

Policy for the Integrated Management System for Occupational Health and Safety, Energy, Environmental Protection, Quality, and Product Safety

The General Management of SMART Railway Technology GmbH has established the following Policy for the Integrated Management System for Occupational Health and Safety, Energy, Environmental Protection, Quality, and Product and IT Safety and Data Protection and is committed to its implementation.

The Policy supplements the corporate Mission Statement and builds on the values of our corporate culture. It encompasses the management systems for occupational health and safety, energy, environmental protection, quality and product and IT safety and data protection. It will be reviewed on a regular basis and updated as needed.

It is binding for the SMART Railway Technology GmbH location and applies to all managers and employees regardless of whether they are employed directly by SMART Railway or by an external service provider (temporary employment agency).

The Policy forms the basis for our corporate and business processes. This means it will be incorporated in our day-to-day processes and thus affect our employees as well as our business partners (customers, suppliers, service provider) and our products.

Our commitment

- General Management is responsible for defining goals, developing and implementing measures, as well as defining key indicators. These defined goals must be measurable, and their implementation must be verified on a regular basis. The Policy provides a framework for defining and assessing individual goals and goals regarding occupational health and safety, energy, environmental protection, quality, and product and IT safety and data protection.
- In the course of the quarterly Management review, General Management assesses compliance with the Policy as well as its suitability and goals, and defines adjustment and modification measures as needed.
- We commit ourselves to ensure that all relevant laws, standards, and self-imposed obligations are taken into account and complied with. All employees receive instruction in order to create awareness of these topics.
- All relevant topics are documented in the integrated management system, and communicated and implemented in the company via the management systems; they thus reach all employees.
- All employees are included in the implementation and execution of the management systems. They receive the information, qualification, and motivation needed for their tasks and functions. They are obligated to perform these tasks.

- All relevant aspects of the Policy are passed on in a suitable adjusted format to persons working on behalf of SMART Railway Technology GmbH. This ensures that SMART Railway Technology GmbH can comply with its obligations.
- We commit ourselves to the continuous improvement of our management system for occupational health and safety, environmental protection, quality, and product and IT safety and data protection and its performance.
- In the course of the strategic planning process, General Management ensures that adequate personnel and investment resources will be made available for the implementation in all relevant areas of the organization.

For the management topics below, the following aspects are defined as part of our Policy:

Occupational health and safety

The General Management of SMART Railway Technology GmbH agrees to:

- avoid and minimize hazards and risks, in particular of accidents and occupational disease,
- operate an effective emergency management system,
- systematically identify and assess hazards and risks, and to implement suitable, adequate protective measures,
- take social concerns into consideration in all corporate activities,
- introduce, realize, and maintain a management system in order to contribute to the continuous improvement of worker safety and thus to avoid harmful effects on health.

Energy management

The General Management of SMART Railway Technology GmbH agrees to:

- continuously improve the energy-related services,
- reduce energy consumption,
- observe energy efficiency criteria in the procurement process for products and services,
- introduce, realize, and maintain a management system in order to contribute to a sustainable reduction of harmful effects on the environment from corporate activity.

Environmental management

The General Management of SMART Railway Technology GmbH agrees to:

- avoid harmful effects on the environment and thus contribute to environmental protection,
- systematically identify and assess the environmental effects of the company's relevant processes,
- implement suitable and adequate corrective measures in order to reduce harmful effects on the environment,
- take environmental concerns into consideration in all corporate activities,
- introduce, realize, and maintain a management system in order to contribute to a sustainable reduction of resource consumption and harmful effects on the environment from corporate activity.

Quality management and product safety

In the framework of the quality management system in accordance with ISO TS 22163 and DIN EN ISO 9001, the General Management of SMART Railway Technology GmbH agrees to:

- select the FMEA methodology and perform statistical analyses in the development and manufacturing process in order to deliver safe products,
- fulfill the requirements placed on our product and service,
- make the processes and resources available that are needed to fulfill customer expectations and avoid mistakes,
- continuously improve the effectiveness of the quality management system,
- make the Policy the basis for defining and assessing quality goals and key indicators.

SMART Railway Technology GmbH considers the principles set forth in standards DIN EN ISO 9001 and ISO TS 22163 as guidelines that will be evaluated with a regard to their continued adequacy. The quality management system creates a framework for defining and assessing quality-related and technical safety goals. This makes it possible to consistently meet our customers' expectations and to ensure the ongoing development of the company's employees. To ensure compliance with the Policy, General Management appoints a quality management representative.

IT Security and Data Protection

The General Management of SMART Railway Technology GmbH agrees to:

- to ensure the confidentiality, integrity, availability and authenticity of data in accordance with their risk potential by taking appropriate measures,
- that internal and external requirements for IT security are identified, evaluated and integrated into our processes and products,
- that appropriate technical, organisational and infrastructural measures are taken to ensure that access to sensitive data or systems and critical infrastructure (e.g. servers) is only granted to authorised persons,
- maintain appropriate IT emergency management.

To comply with this policy, the management has installed an IT manager and appointed a cybersecurity manager, cybersecurity specialist and data protection officer.

Kassel, March 2023

General Management, SMART Railway Technology GmbH

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