
Alstom Transport Australia Holdings Pty Limited (ACN 644 102 992)

Alstom Transport Australia Pty Limited (ACN 165 157 451)

Bombardier Transportation Australia Pty Limited (ACN 010 699 804)

Modern Slavery Statement 2022

Date of Issue: 29 September 2022

This joint statement is made on behalf of the boards of Alstom Transport Australia Holdings Pty Limited ACN 644 102 992, Alstom Transport Australia Pty Limited ACN 165 157 451 and Bombardier Transportation Australia Pty Limited ACN 010 699 804 together with its subsidiary entities:

- Bombardier Transportation (Customer Support) Australia Pty Limited ACN 088 592 938.
- Bombardier Transportation (V/Line) Australia Pty Limited ACN 088 592 812.
- V/Line Maintenance Pty Limited ACN 088 510 614.

(together, “**Alstom Australia**”) with regards to the *Modern Slavery Act 2018* (Cth) which requires companies with an annual consolidated revenue in excess of AUD\$100 million to be transparent about their efforts to identify and mitigate slavery and human trafficking in their business and supply chains, for the year ending 31 March 2022.

For the purpose of compliance with the *Modern Slavery Act 2018* (Cth), this modern slavery statement covers the operations and business of Alstom Australia for the reporting period of 1 April 2021 to 31 March 2022 (“**Reporting Period**”).

Our organisation, structure, operations and supply chains

Our business

On 29 January 2021, Alstom acquired the Bombardier Transportation group of companies. On 1 January 2022, Bombardier Transportation Australia Pty Limited became a wholly owned subsidiary of Alstom Transport Australia Holdings Pty Limited. After the Reporting Period, on 1 August 2022, Bombardier Transportation Australia Pty Ltd merged into Alstom Transport Australia Pty Ltd.

Alstom Transport Australia Pty Limited is a wholly owned subsidiary of Alstom Transport Australia Holdings Pty Limited which is a wholly owned subsidiary of Alstom Holdings SA incorporated in France. As a consequence each of the Alstom Australia entities is a wholly owned subsidiary of Alstom SA (“**Alstom**”), a French multinational company operating in the rail transport markets.

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. As a promoter of sustainable mobility, Alstom develops and markets systems, equipment and services for the transport sector. Alstom offers a complete range of solutions (from high-speed trains to metros and tramways), passenger solutions, customised services (maintenance, modernisation), infrastructure, signalling and digital mobility solutions.

Alstom in Australia

Alstom has been providing sustainable infrastructure solutions in Australia for more than 100 years and currently employs approximately 1,800 people across more than 25 sites that include engineering centers, manufacturing facilities, project delivery offices and maintenance depots & workshops.

Alstom is committed to supporting the Australian & New Zealand railway markets through the application of the latest innovative and proven technologies that are designed to provide an optimal whole of life cost for our customers while delivering a seamless and superior passenger experience.

Alstom is a leading provider of Systems, Rolling Stock, Signaling, and Maintenance Services for the rail industry throughout Australia.

Alstom's transport operations can be traced back to the 1940's, manufacturing locomotives in Brisbane, Queensland for supply to rail networks throughout the country. The Business later made a significant step forward when it acquired the Ballarat workshops from the Victorian Government in 1999, as a local industrial base for rolling stock build, renovation and components overhaul.

Following the acquisition of Bombardier Transportation in January 2021, Alstom's operations and industrial base in Australia expanded significantly.

Alstom has supplied rolling stock in Queensland (Trams & Suburban), New South Wales (Trams & Metro), Victoria (Trams, Suburban, Regional), South Australia (Trams & Suburban), and Western Australia (Suburban).

Alstom's Services operations maintain more than 2,100 rail cars (including trams) under long-term maintenance contracts right across the country.

Alstom's signaling technology is present on all major rail networks throughout the country, covering more than 1,500 km's of track that includes Australia's first fully automated driverless CBTC technology for the Sydney Metro. Alstom is currently delivering the CBTC technology for the Melbourne Metro Tunnel, Digital Systems across the Sydney suburban network and continues to support the department of Transport in Victoria with ongoing interlocking upgrades as part of the level crossing removal program. In Western Australia, Alstom is a major player in the mining sector with ongoing contracts with BHP and FMG.

Key milestone

With the incorporation of Bombardier Transportation and its subsidiaries into the Alstom Australia group, Alstom Australia has ensured that, during the Reporting Period, those entities became compliant with the Alstom global procedures including:

- Third party assessment and certification of supplier corporate social responsibility credentials in accordance with Alstom's Charter.
- Identification, monitoring and auditing of high-risk countries and suppliers using the Ecovadis eligibility criteria and High-Risk Supplier List.
- Roll out of the Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors in relation to modern slavery practices.

Supply chains

Alstom Australia's supply chain includes a large range of goods from a broad range of industries both domestically and internationally, including Alstom's own domestic and overseas factories where various stages of manufacture take place, the importation of trains or parts into Australia and the delivery of trains to Alstom Australia's customers.

Alstom Australia's supply chain also includes services that contribute to its operations, such as the cleaning and security companies that service Alstom's offices and manufacturing sites.

Alstom Australia's products and services delivered in Australia are sourced from the following countries:

- Rolling stock materials are procured from Australia, Europe and Asia.
- Track/signalling materials and infrastructure services are procured from Australia, New Zealand, Europe, Asia and North America.
- Production consumables are procured from Australia, and North America.

- Indirect services are procured from Australia, New Zealand, Europe, Asia and North America.

Alstom Australia's assessment of modern slavery risks in its supply chain in Australia

Alstom is committed to combating modern slavery and human trafficking. We understand that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, workplace abuse and human trafficking.

Supply chain analysis

As Alstom Australia procures a large range of goods from a broad range of industries both domestically and internationally, we acknowledge that modern slavery is a risk to our organisation and extended supply chain. Our approach to the detection of modern slavery risk in our supply chain is based on various factors. These include vulnerable populations, product and service categories, industry and geographic locations and the types of goods or services being provided.

As this is Alstom Australia's third reporting year, Alstom Australia continues to prioritise its due diligence to identify and understand the potential for and scale of modern slavery risks, focussing on our first-tier suppliers and contractors. Due to the ongoing COVID-19 pandemic restrictions during the reporting period, we were not able to fully implement our proposed initiatives with all of our suppliers. To avoid potential instances of modern slavery in our supply chain, we will continue to work with our suppliers to identify potential instances of modern slavery and support the implementation of appropriate remediation or corrective action plans.

During the Reporting Period, Alstom Australia engaged with approximately 850 external suppliers and contractors domestically (including NZ) and 296 international suppliers and contractors.

Alstom Australia engaged external suppliers and contractors to provide services, the majority of which are procured domestically. The next largest group of services are sourced from Europe. Services delivered to Alstom Australia include works subcontracted directly for our projects and also to support the operations of the business.

In relation to equipment and materials procured by and supplied to Alstom Australia, the majority of equipment and materials are procured from local suppliers in Australia and New Zealand with the remaining equipment and materials procured overseas, from Europe, Asia and North America. Goods purchased by Alstom Australia include Rolling Stock subsystems including brakes, HVACs, pantographs, bogies as well as Signalling and Infrastructure including electrical cubicles, cables, point machines and network communication hardware.

During a previous Reporting Period one of the China-based global suppliers to Alstom was named in an Australian Strategic Policy Institute report dated 1 March 2020 on forced labour practices. The supplier has denied allegations of modern slavery. Alstom undertook reviews and audits of potential forced labour issues in the supplier, and no human rights incidents were identified. In February 2022, an extended follow-up audit dedicated to work conditions on the supplier's site was completed by a third party. Based on the scope and methodology of the SMETA standard audit, the documentation and information received from the Supplier and external audits organised, no human rights incidents were identified on the plant that supplies Alstom. Alstom will continue to monitor this specific case.

Alstom Australia also has approximately 17 internal suppliers supplying catalogue and standard equipment manufactured in France, Germany, Sweden, Austria, Poland, US, Brazil, India and China. Most of this equipment and materials are procured locally within the country of manufacture and are used mainly for Rolling Stock and Signalling purposes. All Alstom's global entities are tasked with following the mandatory global policies and processes to recognise the risks of modern slavery and human trafficking in our business and supply chains.

As manufacturing and maintenance activities constitute a significant proportion of Alstom Australia's operations, we have an ongoing need for personal protective equipment and clothing to protect our workforce. Some or all of these products may be part of the textiles and fashion sector, which is recognised on a global basis as high risk for modern

slavery. Alstom Australia's protective apparel or branded clothing (PPE) is procured from domestic suppliers and makes up less than 0.5% of our total spend.

The selection of Alstom Australia's suppliers is usually performed via a competitive RFQ (Request for Quote) process. Suppliers' offers are reviewed and assessed against industry/market QCD (Quality, Cost and Delivery) and EHS performance.

As part of the broader Alstom group, Alstom Australia aims to progressively develop more comprehensive supply chain risk mapping taking into account the geographic location and nature of products and services sourced. Alstom applies a systematic approach to all risk disciplines, including our procurement processes, practices and dealings with suppliers and contractors, which we know is an essential element of progressing the global eradication of modern slavery and human trafficking. Alstom uses an external platform, *Ecovadis*, to ensure that Alstom's supply chain is sustainable. The assessments performed focus on 21 sustainability criteria that are grouped into four themes: Environment, Labor & Human Rights, Ethics and Sustainable Procurement. *Ecovadis* establishes country CSR score cards based on corruption risk, respect of human rights, politic instability and eco-awareness. The assessment system is in line with the UN Global Compact guidelines, ISO 26000, and the Global Reporting Initiative (GRI).

Alstom's Coronavirus (COVID-19) response

The COVID-19 pandemic continued during the Reporting Period. As each State and Territory in Australia imposed different health and safety rules and requirements to manage the spread of COVID-19, the ongoing management of the COVID-19 pandemic has required Alstom Australia to take different approaches according to the specific requirements of each State or Territory. This included, lock downs - for people to 'stay at home except for essential activities' and for workplaces to either close or modify their operations to slow the spread, avoid health systems being overwhelmed and prevent unnecessary deaths.

Alstom Australia's ANZ Crisis Management Team met on a regular basis to govern the requirements and create and approve work instructions in response to COVID-19. The team refers to the EHS-AUS-WMS-013 Business Continuity Plan – Pandemic to guide the actions it takes for COVID-19 preparedness, mitigation, response, recovery and restoration. The team continues to meet as required according to changing circumstances to discuss the plan and is tasked with identifying actions required to ensure the health and safety of its people and to optimise business continuity.

Alstom Australia also recognises that mental health is an important issue. Psychosocial hazards can develop both within and external to the workplace and can lead to employees being incapable of attending work, performing standard duties or working safely within their roles. Alstom Australia's focus is on working to alleviate such concerns and during lockdown periods invested in various health and wellbeing mobility initiatives.

Alstom's policies and procedures in relation to modern slavery risks

Principles

Alstom invests in educating employees 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 Alstom's fundamental rules of conduct, relating in particular to full compliance with laws, regulations and requirements in Australia.

Alstom's Sustainability & Corporate Social Responsibility Policy is endorsed by Henri Poupart-Lafarge, Chairman & CEO of Alstom.

Alstom is a member of the United Nations Global Compact initiative. In July 2021, the Group's Chairman and Chief Executive Officer renewed his commitment to the 10 principles of the United Nations Global Compact. Alstom

commits itself to a continuous improvement approach with its suppliers and contractors. Alstom's human rights policy is part of the Sustainability and CSR policy and is defined in the Alstom's Code of Ethics.

Supplier compliance

Alstom seeks to do business with suppliers and contractors with similar values, ethics and sustainable business practices, including those related to human rights. Relations with Alstom's suppliers and contractors are governed by Alstom's processes and procedures which apply both during the selection process and during contract performance, including policies governing:

- Consulting Companies
- Preventing corruption with Suppliers and Contractors
- Supplier Selection Process
- Sustainable Development Process
- Sustainable Sourcing Policy
- Ethics and Sustainable Development Charter
- Generic Process Audit

An integral part of Alstom's sourcing and procurement process is the Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors (**Alstom's Charter**). Alstom's Charter sets out Alstom's compliance expectations regarding human rights, the prohibition of child labour, employee health and safety and ethical rules, in particular those relating to anti-corruption and competition compliance, environmental protection and compliance with applicable laws and regulations.

All Alstom's suppliers and contractors are required to commit to compliance with Alstom's Charter, in particular the following objectives:

- 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.

Alstom ensures that its suppliers and subcontractors commit to a social approach and respect environmental, ethical, health and safety requirements through the signature of the Alstom's Charter. By signing the charter, Alstom's suppliers undertake to respect the principles of the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation (ILO), the OECD Guidelines for Multinational Enterprises, the rules of conduct of the International Chamber of Commerce (ICC), and the values defined by Alstom's Code of Ethics.

Recruitment policy

Alstom Australia operates a robust recruitment policy, including conducting eligibility to work in Australia checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Alstom Australia's direct workforce is predominantly made up of professionally qualified and skilled employees and we consider the risk of modern slavery occurring amongst our employees to be very low.

Our direct employees are engaged either by contract or under award agreements. We currently have eight collective industrial instruments and four unions, with whom our employees are free to associate.

Contractual arrangements

All our contracts with suppliers and contractors contain the right to be assessed or audited by Alstom or by a third party nominated by Alstom on the principles defined in Alstom's Charter.

Supplier On-boarding checks

Prior to engaging a new external supplier, Alstom conducts a qualification process plan for preliminary audits known as a "Quick Industrial Assessment". These audits include questions related to suppliers' CSR activities. If the results are satisfactory, a more extensive "Generic Process Audit" is carried out by the quality team, focussing on a priority pool, unless the supplier is certified "IRIS" (International Railway Industry Standard). As part of mandatory on-boarding documents, Alstom Australia's suppliers and contractors are required to comply with Alstom's Charter. Suppliers signing Alstom's Charter also agree to Alstom performing on-site audits with its suppliers and contractors.

Grievance Alert mechanism

Alstom utilises a tool called the "Alert Procedure" which provides a phone line and web-based portal which can be used to confidentially report matters. The Alert Procedure is available to any employee, any person (ie. contractors or suppliers) and any third party. This process allows reporting of breaches or suspected violation of any law, regulation, or the Code of Ethics or Alstom rules and policies - including concerns relating to modern slavery. All matters reported are managed by Alstom's Ethics and Compliance team.

Training

Training is an essential component of our risk management, governance, compliance framework and Alstom's values. Training our employees helps ensure employees are aware of their legal, regulatory and compliance responsibilities. When new employees start working at Alstom, they are required to complete a suite of mandatory online compliance training courses, including training on our Code of Ethics which also covers modern slavery and human trafficking. Mandatory refresher training is provided to employees every two years or earlier if required due to changes in corporate governance compliances or as required by new legislation. As part of our training governance framework and also individual employee performance management, we monitor, report and manage mandatory training completion rates.

Alstom Australia's actions to assess and address modern slavery risks

As our supply chain is one of the areas of greatest potential modern slavery risk, Alstom Australia continues to dedicate significant effort to deepen the understanding of the specific types of human rights risks associated with different types of products, source countries and sectors. Alstom Australia recognises that our review and assessment to identify and address modern slavery risks across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon.

We are and will continue to monitor and assess the effectiveness of Alstom Australia's processes and procedures to address the modern slavery risks.

During the Reporting Period, Alstom Australia undertook ethics and compliance training for all employees. In addition to our corporate training, specific training on Australian modern slavery laws was undertaken.

Over the next year, Alstom Australia will continue to focus on the development of our Australian supply chain assurance framework by undertaking the following actions:

- We will continue to engage with our suppliers with our onboarding and monitoring questionnaire with specific modern slavery focus to raise awareness of the modern slavery requirements, identify potential risks in connection with sustainability at an early stage, and ensure that appropriate steps are taken.
- We will continue to focus on and assess our first-tier suppliers and contractors using the *Ecovadis* external platform, in particular those operating in countries where there is a high risk of modern slavery.
- Modern slavery training will be refreshed annually, in particular for key procurement staff who will attend human rights and modern slavery awareness sessions delivered by internal and external experts.

Subject to the ever evolving COVID-19 situation and restrictions, Alstom Australia may also undertake audits of our suppliers and contractors to assess their compliance with Alstom Australia's modern slavery requirements, including under Alstom's Charter, on a case by case basis.

Other relevant information

As Alstom Australia is a subsidiary of a global international company, we would also like to highlight modern slavery compliance and initiatives by the Alstom group of companies in other countries:

- The UK Modern Slavery Act entered into force in 2015 and applies to commercial organisations carrying out business in the UK. Alstom Transport UK Limited ("Alstom UK") complies with and has a current Modern Slavery Statement in compliance with the *Modern Slavery Act 2015* (UK).
- Alstom's Vigilance Plan was first published for the 2017/8 financial year as part of the French law on Duty of Vigilance. This plan documents the various measures taken at the different levels of the organisation to manage human rights, health and safety and environmental risks.
- Evaluation of Sustainability performance by independent third parties: Alstom's sustainable development performance was last assessed by *Ecovadis* in 2021. Alstom obtained a score of 74 and the resulting "Platinum" status. It was among the top 1% rated companies on the platform.
- Alstom UK and Ireland continues its partnership with the Supply Chain Sustainability School and will use this partnership to improve supply chain knowledge about issues relating to Modern Slavery.
- Alstom is a member of *Railsponsible*, an industry initiative focused on sustainable procurement, with the aim of continuously improving sustainability practices throughout the railway industry supply chain.
- 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.

During the Reporting Period, Alstom was included, for the eleventh consecutive year, in the Dow Jones Sustainability Indices (DJSI), World and Europe, attesting to its leadership position in sustainable business practices. Alstom has maintained its ranking while the DJSI saw a record increase in participation of 33% to 1,843 companies evaluated out of over 5,300 companies invited to be assessed, remaining in the Top 5% of the best scored companies in its industry.

Approval

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) and constitutes Alstom Australia's Modern Slavery Statement for the reporting financial year commencing 1st April 2021 and ending 31st March 2022.

This Joint Statement has been approved by each of the Boards of:

- Alstom Transport Australia Holdings Pty Limited.
- Alstom Transport Australia Pty Limited.

- Bombardier Transportation Australia Pty Limited.
- Bombardier Transportation (Customer Support) Australia Pty Limited.
- Bombardier Transportation (V/Line) Australia Pty Limited.
- V/Line Maintenance Pty Limited.


Mark Coxon (Sep 30, 2022 16:59 GMT+10)

Mark Coxon, Director

Dated: 29 September 2022