
Alstom UK & Ireland Modern Slavery Act Transparency Statement 2020

Date of issue: 27 April 2020

INTRODUCTION

This statement is made by **ALSTOM Transport UK Limited** with regards to the Modern Slavery Act 2015 which requires companies with turnovers in excess of £36million to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply chain.

In accordance with the Act, this statement articulates our policies and practices around recognising and preventing human trafficking and slavery in the global supply chain.

Alstom's mission is to support the transition toward global sustainable transport systems that are inclusive, environmentally friendly, safe and efficient whilst implementing a socially responsible business model. Alstom pioneers and markets the widest range of smart solutions in the rail market offering a complete range of innovative solutions from high-speed trains to metros, tramways and e-buses, on-board passenger solutions, customised services (maintenance, modernisation), infrastructure, signalling and digital mobility solutions. Alstom is a world leader in integrated transport systems.

PRINCIPLES

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains.

Alstom has a **Code of Ethics** that applies to every employee and which is designed to promote honest and ethical conduct with all stakeholders. The Code of Ethics prescribes fundamental rules of conduct, relating in particular to full compliance with laws, regulations and requirements in all countries where Alstom operates. This Code of Ethics was updated in 2020, and now integrates a series of case studies to make it more accessible for employees.

Alstom has a **Sustainability & Corporate Social Responsibility Policy** endorsed in January 2018 by Henri Poupart-Lafarge, Chairman & CEO of Alstom.

Alstom is a member of the United Nations Global Compact initiative and commits itself to a continuous improvement approach with our suppliers and contractors outlined in our **Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors** which was expanded and updated in October 2017.

LABOUR STANDARDS

Alstom's suppliers and contractors shall, in particular, and in compliance with our Charter for Ethics and Sustainable Development, comply with the following:

- Eliminate all forms of illegal, forced or compulsory labour;
- Eliminate child labour; Alstom's suppliers and contractors shall not employ persons not having reached the minimum age required for work and shall never support the use of child labour, except as part of an official government approved educational youth training scheme;

- Eliminate discrimination of any kind in respect of employment and occupation;
- Comply with applicable laws and regulations related to maximum working hours and minimum days of rest;
- Comply with applicable laws and regulations related to the minimum level of wage;
- Respect the freedom of association for their employees, in compliance with applicable laws;
- Comply with applicable laws and regulations related to redundancy.

IMPLEMENTATION AND CONTINUOUS IMPROVEMENT

In order to build on Alstom's work in favour of human rights, the global Sustainability and Corporate Social Responsibility (CSR) Department has appointed a CSR and Human Rights Manager in December 2019. The aim, with this new role, is to develop the existing Human Rights programme, and launch new internal and external initiatives.

The analysis and prioritisation of human rights-related risks is established at different levels within Alstom:

- **A global risk mapping** covers human rights that are most likely to be affected by Alstom's activity;
- **A risk mapping per country** was established by external consultants on the basis of different indexes by international organisations and NGOs such as the United Nations, the International Labour Organisation (ILO), the European Union, the World Bank, International Trade Union Confederation and Transparency International
- **A risk mapping of our suppliers and subcontractors** is updated every year by the Sourcing Department

The risk mapping, prioritisation of issues and analysis of corresponding procedures is reviewed annually by the central Sustainability and CSR Steering Committee.

As part of our commitment to combating modern slavery and human trafficking, we have implemented the following within our organisation:


- Our Sourcing Director UK & Ireland continues to oversee the implementation of policies and procedures related to our Modern Slavery Act Transparency Statement;
- Our Sustainability Manager UK & Ireland continues to contribute through the development of a specific Alstom UK & Ireland Sustainability Strategy;
- Our current sourcing policies and contracts refer to the Alstom Charter for Ethics & Sustainable Development and every supplier is requested to sign this. Over 98% of suppliers have signed to date but the rules still apply to all;
- All our supplier and contractor contracts contain the right to be assessed or audited by Alstom or by a third party mandated by Alstom on the principles defined in the Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors.
- **Evaluation of our Sustainability performance by independent third parties:** Alstom's sustainable development performance was last assessed by Ecovadis in 2018 and again achieved the highest possible recognition of "Gold" status. Alstom's ranking has improved from the 95th percentile in 2016, to the 99th percentile when compared with other companies on this platform.
- In addition to Alstom's internal assessments and audits, a pluriannual audit programme will be launched in 2020 with external consultants in order to roll out additional evaluations of the living and working conditions of our subcontractors and suppliers.

- **Alstom's Vigilance Plan** was published for 2017/18 fiscal year as part of the French law on Duty of Vigilance. This plan presents the various measures taken at the different levels of the organisation to manage human rights, health and safety and environmental risks:
 - global risk mapping and management tools expanded to integrate the relevant topics;
 - specific risk analysis and mitigation measures covering Human Rights, Health and Safety and Environmental risks from Alstom activities, which also apply to contractors operating in Alstom's facilities;
 - dedicated risk mapping and risk management measures for risks arising from the Supply Chain applied to suppliers and contractors.
- A Human Rights review of the countries in which Alstom operates or might operate has been developed. The objective is to identify potential risks related to projects and mitigation measures ahead of bid submissions, including the undertaking of specific Human Rights due diligence assessments when relevant. To this end, human rights related questions have been integrated in the Ethics and Compliance assessment of each bid. Through this process, every project is allocated an estimated level of risk based on their location, type of activity, commercial partners and other potential issues;
- Alstom UK and Ireland continues its partnership with the Supply Chain Sustainability School and will use the school engagement to improve supply chain knowledge about issues relating to Modern Slavery.

APPROVAL

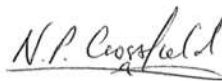
This Statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Act Transparency Statement for the financial year commencing 1st April 2019 ending 31st March 2020.

This Statement has been approved by the board of **ALSTOM Transport UK Limited**.



Olivier Quindos

Sourcing Director UK & Ireland



Nick Crossfield

Managing Director UK & Ireland

Copies of Alstom Code of Ethics, Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors and Sustainability & Corporate Social Responsibility Policy are available on the Alstom website (www.alstom.com) or on request.