



# ETHICS

Code of ethics

# At the heart of our **culture** is our **purpose**

**Because moving is essential to meet, work... or simply to live, at Transdev we empower freedom to move every day, thanks to safe, reliable and innovative solutions that serve the common good.**

We are actively involved in the energy transition and bridging the social divide.

We connect and reconnect people & communities, the rural to the urban, providing solutions tailored to the needs of our customers and passengers.

We share and act for the collective, to contribute to the well-being of society and to create opportunities and progress. We care about people and the environment, in order to achieve reliable and sustainable mobility.

We dare to take up challenges and step out of our comfort zone to always offer the best solutions and innovations in response to tomorrow's challenges.

We are proud to make 11 million people travel daily across 5 continents.

We are people serving people. And mobility is what we do.

Transdev, The Mobility Company





Message from

## Thierry Mallet

*Chairman and CEO*

**A**t Transdev, we develop mobility solutions which aim to **simplify people's mobility**. This specialization places us at the heart of everyday life in territories. It makes us a key player committed to serving general interests, developing local services and protecting the environment.

**Transdev performs these tasks relying on its tens of thousands of employees** who, at all-time and anywhere in the world, act and make decisions in accordance with strong ethical principles.

These individual but shared principles, in line with our values, complying with the recommendations of our shareholders and with guidelines to which Transdev subscribes, such as the Global Compact, shape the Group's image and contribute to the relationship of trust built with our various partners.

Whatever our position in the company, we must keep them in mind and apply them every day, to help us in our choices and to **ensure consistency in our actions and words**.

Our Code of Ethics, approved by the Board Members, allows each Group employee or manager to know "how to correctly proceed".



# Our ethical principles

They reflect our commitment and the Group's undertakings to all stakeholders. They also convey all the values that make Transdev a passionate, committed Group, and a high-performing reliable partner.



## PASSION

### CUSTOMERS

To promote our local authority customers' interests, we put the passenger at the heart of what we do.

We anticipate on needs diligently treat any complaint, and fight for fair competition

### GENERAL INTEREST

Taking the views of all stakeholders into consideration, we aim to increase the quality of life of the people we serve. We apply strictly our Duty of Vigilance

### QUALITY

As mobility professionals, we consider service quality as a constant requirement.

### EXEMPLARITY

Managers or employees, we must be exemplary in applying our ethical principles.

### GROUP SUCCESS

We are united in serving the Group. Our collective energy is the key to success.



## COMMITMENT

### HEALTH & SAFETY

Health and safety of people involved in our activities: employees, passengers, or others (such as pedestrians, visitors...) is our first operational mission.

### AGREEMENTS

Professional and contractual commitments are fundamental for us

### COMPLIANCE

Strict compliance with the applicable laws and regulations in each country and with our own internal processes, even the more stringent of them, is required at all times.

### DIVERSITY

We reject all forms of discrimination, particularly vis-à-vis employees or passengers. We promote tolerant freedom of expression and of association. It is through mutual respect, openness and diversity that we create value.

### ENVIRONMENT

To help improve the environment, we develop public transportation networks and active/soft transport modes. We also systematically seek to reduce consumption of non-renewable resources and emissions generated by our activities.



## PERFORMANCE

### DEVELOPING PEOPLE

As our business primarily relies on people, protection of Human Rights and personal and collective development is key. We reject all forms of harassment, and all forms of child, forced, compulsory labour.

### OPERATING NETWORKS

Operational expertise is at the core of the performance of our contracts and of the quality of our service. We maintain and enhance it, to be able to offer the best service to our clients.

### ASSET PROTECTION

Our assets and resources (material, financial, image...) are precious. Correctly managing and protecting them is a daily responsibility.

### CONTINUOUS IMPROVEMENT

As part of a continuous improvement process, we analyse successes and failures, and identify useful innovations by creating ideas through sharing best practices.

### BUSINESS CONTROL

Risk management, internal control and internal audit are deployed throughout the Group to secure our objectives and compliance with our rules and processes.

### INFORMATION MANAGEMENT

Controlling information is vital. We effectively disseminate the necessary information while striving to protect it when it is confidential or sensitive.



## PARTNEPSHIP

### INTEGRITY

As a trusted partner and a fair competitor, our integrity is the base of our relationships with our stakeholders.

No gift or advantage that could affect, or let people think it could affect, objectiveness is acceptable. If acting as a Board member or equivalent on behalf of the Group, we do not accept any director's fee;

### AVOIDANCE OF CONFLICTS OF INTEREST

We aim to avoid any form of conflict of interest. Therefore, we identify and treat situations in which the independence of our judgement and decision-making could be affected.

### OPPOSITION TO FRAUD AND CORRUPTION

We vigorously oppose all forms of fraud and corruption, whether active (customers, prospects, administration...) or passive (suppliers, subcontractors, competitors...).

### KNOWLEDGE OF THIRD PARTIES

We check and monitor the reliability of the entities we work with in several ways: Ability to deliver, Compliance, Financial health an Ethics (ACFE).

### INVOLVEMENT

We are careful to not compromise our professional actions by other activities which could be unfavourable to the interests of the Group

# Transdev Ethics & Compliance committee

■ The Committee is managed by the Risks, Engagements and Ethics Department, which co-ordinates, drives and monitors the deployment and application of the Transdev Group's Ethics & Compliance policy.

■ The Committee meets to evaluate successes achieved, difficulties encountered, and incidents recorded. It can meet on an ad-hoc basis to discuss any sensitive issues.



## A project to **embody together**

This guide is meant for all employees and managers of the Transdev Group. It can be passed on to our clients. It must be upheld by all our suppliers and service providers who undertake to respect it through the Supplier Charter

## Duty to **alert**



In any group country, a whistleblowing system is available for all employees, and enables them to disclose in good faith an incident while being protected from any retaliation.

Any breach, or attempted breach, of the Code shall be reported:

- either to your Manager
- or to your Ethics & Compliance
- or to your Country Legal Team
- or through your country whistleblowing system.

**In case you do not have access, or do not know how to access, to your country whistleblowing system, do not hesitate to report to the Group Ethics and Compliance Officer ([ethics@transdev.com](mailto:ethics@transdev.com)).**

**Have a question  
Need advice**



Please contact

- your Manager
- your Country Ethics & Compliance Officer
- and/or your Legal Department
- and/or **[ethics@transdev.com](mailto:ethics@transdev.com)**