

# HITACHI

Hitachi Rail STS Australia Pty Ltd

## Modern Slavery Statement 2025

**Hitachi Rail STS Australia Pty Ltd – Modern Slavery Statement 2025**

**1. Introduction:**

Hitachi Rail Ltd. (**Hitachi Rail**) is the holding company of the Hitachi Railway Systems Business Unit of Hitachi, Ltd. (**Hitachi**). Hitachi Rail STS Australia Pty Ltd. (ABN 34 068 707 380) (**Hitachi Rail Australia**) is a second-tier, wholly-owned subsidiary of Hitachi Rail.

Hitachi Rail Australia is committed to supporting and respecting human rights, including the abolition of both forced and child labour, wherever it does business.

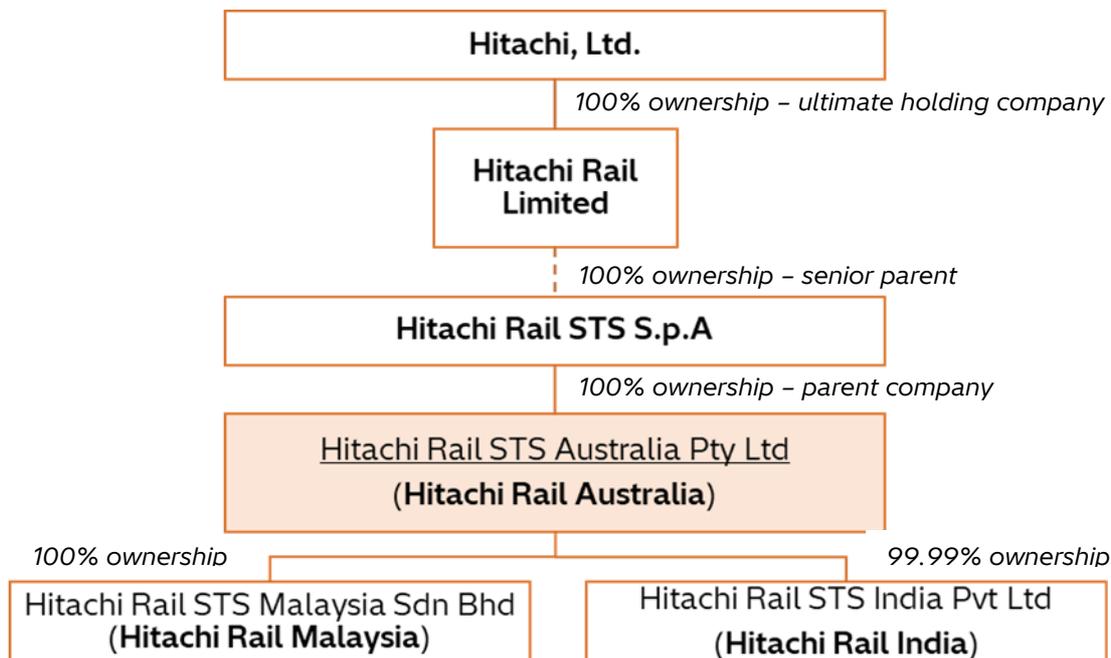
We are committed to acting ethically and with integrity in all our business dealings and relationships and minimising the risk of both forced labour and child labour in our business and supply chains. We engage with our workforce to help them understand what forced labour and child labour are, how to recognise it, and how to act on risk indicators of these issues.

This is the sixth Modern Slavery Statement prepared by Hitachi Rail Australia (**Statement**), in compliance with the *Australian Modern Slavery Act 2018* (Cth) (**Act**). This Statement sets out the key activities Hitachi Rail Australia has undertaken since 1 April 2024 to deliver on our commitments.

**2. Structure, activities, and supply chains:**

**Structure:**

Hitachi Rail Australia is part of a larger group of companies that are subject to direction and coordination of Hitachi. Hitachi Rail Australia is wholly owned by Hitachi Rail STS S.p.A, which in turn is wholly owned by Hitachi Rail. A chart depicting the organisational structure of Hitachi Rail Australia and that of its subsidiaries Hitachi Rail Malaysia and Hitachi Rail India is set out below:



For the period ending 31 March 2025, Hitachi Rail Australia employed 592 people. This includes 547 permanent full-time roles, and 2 apprentices.

Hitachi Rail Australia's head office is located at 11 Viola Place, Eagle Farm, Queensland 4009.

Hitachi Rail Australia also operates out of:

- corporate offices located in Perth (Units 3, 3a & 4, 93 Francisco Street, Belmont, West Australia 6104) and in Sydney (Suite 602, Level 6, 123 Epping Road, North Ryde, New South Wales 2113);
- project offices located in Brisbane (Level 7, 180 Ann Street, Brisbane, Queensland 4000) and Karratha (1104 Lambden Road, Karratha, Western Australia 6714); and
- warehouses located in Brisbane (9 Viola Place, Eagle Farm, Queensland 4009) and Perth (Unit 2, 93 Francisco Street, Belmont, West Australia 6104).

### **Activities of Hitachi Rail:**

Hitachi Rail is a fully integrated, global provider of rail solutions across rolling stock, signalling, operations, service & maintenance, digital technology, and turnkey solutions. Our mission is to contribute to society through the continuous development of superior rail transport solutions. We are proud of our global achievements, from our world-famous 'bullet trains', to our signalling solutions and turnkey projects, state-of-the-art traffic management and digital solutions.

Drawing on the wider Hitachi Group's market-leading technology and research-and-development capabilities, we strive for industry leading innovations and solutions that can deliver value for customers and sustainable railway systems that benefit wider society.

Hitachi Rail Australia is leading several transformative projects advancing sustainable and efficient transportation infrastructure across Australia, for both passenger and freight clients. Notably the significant ongoing ETCS Level 2 deployment across South East Queensland for the Department of Transport and Main Roads (TMR) and our long-established partnerships with key mining clients in Western Australia, namely Rio Tinto and Roy Hill.

Major projects being delivered by Hitachi Rail Australia's subsidiaries Hitachi Rail Malaysia & Hitachi Rail India, during the 2024-2025 reporting period include signalling projects in Peninsular Malaysia and in the Indian states of Tamil Nadu, West Bengal and Uttar Pradesh.

The acquisition of Ground Transportation Systems by Hitachi Rail from Thales, effective since May 31, 2024, is expected to increase innovation, investment, and competition in the rail sector internationally, and to allow a greater capability to deliver for customers, develop new technology and get closer than ever to the markets it serves.

### **Supply Chain:**

Our supply chain comprises other Hitachi Group companies as well as external third-party suppliers. Hitachi Rail Australia and its subsidiaries do not undertake any manufacturing activity in the development and delivery of systems and services for their operations. The highly specialised products and components required to assemble these systems and services are supplied from within the Hitachi Rail group's factories based in Italy, France, the USA and Japan, with final assembly, installation and commissioning work undertaken by workers in Australia, Malaysia and India.

Hitachi Rail Australia and its subsidiaries rely primarily on direct relationships with manufacturers (predominately related Hitachi group entities) and approved OEM resellers for the purchase of

materials for their projects including circuit boards, mechanical and plastic parts, cables, industrial PCs, on-board equipment and electromechanical components.

Hitachi Rail Australia has identified the following jurisdictions as giving rise to the highest risk of modern slavery and human trafficking:

- Afghanistan
- Algeria
- Belarus
- Burundi
- China
- Comoros
- Cuba
- Tajikistan
- Eritrea
- Iran (Islamic Republic of)
- Korea, North
- Lesotho
- Libya
- Myanmar
- Nicaragua
- Papua New Guinea
- Russian Federation
- South Sudan
- Somalia
- Sudan
- Syria
- Turkmenistan
- Venezuela
- Yemen

A review of all transactions during the 2024-2025 reporting period between Hitachi Rail Australia and its subsidiaries and the jurisdictions identified above as high-risk confirmed limited activity, this being three intra-company transactions with a related Hitachi entity in China, and each of which was solely for the reimbursement of staff time spent in the region. No other transactions were recorded in any of the remaining high-risk jurisdictions, and no issues of concern were identified in relation to Hitachi Rail Australia or its subsidiaries.

### 3. Our Codes and Policies:

Hitachi Rail Australia's commitment to prevent forced labour and child labour in our business and supply chains is underpinned by appropriate policies that are regularly reviewed and updated to reflect our evolving business.

Our internal **Compliance Programme Manual** (2023) describes how we prevent, detect, and respond to compliance risks and misconduct, and promote a culture of ethical conduct. Our Compliance Programme is benchmarked periodically against industry and global best practices and aligns to Hitachi Group compliance standards.

Our Code of Ethics and Business Conduct (2023) (**Code of Ethics**) applies to all members of Hitachi Rail Australia's governance and control bodies, executives, workforce, and supply chain. The Code of Ethics reflects our commitment to, amongst other things:

- ▶ Abolition of slavery and all forms of forced or compulsory labour;
- ▶ Freedom of association;
- ▶ Equal pay for equal work;
- ▶ Equality at work;
- ▶ Just and favourable remuneration;

- ▶ Non-discrimination; and
- ▶ Protection for the organisation of and participation in collective bargaining.

Hitachi Rail Australia also requires our suppliers to comply with our **Expectations of Business Partners (2024) (Expectations)**, where we expressly preclude the use of child, forced, or trafficked labour in our supply chains and where we require our partners to respect human rights and applicable labour laws and comply with legal requirements for abolishing slavery and all forms of forced or compulsory labour. The Expectations outline Hitachi Rail's requirements for ethical business conduct of all our business partners that we buy from, sell to, or partner with.

Hitachi Rail Australia supplements the above ethics and compliance documents with the following relevant Hitachi Rail policies and manuals that are subject to continuous review and improvement:

- ▶ **Modern Slavery Policy (2024)** details our commitment to maintaining a culture of integrity and openness in all our business dealings and relationships, including that we take reasonable measures to minimize risks of modern slavery and forced labour in our business, operations, and value and supply chains.
- ▶ **Human Rights Policy (2025)** that reflects our commitment to comply with the Universal Declaration of Human Rights when conducting business;
- ▶ **Diverse Perspectives Policy (2025)** that sets out our commitment to: creating and sustaining an inclusive workplace, ensuring all our employees are respected, heard and valued, and that our teams reflect the communities we operate in.
- ▶ **Health, Safety and Environment Policy (2025)** and **Quality and Product and Product Safety Policy (2025)** that set our commitment to provide safe, effective, quality and fit for purpose systems, products, and services to customers, in compliance with good practice, applicable international and national standards and all legal obligations;
- ▶ **Whistleblowing & Speak-Up Policy (2023)** promotes a “speak-up” culture whereby anyone can report, in good faith, actual or suspected violations or breaches of laws, regulations, our Code of Ethics, or our policies and emphasises that Hitachi does not tolerate retaliation against those who report concerns or whistleblowers;
- ▶ **Conflict Minerals Policy (2025)** that states our commitment to responsible procurement activities to ensure that the procurement of materials containing conflict minerals and cobalt does not encourage human rights violations, including child labour;
- ▶ **Social Accountability Manual (2022)** that reiterates Hitachi Rail's commitment to the highest standards of ethics and sustainable development by respecting and implementing the principles of Standard SA8000 (Social Accountability) for human rights and workers' rights;
- ▶ **Respectful Workplace Policy (2024)** provides for a respectful, safe, dignified, and supportive environment for our workforce; we embrace our diversity and promote trust and fairness; and we do not tolerate workplace-related discrimination and harassment or workplace violence.
- ▶ Other written employment practices and procedures that ensure fair recruitment and treatment of our workforce, including Australia specific policies such as:
  - **Hitachi Rail Australia Respectful Workplace Policy (2024)** that provides a clear overview of what is and is not unreasonable and unwelcome workplace conduct, and

outlines employer and employee responsibilities in relation to maintaining a positive workplace of respect across Hitachi Rail Australia; and

- **Hitachi Rail Australia Equal Employment Opportunity Policy (2024)** which sets out our commitment to ensuring the principles of equal employment opportunity and diversity and inclusion are adopted at all stages of the employment relationship and upheld in all its workplaces.

Hitachi Rail Australia continues to make our policies available to our workforce through publication on our internal document management system and intranet. We regularly review and update our policies.

#### **4. Due Diligence for Modern Slavery and Human Trafficking:**

Hitachi Rail Australia has identified certain materials and services procured by our business during the reporting period as giving rise to the highest risk of human rights or of giving rise to the highest risk of forced labour, child labour and trafficking. Hitachi Rail Australia identifies, assesses, controls, and monitors the risk of modern slavery and human trafficking in these industries, and our supply chain more generally, through our supplier due diligence. Core activities include:

##### **Supplier mapping:**

Mapping direct supply chain and business relationships to measure and identify areas where there is potential or indirect risk for modern slavery using published data.

##### **Hitachi Rail Assessment & Screening:**

Initial desktop assessment of all suppliers for, anti-money laundering, anti-bribery and corruption, adverse media, sanctions, watchlists and politically exposed persons. Prospective suppliers are screened for: i) compliance and reputational risk events (e.g. negative news, regulatory enforcement including fines or other penalties, and legal actions including litigations); ii) export trade sanctions and blacklisting; iii) corruption risk (including corruption perception scores, financial secrecy, and corporate tax haven indices); and iv) human rights risk (including EcoVadis industry and country risks, and worker's rights indices). Prospective suppliers are required to agree to adhere to the Expectations and complete the Hitachi Rail screening questionnaire that includes information to understand the supplier's compliance with regulatory requirements and best practices.

##### **CSR & Sustainability Risk Assessment:**

Hitachi Rail works with EcoVadis, a global leader in business sustainability ratings, to deliver an internal programme that enhances visibility of supply chain risks in the corporate social responsibility (CSR) and sustainability space. Hitachi Rail uploads and risk-assesses its supply base using the EcoVadis IQ platform which enables Hitachi Rail to create a CSR & Sustainability risk profile for its suppliers against 4 key criteria: Environment, Labour & Human Rights, Ethics and Sustainable Procurement.

In 2024 Hitachi Rail enhanced the screening platform with the implementation of EcoVadis IQ+ using DocuScan with contactless AI data mining to review supplier policies including Labour & Human Rights. The risk assessment was updated in 2023 with a total of 6,944 suppliers from 204 industries and 55 countries, registering an increase of 142 suppliers with respect to last year, and provides critical insights on the inherent risk profile of Hitachi Rail's suppliers in terms of the industries they work in and the countries in which they operate.

**Site Visits and External Audits:**

Hitachi Rail Australia organises and undertakes supplier visits and audits for quality & assurance and health & safety in accordance with internal policies and procedures. Hitachi Rail Australia also organises social audits of suppliers that have been identified as giving rise to human rights concerns, including modern slavery.

**Internal Audit:**

We have a framework in place for all current procurement processes. These are all tested internally and externally through rigorous audits that look at compliance and the application and adherence to processes. Where there is a non-conformity report or recommendation, we build them into the process development.

**Whistleblowing & Speak-Up:**

Hitachi Rail Australia provides various speak-up channels for any person, internal or external to our business, seeking to report a concern regarding actual or suspected misconduct that may be a violation or breach of any applicable law or regulation, our Code of Ethics, or any of our policies. Our speak-up channels include managers, members of our Human Resources or Legal & Compliance functions, and our dedicated 24-7 Hitachi Global Compliance Hotline, which provides for online or telephonic reporting. Hitachi Rail additionally provides for specific email addresses for supervisory bodies and other eligible recipients as speak-up channels, as required by certain local laws and regulations where we operate. As noted above, Hitachi Rail Australia does not tolerate retaliation against whistleblowers.

**Compliance:**

We have a dedicated compliance team, led by our Chief Compliance Officer. The compliance team is supported by all functions over the business, but in particular Internal Audit, Legal, Finance, Human Resources, Procurement and Sales.

**Contracts:**

Hitachi Rail Australia binds suppliers to comply with all applicable laws, including the Act and our Supplier Code of Conduct.

**5. Training:****Internal Training:**

Raising awareness and building expertise is another process used by Hitachi Rail to manage human rights risks. Hitachi Rail ensures that all new members of our workforce undertake mandatory training on our Code of Ethics (translated into 15 languages) within three months of joining. This training is refreshed annually for our whole workforce. The training explains how to spot and report potential or actual breaches of the Code of Ethics, including in relation to human rights, and details the consequences for failing to comply with the Code of Ethics. As part of Hitachi's Ethics Month in October 2024, the Compliance Team partnered with the Learning and Development Team to launch annual Code of Ethics training. More than 23,000 Hitachi employees participated in the Code of Ethics refresher, which occurred during 1 October to 30 November 2024, with the Asia Pacific region achieving a 99% completion rate.

We have deployed bespoke Modern Slavery e-learning to our workforce globally that helps them identify potential instances of Modern Slavery in our business and supply chain and explains our procedures for preventing and reporting the same. Over half of our global workforce with access to eLearning have completed the training to date, and we have targeted 100% completion.

- ▶ For Hitachi Rail Australia, the percentage completion rate for the Modern Slavery e-learning is currently at 65.78%, and targeting 100% completion by 31 March 2026.
- ▶ For Hitachi Rail India, the percentage completion rate for the Modern Slavery e-learning was 80.76%, and targeting 100% completion by 31 March 2026.
- ▶ For Hitachi Rail Malaysia, the percentage completion rate for the Modern Slavery e-learning was 55%, and targeting 100% completion by 31 March 2026.

We have deployed bespoke mandatory Respect in the Workplace training to all our workforce (employees and contractors) locally. This course helps protect the health and safety of our employees. This is provided when an employee is onboarded; it is either delivered in person and instructor-led or delivered via online and is mandatory for all new hires to complete within the first 90 days of employment.

We actively work with our procurement teams and management to identify gaps in individual and role training as part of the wider due diligence activities and responsible sourcing programme.

**External Training:**

Through the EcoVadis tool, registered suppliers have access to the EcoVadis Academy training which includes e-learning courses on Child Labour, Forced Labour & Human Trafficking topics.

## 6. Assessing effectiveness:

We continue to monitor the effectiveness of our processes to ensure that we source responsibly, trade ethically and prevent human trafficking within our business and supply chain. This section outlines key performance indicators (KPIs) to help measure progress against our goals.

**KPIs**

Goal	Status
Ensure new members of the workforce have completed Code of Ethics training within 3 months of new employee start date	Achieved
Ensure that existing workforce have undertaken refresher Code of Ethics training annually	Achieved
Ensure workforce with access to eLearning have completed Modern Slavery every two years	On track
Maintain and enforce Hitachi Rail’s suite of internal policies to mitigate risk	On track
Continue to ensure that anti-slavery clauses and compliance with the Expectations are embedded into all high-risk contracts	On track

## 7. Statement Approval:

This Statement was approved by the Board of Directors of Hitachi Rail STS Australia Pty Ltd on 29 September 2025.

**DocuSigned by:**  
  
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Sarfaraz Samnakay

Managing Director and Country Representative

Hitachi Rail STS Australia Pty Ltd

Date: 29 September 2025