

# Report of Alstom Entities on Fighting Against Forced Labour and Child Labour in Supply Chains Act

## 1. ALSTOM'S BUSINESS STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

This Report is made by **ALSTOM TRANSPORT CANADA, INC.**, and **ALSTOM NETHERLANDS, B.V.**<sup>1</sup> with regards to the Fighting Against Forced Labour and Child Labour in Supply Chain Act of 2023 (the "Act"), which requires companies that have a place of business in Canada with turnover more than \$40 million and an average of at least 250 employees to be transparent about their efforts to eradicate modern slavery in their supply chain. In accordance with the Act, this Report articulates our policies and practices around recognizing and preventing modern slavery in the global supply chain.

The Alstom Group's mission is to support the transition toward global sustainable transport systems that are inclusive, environmentally friendly, safe and efficient while implementing a socially responsible business model. The Alstom Group ("Alstom" or the "Group") 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 commuter trains, on-board passenger solutions, customized services (maintenance and operation), infrastructure, signaling and digital mobility solutions. Alstom is a world leader in integrated transport systems. Sourcing activities represent nearly 60% of the Group's turnover.

ATCI's supply chain includes a broad range of goods from industries both domestically and internationally, including Alstom's own domestic and overseas factories where various stages of manufacture take place, the subsequent importation of the trains or parts into Canada and the delivery of the trains to ATCI customers. ATCI's supply chain also includes services that contribute to its operations, such as the cleaning and security companies that service ATCI's offices and manufacturing sites. ATCI's products and services delivered in Canada are sourced from numerous countries around the world.

ATCI's sourcing management activities are centralized at the Alstom Group company level. These activities include supplier qualification assessment, supplier selection and monitoring, business award, and contract award, described in detail below. Throughout this Report, these activities, fully applicable and enforced at ATCI, will be described at the Alstom Group level, except where specifically noted.

Alstom is committed to achieving a sustainable value chain involving its partners and stakeholders. This includes the integration of Sustainable Development principles into the procurement strategy and ways of working. ATCI specifically has 4,600 employees and work with over 1,200 suppliers in Canada. With manufacturing and engineering sites in Brampton, Kingston, and Thunder Bay in Ontario, in La Pocatière and St-Bruno in Quebec, as well as very long-term, structuring rail mobility projects and offices in every major city across the country, Alstom is Canada's reference rail manufacturer, proud to carry Canadian values throughout its activities here or elsewhere.

## 2. RELEVANT DUE DILIGENCE POLICIES AND PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Alstom has set out its commitment to human rights<sup>2</sup> and fighting against forced labour in the following policies and processes: Alstom's **Vigilance Plan, Code of Ethics, Sustainability & Corporate Social Responsibility Policy,**

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<sup>1</sup> Alstom Netherlands, B.V is the 100% shareholder of Alstom Transport Canada, Inc. ("ATCI") and, as such, is required to submit this Report.

<sup>2</sup> The term "human rights" is used in this Report interchangeably with "modern slavery," as that term is defined in the Act.

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**Alstom's Sustainable Procurement Policy, the Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors, and the Ethics and Compliance Tender Scorecard.** In addition, specific steps in Alstom's due diligence process relating to human rights management in Alstom's activity and supply chain are set out below.

## **Alstom's Vigilance Plan**

Alstom's **Vigilance Plan** was first published during the 2017/18 fiscal year as part of the French law on Duty of Vigilance. It is updated every year to report on the measures implemented and assess the efficiency of the Group's actions regarding human rights, health, safety, and environmental issues. The Vigilance Plan covers the activities of Alstom SA and its fully consolidated subsidiaries, including ATCI. It also covers the activities of suppliers of goods and services with which Alstom Group has an established commercial relationship. The Vigilance Plan targets risks that could have severe adverse impacts on human rights and fundamental freedoms, health and social & human rights, safety and the environment, as defined by the law. It presents the mapping of the risks identified, the procedures for regularly assessing the situation, the measures in place to mitigate the risks or prevent damages, the system for monitoring the measures implemented and assessing their effectiveness and the report on the effective implementation of those measures:

- global risk mapping and management tools expanded to integrate the relevant topics. The global risk mapping for human rights is based on the list of human rights as presented in Annex A of the UN Guiding Principles Reporting Framework: "Table: Internationally Recognised Human Rights and Examples of How Business Might Impact Them." In 2022, the methodology and results of this risk mapping exercise and overall Vigilance Plan were updated, with the support of an external consulting firm. This exercise involved extensive consultation of corporate and operational functions to identify emerging risks and assess and prioritize all human rights risks, in relation to Alstom's activities and supply chain. This assessment led to the identification and prioritization of the human rights risks for Alstom and its business partners in projects where Alstom is involved.

- 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, led by Sustainable Procurement department.

The Vigilance Plan was established by a cross-functional working group composed of members of the following Alstom departments: Human Resources, Environment Health and Safety, Ethics and Compliance, Procurement, Internal Audit and Risk Management, Governance and Sustainability and CSR. The deployment of the Vigilance Plan is under the supervision of the Sustainability and CSR Steering Committee. The Vigilance Plan is reviewed on an annual basis and necessary updates are made.

## **Alstom's Code of Ethics**

Alstom has a **Code of Ethics** that applies to every employee, and which is designed to promote honest and ethical conduct with all stakeholders in line with our company values: Agile, Inclusive and Responsible. The Code of Ethics prescribes fundamental rules of conduct, particularly to full compliance with laws, regulations, and requirements in all countries where Alstom operates, and defines Alstom's human rights policy. The Code of Ethics was updated in 2020, and now integrates a series of case studies to make it more accessible for employees.

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## **Alstom's Sustainability & Corporate Social Responsibility Policy**

Alstom's human rights policy is part of its **Sustainability & Corporate Social Responsibility Policy** endorsed in March 2021 by Henri Poupart-Lafarge, Chairman & CEO of Alstom, which commits to enforcing the highest ethical standards, acting against discrimination, and respecting human rights.

Alstom aims to comply with the Guiding Principles on Business and Human Rights set out by the United Nations Human Rights Council and to respect internationally recognized human rights in all countries where Alstom operates. Alstom is particularly respectful of the laws governing, *inter alia*, human rights and labour, health and safety standards, and the protection of the environment. Alstom's policy is to comply fully with the fundamental conventions of the International Labour Organization (ILO). Alstom supports the elimination of all forms of illegal, forced, or compulsory labour, including child labour. Illegal, forced, or compulsory labour is strictly prohibited for Alstom's suppliers and subcontractors. Alstom also complies with the Guidelines for multinational enterprises of the OECD (Organization for Economic Cooperation and Development) and the United Nations Universal Declaration of Human Rights.

As a signatory member of the United Nations Global Compact, Alstom supports the Sustainable Development Goals (SDGs) that aim to end extreme poverty, protect the planet, and ensure prosperity for all by 2030. Alstom bases its value system and business approach on the 10 principles of the Global Compact and submits its Communication of Progress (COP) each year. 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 cross-functionally according to the topics addressed. The Human Resources function, Sustainable Procurement, Environment, Health and Safety (EHS), Sustainable Development and Corporate Social Responsibility (CSR), Ethics and Compliance (E&C) and the Legal Department are all involved in enforcing the Sustainability & Corporate Social Responsibility Policy and related human rights processes.

## **Alstom's Sustainable Procurement Policy**

The Group **Sustainable Procurement Policy**, signed by the Chief Procurement Officer (CPO), covers the following five main pillars:

- Ensure that the Suppliers and Contractors commit to the "Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors";
- Assess, develop, and support suppliers and contractors on their Corporate Social Responsibility performance;
- Source eco-designed, environmentally friendly, and socially responsible products and services provided in the frame of safe working conditions;
- Develop tight and balanced relationships with start-ups, small, medium, large companies and companies employing differently abled people, in the context of both global and local footprints;
- Work in a continuous improvement approach with appropriate indicators.

## **Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors**

Once a project has commenced, 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**. Procurement teams require their suppliers to comply with Alstom Sustainable Development values and principles detailed in the Charter. This is a prerequisite to enter Alstom's panel of suppliers. Compliance with this

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Charter is also part of Alstom's general procurement terms and conditions. Alstom's suppliers and contractors shall and in compliance with the requirements of the Charter, 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.

Furthermore, as mandated by the Charter, suppliers undertake to be compliant at least with the United Nations' Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation (ILO), the OECD (Organization for Economic Cooperation and Development) Guiding Principles, the rules of conduct of the International Chamber of Commerce (ICC), and the values defined by Alstom's Code of Ethics.

In accordance with the ISO 37001 standard on anti-corruption management systems, the Alstom Charter also includes reference to Alstom's Alert Procedure. Suppliers and subcontractors and any other third party can use this procedure 24/7 to report possible violations of the Code, Alstom rules and policies, or the laws, on a nominative or anonymous basis -- including concerns relating to modern slavery. All matters reported are managed by Alstom's Ethics and Compliance team.

## **Ethics and Compliance Tender Scorecard, Incorporating the Human Rights Risk Score**

The watch for potential human rights issues, including modern slavery, starts from the very beginning of any project. A specific Human Rights Risk Scorecard for new tenders and projects was developed, and it considers country risk mapping, type of activity and project structure. The objective is to identify potential risks related to projects and define mitigation measures ahead of bid submissions, including the undertaking of specific human rights due diligence assessments when relevant. To this end, the Human Rights scorecard has been integrated in the Ethics and Compliance assessment process. In FY2021/22, specific monitoring was set up on projects identified as high-risk during the tender process, involving operational teams and central functions.

## **Due Diligence and Monitoring Processes**

In the risk evaluation of suppliers, at both the initial retention of the supplier as well as during their relationship with Alstom, each supplier is evaluated based on corporate social responsibility criteria, using one or more of six different methods, cumulatively in some cases:

- online screenings, provided by an external solution provider ADIT;
- online documentary assessments, carried out by an external company Ecovadis based on international sustainability standards such as the Ten Principles of the UN Global Compact, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standards, the ISO 26000 standard, and the UN Guiding Principles on Business and Human Rights;
- onsite evaluations, called "quick industrial assessments," run by Alstom's Procurement teams;
- onsite audits, called "supplier process audits," led by Alstom's supplier Quality teams;

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- onsite corporate social responsibility audits, conducted by external specialized companies, such as TUV and SGS, and based on the Universal Declaration of Human Rights, the International Labour Organization conventions (ILO), the SA 8000 standard (Social Accountability), ISO 37001, 14001, 45001, and applicable local law;
- assessment of living conditions on construction sites where contractors' workers are provided with accommodation, led by EHS (Environment, Health & Safety) teams during Alstom Zero Deviation Plan audits.

When the results of the assessments or evaluations do not meet Alstom's requirements, suppliers are required to define and implement a corrective action plan. Alstom's teams are available to aid and support suppliers throughout the improvement process during their relationship with Alstom.

## **Ethics & Compliance Department's Suppliers' Due Diligence screening**

Alstom's **Ethics & Compliance (E&C)** policy establishes added due diligence procedures of its third parties, including its suppliers and contractors. Since September 2019, the E&C Group has been using its own screening tool to check suppliers and contractors against sanction and adverse media lists before and during the business relationship with such entities and to communicate the risks identified or the related remediation measures. These risks include the possibility of human rights violations, conflict minerals, environmental harm, and modern slavery. When a risk alert identified by the tool poses a true material legal or reputational E&C or CSR risk necessary actions are taken, such as blacklisting the supplier or terminating existing contracts with it.

## **Suppliers' sustainability risk mapping**

The yearly Tier 1 suppliers' (including contractors) risk mapping is led by Sustainable Procurement team. The risk mapping recently has been strengthened using Ecovadis IQ module. As a consequence, about 52,000 suppliers' sites are analyzed yearly, whatever their spend, on both their main activity (according to the United Nations International Standard Industrial Classification) and their country location. The IQ module uses indicators from external international databases. The activity risk covers, among other topics, labour & human rights and child and forced labour. The country risk covers, among other topics, human rights, and global slavery. The outcome is the classification of each supplier site into a CSR gross risk with a scale up to six levels.

## **Suppliers' CSR evaluation methodology and governance**

Alstom also conducts additional ongoing assessments (e.g., Ecovadis rating, onsite CSR audits) for suppliers with a yearly ordered amount higher than 100 K€ and that account for the highest levels of CSR gross risks:

Those with a very high CSR gross risk must undergo both onsite CSR audits and Ecovadis ratings.

Those with high or medium-high CSR gross risks must be covered at least by a valid Ecovadis assessment.

For new supplier sites not included in this ongoing risk assessment, the ADIT screening result determines the CSR net risk. The outcome of those evaluations -- the CSR net risk level -- is used in both the supplier business award and in the supplier risk management processes.

Each time a CSR evaluation result does not meet Alstom's criteria, the supplier is required to define and implement a corrective action plan. To do so, they can benefit from the support of Alstom's teams trained to help them improve their CSR evaluation.

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All suppliers with medium CSR net risk and pending corrective action plans from Ecovadis and/or onsite CSR audits are closely monitored by Alstom, with the support of the Sustainable Procurement Performance Manager if needed.

Suppliers with high CSR net risks trigger the escalation process: indeed, the CSR status of these suppliers must be discussed during the Quarterly Supplier Risk Management Reviews with Procurement top management. If there is no progress after two sessions, the suppliers who triggered the escalation process are escalated to review by higher management, which can lead to suspending or terminating the business relationship with these suppliers.

## **Ecovadis assessments**

Suppliers identified throughout the risk mapping can be selected for an **Ecovadis** evaluation. This online assessment covers 21 sustainability criteria under four pillars: environment, labour & human rights (including child labour, forced labour and human trafficking), ethics and sustainable procurement. It is based on a detailed questionnaire with official documentary evidence to attach to the platform, as well as on a 360° CSR watch. The questions are customized depending on the size, the activity, and the localization of the supplier.

The evaluation system is in line with the UN Global Compact guidelines, ISO 26000, and the Global Reporting Initiative (GRI). Following their evaluation by Ecovadis independent experts, suppliers can benchmark their CSR performance with comparable companies (from same country or doing same activity). Non-compliant suppliers (global score < 45) are reassessed by Ecovadis, once the corrective action plans have been implemented, to check their effectiveness.

During two recent fiscal years (FY21/22 and FY22/23), 796 suppliers' sites were subjected to an Ecovadis analysis.

## **Internal Suppliers' Audits and Evaluations**

Because of the nature of on-site activities and the scale of certain projects, **CSR and EHS audits** are conducted throughout the relationship with the supplier to review living conditions, working conditions and labour and recruitment practices on construction sites

Assessment of living conditions on construction sites where workers are provided with accommodation is integrated in **AZDP (Alstom Zero Deviation Plan)** audits in identified high-stakes projects. A specific instruction has been developed for its implementation jointly by the CSR, Sustainable Procurement and EHS teams. The questionnaire used in the assessment covers such issues as the general level of comfort and cleanliness of the facilities and the existence of communication means and medical care facilities. It can be adapted in the countries to consider local standards, for example, worker welfare. Noncompliance requires subcontractors to prepare and implement an appropriate action plan and potentially a reassessment by Alstom. Depending on the results of this reassessment, Alstom may terminate the relationship if circumstances warrant.

In addition, for all of Alstom's new suppliers, preliminary evaluations called "**quick industrial assessments**" are carried out onsite by Alstom's procurement teams. They address questions related to suppliers' CSR activities. If the results are unsatisfactory, more extensive audits, called "**supplier process audits**" are conducted by Alstom's supplier quality teams. These audits include compliance with a minimum level of social practices, as well as dedicated questions on child labour, working conditions, hazardous substances and waste management, recycling processes.

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## External audit program

Since 2020, Alstom has partnered with external specialists, such as TUV and SGS, to conduct an onsite CSR audit program with the aim of rolling out additional assessments, benefiting from a global network of local social audit experts and targeting high-risk contractors and suppliers. Alstom has been auditing the manufacturing and/or installation bases of selected suppliers and contractors, located mainly in Asia Pacific, Africa, Middle East, and Latin America regions. In 2022/23, 54 audits took place on sites in Bahrain, Brazil, China, India, Italy, Morocco, Philippines, Singapore, South Africa, and Turkey. These audits are based on the international Social Accountability 8000 standard, with the following process: opening meeting with the supplier's management, qualitative and quantitative controls performed, including some interviews with workers & staff to check conformity against local and international standards. The third parties' auditors check suppliers' sustainability compliance on the following topics: child labour, forced labour, employment contracts, health & safety, freedom of association, discrimination, disciplinary practices, working hours, wages & compensation, environment, monitoring of compliance and anti-bribery. At the end of the audit, a closing meeting is conducted to present findings and recommendations and supported by an initial audit report including the corrective action plan to be signed by the supplier. Finally, in order to follow up the closure of non-conformities (especially any major and critical ones), documentary review and/or follow up audits are performed if necessary.

In addition, if allegations related to the working or living conditions of suppliers or contractors are brought to Alstom's attention through other sources (e.g., NGO contacts, screening, etc.), they are thoroughly investigated through supplier inquiries and site visits.

## Conflict Minerals

Alstom's **Position Paper on Conflict Minerals** is available on its website. Conflict minerals requirements are also part of the general purchase conditions of goods & services and of the Ethics & Sustainable Development Charter.

In addition, in February 2024, a new **e-learning 'Conflict Minerals in the supply chain'** was released for Alstom employees in the training platform.

In order to comply with conflict minerals laws and regulations in different jurisdictions, every year Sustainable Procurement conducts a risk mapping analysis of its product families to identify potential risks. Then, it launches a specific survey on conflict minerals to the main suppliers indicated, in order to track the origin of minerals contained in the goods purchased by Alstom and check that those suppliers have an internal process to mitigate related risks in their own supply chain.

This survey is based on the Conflict Minerals Reporting Template (CMRT), the Cobalt Reporting Template (CRT), and the Mica Reporting Template (MRT) of the Responsible Minerals Initiative (RMI). Besides this specific survey, the conflict minerals topic is monitored through the Suppliers' CSR performance process, using suppliers' answers to Ecovadis dedicated questions. Finally, Alstom encourages its suppliers to use recycled minerals or to get certifications attesting that the minerals they use are conflict-free or to be part of an international initiative for the responsible sourcing of conflict minerals (e.g. the RMI, the International Tin Supply Chain Initiative (ITSCI), the Responsible Cobalt Initiative (RCI)).



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### 3. PARTS OF ALSTOM'S BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF USING FORCED LABOUR OR CHILD LABOUR AND THE STEPS TAKEN TO MITIGATE THEM

Alstom has a duty to use its global influence to fight forced labour and child labour. That said, all members of the supply chain also have a role to play in that regard. Alstom relies upon the cooperation of all our suppliers and expects them to meet the highest standards of sustainability and ethics, as defined in our various policies, Code of Ethics and Ethics and Sustainable Development Charter, and as discussed at greater length in this Report. Alstom suppliers must cascade the principles in Alstom's Charter for Ethics and Sustainable Development to their own suppliers and contractors and implement a similar continuous improvement and compliance approach. Moreover, Alstom counts on close collaboration between the main supply stakeholders to ensure the processes' compliance and the efficient prevention of risks.

As described above, Alstom's Sustainable Procurement group plays an essential role in strategic sourcing regarding the environmental, social, ethical and governance strategy. It ensures that sourcing meets appropriate standards and actively participates with stakeholders in the assessment of needs and selection of goods or services. The supplier CSR performance process is detailed in question 2, above.

Procurement also acts jointly with the **Legal Department** which, for its part, actively participates in the negotiation of contracts while providing recommendations and opinions. The Legal Department also makes sure that contracts comply with the legislation in force and with ethical practice standards, while guiding contracting parties on their legal responsibilities.

For example, Alstom's contracts refer to the Alstom Ethics and Sustainable Development Charter (that contain the right to be assessed or audited by Alstom or by a third party mandated by Alstom, on sustainability topics) which every supplier is required to sign. Illicit employment and conflict minerals clauses are also part of Alstom General Purchase conditions of goods and/or services.

One human rights issue was raised via the Alert Procedure over the 2020/21 fiscal year following the publication of a report by the Australian Strategic Policy Institute (ASPI). This report focused on the potential forced enrolment of Uyghurs in the supply chains of major international companies and one of Alstom's suppliers was mentioned in this report. Following the publication of the ASPI report, Alstom undertook an in-depth review of potential forced labour issues in the supplier referenced, including internal interviews, document reviews and annual third-party audits. Based on this review, no human rights incidents were identified on the plant that supplies Alstom. Alstom will continue to monitor this specific case and assess potential human rights issues in its supply-chains.

### 4. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

The deployment of Alstom's Human Rights program also relies on raising both employee and supplier awareness on this issue. The **Sustainable Procurement General Knowledge** training program is mandatory for all employees making contracting or purchasing decisions and covers topics including forced labour

In addition, an **e-learning module** was launched in November 2020 for all staff, but particularly targeted at the Tender, Project Management, and Sustainability & CSR teams, and aims to introduce key concepts around human



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rights. Specific awareness sessions on the Alstom Human Rights Program were rolled out to site teams in the context of the external audit program's launch described above.

**Ecovadis webinars** (general presentation and improvement actions sessions) have been provided for both Alstom's procurement community and suppliers.

The goal is to ensure human rights considerations are integrated in all the Group's activities and that employees are trained globally to represent Alstom's commitment on this topic, raising awareness around the topic of human rights and Alstom's actions to promote these considerations.

## **5. STEPS TAKEN TO ADDRESS ANY USE OF FORCED OR CHILD LABOUR**

Alstom has not identified any circumstances of forced or child labour in its supply chain. Nevertheless, Alstom has taken, and will continue to take, the numerous steps described above to prevent forced or child labour from occurring in its supply chain.

## **6. MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT MAY BE AFFECTED BY THOSE STEPS TAKEN TO ELIMINATE THE USE OF FORCED OR CHILD LABOUR**

Alstom has not identified any vulnerable families that have been affected by the measures taken to eliminate the use of forced or child labour in our activities and supply chains and, correspondingly, no loss of income resulting from such efforts.

## **7. HOW ALSTOM ASSESSES THE EFFECTIVENESS IN ENSURING THAT FORCED AND CHILD LABOUR ARE NOT BEING USED**

### **Internal Evaluations**

Alstom first ensures the effectiveness of its supplier CSR performance process through all key performance indicators mentioned above (and available in Alstom's **Annual Report**).

Every year, Alstom conducts a social survey to ensure the absence of any incident regarding child labour, forced labour or freedom of association risk and monitors human rights alerts reported through its **Alert Procedure**. Alerts are recorded and investigated as per Alert Procedure rules. If allegations related to the working or living conditions of suppliers or contractors are brought to Alstom attention through other sources (e.g., NGO contacts, screening, etc.), they are also properly investigated through supplier inquiries and site visits.

In addition, each year, part of Alstom's procurement teams are evaluated via a demanding internal assessment (**APSYS (Alstom Performance System)**), that aims to measure the maturity of the procurement function on three axes: the strict application of processes and tools, people collaboration and trainings, and results achieved. During this audit, a dedicated section on Sustainable Procurements is reviewed, with a focus on the CSR management of suppliers and CSR training completion. The results of these yearly assessments demonstrate the status of compliance on this item.

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## **External Evaluations by independent third parties:**

Alstom Group is regularly assessed by **Ecovadis**. In 2023, Alstom's Sustainable Procurement achieved "Gold" status, placing the Group among the top 5% rated companies on the platform

In 2023, ATCI was assessed by **AFNOR** against the **Corporate Social Responsibility Commitment Label** and achieved 2 out of 3 star "confirmed" status. The audit included verification of sustainable procurement practices.


*Copies of the Alstom Vigilance Plan, Alstom's Universal Registration Document and Annual Financial Report (2023/24), Alstom Code of Ethics, Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors, Sustainability & Corporate Social Responsibility Policy, and Alstom's Position Paper on Conflict Minerals (2023) are available on the Alstom website ([www.alstom.com](http://www.alstom.com)) or on request.*

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## Attestation

### **Alstom Transport Canada Inc.**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.” (emphasis added)

  
Julie Turgeon (May 30, 2024 09:58 EDT)

Full name: Julie Turgeon

Title: Vice-President, Legal, Contract Management and Compliance, Americas

Date: May 30<sup>th</sup>, 2024

I have the authority to bind ALSTOM TRANSPORT CANADA, INC.,

### **ALSTOM NETHERLANDS, B.V.**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.” (emphasis added)

  
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Full name: Frank Strik

Title: Director

Date: May 30<sup>th</sup>, 2024

I have the authority to bind ALSTOM NETHERLANDS, B.V.


# Forced and Child Labour in Supply Chains Report (Final)

Final Audit Report

2024-05-30

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