

Rochester Public Transit

Title VI Program

January 2024

Title VI of the Civil Rights Act of 1964 ensures that public transportation and other FTA-funded services to the public are provided without regard to race, color and national origin. To help us verify that, FTA issued Circular 4702.1B in 2012, which requires recipients of FTA funds to submit a Title VI Program every three years. Chapter IV of the circular explains the policies, practices and procedures that FTA recipients must document to constitute a Title VI Program. The full circular can be found online at:

[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Title VI FINAL.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf)

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1. Introduction

This program reflects Rochester Public Transit's policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civic Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person in the United State of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.

2. Title VI Requirements

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

In 1994, President Bill Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

To that end, the Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which replaced Circular 4702.1A issued in 2007. This document outlines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds.

Specifically, FTA requires recipients, including the Rochester Public Transit, to "document their compliance with DOT's [United States Department of Transportation's] Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including sub recipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA."

Rochester Public Transit Title VI Program includes the general requirements applicable to all FTA recipients, as well as those requirements specific to operators of regular route transit service.

3. Signed Policy Statement

A policy statement signed by the Mayor of the City of Rochester assuring Rochester Public Transit's compliance with Title VI of the Civil Rights Act of 1964 can be found as [Attachment A](#).

4. Notifying Beneficiaries of Protection under Title VI

The Title VI Circular provides the following direction regarding public notice of Title VI protections:

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

Rochester Public Transit provides notice of Title VI protections through a variety of means.

- Detailed information and instructions for filing a Title VI complaint, and a copy of the approved Title VI Program, are available on the Rochester Public Transit website: https://www.rochestermn.gov/home/showpublisheddocument/40895/638453262_60657000
- The Title VI Program will be filed in the Title VI Manager's office and available to the public for review upon request. Complete copies will be provided to the public upon request. The document will be translated to other languages upon request.
- Title VI information posters shall be prominently and publicly displayed in Rochester Public Transit facilities, and revenue vehicles, and on its schedules ([Attachment B](#)).

City of Rochester employees with material and direct involvement with the Rochester Public Transit programs shall be subject to the following:

- Staff shall be provided a copy of the Title VI Program, informed of the provisions of Title VI, and Rochester Public Transit expectations to perform their duties accordingly; all such employees are required to sign the Acknowledgement of Receipt ([Attachment C](#)).

5. Title VI Complaint Procedures

The Title VI Circular provides the following direction regarding Title VI Complaint procedures:

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The complete Title VI complaint procedures are as follows:

1. Any individual, group of individuals, or entity who believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with Rochester Public Transit. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (the date when the complainant(s) became aware of the alleged discrimination, the date on which that conduct was discontinued, or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identities of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or email transmittal for the Rochester Public Transit to be able to process it.
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for them to complete, sign, and return to the Rochester Public Transit for processing.
2. Upon receipt of the complaint, the Transit Administrator/Title VI Manager will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. Complaints against the Rochester Public Transit will be referred to FTA or the appropriate federal agency for proper disposition pursuant to their procedures.
3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.

- b. The allegation(s) must involve a covered basis such as race, color, national origin.
 - c. The allegation(s) must involve a program or activity of a federal-aid recipient, sub recipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for addition information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once Rochester Public Transit decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will receive a case number and will then be logged into Rochester Public Transit's records, identifying its basis and alleged harm.
6. In cases where Rochester Public Transit assumes the investigation of the complaint, Rochester Public Transit will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Rochester Public Transit written notification of acceptance of the complaint to furnish their response to the allegations.
7. Rochester Public Transit final investigative report and a copy of the complaint will be forwarded to the appropriate federal agency and affected parties within 60 calendar days of the acceptance of the complaint.

Rochester Public Transit has a standard process for investigating all complaints. Full procedures for filing a complaint and Rochester Public Transit procedures for investigating complaints can be found as [Attachment D](#). At a minimum, the complaint should include the following information:

- Name, mailing address, and how to contact complainant (i.e., telephone number, email address, etc.)
- How, when, where and why complainant alleges s/he were discriminated against. Include the location, names and contact information of any witnesses.
- Other significant information.

Rochester Public Transit provides a complaint form on its website at <https://www.rochestermn.gov/home/showpublisheddocument/40895/63845326260657000>

The complaint may be filed in writing with The City of Rochester City Clerk or with FTA at the following addresses:

The City of Rochester City Clerk
201 SE 4th Street
Rochester, MN 55904
507-328-2900
507-328-2901

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

6. Record of Title VI investigations, complaints, or lawsuits

The Title VI Circular states the following regarding Title VI investigations, complaints, and lawsuits:

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient.

Rochester Public Transit will maintain a log of Title VI complaints to summarize and track all complaints. See [Attachment E](#) for a copy of the log. Rochester Public Transit has never received a Title VI-related complaint or lawsuit pertaining to Rochester Public Transit, since the last Title VI update in August 2023.

7. Rochester Public Transit Limited English Proficiency Outreach Plan

A full copy of Rochester Public Transit outreach plan for individuals with limited English proficiency (LEP) can be found in [Attachment F](#). We also observe the “Safe Harbor Provision” from Circular 4702.1B Chap. III-9. Key elements of the plan include:

- Rochester Public Transit website will have an email added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.
- Rochester Public Transit Title VI Policy and Limited English Proficiency Plan has been posted on the agency website, www.rptride.com
- Rochester Public Transit staff has added a link to Google Translator to aid in translation of our website.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services available on site [with bi lingual transit staff] or with IMAA (Intercultural Mutual Assistance Association).
- Rochester Public Transit has a continuing relationship with various agencies working with LEP populations. This includes bus training for bi-lingual caseworkers who in turn work with various cultural groups. These caseworkers are very proficient with public transit. A link is provided on Rochester Public Transit website to one of the major agencies, IMAA (Intercultural Mutual Assistance Association) that serves the Rochester Area. <http://www.ima.net/>

- Translation of vital documents include:
 - Title VI Notifications on Vehicles
 - Title VI Complaint Form
 - Title VI Complaint Procedures

8. Notification of Rochester Public Transit Title VI Obligations

Rochester Public Transit publicizes its Title VI program by posting its commitment to providing services without regard to race, color or national origin at Rochester Public Transit -owned facilities. Further Rochester Public Transit provides information regarding their obligations on the website, on displays in our downtown transit center, and in transit schedules available on all busses.

9. Analysis of Construction Projects

Future Projects:

- BRT (Bus Rapid Transit)
- Bus Stop Improvement Project
- Fleet Electrification Project
- 75th St Park and Ride

10. Rochester Public Engagement Plan

- The City follows a public participation plan established under the Rochester-Olmsted Council of Governments (a sixteen member Policy Board with representatives from the various governmental jurisdictions within Olmsted County). The complete report, titled ROCOG Public Involvement Policy is attached to this document as [Attachment H](#).
- The plan details how ROCOG has directed its efforts to involve the community in transportation planning decisions, not only to meet federal mandates, but also to improve the decisions themselves. The City has decided to follow this plan because of the following reasons:
 - The City is part of ROCOG and participated in creating this plan.
 - The City's issues and ROCOG's issues on transportation are similar.
 - The Public Involvement Vision seeks a broad based community consensus and it is in the best interest of the City to strive to do the same when planning new transit routes.

11. Minority Representation on Planning and Advisory Bodies

The Title VI Circular states the following regarding the membership of planning and advisory bodies:

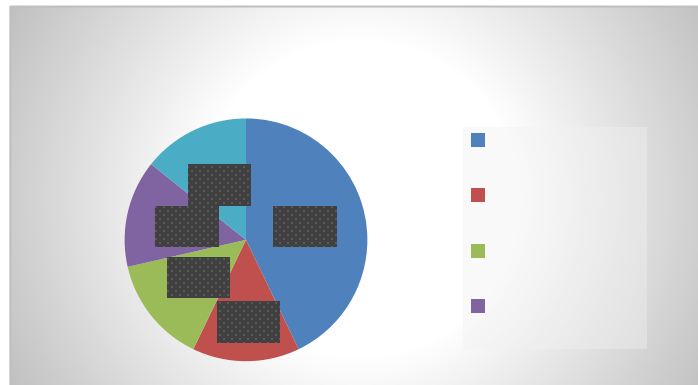
Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils

The City of Rochester Citizens Advisory on Transit (C.A.T.) exists in order to provide user input into the operation and planning of the Rochester's Transit System. Citizens Advisory on Transit (C.A.T.), The C.A.T. shall consist of 7 members appointed by the Mayor and approved by the Common Council of the City of Rochester. Members shall be registered voters and residents of the transit service area. Consumers of public transit shall be represented on the CAT if possible. Membership shall be for a term of three years. The member's term shall be calculated from the closest January 1st date to their appointment date. Reappointment of members, once their term has expired, is subject to approval by the Mayor of the City of Rochester and is limited to 2 full terms. Partial terms (i.e. an appointment of a new member for a current member who resigns in the middle of their term) are not counted as a full term. Members apply for and serve two-year terms; they are unelected community members who represent the needs of Rochester Transit users. Bylaws can be seen on [Attachment I](#).

C.A.T Board Member Roster:

Name	Term
Sabit Ahmed	1st Term- May 17, 2021 - Dec 31, 2024
Charles A Asamoah	1st Term - May 17, 2021 - Dec 31, 2024
Karen Doering	1st Term - Jan 17, 2018 - Dec 31, 2023
Joel Lovelace	2nd Term - Jan 01, 2019 - Dec 31, 2024
Kanchan S Panesar	1st Term - Feb 23, 2022 - Dec 31, 2024
Tracy L Schramm	2nd Term - Jun 17, 2019 - Dec 31, 2025
Lisvel Valerio	2nd Term - Oct 21, 2019 - Dec 31, 2025

Race Categorized:



12. Sub Recipient Monitoring

Rochester Public Transit does not have any sub recipients of its funding from FTA.

13. Facility Equity Analysis

Rochester Public Transit has not constructed any facilities that require a Title VI Equity Analysis since the last Title VI Program submission in 2023.

14. System Wide Standards and Policies

The FTA Title VI Circular states that all fixed route transit providers, like Rochester Public Transit, must set system-wide service standards and policies. Rochester Public Transit's system-wide service standards and policies are defined below.

Service Standards

- Vehicle Loads: Trip ridership on Rochester Public Transit express routes are reviewed weekly to look for patterns of bus loads. When an individual trip experiences ten or more full bus loads at least three times a week for three straight weeks, the trip is examined for possible solutions to reduce the number of full bus loads in the context of available financial and vehicle resources.
- Vehicle Headways: For peak period express routes serving Rochester have 10 min. headways and 30 min non-peak. Rochester Public Transit has a goal of at least 30-minute headways per route. Weekend Routes have 60 min headways.
- On-Time Performance: The goal is that 90 percent of the trips are on time for all regular route service. Due to the nature of express bus service an "on-time trip" is defined as a trip that is not more than two minute early and not more than five minutes late. However, note for those time points classified as "drop-off" time points in the schedule buses can be early due to the nature of the express bus service. Monthly random sampling is done and an analysis will be done annually using the sampling data to determine compliance with this policy.
- Service Availability: Rochester Public Transit is primarily a fixed and express route service with a supplemental Paratransit Service. As a result the service has evolved with the philosophy of having our Transit Center located in the center of the city that will have the most trips and serve the largest busiest areas with access to park-and-ride routes. Main routes are also supplemented with three connected express routes with frequent trips to our park-and-ride facilities. If you divide the city into four equal quadrants, there is to be at least one express route located in each quadrant. Service is provided within city limits

Service Policies

Rochester Public Transit primarily provides fixed routes. Most Rochester Public Transit fixed routes contain a local portion that connects to a park-and-ride and where boarding's and alighting's take place.

- Distribution of Transit Amenities: The local portion of Rochester Public Transit fixed routes operate as a “flag down” service, meaning the bus will stop anywhere along the local portion of the route if a customer flags down the bus driver, given that the bus driver deems it a safe location to stop. Shelters and stops are still placed along the route for scheduled time pick-ups. The goal of each express route is to transport riders to and from the park-and-ride facilities. Rochester Public Transit maintains four park-and-ride facilities, stations and lots. Park-and-ride lots have fewer amenities than stations. Park-and-ride lots may have a bench or shelter that is at least 4 feet by 8 feet. A shelter is defined as a rider waiting facility that is not fully heated and cooled and does not include restrooms. All park-and-ride stations and shelters at park-and-ride lots will include bus service information, and may include lighting.
- Vehicle Assignment by Mode: Rochester Public Transit service has three types of heavy-duty vehicles: articulated low floor 60ft- EV, Arboc cutaway 27 ft., and 40-foot low flow. Each bus style has a different passenger capacity. Buses are assigned to specific trips based on the historical ridership figures and current ridership trends to best match vehicles sizes to ridership demand and help prevent standing loads. Vehicle assignments are analyzed each service pick change.

The Arboc Cutaway buses are used for Paratransit (ZIPS) demand response service are typically identical models that are only two to three years differences in age over a five-year life span. For peak period times, all buses are assigned equally to the service.

Additional Service Policies are incorporated within the Transdev Mobility Company Policy Manual [Attachment J](#), which is viewed to set practices that provide a general framework of how the City of Rochester will govern its transit operations.

More specifically, the adoption of the Policy Manual is directed toward ensuring compliance with all applicable federal regulations as condition to receiving federal funds for vehicles and facilities. The Policy Manual provides the mechanism to satisfactorily demonstrate that its contracted bus service providers are also in compliance with applicable federal regulations and that the City is adequately monitoring that compliance. The Policy Manual sets the procedures to satisfactorily demonstrate that the City of Rochester is providing adequate monitoring, oversight, and control over its federally funded facilities and vehicles.

The end result of implementing the Policy Manual is an environment to help ensure that Rochester Public Transit services and facilities are operated in safe, reliable, and cost-effective manner and made available to the general public regardless of race, color, national origin or disability.

The Policy Manual includes the following chapters:

- The Ethical Decision Making Process
- Reporting a Suspected Violation
- No Retaliation
- Safety
- Corporate Social Responsibility
- Collaboration and Mutual Respect
- Respecting the Views of Others
- Promoting Workplace Diversity and Equality
- Honoring Our Commitments
- Fair Competition
- Our Financial Integrity
- Maintaining Confidentiality
- Compliance with Employment Laws
- Employee Health and Safety
- Drug and Alcohol- Free Workplace
- Social Media
- Company Email and Internet Use
- Company Property
- Conflict of Interest
- Anti-Bribery and Anti-Corruption
- Political Contributions and Activities
- Others with Whom We Do Business
- Insider Information
- A Special Message to Senior Management
- Notes

15. Subcontractors and Vendors

All subcontractors and vendors who receive payments from the Rochester Public Transit where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

16. Record Keeping

The Title VI Manager will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of Title VI Program, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

Attachment A:

**THE CITY OF ROCHESTER, PUBLIC TRANSIT
TITLE VI
NON-DISCRIMINATION - POLICY STATEMENT**

The City of Rochester, Public Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title I of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To obtain more information on The City of Rochester, Public Transit's nondiscrimination obligations or to file a Title VI complaint, contact The City of Rochester:

For information contact:

Transit Director
Rochester Public Transit
4300 East River Road NE
Rochester, MN 55904
507-328-2424
507-328-2401 (fax)

To file a complaint:

City Clerk
201 SE 4th Street
Rochester, MN 55904
507-328-2900
507-328-2901 (fax)

You may file a written complaint no later than 180 calendar days after the date of the alleged discrimination.

Information on non-English alternative formats may be obtained from the City of Rochester Public Transit's Transit Director.



A handwritten signature in cursive script, reading "Randy Staver", is written over a horizontal line.

Attachment B:

ROCHESTER PUBLIC TRANSIT TITLE VI NOTICES

Title VI Notice Posted at Rochester Public Transit Facilities:



Your Rights Under Title VI of the Civil Rights Act of 1964

The city of Rochester promises access to all our programs, services and benefits without regard to race, color, or national origin. The City of Rochester will not tolerate discrimination by its employees or entities it contracts with for products or services. The City of Rochester prohibits all discriminatory practices that may result in an individual:

- Being denied any service, financial aid or benefit provided under a program to which he or she may be otherwise entitled,
- Being held to different standards or requirements for participation.
- Experiencing segregation or separate treatment in any part of a program.
- Being subject to distinctions in quality, quantity or manner in which a benefit is provided.
- Experiencing discrimination in any activities conducted in a City of Rochester facility built in whole or part with Federal funds.

The City of Rochester is committed to fairness and pledges to uphold its responsibilities under Title VI of the Civil Rights Act of 1964, which says in part:

- No person in the United State shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (42 U.S.C. Sec200d)

In addition, Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 1994 provides:

- Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

If you believe that you have been discriminated against in relationship to the City of Rochester because of your race, color, or national origin, you may file a complaint with the City of Rochester at:

City Clerk
201 SE 4th Street
Rochester, MN 55904
507-328-2900
507-328-2901 (fax)*

or

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

Upon request, this publication will be translated and/or made available in alternative formats.

Title VI Notice Posted Aboard Rochester Public Transit Revenue Vehicles:

Title VI Notice to Public

The City of Rochester hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.


Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding this service has a right to file a formal complaint with the city. Any such complaint must be in writing and submitted to the City of Rochester - Transit and Parking Division within one hundred eighty (180) days following the date of the alleged occurrence.

For more information regarding civil rights complaints, please contact:

City of Rochester - Transit and Parking Division - 4300 East River RD NE, Rochester, MN 55906
Telephone: 507.328.2424
www.RPTRIDE.com

Title VI Notice Included in Rochester Transit Schedules: Highlighted

Rider Information



Bicycles

Each RPT bus has a rack on the front which will hold two bicycles. Instructions are printed on the rack. Lift your bike and place the bottom of the tires on the rack. Secure bike by placing the tension bar on top of one wheel.

If exterior rack is full, or the bike does not fit properly, a bicycle may be brought onto the bus and kept under the control of the owner in the front seating area. Persons with disabilities will have priority to use the wheelchair restraints located in that area.

Wheelchairs

All RPT buses are wheelchair accessible. The driver will assist in securing your wheelchair. Ramps will be deployed for anyone who wishes to use them when boarding.

Lost and Found

Articles found on buses will be kept in the lost and found at RPT offices for 30 days only. Please call 328-RIDE (7433) for information.

Operations

The City of Rochester contracts for operations of the service. Our contractor shares our same values of customer service and safety. You can visit our website at rptride.com for more information or to contact us.

Funding is provided by the Federal Transit Administration (FTA), Minnesota Department of Transportation (MnDOT), City of Rochester, and passengers through fare and bus pass purchase.

Title VI of the Civil Rights Act of 1964 ensures that public transportation and other FTA-funded services to the public are provided without regard to race, color, or national origin. To file a civil rights complaint, visit rptride.com, or contact:

Transit Manager
4300 E. River Road NE
Rochester, MN 55906

The information in this publication is provided to the public for information only. Schedules are subject to change without prior notice. Rochester Public Transit is not responsible for inconvenience or damage resulting from errors in this publication or delays in transit service. For current information including delays and detours, visit rptride.com.

Rochester Public Transit's mission is to provide an efficient and accessible public transit system that is convenient, safe, reliable, cost-effective, and adaptable and supports City of Rochester's strategic priorities for affordable living, quality city services for quality living, and economic vibrancy and growth management.

www.rptride.com507-328-RIDE (7433)9

Attachment C:

**ROCHESTER PUBLIC TRANSIT
STAFF ACKNOWLEDGEMENT OF RECEIPT
OF TITLE VI PROGRAM**

All Rochester Public Transit employees with material and direct involvement with the Rochester Public Transit program are expected to consider, respect, and observe this Title VI Program in their daily work and duties. If a member of the public approaches you with a question or a complaint, direct them to the Transit Operation Planner who is the Title VI Manager.

I hereby acknowledge the receipt of the Rochester Public Transit Title VI Program. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI and in accordance with Federal Transit Administration (FTA) Circular 4702.1.B.

Your signature

Print your name

Date

Attachment D:

**Rochester Public Transit
Title VI Complaint Form**

The **Rochester Public Transit's** Title VI Complaint Procedure is made available in the following locations:

- Agency website
- Hard copy in the central office
- Available in appropriate languages for LEP populations.
- Other, _____

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Section V			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes			
<input type="checkbox"/> No			
If yes, check all that apply:			

<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

**The City of Rochester City
Clerk
201 4th Street SE #135
Rochester, MN 55904**

or

**FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590**

Attachment E:

Rochester Public Transit will maintain a log of Title VI complaints to summarize and track all complaints. Rochester Public Transit has never received a Title VI-related complaint or lawsuit pertaining to Rochester Public Transit.

<u>Complainant</u>	<u>Address</u>	<u>Date Filed</u>	<u>Status</u>	<u>Disposition</u>

<u>Year</u>	<u>Number of Complaints</u>
2019	0
2020	0
2021	0
2022	0
2023	0

Attachment F:

Limited English Proficiency [LEP] Plan

Introduction

This *Limited English Proficiency Plan* has been prepared to address the City of Rochester's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the City of Rochester, which receives federal assistance through the U.S. Department of Transportation [U.S. DOT].

Plan Summary

Rochester Public Transit has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Rochester Public Transit undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City of Rochester Public Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Rochester Public Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Rochester Public Transit to the LEP population.
4. The resources available to Rochester Public Transit and overall costs to provide LEP assistance.

A summary of the results of Rochester Public Transit four-factor analysis is in the following section.

Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely*

to encounter a City of Rochester Public Transit program, activity or service.

Rochester Public Transit staff reviewed the most recent US Census information from American Fact Finder on the US Census Bureau's website:

<https://www.census.gov/quickfacts/fact/table/MN,rochestercityminnesota/PST045222>

The information determined that 19,827 persons in Rochester [17.8% of the population] speak a language other than English. 6,824 persons [6.1%] have limited English proficiency; that is, they speak English "not well" or "not at all".

Of those persons with limited English proficiency, 1055 speak Spanish, 2,330 speak Asian and Pacific Island languages, 872 speak other Indo-European languages, and 2567 speak other languages.

2. The frequency with which LEP persons come in contact with Rochester Public Transit programs, activities or services.

Rochester Public Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. Rochester Public Transit has had no requests for translated documents and very minimal requests for interpreters, which were accommodated by Rochester Public Transit staff.

In the future, Rochester Public Transit will proactively attempt to reach other LEP individuals who may be hesitant on approaching transit staff. This will be done by communicating our services regularly to outreach groups such as IMAA (Inter-cultural Mutual Assistance Agency), Olmsted County Community Services, Mayo Clinic Social Services, the local school district, and religious organizations.

3. The nature and importance of programs, activities or services provided by Rochester Public Transit to the LEP population.

Services provided by Rochester Public Transit that are most likely to encounter LEP individuals are the fixed route [city bus] system, which serves the general public and the demand response [dial-a-ride] system, which serves primarily senior and disabled persons.

Rochester Public Transit LEP Program actively pursues the involvement and input from individuals, agencies, and groups representing persons with limited English proficiency. Besides individual consumer contacts, the most effective outreach has involved meetings with and presentation to representative groups. This includes agencies providing interpreter services, advocacy, and consumer groups representing many different language groups. The City also meets with and coordinates public transportation with Olmsted County Human Services and Rochester Public Schools. Both agencies provide bus passes to eligible persons.

On different occasions, over the past years, the City has met with a number of cultural groups, local health clinics, ARC Minnesota, and the Salvation Army to meet with members that would be considered LEP. The City collaborated with these organizations to offer information on how to use the City's public transit system.

4. The resources available to The City or Rochester Public Transit and overall costs to provide LEP assistance.

Rochester Public Transit assessed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that Rochester Public Transit could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Currently, there are a number of transit drivers that are bi lingual that can assist passengers if needed. The languages represented by these drivers are Cambodian, Spanish, Arabic, Somalian, and Ethiopian.

Based on the four-factor analysis, Rochester Public Transit developed its LEP Plan as outlined in the following section.

Limited English Proficiency [LEP] Plan Outline

How Rochester Public Transit staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- Dispatchers and schedulers will be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
- Vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted in November each year.

Language Assistance Measures

Although there is a very low percentage in Rochester of LEP individuals, that is, persons who speak English “not well” or “not at all”, Rochester Public Transit will ensure that the following measures are in place:

- When Rochester Public Transit website is redesigned, a feature will be added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.
- Rochester Public Transit Title VI Policy and Limited English Proficiency Plan has been posted on the agency’s website, www.RPTRide.com
- A link to Google Translator has been added to the agency’s website, www.RPTRide.com.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services available on site [with bi lingual transit staff] or with IMAA.

Staff Training

The following training will be provided to Rochester Public Transit staff:

- Information on Rochester Public Transit Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of IMAA which is discussed below.
- How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Rochester Public Transit will seek language assistance by primarily reaching out to agencies and consumer groups that are already established in our community; agencies such IMAA and the local school district. Currently, the IMAA website is linked to the City’s public transit site at www.rochesterbus.com. IMAA is a full service immigrant settlement agency with interpretation services providing training and information about community services and resources including job training/ education, housing, transportation, and other assistance.

Monitoring and Updating the LEP Plan

Rochester Public Transit will update the LEP as required by U.S. DOT and when it is clear that higher concentrations of LEP individuals are present in Rochester Public Transit service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.

- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
 - Determine whether transit system's financial resources are sufficient to fund language assistance resources needed.
 - Determine whether Rochester Public Transit have fully complied with the goals of this LEP Plan.
 - Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of Rochester Public Transit LEP Plan

A link to Rochester Public Transit LEP Plan and the Title VI Plan will be included on Rochester Public Transit website, www.RPTRide.com

Any person or agency with internet access will be able to access and download the plan from Rochester Public Transit website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Rochester Public Transit will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to Rochester Public Transit as follows:

Rochester Public Transit
 4300 East River Road Rochester
 MN 55906
 507-328-2463

Attachment G:

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Attachment H:

ROCOG Public Involvement Policy:

Please See External Site-

https://www.olmstedcounty.gov/sites/default/files/2022-06/final%20PIP%202022_0.pdf

Attachment I:

CITY OF ROCHESTER ADVISORY BOARDS, COMMITTEES AND COMMISSIONS RULES OF PROCEDURE AND OPERATION

ARTICLE 1: Rules of Procedure Rule 1.

Meetings

A. Regular Meeting:

Regular meetings, at least semi-annually, of each City of Rochester Advisory Board, Committee and Commission shall be held as determined by the group and as publicly posted in accordance with the State of Minnesota's open meeting law requirements

Ad Hoc Meetings. At the end of each meeting the Board shall decide the date and time of the next meeting. If a date and time cannot be found, the Board shall ask the Board Secretary to find a date and time that will work. All meetings shall be noticed in accordance with State Law.

B. Quorum:

A majority of appointed members shall be a quorum for the transaction of business, but in the absence of a quorum, the members present may adjourn the meeting to a later date or hold the meeting but not act on any action items, which must be deferred to the next meeting with a quorum.

Rule 2. Presiding Officer

- A. Conduct of Meeting. The presiding officer at all meetings of the Advisory Board, Committee or Commission shall be the chair, and in the chair's absence, the vice-chair.

Rule 3. Remarks and Debate

- A. Interruption. No member of the Board or Commission shall interrupt or argue with any other member while such member has the floor. Exceptions to the rule are described under C and D of this section.
- B. Courtesy. Members of the Advisory Board, Committee or Commission in the discussion, comments, or debate of any matter or issue, shall be courteous in their language and demeanor and shall not engage in disorderly behavior, or make personal comments, derogatory remarks or insinuations in respect to any other member of the Board, staff or public.
- C. Discipline. If a member of the Advisory Board, Committee or Commission violates these rules, the presiding officer shall call such member to order, in which case such member shall be silent except to explain or continue in order. Any other member of the Advisory Board, Committee or Commission may, under a point of order, call the presiding officer or other member to order. Additional discipline may include, but is not limited to, a verbal admonition, public reprimand, and expulsion from the meeting at which the conduct is occurring.

- D. Challenge. Any member of the Advisory Board, Committee or Commission shall have the right to challenge any action or ruling of the presiding officer, or member, in which case the decision of the majority of the members present, including the presiding officer, shall govern.
- E. City Staff. The staff designee or liaison shall have the right to enter into a discussion of any matter coming before the Advisory Board, Committee or Commission but they are primarily there to provide technical support, factual information and offer advice.

Rule 4. Order of Business

- A. Order of Business. The order of business shall be as follows:

1. Call to Order/Roll Call
2. Approval of Minutes
3. Order of Agenda
4. Open Comment Period
5. Reports
6. Old Business (denote action items)
7. New Business (denote action items)
8. Other Business
9. Adjournment

The order of the agenda can be modified by a majority vote of the board at the start or during the meeting to accommodate speakers or maintain a quorum for action items.

The open comment period shall be limited to 15 minutes total with each speaker limited to four minutes. No other public comment or participation is allowed, unless there is a legally noticed public hearing.

Rule 5. Motions

- A. Making a Motion. For an item to be brought to the floor a member shall make a motion. Items shall be brought to the floor in the order of the agenda.
- B. Seconding a Motion. All motions must receive a second for action, except for a call for nominations, withdrawing a motion, and a point of order. If a second is made, the presiding officer will state the names of the respective ~~Board~~ members making and seconding the motion and they will be noted in the minutes of the meeting. If a motion does not receive a second, it dies.
- C. Amending a Motion. Any member may move to amend a pending motion. No more than two amendments may be made to a pending motion. The last amendment made shall be voted on first.
- D. Postpone to a Certain Date. This motion is used to delay consideration of an item until a specified date.
- E. Postpone Indefinitely (Table). This motion is used to delay consideration of an item until an unspecified date.
- F. Point of Order. Any member may raise a point of order at any time. A point of order means that the member is asking for a ruling on whether the rules of procedure are being followed. The point

of order shall first be made to the presiding officer for a ruling. The member may appeal the presiding officer's ruling to the full Board/Commission/Committee, which may affirm or overrule the presiding officer's ruling by a majority vote of the members present. A point of order directed to the presiding officer or Board/Commission/Committee does not require a second and is not subject to amendment.

- G. Reconsideration. No motion to reconsider a vote shall be in order except by a member who voted on the prevailing side during the same or next meeting. Any member shall have the right to change their vote at any time before final action is taken.
- H. Discussion on the Motion. The Board/Commission/Committee may discuss a pending motion only after the motion has been moved and seconded.
- I. Calling the Previous Question. Any member may call a vote on the motion (Calling the "Previous Question"). If a Board member calls the question, the presiding officer shall allow the members that have not spoken to the motion one chance to speak. The presiding officer shall then call for a vote, after which a vote shall take place.
- J. No Opposition. If the presiding officers determines there is no opposition to a motion, the presiding officer may ask if there is any objection to the proposed action. If there is none, the presiding officer shall announce the result. In this situation the action shall be done by unanimous consent.

Precedence of Motions

- A. Precedence of Motions. When a question is under consideration, no motion shall be entertained except as follows, such motions having precedence in order as stated:
 - 1. To adjourn. (Not debatable.)
 - 2. To remove an item from the agenda.
 - 3. To lay on the table.
 - 4. To call the question.
 - 5. To postpone to a date certain.
 - 6. To amend.
 - 7. To substitute.
 - 8. To postpone indefinitely.
 - 9. Main motion.
 - 10. Motion to reconsider.

Rule 6. Suspension of Rules

No rule shall be suspended except by a two-thirds vote of the Board/Commission/Committee members present at the meeting. A motion to suspend a rule is not debatable. Vote on the motion to suspend shall be by voice vote of the members.

Rule 7. Robert's Rules of Order

Any questions of practice or procedure not provided for by these rules shall be governed by Robert's Rules of Order (newest revision).

Rule 8. Amending these Rules

Amending these rules requires notification and ratification by the City Council and Mayor.

Article II: Rules of Operation

In carrying out its duties, several responsibilities for the Advisory Board/Commission/Committee are specified in the *ordinance* or *charter* or *statute*. In lieu of any specific language reference above for individual Advisory Boards/Commissions/Committees, the following should act as the guide.

Rule 1. Membership

Unless specified by Charter, Ordinance or State Statute, membership shall consist of 9 members and, as is practicable based on recruitment, application and skill sets needed, shall represent the makeup of the population of the community at large.

Rule 2. Officers

The chair, vice chair, and secretary or secretary/treasurer of the Advisory Board/Committee/Commission shall be elected by the membership from among its members. The election shall occur at the first meeting of each year. Each person elected to an office shall serve until their successors have been elected. If the chair should resign or otherwise be unable to serve out his or her term of elected office, the vice chair shall become the chair and the Advisory/Committee/Commission shall elect a new vice chair to serve until his or her successor is elected at the first meeting of the new year. If the vice chair or secretary should resign or otherwise be unable to serve out his or her term of elected office, the Advisory Board/Committee/Commission shall elect a new vice chair or secretary to serve until his or her successor is elected at the first meeting of the new year.

Council/Board Specific Procedures

Rule 3. Meetings

The Board's meeting agenda will include a time for public comment. There is a 15- minute time limit for public comment. Each speaker is limited to four minutes. The time for public comment can be extended by action (majority vote) of the Advisory Board/Committee/Commission.

Rule 4. Disability Accommodation

Advisory Board/Commission/Committee meetings are open to the public. Requests for accommodations from persons with disabilities must be made to the city administrator's office at least 24 hours in advance of a meeting. The city administrator's office may be reached at 507-328-2000.

Rule 5. Transparency Act

All *Advisory Board/Commission/Committee* meetings shall be audio and visual recorded and available for public viewing within 48 hours of the meeting.

Rule 6. Removal of Members

The appointing authority of any member of an advisory board/commission/committee may remove any member.

Rule 7. Attendance

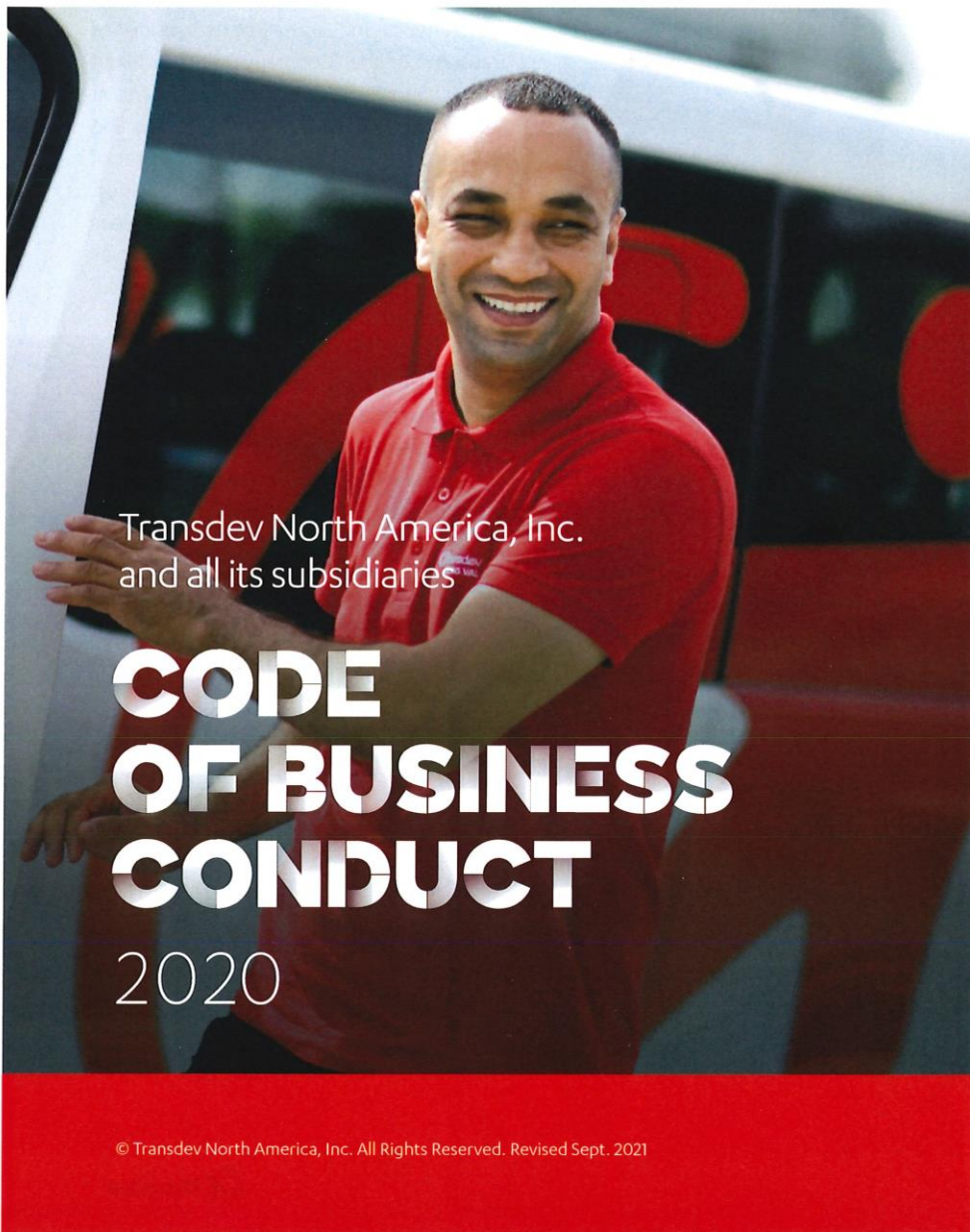
Every appointed member of any Advisory Board/Committee/Commission shall be required to attend at least eighty percent (80%) of the regularly scheduled meetings each calendar year of such body unless excused from attendance by the chair of that body. Each Advisory Board/Committee/Commission shall maintain attendance records which document absences of members from meetings and which indicate whether those absences are excused or unexcused. Each member of an Advisory Board/Committee/Commission shall report to the Mayor the name of any board or commission member who failed to meet the attendance requirement specified above.

Failure of any appointed Advisory Board/Committee/Commission member to meet the said attendance requirement shall constitute just cause to remove the individual from that appointed position. In the case of a non-charter board member, the appointing authority may summarily remove that board member upon a determination that the member has failed to meet the attendance requirement. In the case of a charter board member, the appointing authority may institute proceedings as otherwise specified in the Charter to remove the individual from the appointed position.

Rule 8. Term Limits

Except as otherwise expressly provided by State law, no appointed member of any Advisory Board/Committee/Commission of the City shall be eligible to serve on such board or commission more than six consecutive years or two consecutive terms whichever period is longer. Any person whose reappointment is prohibited by this restriction shall become eligible again for reappointment to the same board or commission twelve months after the date on which the individual first became ineligible for reappointment.

Transdev Policy Manual



Introduction



The Transdev Code of Conduct (“Code”) applies to all of our employees at Transdev North America, Inc. and all of its subsidiaries (“Transdev” or the “Company”) in the United States. Its purpose is to ensure that all of us at Transdev not only observe applicable laws and regulations but also abide by a broader set of ethical standards in our conduct and decision-making. We also expect Company employees who are responsible for third party relationships to ensure these organizations are aware of our Code and ensure their compliance as well.

This Code does not replace what we know instinctively or in the exercise of good judgment to be legal and ethical behavior, but it highlights critical areas of concern for the Company in a world full of challenges to instinct and judgment, and it provides guidance where uncertainty may exist. The Code also must be read as an appendix to the Transdev Group’s Code of Ethics.

It is our absolute legal and moral obligation and a source of great strength for us as a Company that we manage ourselves and our business with the highest degree of honesty, ethics, and integrity. Adherence to this Code of Conduct, therefore, is an essential condition of employment at every level of the Company.

Laura Hendricks
CEO, Transdev U.S.

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This Code of Conduct is a statement of certain fundamental principles and policies that govern employees of Transdev North America, Inc. and its subsidiaries, as well as the conduct of third parties with whom we do business. It is not intended to create and does not create any rights in any employee, customer, vendor, subcontractor, competitor, shareholder, or any other person or entity. The Company reserves the right to amend, alter, or terminate this Code of Conduct at any time. If the Code conflicts with any applicable laws or regulations, the laws or regulations will prevail.



The Ethical Decision-Making Process

We act with honesty and integrity based on our shared ethical principles

At Transdev our shared ethical principles contained in this Code are the cornerstone of how we conduct business and treat one another every day. More than a simple statement of values or adherence to a set of rules, the ethical principles in our Code constitute a way of leading, thinking, and acting that reflect the highest ethical standards. While this Code of Conduct is both a statement of Company values and set of rules that must be adhered to as a condition of employment, it is not intended to stand alone in guiding the individual. It cannot answer every possible question an employee may confront. Good ethical decision-making is a process – combining adherence to rules, utilizing one’s own instinctive sense of right and wrong, and, often, asking the following questions:

- Is the decision consistent with Company policies, this Code of Conduct, and the law?
- What does my own personal sense of right and wrong tell me?
- Would my decision be one that I could comfortably share (if permitted with my family, my friends, and others whom I respect the most)?
- How would the decision look if it were made public?
- If the answer is not already clear, who among my supervisors and/or co-workers could I consult with who might know the answer, or whose judgment might best help me in the decision-making process?

When still uncertain, employees are encouraged to discuss and even debate ethical issues among fellow employees. Inviting alternative views and entering into dialogue with others is a learning activity that can increase knowledge and awareness of the risks involved in the decisions we make. Asking questions and speaking up on important ethics and compliance issues are essential duties we have to ourselves, each other and our Company, helping to strengthen an ethical culture.

Where questions may be too sensitive for open discussion, employees are encouraged to speak with a supervisor, manager, human resources representative, or anyone within the Company’s leadership. Anyone may also contact Transdev’s General Counsel, who serves as the Company’s Chief Ethics & Compliance Officer and who will treat your question in confidence, if requested. In addition, our Ethics & Compliance Hotline is available 24 hours a day, 365 days a year, at **1-866-850-3033**. Transdev strictly forbids retaliation for raising any concerns under the Code.

Reporting a Suspected Violation

If you know, or in good faith suspect, that a violation of the law or this Code of Conduct has occurred or is at risk for occurring, you are encouraged to immediately report the suspected violation to the Company.

You can do this in a variety of ways: by contacting your supervisor or other member of management, or if you are uncomfortable doing so, you may contact Transdev's General Counsel (who is also Transdev's Chief Ethics & Compliance Officer) or Transdev's Human Resources Department. You may choose to provide this information on an anonymous basis.

You may also report a suspected violation to the Company through the Transdev Ethics & Compliance Hotline at **1-866-850-3033**, which has assistance available in multiple languages. This information is also available online on our Transdev intranet at **my.transdevna.com** and on our Company website at **www.transdevna.com**.

This Ethics & Compliance Hotline is available 24/7 and is operated by a third-party company, Navex Global, which specializes in receiving such reports. By using the Ethics & Compliance Hotline, you also may choose to remain anonymous.

Regardless of how a concern is reported, all concerns and complaints will be investigated and a response to the concern provided. In all instances, reported matters will be treated confidentially to the extent possible in conducting and concluding a proper investigation. Regardless of the outcome of any investigation, you can be assured that no retaliation against you from any source will be tolerated when you have reported a violation or suspected violation in good faith.

No Retaliation

An essential part of an effective ethical compliance program includes providing employees the means to report in good faith known or suspected violations of this Code of Conduct, the law, or Company policies and procedures, without fear of retaliation from any source.

Therefore, we will not tolerate any action taken in whole or in part in retaliation against anyone who has raised a question or concern in good faith about a violation of this Code of Conduct, the law, or any Company policy or procedure.

At the same time, the integrity of the reporting system and the respect we have for one another means that those who act in bad faith and knowingly make a false report will be subject to discipline up to and including termination from employment.

To the fullest extent possible, we will maintain the confidentiality of anyone who reports a suspected violation or participates in the investigation of it.

Safety

Ensuring the safety of our passengers and people is our absolute priority and is to be shared by everyone at Transdev. "Safety First" is the foundation upon which we build, day after day, a relationship of trust, respect, and partnership with our customers, passengers, and teams. Compliance with laws and rules intended to protect life and property is essential, but equally important is our ethical and moral obligation to conduct our business in a manner that protects the well-being of ourselves, our fellow employees, our passengers, and all who live and work within the communities we serve.

In the business of transporting people, we constantly face risks to life and property. Maintaining a strong safety culture, therefore, is a responsibility shared by all of us. Every decision we make, individually and collectively, must take into account the safety of others and ourselves. Every manager has the duty to assess, train, encourage the reporting of safety violations and risks, and discipline and reward the employees he or she manages with a commitment to safety. Likewise, every employee has a duty to assess, be trained, comply with safety rules, report observed violations and risks, and keep safety foremost in his or her mind. We are committed to doing all we can to keep a constant focus on the safety of our employees and passengers, pedestrians, other motorists, and the community at large.

We cannot manage what we do not measure. We cannot be vigilant in safety without identifying where our greatest risks lie. Therefore, we will accurately monitor and measure our performance in areas of risk reduction and safety improvement and will use the information we gather to our best advantage in designing and improving our safety practices. Where we can identify risks that are within the control of others, we will undertake to educate and persuade others to mitigate or eliminate those risks.

Uncompromising Safety is our credo



Corporate Social Responsibility

OUR COMMITMENT TO CORPORATE SOCIAL RESPONSIBILITY

Transdev's commitment to social responsibility rests on a foundation of providing high quality transportation services and sustainable and responsible mobility to clients, passengers, and communities. This includes providing safe, reliable, comfortable, and convenient transportation to passengers, enabling them to get to work, school, healthcare, entertainment, airports, and more.

Transdev's commitment to Corporate Social Responsibility is centered on three primary areas: sustainability, inclusion, and being good citizens in our communities.

Sustainability: Help Protect our Environment



As a major operator in public transport, we are naturally engaged in the fight against climate change because our passengers would otherwise likely be traveling in cars. We are constantly innovating to limit the impact of transportation on the environment through the use of alternative energies to “fossil fuels” and to reduce our carbon footprint.

Inclusion: Respect Diversity. Build Inclusion and Teamwork.

We are proud of the diversity of our people and work hard to respect the different cultures, histories, and perspectives in our workforce. We are dedicated to including different and diverse points of view in our discussions and decision-making. We believe in tolerance and valuing the contributions of all the members of our team. We respect the views of others and understand that everyone has a unique story that helped shape the opinions we have.



We strive to have productive and respectful relationships with the labor organizations that represent our people in many locations, and with our franchisees and independent contractors. We recognize our employees are our greatest assets and invest in training our people and further developing their skills.

Community: Be Good Citizens in Our Communities

As a trusted partner to cities, counties, transit authorities, airports, and universities, we are involved in the life of the people and communities we serve. We are dedicated to providing courteous, professional service that our passengers can rely on. We focus on the safety and comfort of the people who ride in the vehicles we operate, as well as the safety of pedestrians and other motorists. We are one of the largest operators of paratransit services in the U.S. and Canada, transporting people who are elderly or have disabilities. Our Company and our employees frequently participate in local charities and programs in a shared commitment to make a positive impact on our communities.



Collaboration and Mutual Respect

We achieve more when we work together in an atmosphere of collaboration, mutual respect, and openness. Working in an environment where we feel free to share knowledge, expertise, and resources across all divisions of the Company and within the Transdev Group inspires innovative ideas and harnesses the collective talents of many. A collaborative working environment based on respect and openness enables us to address challenges promptly and effectively.

To support this culture of openness, all employees should:

- listen to and respect different points of view expressed in the workplace;
- invite new ideas and encourage transparency in dealing with others;
- take advantage of Transdev's various communication channels to exchange ideas, expertise, and lessons learned; and
- raise any questions, challenges, misunderstandings, or problems early to ensure they are addressed promptly and appropriately, including engaging Human Resources when appropriate.



Respecting the Views of Others

Part of the appeal of working at Transdev is the opportunity to meet new people every day. We are a passenger-centric company providing millions of rides every year. It is inevitable that, from time to time, we may encounter colleagues or customers who have differing worldviews.

Varied perspectives help societies grow. An important foundation of an evolving company is maintaining an atmosphere where everyone feels their views are respected, even if they are not endorsed. We respect the views of others and understand that everyone has a unique story that helped shape the individual they are today.

Promoting Workplace Diversity and Equality

We are extraordinarily proud of our diverse workforce and the background that each employee brings to our company. It is important that we continue hiring from a diverse pool of candidates in all sections of the Company. Our goal is to accurately reflect the diversity of the millions of passengers we transport every year and their varied cultural heritage.

A diverse workforce brings different opinions and philosophies to contribute which are critical to our future success.

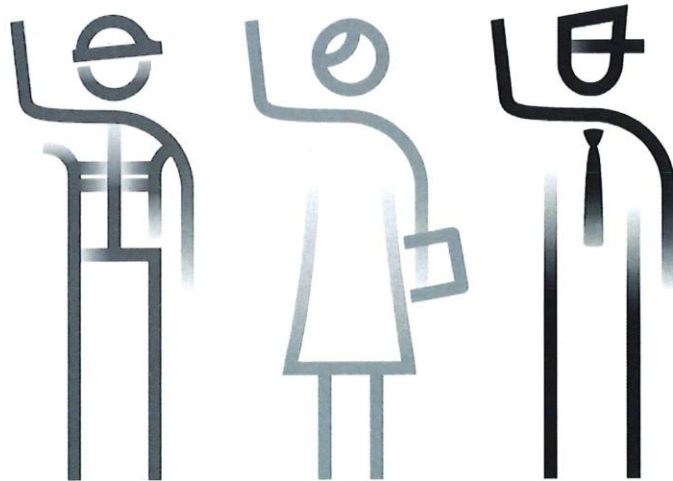
Honoring Our Commitments

Promoting and protecting our reputation for meeting the needs of our clients and the communities we serve requires that we honor our contractual and legal obligations to our customers, vendors, subcontractors and all those with whom we contract or do business.

Accordingly, before entering into any contractual relationship, we will undertake a thorough and competent review and have a good understanding of the terms and provisions of the contracts and the commitments we make.

We will make no commitment that we are not capable or willing to fully honor, nor will we willfully fail to perform any contract without legal justification.

We will honor these same commitments to our vendors and subcontractors, whose products and services we rely upon for our success.



Fair Competition

Transdev is committed to the concept of fair competition. Faithful adherence to the principles of honesty and integrity in our dealings with all stakeholders is paramount.

Consistent with these principles, we will strictly comply with all anti-trust and unfair competition laws and never enter into any agreement or understanding with a competitor, express or implied, written or unwritten, involving:

- Prices, costs, profits, terms, and conditions of our services;
- Territories and market share;
- Limitations on services;
- Customer or supplier allocation or selection;
- Any action that affects, limits, or restricts competition.

Exceptions are allowed for reasonable restrictive covenants that are part of a bona fide acquisition, sale, or joint venture relationship but only upon approval of the Legal Department and CEO of the Company.

Appearances are important; for this reason, we advise that all contacts with competitors, including with former business associates who are working with competitors, be limited. Private meetings with a competitor should not be held without first advising senior management and contacting the Legal Department. In addition, the Company does not participate in any trade associations, national or local, without first securing formal approval from senior management and the Legal Department.

We need to know our competitors and marketplace, but we will not receive or use the confidential or proprietary information of a competitor or vendor unless we know the competitor or vendor intends for us to receive or use it.

Fair competition means that we will not disparage our competitors. While statements about our competitors based upon published or known facts and made for the purpose of fairly distinguishing our Company from our competitors are sometimes appropriate, any such statements should first be discussed with and approved by senior management.

Our Financial Integrity

We will always be honest in our records and reports of financial information. All financial books, records, reports and accounts will conform to accepted accounting principles and will fully and accurately state what they purport to show. We will not record entries that knowingly conceal or disguise the true nature of a transaction.

Every employee will properly record and report all required material information with respect to his or her employment and areas of responsibility.

Any submission to a third party of a proposal, offer, or other document that is false, incomplete, or misleading is prohibited, because it is wrong and because it can result in civil and/or criminal liability for our Company, the involved employee, and the supervisors who permitted such practices.

Transdev Group has issued a Financial Code of Ethics. While applicable to all senior management, some of the Code is also relevant to every employee who in any way is involved in recordkeeping and reporting internally. Consequently, every employee is required to:

- act with integrity at all times, avoiding any conflicts of interest, real or apparent, in their professional and personal relationships--or, where such conflicts cannot be avoided, reporting them to their immediate supervisor;
- provide information on the Company's business that is comprehensive, true, exact, objective, understandable, and communicated within the required deadlines;
- act in good faith and in a responsible manner, with competence and diligence such as to present a true and fair view of the major facts and events concerning the Company;
- protect the confidentiality of information concerning the Company in the absence of specific authorizations and/or obligations and without using information held by the Company for personal interests;

- preserve their independent judgment and act in an objective and impartial manner;
- share their knowledge and know-how within the Company, in accordance with applicable legal provisions;
- encourage ethical behavior among employees under their supervision;
- make sure that the Company responsibly uses and maintains control over all assets and resources with which it is entrusted.

As a company, we will not tolerate the failure to honor these commitments in ourselves or in others. Any suspected or known violation should be reported immediately to supervisory personnel and/or the Finance or Legal Department, or other reporting means available.



Maintaining Confidentiality

Transdev is committed to maintaining the confidentiality of the information and exchanges of the Company and its business partners.

We will be careful to protect the Company's internal communications, as well as confidential proprietary and trade secret information from unauthorized disclosure, including, without limitation:

- All internal communications including email and other electronic messages, records and information.
- Operating results, pricing, costs, other financial data;
- Strategic business plans and marketing strategies;
- Client lists;
- Personnel and medical records and information;
- Company-developed technology;
- Information regarding acquisitions and divestitures;
- Processes and methods; and
- Passenger information, including medical information and records.

In the same manner, to the extent permitted by law, we will maintain the confidentiality of information belonging to any employee, client, vendor, competitor, or other third party received by us with the express or implied understanding of confidentiality, or that became known to us by reason of prior employment with another Company.

All employees should immediately report any suspected breach of these confidentiality guidelines to their supervisor, Human Resources, or the Legal Department.

Compliance with Employment Laws

The people with whom we work every day are the most important part of our business. Transdev recognizes the responsibility that we, as individuals and as a Company, have toward the well-being of our fellow employees.

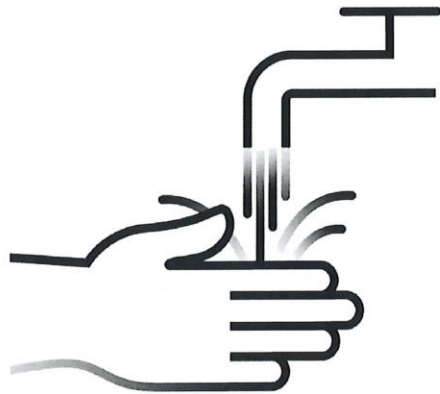
Transdev is an equal opportunity employer committed to a workplace environment that respects the dignity of every employee and that is free of unlawful discrimination and harassment.

We will not engage in, or allow a workplace atmosphere tolerant of:

- Unlawful discrimination or harassment based upon race; color; sex; religion; age; national origin; marital, parental, or family status; sexual orientation; veteran status; pregnancy; disability; or any other legally protected status;
- A pattern of deliberate or intentional verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance under applicable law and standards of behavior in the workplace; or
- Sexual advances or inappropriate behavior (including jokes, comments, or other offensive behavior), which could be labeled sexual harassment or create a hostile workplace environment.

We will educate ourselves, train each other, and honor both the letter and spirit of all laws and Company policies pertaining to employee rights and obligations, and freedom from discrimination and harassment in the workplace.

Any employee who suspects or observes inappropriate conduct must immediately report this behavior to their supervisor, the Human Resources Department, the Legal Department, or through the Ethics & Compliance Hotline.



Employee Health and Safety

Consistent with our commitment to safety and to the health and well-being of our fellow employees, we will:

- Strive to provide all employees with working conditions that protect their health and safety, both physical and emotional;
- Educate ourselves and train others on Company health and safety procedures and will strictly comply with them;
- Identify and implement the best health and safety practices and procedures;
- Never operate vehicles or equipment we know pose a health or safety risk for ourselves, other employees or our clients or general public;
- Not engage in or tolerate violence or threats of violence in the workplace at any time;
- Hire only subcontractors and use only vendors who share our commitment to this Code and health and safety in the workplace; and
- Immediately report any suspected threat to the health and wellbeing of any one or more employees.

Illegal drugs, inappropriate use of legal drugs, and alcohol, have no place in the workplace. We will not tolerate their use, consistent with Company drug and alcohol-free workplace rules.



Drug and Alcohol-Free Workplace

The importance of maintaining a Drug and Alcohol-Free Workplace for the health and safety of our employees, customers, passengers, and the citizens of the communities we serve justifies the special attention we give it here in our Code of Conduct.

Company policies and procedures, and, where applicable, federal and state laws, prescribing a drug and alcohol-free workplace, must be fully respected and obeyed. We will not tolerate the use of alcohol or illegal drugs in the workplace. Likewise, we will not tolerate the inappropriate use of legal drugs in the workplace.

We will immediately report to supervisory personnel any suspected violations of the law or Company policies or procedures.

Social Media

Social media (including personal and professional websites, blogs, chat rooms, and bulletin boards; social networks, such as Facebook, LinkedIn, Twitter, and Instagram; video-sharing sites such as YouTube; and e-mail) are a part of the daily lives of many of our employees as well as important tools in marketing and communications. The Company respects the rights of its employees to use social media and is committed to ensuring that it is used consistent with the *We@Transdev* Management Model and this Code of Conduct both inside and outside of work. The same general rules that apply to our internal communications in the workplace and our communications via traditional media outside of the Company apply to the use of social media.

In respect to the use of Social Media, it is important to understand the following rules. Failure to adhere to them can result in discipline up to and including termination from employment:

- Communications through social media concerning the Company and other Company employees must not violate this Code of Conduct or any other Company policy, especially as they relate to discrimination, unlawful harassment, or immoral, unethical, or illegal activities.
- Social media sites are not the appropriate place to make a complaint regarding alleged unlawful discrimination, harassment, or safety issues within the Company. We encourage you to make such complaints promptly in accordance with the Company's established complaint procedures.
- Blogs and other forms of social media communications are individual interactions, not Company communications. Employees can be held personally liable for their posts. For this reason, employees should exercise caution with regards to exaggeration, obscenity, guesswork, copyrighted materials, legal conclusions, and derogatory remarks or characterizations. Give credit where credit is due, and do not violate

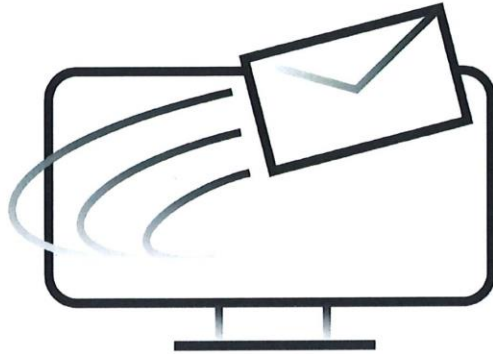
1) Please note that nothing in this policy or Code of Conduct is intended to limit or restrict any employee's right to participate in conversations that are protected by the National Labor Relations Act regarding wages, benefits, or working conditions. The rights of our employees to engage in protected labor activity are as important as any rights recognized by this Code of Conduct.

the rights of others. Do not claim authorship of something that is not yours or use the copyrights, trademarks, publicity rights, or other rights of others without the permission of the rightful owners.

- Because social media and networking activities are public, your Company e-mail address and Company assets should be used only to perform job-related activities, which may include professional networking and limited personal social networking as explained above, consistent with the Company's written email and internet use policies. Use of social media while at work must be very limited and not interfere with the full performance of an employee's job duties.
- Information and communications that are published on online sites should never be attributed to the Company or appear to be endorsed by, or to have originated from, the Company unless authorized by the Company. Using an individual's name, Company logo and/or a Company e-mail address may imply that the employee is acting on the Company's behalf. Always be clear in your communications that you do not speak for the Company unless you are authorized to do so as part of your job with the following recommended disclaimer:

"The opinions expressed here are the personal opinions of [your name]. Content published here is not monitored or approved by Transdev before it is posted and does not necessarily represent the views and opinions of the Company."

- You may not disclose any sensitive, proprietary, confidential, or financial information about the Company or any affiliates of the Company. The use of Company logo, trademarks, or branding is prohibited. You may not post anything related to the Company inventions, strategy, financials, products, etc. that has not been made public.
- While you may respectfully disagree with Company actions, policies, or management decisions, you may not attack personally or post material that is obscene, defamatory, discriminatory, harassing, libelous, or threatening about the Company or other Company employees. As stated above, this Policy is not intended to restrict or prohibit any Company employee from engaging in protected concerted activity under the National Labor Relations Act.



Company Email and Internet Use

The Company's email and computer systems are essential business tools intended to be used for legitimate Company purposes only, although occasional personal use is permitted consistent with the Company's written email and internet use policies. All employees using the Company's email and computer systems must be familiar with and adhere to the Company's policies governing its email, internet, and computer systems. All existing Company policies, including but not limited to the use of intellectual property, insider trading, misuse of Company property, discrimination, harassment, sexual harassment, information, data security, and confidentiality, apply equally to employee conduct in connection with use of email and the internet. More simply said, the use of the Company email and computer systems should at all times be consistent with the *We@Transdev* Management Model and this Code of Conduct.

All email accounts and all email content created, sent, received or stored on the Company's email system, whether business or personal, are the sole property of the Company and are not the property of the employee or other personnel. There is no expectation of privacy in any email or internet content transmitted over or stored in the system. Email retained on the Company email system remains the property of the Company and users are forbidden to delete email from the system before or upon leaving the employment of the Company.

Highly confidential or sensitive information should not be sent through email. Email should be used in a manner that will not risk the disclosure of Company proprietary and

other information to persons outside the Company. Email messages may need to be saved and may be required to be produced in litigation. Strict adherence to any directives of the Legal Department or Senior Management to preserve email content is required.

Company Property

Company property includes all tangible items and intangible items such as electronic systems in the workplace, including but not limited to vehicles, equipment, facilities, computers, computer software, copy machines, faxes, email content, electronic data files, telephones, cell phones, wireless devices, stationery, supplies, postage, etc. It also includes the goodwill and good nature of the Company, and the fruits of the labor and investment made on behalf of the Company.

We will take all appropriate measures to preserve and protect Company property from misappropriation and waste. Company property may only be used for legitimate Company purposes. We will not use Company property for personal benefit, except in limited circumstances that are approved and documented in advance by a responsible supervisor. Use of Company telephones and email for non-Company purposes will be kept to a minimum consistent with Company policies.

Because it is Company property, we have no expectation of privacy in its use, including the use of email, telephones, and electronic communications and media. The Company reserves the right to inspect Company property whenever and wherever it is used or located.

Conflicts of Interest

A conflict of interest is a situation where one's independent judgment is or has the appearance of being impaired in the performance of his or her job responsibilities by a personal interest. Honesty and integrity are the highest principles we can adhere to in our business. Our success is dependent upon the public's continued trust and confidence in us as well as the examples we set for each other. Any potential or actual conflict of interest must be avoided whenever possible, including, without limitation:

- Accepting or giving any gift, meal, entertainment, gratuity or other thing of value that is more than \$100 per person might impair or give the appearance of impairing an employee's independent judgment in the performance of his or her job responsibilities, or that violates Company policies and procedures. Any gift, meal, entertainment, gratuity or thing of value that is more than \$100 per person must be approved by the Legal Department in advance. If in doubt, consulting with Senior Management or the Legal Department is advisable. Please note that many clients have thresholds for permitted gifts that are much lower than \$100 per person, including permitting no receipt regardless of value. It is imperative that any gift, meal, or gratuity given by a Transdev employee never run afoul of any relevant client policies, regulations, or guidelines. Any thing of value must only be given to individuals with whom you are conducting business and not any family members, relatives or friends of that individual.
- In addition, accepting or giving any gift, meal, gratuity, thing of value, or engaging in any similar activity, that might impair or give the appearance of impairing the objectivity, impartiality, or independence of a tender process or contract negotiation. Any Transdev employee must consult with the Legal Department before accepting or giving any gift, meal, gratuity or thing of value during or in close proximity to a tender process or contract negotiation.
- Having any outside activity or relationship that competes with the Company, utilizes, or diverts Company resources, impairs an employee's independent judgment, or hinders giving full time and attention to his or her job, including secondary employment (both paid and unpaid). In particular, no employee (or member of his or her family) may directly or indirectly have any business relationship with the Company or any of its subsidiaries or affiliates, without the prior written approval of the Company CEO and Legal Department.

- Having a personal relationship with another employee that interferes with the objective performance of either the employee in his or her job. This includes, without limitation, prohibitions on romantic or close personal relationships between employees in direct reporting relationship with each other.
- Having a position with or investment (greater than 2% in a publicly-traded company) in a competing business.
- Appropriating or diverting to any other person or entity a business or financial opportunity that the employee learns of or develops in the course of employment and knows or should know the Company might want to pursue.

It is not possible to list all situations that constitute a conflict of interest; the facts of each case will determine whether there is an actual or potential conflict. A potential conflict of interest arises in any situation in which an employee has a personal interest that influences or appears to influence the employee's judgment or action in conducting the Company's business. This may put an employee's objectivity in doubt when working with suppliers, competitors, government officials, or customers, or in performing his or her own duties. Any situation that creates even the appearance of a conflict, even when an actual conflict or improper influence does not exist, can have adverse consequences for the Company and the individual employee, and should be carefully considered and avoided when possible. Employees should consult with Human Resources or the Legal Department to clarify any uncertainty over a potential conflict of interest, and any known or suspected conflict of interest should be reported immediately to a supervisor, Human Resources Director, or the Legal Department.

All employees should also be aware of their clients' similar restrictions in accepting gifts, meals, and entertainment offered to them so as to not have them run afoul of their own agency or company's restrictions.²

2) For an example, see Footnote 3 on the following page.

Anti-Bribery and Anti-Corruption

Transdev requires all employees to act with integrity and in compliance with all applicable laws and regulations. As such, Transdev prohibits the offering, giving, promising, arranging, or authorizing others to give anything of value, either directly or indirectly, to any party, in order to influence official action, improperly obtain or retain business, or otherwise gain an unfair business advantage. Transdev also prohibits receiving, or agreeing to receive, anything of value that results or may result in the improper performance of an employee's duties at Transdev. Employees may not use third parties to facilitate such payments or allow third parties to act unethically on our behalf.

The U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and other similar foreign and domestic laws and regulations (collectively, without limitation, the "Anti-Corruption Laws") prohibit companies from such unethical practices wherever they are conducted. Failure to comply with Anti-Corruption Laws may lead to serious civil and criminal penalties for the Company and the individuals involved. Accordingly, violations of this policy may be grounds for immediate termination of employment or the Company's relationship with a third party working on behalf of the Company.

All transactions must be documented fully in accordance with Company-established bookkeeping practices and established accounting practices. No transactions on behalf of the Company will be permitted that are not properly recorded and disclosed.

DEFINITION

The term "**Government Related Person**" is broadly defined and includes officials and employees and/or any person acting in an official capacity for or on behalf of:

- any government, governmental agency or instrumentality, or any public international organization;

3) Anti-Corruption Laws also includes such laws implemented at the local, municipal, and agency levels. Employees shall remain aware of and sensitive to such restrictions so as to not violate such restrictions. For instance, the Port Authority of New York and New Jersey maintains a Code of Ethics for its vendors, which includes a Zero Tolerance Policy regarding gifts, gratuities, and favors for Port Authority employees or the Board of Commissioners: <https://www.panynj.gov/business-opportunities/pdf/Code-of-Ethics-for-PA-Vendors.pdf>. In addition, any gifts, meals, entertainment, gratuities or other things of value provided by Golden Touch in excess of \$50 per person must be approved by the Legal Department.

- any company that is controlled by a government or governmental agency (notwithstanding that the company may be publicly listed);
- any political party, party official, or political candidate; or
- the spouse or immediate family member of any of the above.

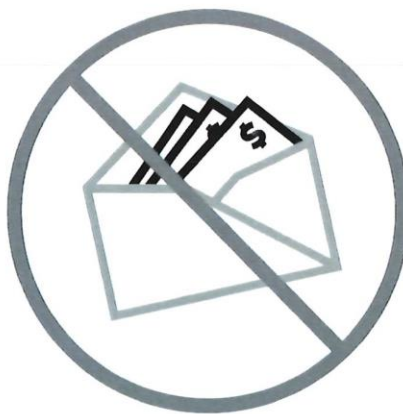
Government Related Persons are not always easily identifiable. Consult the Legal Department for guidance on whether an individual should be considered a Government Official.

“Other Covered Individual” means any individual who holds a position of trust or authority with a customer or business relation of the Company, or otherwise is expected to act in good faith or impartially vis-à-vis the Company.

Similarly, “Anything of Value” should be interpreted broadly and may include, but is not limited to: (1) cash or cash equivalents, such as gift certificates; (2) gifts or free goods; (3) meals, entertainment or hospitality; (4) travel or payment of expenses; and/or (5) the provision of services. Anything of Value can also include intangible benefits, such as enhanced reputational, social, or business standing.

NO BRIBERY OR CORRUPTION

As noted above, Transdev does not tolerate any form of bribery or corruption, regardless of differing business cultures and traditions in the countries or industries in which the Company conducts business. This expectation applies equally to interactions in the public and private sectors.



Department and any such payments must be accurately recorded in Transdev's books and records.

SPONSORSHIP OR CHARITABLE CONTRIBUTIONS

The Company may, from time to time, provide sponsorship, donations, and/or assistance to bona fide charitable organizations or causes, whether in the form of funds, assets, services, or other support ("charitable contributions"). Any Transdev employee must receive approval from the Legal Department before providing a charitable contribution in any amount on behalf of the Company.

Charitable contributions may not be made at the suggestion, request, or behest of any Government Related Person or customer, or to a charity owned, controlled, or connected to a Government Related Person or customer, in order to obtain any improper advantage or otherwise obtain or retain business for the Company directly or indirectly through any improper, unethical, or illegal means. Similarly, such contributions must not: (1) be intended or give the impression of being intended to improperly influence the award or terms of a contract; (2) create or give the appearance of a conflict of interest; (3) create possible collusion; or (4) bypass or circumvent any local law or regulation.

THIRD PARTY RELATIONSHIPS AND RETAINING INTERMEDIARIES (CONSULTANTS AND LOBBYISTS)

It is the Company's policy to do business only with reputable, honest, and qualified third parties, and it is the Company's expectation that third parties will use only ethical, legitimate, and legal business practices in connection with its work for, or with, the Company. It is also the Company's expectation that third parties will take the proper steps to ensure that they comply with any applicable Anti-Bribery and Anti-Corruption Laws.

Transdev and its employees may be held liable in certain circumstances for an act of bribery committed by a third party who works on behalf of the Company. Therefore, employees may not use a third party to do indirectly what they cannot do directly. All payments made by the Company to any third party must be in exchange for fair value in goods or services and for a real and legitimate business purpose. Honesty, integrity, and fairness must govern all business dealings.

Further, special care must be given the retention and use the services of intermediaries, brokers, lobbyists, agents, lawyers, and other similar consultant arrangements

(collectively, “consultants”). There are good reasons to retain and use such consultants, but it is essential that we exercise sound caution and discretion whenever we retain such services as these arrangements sometimes present heightened risks.

We will strictly follow Company policies and procedures regarding the retention of such consultants. Except as otherwise provided by Transdev policy, Legal Department approval is required before hiring or using any consultant on any fee basis. In many jurisdictions, such fees are illegal and a violation can carry both civil and criminal penalties.

For all relationships where a third-party vendor brokers, refers, arranges, facilitates, or procures transportation services to be provided by a Transdev subsidiary for a third party, including individuals and companies, and for which the third party vendor receives a referral or commission payment for such referral services, employees must adhere to Transdev’s Standard Operating Procedure for Vendor Referral Contracts and Payments which require Legal and Finance Department approvals and written agreements.

For all other consultant arrangements, no success fee, contingency fee, or remuneration of any kind contingent on success in obtaining a contract or other business can be paid to a consultant without the prior written approval of the Legal Department. The process and forms for engaging consultants and lobbyists can be obtained from the Legal Department.

Take care when preparing or modifying a contract. It can hide the payment of bribes or facilitating payments for which the Company may be held liable. Closely monitor, for instance, any changes to the place or method of payment, the amount paid, exceptional fees, or the reimbursement of expenses incurred. Also be alert to the use of any “pass through” payments—that is, payments to one entity or individual that are intended to flow to, and be for the benefit of, another entity or individual. Any and all compensation paid to such a consultant must be consistent with the value of the services actually rendered. We will require transparency in all compensation arrangements with our insurers, surety providers, and brokers.

We will not tolerate any consultant engaging in activities that we know or suspect are illegal or unethical.

**EMPLOYMENT OF INDIVIDUALS REFERRED BY CUSTOMERS
OR GOVERNMENT OFFICIALS**

The employment by Transdev of persons who are relatives of, or are closely connected to or referred by, Government Related Persons or Other Covered Individual involves potential risk, both to Transdev and to the individuals within Transdev making such employment decisions. If not managed correctly, the hiring of such candidates could violate applicable Anti-Corruption Laws.

Hiring decisions should be based on the merits of the individual candidate, vis-à-vis others being considered for the position, if applicable, and such candidate should go through the usual hiring procedures. A candidate shall not be hired solely as a favor for a Government Related Person or Other Covered Individual in order to create, maintain, or improve a business relationship.

CONFLICTS OF LAW OR POLICY

With the expansion of anti-corruption laws across the country and the world, and with anti-corruption policies across the private and public sectors, it is possible that employees will encounter situations where local law or an entity's policy may be inconsistent with Transdev's policies. If you believe you are faced with a situation where the Code of Conduct or other Transdev policy conflicts with applicable law or an entity's policy, you are directed to contact the Legal Department before proceeding.

SPOTTING RED FLAGS AND REPORTING VIOLATIONS

Employees should be alert to warning signs or suspicious circumstances ("red flags") that may indicate potential violations of this Code or of applicable Anti-Corruption Laws. Examples of such signs and circumstances include, but are not limited to:

- Unusual or excessive payment requests, such as requests for over-invoicing, up front payments, unusual commissions or mid-stream compensation payments, excessive finders' fees, agents' fees or payment for goods or services, requests for payments in a third-party country, to a third party, to a foreign bank account, in cash or other untraceable funds, or checks drawn to cash;
- Payments to third parties outside the normal scope of the transaction;
- Abbreviated, "customized," or non-industry standard invoices, or inadequate documentation to support payment requests;

- Non-market compensation arrangements;
- Lack of foundation to support compensation;
- A vague description of the purpose of the engagement and/or the services to be provided by the third party;
- Lack of experience or qualification to provide the requested services, a reputation for corruption, or misrepresentations regarding background or experience;
- Charges or media reports against a third party involving potential violations of local or foreign laws or regulations relating to corrupt activities;
- A demand or suggestion by a Government Related Person that a particular third party should be used by the Company;
- A special or close relationship between the third party and a Government Related Person, or the discovery of a previously undisclosed relationship between the two;
- Refusal or hesitancy by a third party to promise to abide by the Company's Anti-Corruption Policy or to provide representations or certifications regarding his or her conduct;
- A desire to keep a third party's representation of the Company or the terms of his or her engagement secret; and/or
- Requests for payment of exorbitant travel and entertainment expenses or gifts for foreign officials, or requests for reimbursement of such expenses not approved in advance.

Any employee who suspects or becomes aware of any violation of these Anti-Bribery and Anti-Corruption guidelines must immediately report the violation to Transdev's General Counsel (who is also Transdev's Chief Compliance Officer) or through the Transdev Ethics & Compliance Hotline. All matters reported in good faith will be investigated, and Transdev prohibits retaliation against anyone who reports suspected misconduct in good faith.

Political Contributions and Activities

It is impermissible for any representative of the Company to (a) request or pressure an employee or any third party to make a political contribution on behalf of the Company or the requesting person, (b) promise to reimburse another employee for his or her political contribution, (c) utilize third parties to make political contributions that would be unlawful for the Company, the employee, agent, consultant, or representative to make directly, or (d) have his/her political contribution reimbursed by the Company, another employee, or any third party. Political contributions must also comply with the Anti-Bribery and Anti-Corruption guidelines set forth above on pages 28-34. The Legal Department must approve all political contributions made by anyone in the Company's management including contributions made by spouses of family members.

As a corporation, we are prohibited by federal law from making contributions to any federal election campaign.

As a subsidiary of a foreign company, we are prohibited from making any contributions, directly or indirectly, to any state or local candidate, party, or organization that supports a candidate, unless certain criteria are strictly met and Company procedures required by law are strictly followed. Foreign nationals are prohibited altogether from conducting political campaign activities. There are also individual and aggregate limits under state and local laws on the amounts of lawful contributions. Violations of these laws have serious criminal penalties.

We will not conduct any political campaign activities on Company time or use any Company funds or other resources, such as Company telephones, fax and copy machines, and meeting rooms, for such purposes except as approved in writing in advance by the Legal Department in accordance with established Company policies and the law.

We will make clear that any individual political views we express are our own and not the views of the Company.

Others with Whom We Do Business

As noted above, adherence to the Code's guiding principles of honesty and integrity also applies to our relationships with our business partners, customers, vendors and subcontractors.

We must always be honest and fair in our dealings with others with whom we do business, honoring our contractual obligations to them and respecting the contributions they make to our success and their right to make a fair profit. This obligation includes treating them professionally, respectfully, and courteously. All information provided to us by a vendor or subcontractor must be considered confidential in respect to their competitors, unless otherwise stipulated, and protected to the same extent as we would protect our equivalent information.

Significant care should be taken in selecting the individuals and businesses with whom we do business. We will select vendors and subcontractors who provide the best value to the Company, but their reputations for honesty and integrity reflect upon us and must be beyond reproach. We will not do business with customers, vendors, or subcontractors who do not strictly comply with the law or whose business conduct does not conform to the standards of ethical conduct we expect of ourselves. We will not knowingly allow anyone working with us or for us to violate any laws or standards of ethical conduct. Third parties with whom we do business must adhere to universally recognized fair business and labor practices, comply with health and safety workplace standards for their employees, and strictly comply with environmental laws and regulations. In terms of sustainable development, it is important that our business partners contribute to our initiatives, in particular by reducing energy consumption, water, air, and soil pollution, and waste of resources as they conduct their work activities.

As described in the Conflicts of Interest section above, we do not accept personal benefits, meals, or gifts of any kind from a vendor or subcontractor in excess of \$100 per person or allow anyone else to do so on our behalf. We may offer to or receive entertainment from a customer, vendor, or subcontractor provided it is done for the purpose of developing or reinforcing a business relationship, but only with a reasonable rate of frequency and within modest boundaries and approval of a supervisor, and if not otherwise prohibited by this Policy, other Company policies, and applicable Anti-Corruption Laws. We do not give or receive extravagant invitations for social or networking events unless they are part of a promotional event open to others and then only after consultation with your supervisor, senior management, or the Legal

Department. For further guidance, consult the sections above entitled, “Conflicts of Interest” and “Anti-Bribery and Anti-Corruption.”

All permitted purchases of goods and service by the Company from a former employee must be performed under conditions equivalent to those of the market. Approval from a supervisor must be obtained for any transaction planned with an employee about to leave the Company or who has left the company within the past five years, or with a Company in which the employee in question has direct or indirect interests.

Insider Information

Use of material, non-public (“insider”) information about the Company, Caisse des Depots et Consignations, the Rethmann Group, Transdev Group, or any of their subsidiaries or affiliates (or any unrelated company) for the financial benefit of an employee or other person is unethical and illegal and can subject the employee, other person, or anyone aiding and abetting such conduct, to criminal and civil liability. Therefore, we will not engage in or tolerate anyone else engaging in such unlawful conduct.

We will take all appropriate measures to ensure that material, non-public information is released only to those employees or others who have a legitimate right and need to know.

We will immediately report any known or suspected violations to supervisory personnel or to the Finance or Legal Department.

A Special Message to Senior Management

Responsibility for oversight of the Company's legal and ethical compliance programs rests with senior management.

Senior management has three (3) key obligations in this respect:

- making sure that the Company has adequate resources dedicated to compliance programs;
- implementing and maintaining effective compliance programs; and
- periodically reporting to the Board of Directors about the Company's compliance activities.

Meeting these obligations requires:

- a personal commitment and constant vigilance;
- due care in identifying and reporting risks and violations;
- employing a decision-making process that encourages alternative viewpoints;
- inviting bad news as well as good;
- managing an environment that does not tolerate retaliation;
- creating accountability and fairly punishing wrongdoing;
- recognizing and rewarding ethical behavior.

It is senior management's responsibility to uphold standards, set examples of behavior, and foster a climate of legal and ethical compliance. Embracing the letter and spirit of this Code of Conduct and the *We@Transdev* Management Model of the Company is critical to good decision-making and an effective legal and ethical compliance program.

Attachment K:

Rochester Public Transit Development Plan 2023:

Please See External Site-

<https://www.rochestermn.gov/home/showpublisheddocument/37835/638130822645100000>