



Procurement Policy

DSB



Department responsible: Executive Vice President, Procurement & Legal Affairs

Approved by: The Executive Team

Date: 28 October 2025

1. Introduction

Group Procurement has the overall responsibility for procurement matters at DSB and sets the framework for procurement and contract management processes at DSB.

2. Purpose

The Procurement Policy sets the framework for how we at DSB make purchases in a socially responsible and sustainable manner so that our purchases are financially prudent and so that we make demands on the value chain.

The Procurement Policy covers all purchases of goods and services in DSB and wholly-owned companies.

3. Our ambition and targets

Group Procurement provides purchasing, procurement law and contract management advice. Purchases are made in Group Procurement in collaboration with the relevant business areas. Contract management is carried out by contract managers, who are either based in Group Procurement or in the relevant business areas.

All purchases must be made in adherence to our procurement, ordering and contract management processes.

4. How we achieve our ambition and/or reach our targets

Group Procurement works closely with the business areas when concluding contracts to ensure that the needs of the individual business areas are met. Group Procurement facilitates the involvement of relevant specialists and ensures that purchases are made according to the legal requirements on tendering and the management of procurement.

To support this, Group Procurement works with:

- Category-based purchasing
- Fact-based data
- Structured processes for contracting and contract management described in DSB's management system, including roles and responsibilities
- Procurement compliance targets
- Sustainability and other CSRD requirements in the value chain

This practical procedure is as follows:

- The business areas register their purchasing needs
- Group Procurement's sourcing managers follow the Group Procurement Guidelines and the sourcing model in the procurement process. This ensures that all mandatory requirements are

complied with and contracts are concluded through tendering and competitive procurement, cf. the thresholds for such

- Group Procurement's sourcing managers hand over the contracts to a contract manager once the contract is signed
- Contract managers are responsible for the contract throughout the term of the contract and follow up on the rights and obligations in the contract
- Category managers continuously track purchases in their category to follow up on targets and plans
- Group Procurement provides purchasing data and KPI's.

4.1. Impacts, risks and opportunities

Through requirements and obligations in the contracts, we can influence the value chain. Group Procurement uses a segmentation model that identifies the largest and most important suppliers, including those that are associated with the greatest risk to DSB, for example by impacting our operations, and those that we have the greatest impact on, for example where suppliers' employees are affected by working at our locations.

We are always looking for good, constructive and proactive cooperation with our suppliers. As a public institution owned by the Danish state, DSB has a special responsibility to uphold high ethical and moral standards. Therefore, our objectivity and professionalism in connection with making a purchase, concluding a contract or managing the contract during the contract term must never be called into question. All supplier contracts must contain DSB's Ethical Guidelines, and measures must be taken to follow up in the event of a suspected breach of these guidelines. Every employee has an obligation to inform his or her immediate superior of any impartiality issues or suspicion of other breaches of DSB's Ethical Guidelines.

5. Organisation, responsibility and approval

The Executive Vice President, Procurement & Legal Affairs has the overall responsibility for the Procurement Policy, which is approved by the Executive Team. Likewise, it is the Executive Vice President, Procurement & Legal Affairs who, with the involvement of other relevant executives, is responsible for approving any necessary deviations from the Procurement Policy.

6. Interaction with other policies and guidelines

- Corporate Social Responsibility Policy
- Ethical Guidelines for Suppliers and Business Partners (Code of Conduct)
- Decision-making powers of DSB SOV and DSB's subsidiaries, respectively
- Policies and guidelines on rail safety, IT security, GDPR, environment and health and safety
- Rules regarding gifts and other benefits