

Report of Alstom Transport Canada Inc pursuant to the *Fighting Against Forced 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.** ("Alstom Canada") under the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (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.

Alstom Canada is part of the Alstom Group. 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", "Alstom SA" 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.

Alstom Canada'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 Alstom Canada's customers. Alstom Canada's supply chain also includes services that contribute to its operations, such as the cleaning and security companies that service Alstom Canada's offices and manufacturing sites. Alstom Canada's products and services delivered in Canada are sourced from numerous countries around the world.

Alstom's Procurement community is organized by domain and by region. Domains are responsible for global supplier management and commodities management, whereas regions are responsible for tender management and projects execution.

Procurement activities include supplier qualification assessment, supplier selection and monitoring, business award, and contract award, described in detail below. Throughout this Report, these activities, while fully applicable and applied at Alstom Canada, 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 our procurement strategy and ways of working. Alstom Canada has 5,020 employees and works with approximately 1200 suppliers and contractors around the world, of which 800 are located in Canada. With manufacturing and/or engineering sites in Toronto, Brampton, Kingston, and Thunder Bay in Ontario, in St-Bruno and La Pocatière in Quebec, as well as very long-term, structuring rail mobility projects and offices in major cities across the country. Alstom is Canada's only rolling stock manufacturer and is proud to carry Canadian values throughout its activities here or elsewhere.

Alstom is proud to share that in 2024, Alstom Group achieved "Platinum" status from Ecovadis, an independent third party. This places Alstom Group among the top 1% rated companies on the platform in the areas of environmental responsibility, ethics, labour practices and sustainable procurement.

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

Alstom has set out its commitment to human rights¹ and fighting against forced labour in the following policies: Alstom's **Code of Ethics, Sustainability & Corporate Social Responsibility Policy, Alstom's Sustainable Procurement Policy, and the Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors.**

2.1 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.

2.2 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 Alstom's then Chairman and CEO, which commits Alstom 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 to the UN Global Compact

2.3 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;
- Measure and reduce the environmental footprint of purchased goods & services, with a focus on CO2e emissions;
- Promote circular business models to preserve resources; and

¹ 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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- Develop tight and balanced relationships with all its suppliers in the context of both global and local footprints and promote Diversity Equity & Inclusion initiatives.

2.4 Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors

Alstom's Procurement teams require their suppliers to comply with Alstom Sustainable Development values and principles detailed in the **Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors (the "Charter")**. This is a prerequisite to enter Alstom's panel of suppliers. Compliance with this Charter is also part of Alstom's general procurement terms and conditions. This charter is communicated in each Request for Quotation (RFQ) and at the back of each purchase order sent to the suppliers. Alstom requires suppliers to cascade and promote the principles of this Charter to their own suppliers and contractors in order to contribute to a responsible and sustainable value chain.

Alstom updated the Charter in September 2024 in order to strengthen the sustainability requirements from its suppliers in order to comply with the latest standards worldwide.

The Charter states that the Suppliers are to undertake compliance with:

- the United Nations' Universal Declaration of Human Rights,
- the fundamental conventions of the International Labour Organisation (ILO),
- the OECD Guiding Principles,
- the rules of conduct of the International Chamber of Commerce (ICC),
- the values defined by Alstom's Code of Ethics.
- applicable corporate due diligence legislations.

Suppliers are also expected to establish an appropriate management system regarding business conduct, social and environmental stakes (e.g. based on SA8000, ISO 37000, ISO 30400/15, ISO 45000, ISO 14000, ISO 50000, ISO 26000, ISO 20400, ISO 59000 families, or other equivalent standards).

In order to protect the fundamental principles and rights at work and as mandatory prerequisite to work with Alstom, Alstom requires its suppliers and contractors to comply with the Social and Human Rights requirements detailed in the Charter, including those related to:

- Modern slavery including human trafficking, forced, bonded or indentured labour
- Child labour
- Working hours
- Wages and benefits
- Occupational Health & Safety
- Harassment and bullying
- Non-discrimination, diversity, equity, and inclusion
- Social dialogue and freedom of association
- Grievance practices
- Responsible sourcing of minerals (applicable to goods providers only)

Note : There are also other requirements under the Charter (e.g., Environmental and Ethical requirements)

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 applicable law - including concerns relating to discrimination & harassment; employee relations; environmental, health, safety; human rights; workplace security and theft; modern slavery. All matters

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reported are managed by Alstom's Ethics and Compliance team. Such reporting can also be done anonymously.

3. RELEVANT DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

As a global company, Alstom is expected to adhere to and promote high levels of human rights, social and labour standards across its sphere of influence. Alstom's global approach to the identification, prevention and mitigation of human rights risks in its value chain is managed transversely according to the topics addressed. Sustainable Procurement, Health and Safety, Sustainable Development and CSR, Ethics and Compliance and the Legal Departments are all involved in human rights management for supply chain workers. The general approach is coordinated by the CSR & Human Rights manager (CSR department) and there are also dedicated processes per trades (or department) involved (EHS, Sustainable Procurement, Ethics & Compliance and Sustainability & CSR). The existence and the effectiveness of these processes are reviewed as part of Alstom's broader Vigilance Plan, discussed below.

The following processes are incorporated in Alstom's management system to address and mitigate potential risks:

3.1 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 Alstom Canada. 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 requires the preparation of a report on the effective implementation of those measures, as follows:

- 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 Recognized 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 Alstom Group's 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 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 the Sustainable Procurement department.

For its Vigilance Plan update of 2024-2025, Alstom has conducted a dedicated vigilance risk mapping exercise to provide a consolidated vision of the company's potential negative impacts on human rights, health and safety and the environment, and to facilitate the monitoring of the related-risks, in compliance with the

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regulatory requirements applicable to the Group, reinforced by the coming into force of the EU's Corporate Sustainability Due Diligence directive ("CSDDD") on July 25th 2024.

The Vigilance Plan is established by a transverse working group composed of members of the departments involved in the topics addressed: Human Resources, Environment, Health and Safety, Procurement, Ecodesign, Railway Safety, Passenger Experience, Risk Management, Sustainability and CSR (including Human Rights and Climate/Energy) and Ethics and Compliance. At the operational level, the monitoring of the Vigilance Plan is overseen by Alstom's Sustainability and CSR Steering Committee. The Sustainability and CSR Steering Committee meets on a quarterly basis to oversee and monitor progress on the CSR strategic plan and to coordinate the deployment of transverse activities, including vigilance duties.

3.2 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 has been 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. Since FY2021/22, specific monitoring has been set up on projects identified as high-risk during the tender process, involving operational teams and central functions.

3.3 Due Diligence and Monitoring Processes for Supply Chain

In the risk evaluation of suppliers, at both the initial selection of the supplier as well as during their relationship with Alstom, each supplier is evaluated based on corporate social responsibility (CSR) criteria, using one or more of the following six different methods:

- online screenings, provided by an external solution provider ADIT (see paragraph 3.3.1);
- online documentary assessments, carried out by an external company Ecovadis (see paragraph 3.3.4);
- onsite evaluations, called "quick industrial assessments," run by Alstom's Procurement teams (see paragraph 3.3.5);
- onsite audits, called "supplier process audits," led by Alstom's supplier Quality teams (see paragraph 3.3.5);
- 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 (see paragraph 3.3.5); and
- onsite corporate social responsibility audits, conducted by external specialized companies, such as TUV and SGS (see paragraph 3.3.6).

3.3.1 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 a screening tool by an external solution provider ADIT to check suppliers and contractors against sanction and adverse media lists before and during the business relationship with such entities and to communicate to the relevant departments 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 is assessed as posing a material legal or reputational E&C or CSR risk, necessary actions are taken including removing the supplier from the Alstom supplier panel or terminating existing contracts with it.

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3.3.2 Suppliers' sustainability risk mapping and CSR gross risk

The yearly Tier 1 suppliers' (including contractors) risk mapping is led by the Sustainable Procurement team. The risk mapping recently has been strengthened using the IQ module by Ecovadis. As a consequence, about 40,000 supplier 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.

3.3.3 Suppliers' CSR evaluation methodology, CSR net risk and governance

Alstom also conducts (or has third parties conduct) additional 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.

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 an 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 the review level for the highest risk suppliers, which can lead to suspending or terminating the business relationship with these suppliers.

3.3.4 Ecovadis assessments

Ecovadis experts assess 21 sustainability criteria under four pillars: environment, labour & human rights (including child labour, forced labour and human trafficking), ethics and sustainable procurement. The suppliers must respond to customized online questionnaires (depending on the supplier's size, activity and location) and upload the required evidence on the Ecovadis platform. The Ecovadis expert teams analyze all the supplier-provided information as well as consider the results of the supplier 360° CSR watch in order to then determine a supplier's sustainability score.

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). If a supplier scores <45, a corrective action plan may be required, as well as having the supplier re-assessed. 835 suppliers' sites were subject to an Ecovadis evaluation during FY24-25, with an average score of 63/100.

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3.3.5 Internal Suppliers' Audits and Evaluations

Because of the nature of on-site activities and the scale of certain projects, **EHS audits** may be conducted on subcontractors in order 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 to consider local standards, for example, worker welfare. Non-compliance requires contractors 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 and address questions related to suppliers' CSR activities.

More extensive audits, called "**supplier process audits**" are also conducted by Alstom's supplier quality teams on selected Alstom suppliers; 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.

3.3.6 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 focusing on subcontractors and suppliers of a certain risk profile. 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 2024-25, 36 onsite CSR audits were conducted. These audits are based on the Universal Declaration of Human Rights, the International Labour Organization conventions (ILO), ISO 37001, 14001, 45001, and applicable local law and 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.

3.3.7 Suppliers' selection at business award stage

Social, environmental and ethical criteria are considered during suppliers' selection. In October 2023, the selection process was updated to strengthen the CSR criteria and to involve EHS, Eco-design and Ethics and Compliance teams in the award decision according to risk level. The sustainability criteria considered include:

- the supplier's CSR net risk; and

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- the signature of Alstom EHS requirements by Contractors + EHS evaluation and performance results, depending on the scope of work.

3.4 Conflict Minerals

Alstom's **Position Paper on Conflict Minerals** is available on its website. In addition, there are conflict minerals requirements in the general purchase conditions of goods & services and of the Ethics & Sustainable Development Charter.

In order to comply with conflict minerals laws and regulations in different jurisdictions, Sustainable Procurement performs a yearly risk mapping analysis of its product families to identify potential risks. Then, it launches a specific survey related to conflict minerals; the survey is focused on suppliers considered most at risk of conflict mineral-risk. The purpose is 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 Extended Minerals Reporting Template (EMRT) of the Responsible Minerals Initiative (RMI) for both mica and cobalt. Besides this specific survey, the conflict minerals topic is monitored through the Suppliers' CSR performance process, analyzing suppliers' answers to questions from the Ecovadis survey questions.

3.5 Social Survey

Every year, Alstom conducts an internal **social survey** amongst its HR population to ensure the absence of any incident regarding child labour, forced labour or freedom of association risks.

3.6 Alerts Monitoring Process:

Should an alert be raised internally or externally on the issue of Human Rights (via the Alert procedure (*see the next paragraph for more information*), onsite CSR audits or other sources/warnings (NGO)), the following methodology is applied:

- 1/ assessment of the situation by the department that receives the alert
- 2/ establish a multi-métiers team in order to investigate and characterize the problem (severity, occurrence, financial and CSR impacts), with the management team directly concerned by the alert raised
- 3/ define an internal action plan (e.g., information gathering, position statement preparation, audit planning) close the alert and inform the reporter about the status of the actions
- 4/ contain the problem with the supplier (e.g., asking for a corrective action plan to the concerned supplier(s) by due date)
- 5/ ensure that the issue related to the alert is addressed (e.g., thanks to suppliers' documentary review and/or follow up audits)

Depending on the criticality, a supplier escalation process can be triggered: in addition, the CSR status of suppliers would be discussed during quarterly Supplier Risk Management Reviews, attended by the senior procurement management team. If there is no progress after two sessions, the suppliers who triggered the escalation process are further escalated for additional review which can lead to suspending or terminating the business relationship with these suppliers.

The **Alert Procedure process for suppliers** is detailed under [Alert Procedure \(alstom.com\)](#). The Alstom Alert Procedure ensures reporter confidentiality. Alstom takes measures to respect and secure the confidentiality of the person making the alert. Alstom will honour its commitment that no employee or third party will suffer reprisals, such as a change of status, threats, harassment or any other form of discrimination and retaliation

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resulting from the use of the alert procedure or disclosure of information in good faith. Alstom’s process also allows for the anonymity of the reporter, where permitted by law.

In most cases, Alstom closes out its reviews of the Alert cases in three-six months, depending on the complexity and available information.

Investigation Process



The acknowledgement of the report takes place within seven days of its receipt and the company will provide feedback to the reporter within a reasonable period.

4. IDENTIFICATION AND MITIGATION OF RISK OF USING FORCED LABOUR OR CHILD LABOUR

Based on Alstom’s yearly Tier 1 suppliers’ (including contractors) risk mapping (see paragraph 3.3.2), suppliers located in countries with a “very high” or “high” exposure to human rights risks account for an 11% spend (mainly India and China) at Alstom group level and a 2% spend for Alstom Canada.

The steps and the governance to mitigate these identified CSR risks are detailed in section 2 above.

The Alstom Procurement Department and Alstom Legal Department work together in the negotiation of contracts. The Legal Department also makes sure that contracts comply with legislation in force and with ethical practice standards. For example, Alstom’s contracts refer to the Alstom Ethics and Sustainable Development Charter. Clauses addressing illicit employment and conflict minerals 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 in the plant that supplies Alstom. Alstom will continue to monitor this specific case and as well as continue to assess potential human rights issues in its supply-chains.

See this table below for more information from Alstom Alerts:

	2023/24	2024/25
Number of alerts in the area of non-respect of human-rights (child exploitation, forced labour) or working conditions, from alert procedure <u>involving Alstom’s supply chain</u> and leading to internal investigation	2	0
Outcome of investigations	1 supplier taken out of panel**	N/A

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	1 alert was found to be unsubstantiated	
Over FY2024/25, Alstom has not been found to be in breach of labour law or human rights in its supply chain, or held liable.		

**Note: The supplier noted in the table above was based outside of Canada and was active on a European site.

5. TRAINING PROVIDED TO EMPLOYEES AND SUPPLIERS ON FORCED LABOUR AND CHILD LABOUR

The deployment of Alstom’s Human Rights program relies on raising both employee and supplier awareness on this issue. As a result, we set out below the trainings that we offer employees as well as the supplier community.

Several modules in Alstom’s employee learning platform address social risks:

- **Sustainable Procurement General Knowledge** training is mandatory for all employees making contracting or purchasing decisions and covers topics including forced and child labour.
- An **e-learning on Human Rights** 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 rights.
- The e-learning **‘Conflict Minerals in the supply chain’** has been available for Alstom employees since 2024. It is recommended for employees who work with certain commodities at risk.
- In addition, **Ecovadis webinars** (general presentation and improvement actions sessions) have been provided to 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.

For the supplier community, Alstom launched its new **Supplier Academy** in March 2025 on the online Alstom University platform. This program is designed to strengthen collaboration with our suppliers and align with Alstom’s goal of reinforcing supplier relationships and driving operational excellence. Furthermore, by targeting small and medium-sized companies (SMEs), the Alstom University for suppliers contributes to their growth and development, reflecting our commitment to supporting the broader market ecosystem and fulfilling our corporate responsibility. The main objective of the Alstom University for suppliers is to provide tailored training for suppliers.

This new learning platform includes several e-learning modules on social topics, such as:

- Ethics for Alstom’s suppliers (that explains the Ethics and Sustainable Development Charter for Alstom’s Suppliers and Contractors).
- Human Rights in the supply chain
- Ecovadis for Alstom
- Conflict Minerals in the supply chain

6. 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.

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7. 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

As set out in section 6 above, Alstom has not identified any circumstances of forced or child labour in its supply chain. As a result, Alstom has not identified 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.

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

8.1 Internal Evaluations

Regarding Sustainable Procurement, several targets have been set to manage tier 1 (suppliers and contractors) sustainability risks, including Labour and Human Rights risks. Alstom first validates the effectiveness of its supplier CSR performance process through the key performance indicators (some of which have also been mentioned above):

- Part of the purchase amount covered by the key* suppliers having signed the Ethics and Sustainable Development Charter (in %)
- Percentage of suppliers monitored or assessed on CSR and E&C standards as per their level of risk (in %)
- Percentage of suppliers with low or medium CSR net risk** (in %)
- Percentage of Procurement community members trained on Sustainable Procurement (in %)
- Number of suppliers enrolled in Alstom Sustainable Procurement training program

*(*Suppliers with whom Alstom has a spending exceeding €100,000, excluding the charters included in the general conditions of purchase*

*** CSR net risk : CSR risk level obtained after adequate CSR evaluation(s) as per supplier's initial gross risk level)*

Alstom also monitors the percentage of FY alerts related to suppliers' human rights or working conditions, as well as whether any investigation into a raised alert, if applicable, was closed within a reasonable time frame. The reasonable period to close the alerts is under 3 months (6 months maximum if the circumstances warrant); this time period is based on French law (Waserman) n°2022-401 dated March 21th 2022. It is interesting to note that the Waserman law was passed in order to improve whistleblower protection.

These 5 indicators are publicly available in **Alstom's Annual Report**.

	2024/25 Canada	2024/25 Group	Target FY24/25
Part of the purchase amount covered by the key suppliers having signed the Ethics and Sustainable Development Charter (in %)	95%	98%	99%
Part of suppliers monitored or assessed on CSR and E&C standards (%)	88%	93%	100%
Part of suppliers with low or medium CSR net risk (in %)	88%	93%	92%
Part of Procurement teams trained on Sustainable Procurement (in %)	93%	87%	70%
Number of suppliers enrolled in Alstom Sustainable Procurement	N/A at country level	573	218

Report of Alstom Transport Canada Inc pursuant to the *Fighting Against Forced and Child Labour in Supply Chains Act*:

In addition, each year, Alstom’s procurement teams are evaluated via the **APSYS (Alstom Performance System)**, to measure the maturity of the procurement function on three main criteria: the 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.

8.2 External Evaluations by independent third parties:

Alstom Group is regularly assessed by **Ecovadis**. As noted in the introduction of this report, in 2024, Alstom achieved “Platinum” status (with a score of 86/100), placing the Group among the top 1% rated companies on the platform. This was an increase in rating from Alstom’s 2023 “Gold status”, which had placed Alstom in the top 5%.

In 2023, Alstom Canada was assessed by **AFNOR** against the **Corporate Social Responsibility Commitment Label** (ISO 26000 standard) 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 (2024/25), 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) or on request. In addition, the Impact of Alstom in Canada 2024 (released November 2024), assessed by external consulting firm EY, is also available on our website.

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 (29 mai 2025 16:03 EDT)
[Signature]

Full name: Julie Turgeon

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

Date: May 29, 2025

I have the authority to bind ALSTOM TRANSPORT CANADA INC.