
Bombardier Transportation Modern Slavery Act Transparency Statement 2021

Date of issue: 29 June 2021

INTRODUCTION

This statement is made by **Bombardier Transportation UK Ltd (the "Company")** with regards to the UK Modern Slavery Act 2015 (the "Act") 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.

Please note that Bombardier Transportation – including the Company – was acquired by Alstom Group on 29th January 2021.

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. The statement is made pursuant to section 54 of the Act and describes measures in place at the Company to ensure that slavery and human trafficking is not taking place within the Company's business and supply chains.

In accordance with the Act this statement is published on the following website: www.alstom.com

ABOUT ALSTOM

Leading societies to a low carbon future, Alstom develops and markets mobility solutions that provide the sustainable foundations for the future of transportation. Alstom's product portfolio ranges from high-speed trains, metros, monorails and trams, to integrated systems, customised services, infrastructure, signalling, and digital mobility solutions. Alstom has 150,000 vehicles in commercial service worldwide. With Bombardier Transportation joining Alstom on January 29, 2021, the enlarged Group's combined proforma revenue amounts to €14 billion for the 12-month period ended March 31, 2021. Headquartered in France, Alstom is now present in 70 countries and employs more than 70,000 people.

BOMBARDIER'S APPROACH (Covering the period in question)

Bombardier is a signatory of the United Nations Global Compact ("UNGC"), the world's largest corporate citizenship and sustainability initiative. As such, we are committed to promoting, in our business activities, the 10 fundamental principles of the UNGC which address human rights, environmental protection, anti-corruption and labour rights, more specifically the elimination of all forms of forced and compulsory labour and abolition of child labour. Bombardier places substantial value upon suppliers who support and respect the internationally proclaimed human rights contained in the UNGC.

Bombardier's code of Ethics ("the Code"), reviewed in 2019, addresses ethical conduct in our work environment, business practises and relationships with external stakeholders. It requires Bombardier to uphold core values, standards of behaviour and our commitment to the UNGC's 10 principles across all of our global activities.

Bombardier's Supplier Code of Conduct specifically includes provisions prohibiting child labour and forced or compulsory labour, as follows:

"Child Labour

Bombardier will not engage in nor support the use of child labour and will not tolerate the use of child labour by its Suppliers either. For the purpose of this Supplier Code, child labour covers all type of work carried by employees under the age of 15 years old, excluding when such employment forms the basis of vocational training or takes form of educational program. However, for employment or work which by its nature or

circumstances is not suitable for a person under the age of 18 years old, child labour shall mean employees under the age of 18 years old.”

“Forced Labour / Modern Slavery / Human Trafficking

Bombardier will not engage in the use of forced or enslaved labour or human trafficking, nor will it tolerate their use at any level in its supply chains. Suppliers must not demand any work or service from any person under the menace of any penalty. For example, Suppliers’ employees must be free to leave work or terminate their employment with reasonable notice, and they are not required to surrender any government issued identification, passports or work permits as a condition of employment.”

ALSTOM’S PRINCIPLES

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 March 2021 by Henri Poupert-Lafarge, Chairman & CEO of Alstom.

Alstom is a member of the United Nations Global Compact (UNGC), promoting the respect of human rights within its sphere of influence. In June 2020, the Group’s Chairman and Chief Executive Officer renewed his [commitment](#) to the 10 principles of the United Nations Global Compact.

Alstom’s objective is to identify risks and prevent serious violations of human rights and fundamental freedom in its activities and supply chain. Respect for human rights is managed transversely according to the topics addressed. The Human Resources function, Sustainable Sourcing, Procurement, Health and Safety, Sustainable Development and Corporate Social Responsibility (CSR), and the Legal Department are all involved in Human Rights processes.

Alstom 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 is required to be signed by all of our approved suppliers.

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.

BOMBARDIER'S ACTIONS TO ASSESS AND MANAGE RISK IN THE COMPANY'S SUPPLY CHAIN

In 2020 the Company operated four procurement teams, Rolling Stock, Services, Indirect Goods and Services and Rail Control Systems. The teams continued to develop and deploy a number of complementary measures to guard against the risk of forced and child labour in supply chains. Those measures include the following:

1. Guided by our revised Third-Party Due Diligence Policy, our supply chain organisation has continued to operate its formal risk assessment procedure prior to engaging with new suppliers and conducts reviews based on their operational risk framework. We continued to review our Supplier Code of Conduct to keep on par with international standards, especially with respect to anti-corruption, human rights and forced labour.
2. The Steering Group of senior procurement professionals created to develop, lead and maintain the Company's efforts in this area continued to meet on a regular basis to increase departmental cohesion. The Steering Group continued to report to the Company's Board of Directors.
3. Building on the success of our training programme reaching the intended audience via our online training platform in 2019, we deployed our online training platform and reached 839 employees in 2020.
4. Should employees or suppliers have concerns regarding slavery they have the responsibility to report their suspicions and we provide multiple channels for them to do so on a confidential basis:
 - to colleagues including supervisors, human resources representatives, legal services
 - representatives, internal audit representatives or next level of management;
 - to Bombardier's Ethics and Compliance Office, by email or phone, open to both employees and suppliers and to dedicated Ethics Ambassadors available at all major sites; or
 - via our free, independent and confidential hotline available to all employees 24/7 anywhere in the world, accessed by phone or online.
5. Tier 1 supplier self-assessments of risk are being undertaken via questionnaire. Suppliers are asked to confirm that they (and their supply chains) comply with our expectations and recognised CSR standards, including with respect to human rights. Results are scored to determine risk and appropriate next steps. In 2020, we risk assessed and scored many important suppliers and conducted desktop audits.

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 ending 31st December 2020. This statement has been approved by the Board of Directors of the Company.



Will Tanner

Director

29 June 2021