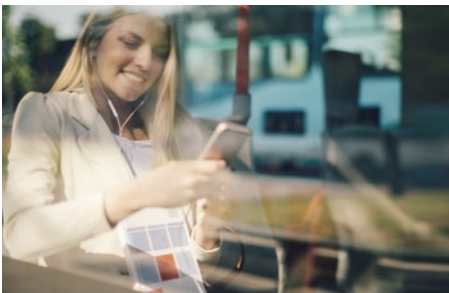
### Have a concern? Speak up

Speak to your line manager, your local HR team – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580** (or if outside the UK **00 44 191 528 5322**) or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)



# 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 One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**

# Using Arriva equipment

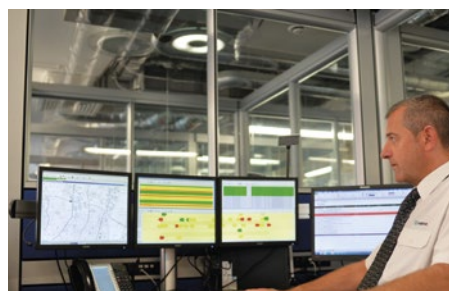
We will supply you with some or all of the tools needed to do your job at Arriva. We call these things 'assets'. Assets include physical equipment (such as uniforms, computers and phones) and also information (such as ID numbers and system log-ins). If you use Arriva assets, you should:

## 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.



## Delete Arriva information from your own devices when we ask

If you use your own computers, phones or other equipment to do Arriva work, (known also as BYOD – 'Bring Your Own Device') then you must remove all Arriva information from them when you stop working for Arriva, or at any other time when we ask you to.

## Find out more

Our BYOD standard can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local compliance manager, the group information security team – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**

# Keeping our information safe

Arriva creates, stores and shares huge amounts of information. Much of it can be shared freely with anyone; some of it should be shared only 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

Is information that is in the public domain.

Information is classified as open if... it's 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

Internal is accessible to all employees, trusted third-parties and our subsidiaries. Internal 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 DPA 1998 and GDPR.

### Strictly confidential

This information 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 1998 and GDPR.

### Find out more

Our full Confidentiality policy can be found on One Arrivanet.

### Have a concern? Speak up

Speak to your line manager, your local compliance manager, the Group information security team – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**.

# 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

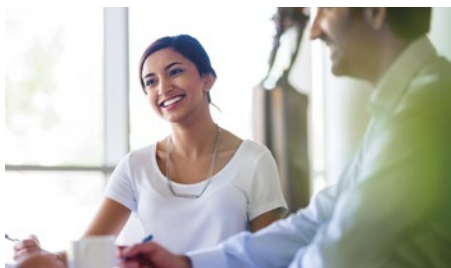
Our full policy on Political Lobbying can be found on One Arrivanet.

### Have a concern? Speak up

Speak to your line manager, your local compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: **inconfidence@arriva.co.uk**

# How we treat our suppliers

The partners and suppliers we choose to buy from or work with, and how we choose to work with them, can have a significant impact on the environment, economies and communities.



Because of this, we have a set of 'responsible procurement' principles which guides how we engage with our suppliers. It helps make sure that our decisions have a positive impact – that they promote innovation, efficient use of resources, and improve the lives of those who are involved with our supply chains.

## 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 full Responsible Procurement policy can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local compliance manager, your procurement team – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)

# 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.

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.

## 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. In particular:

## We make 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.

## We are always vigilant

We make sure that everyone who works for Arriva, and especially those whose roles might be affected by these issues, understands the risks and is able to spot risk factors and tell-tale signs.

## We work to raise awareness

We proactively work with our suppliers and government partners to identify areas where there might be risks of human rights abuses.

## Find out more

Our full policy on Human Rights can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local finance team or compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)

# 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.

Tax evasion is a further example of financial crime where there is deliberate non-payment or underpayment of tax. Allegations of tax evasion can seriously damage our reputation and a conviction could result in large fines and /or Arriva being prevented from taking part in public tenders. In the UK, it is a criminal offence if we fail to prevent anyone associated with Arriva from facilitating tax evasion, either in the UK or overseas.

## 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 tax evasion and the facilitation of tax evasion, 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 in Arrivanet. 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.

## Find out more

Our full Accounting Guidelines can be found on One Arrivanet.

## Have a concern? Speak up

Speak to your line manager, your local finance team or compliance manager – or, if you'd prefer to speak anonymously, contact the group's confidential line on **0800 587 7580 (or if outside the UK 00 44 191 528 5322)** or email: [inconfidence@arriva.co.uk](mailto:inconfidence@arriva.co.uk)





## Doing 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.



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