



SIEMENS MOBILITY PTY LTD

# Modern Slavery Statement March 2025

**SIEMENS**

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## MODERN SLAVERY STATEMENT

# About this statement

Siemens as a global company, are well aware of our responsibility to society. We are unreservedly committed to safeguarding and respecting human rights in every stage of the value chain. We understand this to be a key element of acting with integrity and responsible corporate governance. Our goal and aspiration are to identify any human rights violations occurring anywhere in our value chain as early as possible and to mitigate identified risks responsibly.

The Siemens group recognizes establishing sustainability in the supply chain as a key company policy and responsibility to jointly work for a better life for all who take part in our interconnected world – with no place for forced labour, slavery, and human trafficking in any form.

Group sustainable practices are firmly anchored in Siemens Mobility's corporate culture, based on a culture of care, excellence, and trust. Our mission is to provide rail traffic technology that helps transform the everyday for everyone. Siemens Mobility applies globally binding principles that require all staff to behave in an ethical, law-abiding manner. Siemens Mobility also acts responsibly to support economic, environmental, and social progress and has the same expectations of its customers and supply chain.

The *Modern Slavery Act 2018* (Cth) (**the Act**) requires certain entities to report on the risks of modern slavery in their operations and supply chains and to report the actions they are taking to address those risks. The Siemens Group supports the objectives of this legislation and is committed to doing business in a manner that meets fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption as a participant of the UN Global Compact. This includes working towards removing the risks of modern slavery by eliminating all forms of forced and compulsory labour and the abolition of child labour.

To prepare this Modern Slavery Statement in accordance with the Act Siemens Mobility undertook an assessment of its operations and supply chains and established a cross company working group to review and contribute to the strategic direction. This statement describes Siemens Mobility's structure, operations, and supply chain. It outlines the process Siemens Mobility undertook to better understand its supply chain, the potential risks, as well as the actions it has taken and is taking in support of the objectives of the Act.

Siemens Mobility Pty. Ltd. (ACN 625 304 556) (**Siemens Mobility**) is a large proprietary company incorporated in Australia with its registered office at 885 Mountain Highway, Bayswater, Victoria 3153, Australia. Siemens Mobility is part of the Siemens Mobility group of companies ultimately owned by Siemens AG which is listed on the Frankfurt stock exchange (**Siemens Group**). This statement covers Siemens Mobility financial year ending 30 September 2024.

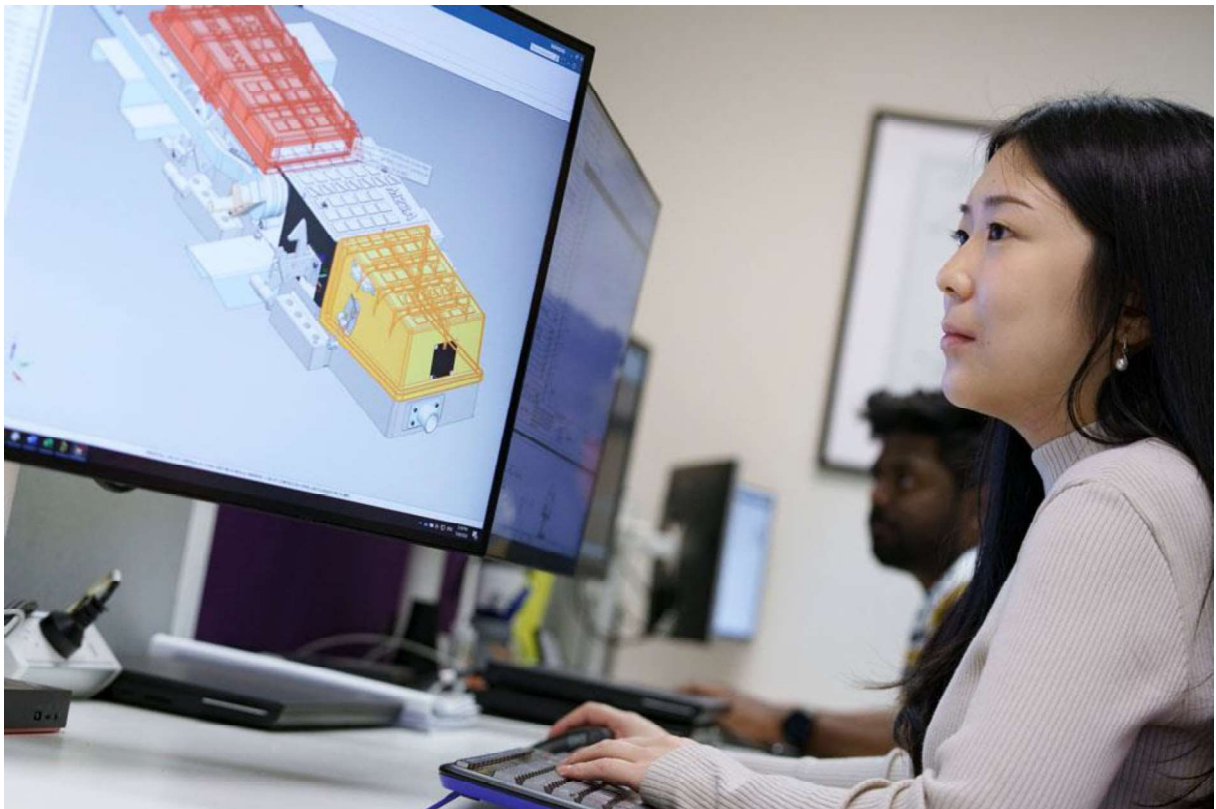
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## MODERN SLAVERY STATEMENT

# FY2024 in Review

Modern Slavery involves the serious exploitation of humans and Siemens recognizes its responsibilities to take appropriate action.

Our statement details our operations and supply chains and transparently outlines our approach to assess, prevent, and mitigate Modern Slavery risks. We recognize that Modern Slavery is an evolving and ever-changing topic, so our approach is to sustainably implement value added controls, invest in tools and resources to provide quality on-demand reporting to our supply chain and operations. At Siemens, we take responsibility for the role we play to combat Modern Slavery.

To the best of our knowledge and according to the risk assessment conducted for fiscal year 2024, we are not aware of any cases of child or forced labour among our own employees globally and no instances of Modern Slavery in our Supply Chain – this includes detected and/or reported.

We remain vigilant and committed to a zero-tolerance approach.

During FY 2024 our actions included:

- On-going evaluation of our suppliers
  - This included the Supplier Registration and Qualification processes, that our systems monitor to ensure suppliers undertake the required tasks and alert when there is possible non-compliance.
  - Working with our suppliers to ensure they meet the requirements of our Code of conduct.
  - Real time risk alerts of our supplier base, for possible non-compliance.
  - Desktop audits of medium and high-risk suppliers.
- The inclusion of Human Rights into the Siemens Business Conduct Guidelines.
  - Siemens is committed to responsible and ethical business conduct – beyond compliance with laws and regulations – always and everywhere. Globally all Siemens business partners, stakeholders and employees are required to agree and abide by our Business Conduct Guidelines.
- Siemens was a participant of the United Nations Global Compact
  - Its ten principles and the Global Industrial Union framework agreement are binding on the company globally.
- Review of Modern Slavery legislation and guidance
  - Modern Slavery best practice, guidance and legislation were reviewed to ensure the risk in this rapidly and evolving topic, continue to be addressed.

Summary of the FY 2024 Supply Chain:

- 87.2% of what we source, comes proudly from Australia
- Siemens engaged with 685 third-party suppliers from 22 different countries
- 97.6% of what we procure comes from suppliers based in low risk countries. Only 1.6% of our procurement comes from high-risk countries. Mobility had no spend with suppliers operating in extreme risk countries in the last year

## MODERN SLAVERY STATEMENT

# Our values

As a global company, we are aware of our social responsibility and creating a positive, long-term impact for our people, customers and the planet is an integral part of our organization.

We are fully committed to respecting Modern Slavery, for our entire value chain. As part of our annual Modern Slavery reporting, we are determined to provide transparency of our progress with regards to our Modern Slavery activities. We provide disclosure on our risks, continuous improvement measures and our grievance mechanisms, to demonstrate our commitment.

Sustainability is a guiding principle, supporting us in our day-to-day work and ensuring our long-term growth. Both integrity and sustainability are closely linked to our three company values: excellent, innovative, and responsible. Through sustainable development we make our contribution to a more equitable global economy and provide energy-efficient, durable products and solutions for our customers. In this way, we aim to live and breathe our socially responsible company culture – for the good of society.

Our pledge to safeguard human rights is anchored in our Siemens Business Conduct Guidelines (BCGs). The BCGs are binding on all employees and business partners worldwide. They set out the fundamental principles and rules that apply to our actions within our company and in relation to our customers, external partners, and the public. Siemens vision to create livable communities, opportunities, equal chances for people as well as future-proof, healthy, safe, and inclusive work environments.

We enable our partners and customers to improve people's lives today and transform the backbone of societies for a better tomorrow. For instance, in the field of mobility, passengers and operators benefit from greater safety and convenience thanks to our technologies and provide socioeconomic development of communities, by enabling access to public transportation.

Transform mobility for everyone  
At Siemens Mobility, we work together with our customers partners worldwide to provide sustainable mobility solutions.

As a leading technology company, we combine the real and digital worlds like no other in rail to move people and goods seamlessly and transform mobility for everyone.



Figure 1 Country CFO, Alexander Von Maravic and Country CEO, Raphaele Guerineau

## MODERN SLAVERY STATEMENT

# Our people

At Siemens Mobility, equitable treatment and respect form the core of our value system. We foster diversity, inclusion, personal dignity, privacy, and community. We mirror the communities in which we work because of our diversity. With equity, we guarantee that everyone is treated fairly and given access to the same opportunities. And through inclusion, we actively strengthen the voices of each person. We empower our people through a sense of community and discover unused potential for everyone's development. Belonging makes it possible to develop technology that serves a purpose. Belonging changes people.

Our workforce is comprised predominately of highly skilled workers across Australia in office, manufacturing, and project environments. Our workers are covered by industrial instruments including, modern awards; enterprise agreements; and individual employment contracts. When determining the remuneration of our employees, we analyze external market data in Australia, relevant to the specific role and the required qualifications, knowledge, and skills. And, on an annual basis, each employee's data is reanalyzed, ensuring our employees meet or exceed minimum entitlements prescribed by the National Employment Standards.

We focus on matching the right candidates with job vacancies based on competency and experience, and then continuously upskill and reskill our people by supporting their willingness to experiment and learn, and to help them develop a personal growth mindset. We offer all our employees a flexible work policy and each employee has access to Siemens employee share plans, to participate in Siemens' success also as a shareholder.

We provide to our employees (and their immediate family) access to counselling, coaching and support from qualified health professionals. This free and confidential service is available 24/7, with online tools and referral services included.

Our employees participate in the Global Employee Engagement Survey to provide valuable feedback on a diverse range of topics. We celebrate our people and achievements through various on-site and off-site events, including Family Days throughout Australia. We empower our community to engage in meaningful ways, both within and beyond our organization, including our Siemens4Volunteering program, allowing our people to benefit the communities we serve.

We do not tolerate discrimination, sexual or any other form of harassment, or inappropriate behaviour toward individuals or groups. Siemens Tell Us allows for Siemens employees to anonymously raise concerns.



## MODERN SLAVERY STATEMENT

# Structure, Operations and Supply Chains

Siemens AG is the ultimate owner of Siemens Mobility and Siemens has been active in Australia and New Zealand since 1872. Siemens Mobility GmbH, Siemens Mobility and the other Siemens mobility entities (the **Siemens Mobility Group**) aim to be the technology partners of choice for passengers. With the Siemens Mobility Group's long-standing transport expertise and IT know-how, it is constantly developing new, intelligent mobility solutions that increase availability of infrastructure, optimize throughput, and improve passenger experience.

The operations of Siemens Mobility are predominantly office, manufacturing, service centre and project-site based, and Siemens Mobility employs around 600 people directly across Australia and New Zealand.

## The Supply Chain that Supports Siemens Mobility's Operations

To identify both geopolitical and sustainability risks across the supply chain, Siemens AG sources insights from Systain Consulting GmbH (Systain). Systain is a leading sustainability consultancy for companies across Germany and produces sustainability risk ratings based on supplier country and covers legal compliance, human rights and labour practices, environmental protection, fair operating practices, responsible minerals sourcing and supply chain.

Siemens Mobility sells the Siemens Group portfolio of products, solutions, and services, from rail infrastructure, rolling stock and electrification to intelligent traffic solutions. Siemens Mobility possesses a large and diverse vendor base which procures a range of goods and services both domestically and internationally.

Locally Siemens Mobility engaged directly with approximately 685 third-party suppliers from 22 different countries, however, 96.8% of the Siemens Mobility spend was with suppliers operating within the 5 countries below:

1. Australia (87.2%);
2. Germany (4.6%)
3. Switzerland (2.8%);
4. Mexico (1.5%)
5. United States (0.8%)
6. The remaining 3.2% of Siemens Mobility's spend is made up of spend in countries each with a portion of less than 1%.

Due to the nature of Siemens Mobility's operations in Australia and New Zealand with established local manufacturing sites, approximately 87.5% of the company's spend is sourced locally. Siemens is also a proud holder of the Australian Made licence for its core products.

Depending on the nature of the supply of products and services, Siemens Mobility may have different contractual relationships with suppliers. These may vary from single transactions to multi-year relationships. Contractual arrangements differ depending on the circumstances and include purchase orders, frame agreements (local and global) and sub-contracts. Where there are long term supplier relationships, regular supplier reviews are undertaken in addition to reviews undertaken on initial engagement.





Figure 2 Siemens Mobility Manufacturing Facility in Port Melbourne, Victoria, Australia.

## MODERN SLAVERY STATEMENT

# Risks of Modern Slavery Practices in Operations and Supply Chains

Operational risks of modern slavery practices identified by Siemens Mobility include services performed by low skilled workforces, such as cleaning and manual labour, where minimum wages may not be paid or excessive or unreasonable hours are expected of a supplier's employees. As a technology company with a largely professional workforce, Siemens Mobility considers the risk of modern slavery in the workforce of its direct business operations to be low, however, Siemens Mobility recognizes that it may be exposed to such risk, either directly or indirectly, particularly through its supply chain.

Using Sustain data Siemens Mobility was able to identify that approximately 97.6% of what it spends is with suppliers based in low-risk countries, with 0.9% based in medium risk and 1.6% based in high-risk countries. Siemens Mobility had no spend with suppliers operating in extreme risk countries in the last year.

High-risk breakdown:

- Of the 1.6% spend in high-risk countries
- 1.50.2% was with a US based manufacturer with manufacturing operations based in Mexico. This vendor has implemented stringent supply chain controls to monitor and ensure adhere with Human Rights obligations.

In addition to analyzing geographical spend Siemens Mobility also reviews spend categories to identify high risk categories of spend. At the conclusion of its 2024 financial year Siemens Mobility conducted a thorough supplier review of its entire supplier base and of those third-party party suppliers categorized as medium to high risk, Siemens Mobility has identified that the highest potential risk of modern slavery practices.

Procurement of high-risk sector and Industry goods and services:

7. Signalling module LEDs (Light Emitting Diodes);
8. Aluminium Machined Castings; and
9. C Parts including nuts, bolts, screws, small machined brackets.

## MODERN SLAVERY STATEMENT

# Actions taken to address these Risks, including Due Diligence and Remediation Processes

## Governance Framework

To ensure that Siemens Mobility remains committed to its values and to delivering excellence in corporate governance, transparency, and accountability, Siemens Mobility has a governance framework in place which is based on the global Siemens Group framework and underpins the way it engages with suppliers.

Siemens Mobility has adopted the policies and procedures of the Siemens Group including the Compliance Policy which is a globally binding all-encompassing compliance circular setting out the Siemens Group's stance on anti-corruption, anti-trust, anti-money laundering, data protection, human rights and export control. These policies and procedures have been reviewed to assess their effectiveness and better strengthen the way in which Siemens Mobility engages with suppliers to address modern slavery risks across its supply chain. Siemens employees receive targeted risk-based training on compliance topics and are empowered to report potential compliance concerns, via various reporting channels including the Tell Us service.

The foundation of all supplier relationships is their commitment to observe the principles outlined in our code of conduct for suppliers, which is based on the UN Global Compact and International Labour standards. This code explicitly prohibits the use of forced labour and child labour, and requires suppliers to respect the employment rights of their workers. To do business with Siemens Mobility all suppliers must confirm their acceptance of, and comply with, the Siemens Group Code of Conduct. The Siemens Group Code of Conduct is based on the principles of the UN Global Compact relating to human rights, labour standards, environmental protection, and anticorruption initiatives. These principles are derived from the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) and the principles of the Rio Declaration on Environment and Development.

Siemens utilizes the 'ESG Radar' tool to proactively assess sales-side business opportunities for potential human rights, environmental and other ESG-related issues, enabling the definition of appropriate risk mitigation measures. Siemens' holistic approach to sustainability is further reflected in our DEGREE sustainability framework, which sets clear goals and targets in areas like ethics, governance and equity that address human rights considerations.

With regards to human rights, the Siemens Group Code of Conduct emphasizes respect for the basic human rights of employees, including fair remuneration, freedom of assembly, health and safety standards and prohibition of discrimination, forced labour and child labour.

#### Actions Taken to Continually Assess and Address Risks

We recognise that risk can be a rapidly and evolving topic. As part of our Modern Slavery actions, we identified areas for improvement to strengthen the way in which we engage with suppliers to address modern slavery risks. We have embedded a process to actively assess our suppliers prior to engagement, then continuously monitor our supply chain, ensuring we can effectively focus on emerging and current risks.

#### Update to the Siemens Group Code of Conduct

The Siemens Group Code of Conduct is continuously updated, based upon legislation and Siemens requirements. The Code of Conduct includes areas of human rights, anti-money laundering, terrorism financing, and data privacy to reflect global developments and new legal requirements.

#### Update to Siemens Mobility's Standard Purchasing Terms

Siemens Mobility continuously updates its standard purchasing terms for suppliers to reflect legislation and Siemens requirements. Standard purchase terms include a modern slavery clause setting out obligations regarding compliance with modern slavery related laws and how Siemens Mobility's suppliers are required to support it in managing and monitoring of modern slavery risks in the supply chain. To do business with Siemens Mobility all suppliers must accept these obligations in addition to being bound by the Siemens Code of Conduct.

#### Adoption of the Siemens Group standardized Corporate Responsibility Self-Assessment (CRSA) questionnaire

Siemens Mobility has adopted the use of the CRSA questionnaire module as part of its existing Ready-for-Business (R4B) supplier qualification process within the online Siemens Procurement tool SCM STAR. The CRSA questionnaire is the Siemens Group global standard for evaluating a suppliers' ability to comply to the requirements outlined within the Siemens Group Code of Conduct and assess the supplier against key criteria including modern slavery and human rights. The CRSA is updated as necessary to reflect new standards and regulations.

All potential new suppliers with a spend of greater than €50,000 p.a. who operate in a high-risk country based on the OECD risk categorization map must undergo a qualification process using the CRSA questionnaire, while existing suppliers in this category are re-evaluated every three years. Depending on the category of goods/services supplied, the supplier may also be required to fill in further questionnaires such as the Substance Commitment and Contractor Safety questionnaire.

Supplier management activities are centrally coordinated, which enables efficient exchange of information and digital collaboration with our suppliers via a secure portal. This covers all strategic procurement processes, from supplier onboarding to sourcing, management and professional supplier development, ensuring robust oversight and risk management.

#### Internal Audits

Supplier Quality Management (SQM) and EHS and Quality teams at Siemens Mobility perform site-based audits and desktop audits. Whilst this has to date involved checking of documentation, future audits will also focus in more depth on modern slavery risk mitigation. Criteria for selection of suppliers to audit includes value of annual spend and review of any historical findings in previous audits that have been identified that warrant additional attention. Audits conclude in feedback sessions with our suppliers to ensure that any non-conformances identified are addressed and that follow up actions are documented for future audits. Repeated and/or significant non-conformances may result in contract termination and/or being blocked in Siemens Mobility's ordering system.

#### External Sustainability Audits (ESA)

ESA's are undertaken in specified circumstances to verify adherence to the requirements of the Siemens Code of Conduct and assess the sustainability performance of the supply chain. Siemens Mobility has appointed internationally recognized auditing companies which conduct on-site ESA's of a specified supplier's compliance. The outcome of the audit is an in-depth assessment and report that enables Siemens Mobility and its suppliers to identify and manage potential sustainability risks.

Suppliers are selected for ESA's following a risk-based approach that identifies the parts of the Siemens Mobility supplier base that presents potential sustainability risks. ESA's can also be triggered if a potential sustainability risk or failure to comply with the Siemens Code of Conduct has been indicated as a result of a CRSA.

- [External Sustainability Audits \(ESA\)](#)

#### Blocking of Suppliers Who Do Not Meet the Specified Qualification Requirements

Suppliers who fail to meet all supplier qualification requirements are automatically blocked in Siemens Mobility's ordering system.

#### Onboarding Processes

The risk of modern slavery is also addressed during the employee onboarding process which includes background checks such as right to work in Australia, age verification and qualifications for the relevant tasks prior to undertaking work on behalf of Siemens Mobility. A global external partner is engaged to provide technical advice and support on visas for international personnel entering countries in which we operate. This ensures that they are being treated fairly and safely both by their overseas employers and by Siemens Mobility while working on its projects.

#### Governance

Our approach to managing and mitigating Modern Slavery risks, is embedded in our governance, due diligence and reporting Policy and procedures.

Siemens Mobility Australia employees and the Compliance organization receive targeted, group-oriented, risk-based training. We train our employees about compliance and on the content of our Business Conduct Guidelines, which addresses the risk of modern slavery and in all relevant governance topics including environment, health and safety, business conduct, bullying and harassment.

Compliance risks, including Modern Slavery risks and strategic program data are presented to the Siemens Mobility Australia CEO and CFO on a biannual basis (ad hoc communication will be facilitated where required), by the Compliance department. The Compliance department assumes personal responsibility for compliance, supporting the Australian business, we take a zero-tolerance approach to unethical and unlawful conduct.

#### Reporting

Reliable reporting channels for internal and external stakeholders and the protection of internal whistle-blowers from sanctions is vital to enable possible misconduct to be reported, thoroughly investigated and clarified. The Siemens Mobility Group has a compliance whistle-blower hotline 'Tell Us' for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in 13 languages, online or via telephone. Reports can also be made anonymously. The hotline can be used by employees and management as well as customers, suppliers, and other stakeholders. This hotline is managed by a third-party supplier and all data supplied is maintained on secure servers in Germany.

#### Investigations

Internal investigations are conducted based on binding, clearly defined standards to ensure the fair and respectful treatment of employees, business partners and stakeholders. These standards prohibit unlawful or disproportionate actions.

If we become aware of possible imminent or actual violations of the prohibition of the Modern Slavery act and/or our Siemens Code of Conduct, we will take immediate corrective action to prevent, end or minimize such violations. In this regard we will ensure that any information we receive or become aware of regarding possible violations of the provisions is immediately investigated. We aim to transparently work with our Business Partners to resolve topics, however we strongly reserve the right to terminate a business relationship in accordance with violations of the law and/or Siemens Code of Conduct.

## MODERN SLAVERY STATEMENT

# How Siemens Mobility Pty. Ltd. Assesses the Effectiveness of Actions being taken to assess and Addresses Modern Slavery Risks

A Modern Slavery Working Group made up of senior key cross functional stakeholders including Human Resources, Supply Chain Management, Compliance and Legal has been established at Siemens Mobility to assess and identify modern slavery risks, establish mitigation measures, and ensure continuous improvement. This working group will continue to collaborate and review processes and procedures to promote the topic of modern slavery. It will also monitor the implementation of Siemens Mobility's future activities to assess and address modern slavery risks which will include:

- a) undertaking periodic reviews of the Siemens Mobility supplier base using Sustain data to identify where greatest potential exposure for modern slavery is within our supply chain;
- b) using the Sustain data to focus on the supply chain where suppliers operate in identified high risk countries or provide goods and services identified in a high-risk category (including those listed in section 3 above) with a particular focus on those suppliers' policies and processes around modern slavery governance and how these suppliers monitor their own supply chains;
- c) providing training to employees where relevant to create awareness and understanding of modern slavery risks;
- d) reviewing Siemens Mobility's major suppliers' modern slavery statements as they are released to monitor improved actions and awareness;
- e) ongoing continuous improvement in the Siemens Mobility supply chain and risk assessment processes; and
- f) desktop audits of identified high risk suppliers.

In addition, representatives from the centralized procurement teams across the Siemens entities operating within Australia have set up an ongoing working group whereby ideas and experiences can be shared to better support the Siemens brands to achieve best practice when it comes to assessing and mitigating modern slavery risks across our supply chains.

Siemens Risk and Internal Control framework will further ensure the on-going review of the effectiveness of Siemens Mobility's controls, with its external auditors reviewing the work undertaken, by our senior management/executive leadership team.

This Modern Slavery Statement is made in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* and covers the financial year ended 30 September 2024.

This Statement was Approved by the Siemens Mobility Board of Directors

Siemens Mobility Pty Ltd (ACN 636 537 409)

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Raphaelle Guerineau  
Managing Director and CEO



Alexander Von-Maravic  
Director and CFO

Date: 11/05/25

