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**Alstom UK & Ireland**  
**Modern Slavery Act Transparency Statement 2025**

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Date of issue: 29 September 2025

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**1. INTRODUCTION FROM DIRECTORS**

As Directors of ALSTOM Engineering and Services Limited (Registered Number 02235994), ALSTOM Transport UK Limited (Registered Number 08462831) and ALSTOM Product and Services Limited (Registered Number 05894128) respectively (the “Reporting Companies”), we would like to emphasise our commitment to ethical trade and the prevention of modern slavery and human trafficking across our operations and supply chains.

This statement highlights the key activities which Alstom UK & Ireland, as part of the Alstom Group, has undertaken during this financial year to combat slavery and human trafficking. You can access the full Alstom Code of Ethics PDF [here](#) , or explore their [Ethics & Compliance page](#) for more details.

**2. ALSTOM’S STRUCTURE, BUSINESS, AND SUPPLY CHAINS**

The Reporting Companies are part of the global Alstom Group, headquartered in Saint-Ouen-sur-Seine, France. Alstom Group’s ultimate parent company, Alstom SA, is a multinational leader in rail transport and sustainable mobility, with subsidiaries worldwide, including the Reporting Companies in the UK and Ireland. Procurement activities account for over 50% of the Group’s turnover, and Alstom works with a broad range of suppliers, contractors, and business partners globally. More information on corporate governance is available on [Alstom Group’s website](#).

**3. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

Alstom has a comprehensive Code of Ethics that applies to all employees, promoting honest and ethical conduct and full compliance with laws and regulations. Our Code of Ethics integrates case studies and defines Alstom’s human rights policy. This policy is part of the Sustainability & Corporate Social Responsibility Policy, which commits to enforcing the highest ethical standards, acting against discrimination, and respecting human rights.

Alstom’s suppliers and contractors must comply with the Ethics and Sustainable Development Charter, which prohibits forced or child labour, discrimination, and requires compliance with wage, working hours, and freedom of association laws. Our purchase conditions reserve the right to terminate for non-compliance.

As of 31 March 2025, 98% of Alstom’s purchase amount was covered by suppliers who had signed the Ethics and Sustainable Development Charter, an increase from 97% by March 2024.

#### 4. DUE DILIGENCE POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In addition, a cross-functional Vigilance Committee was set up in May 2023, which comprises of global Alstom Leadership members from Legal, Governance, CSR, Strategy, Ethics and Compliance. This committee gathers on a quarterly basis to develop and implement the strategic guidance on vigilance duties. Current due diligence includes:

- **Third-party evaluation:** Sustainability performance is assessed by independent bodies, such as EcoVadis, achieving high ratings. These scorecards are shared within the **Railsponsible** initiative - a joint effort by major railway companies to promote sustainable procurement.
- **Social audits:** Internal and external audits, especially in high-risk areas such as construction sites and with high-risk suppliers. Our audits check for forced labour, child labour, health & safety breaches (and more), with corrective action to rectify non-compliance, or contract termination.
- **Human Rights Scorecards:** to identify and mitigate risks from the outset (i.e. tendering for a project).
- **Supplier assessments:** Our corporate social responsibility ("CSR") evaluations, including documentary and onsite audits, identify the level of risk. We monitor suppliers assessed as medium or high risk closely and have escalation procedures in place.

#### 5. RISK IDENTIFICATION, ASSESSMENT AND MANAGEMENT

Every year, Alstom produces a 'Vigilance Plan', to detail our measures for risk mapping, management, and mitigation. It includes specific actions for supply chain risks.

We prioritise construction activities and high-risk suppliers for audits and assessments and take specific actions to address any non-compliance. Our suppliers report any concerns to Alstom anonymously, via an alert procedure.

Specifically, Alstom identifies, analyses, and prioritises human rights-related risks at different levels using:

- **(Annual) supply chain risk mapping** - based on CSR criteria, including labour and human rights.
- **Global risk mapping** - across all geographies and activities every three years.
- **Major Project risk assessments** - performed at the tender stage for significant projects.

We have identified construction activities and high risk suppliers as the areas of our business with the highest risk of slavery and human trafficking and complete an Internal Audit campaign and Social Survey to assess these risks. Modern slavery risks are managed through policies and commitments, contractual assurances, training and awareness raising, procedures and tools and collaborations and partnerships.

#### 6. OUR EFFECTIVENESS IN PREVENTING SLAVERY AND HUMAN TRAFFICKING

This year, we have measured our effectiveness in preventing slavery and human trafficking, through:

- **EcoVadis rating:** Alstom's Sustainable Procurement theme was rated 89/100 in 2025.
- **KPIs:** Tracking the percentage of purchase amounts covered by key suppliers who have signed Alstom's Ethics and Sustainable Development Charter. As above, this is currently 98%.
- **Audit coverage:** 93% of supplier sites were covered by CSR assessments in FY2024/25.
- **Incident monitoring:** Annual social surveys and alert procedures monitor incidents of child or forced labour, with best practices and corrective actions reported.

This year, the alert procedure was effective in identifying a UK-based supplier's potential non-compliance with the Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers. Alstom notified the relevant government agencies and

conducted an audit of the supplier's site in response. The audit did not find a breach of the Modern Slavery Act 2015 but did identify unsatisfactory staff treatment that did not meet Alstom's expected employment standards. The supplier has agreed to address these issues.

We sought to conduct a follow-up audit to ensure ongoing compliance; however, when the supplier obstructed this process, Alstom exercised its right to terminate the contract and end the business relationship, in line with our commitment to preventing slavery and human trafficking.

## 7. KEY PERFORMANCE INDICATORS

Alstom Group is regularly assessed by EcoVadis and was rated 90/100 in 2024 and awarded with the Platinum Medal of EcoVadis (99<sup>th</sup> percentile), that positions the Group in the top 1% of all companies on this axis.

In December 2023, Alstom UK & Ireland was re-assessed by AFNOR CSR Commitment Label and achieved 2 out of 3 star "confirmed" status. The audit assessed our maturity against the principles of ISO 26000 which included verification of sustainable procurement practices.

In March 2023, Alstom completed the UK Government's Modern Slavery Assessment Tool and scored 71/100 with strengths noted on Governance, Due Diligence and KPIs, and areas for improvement noted on Policies and Procedures, Training, Risk Assessment.

## 8. STAFF TRAINING ABOUT SLAVERY AND HUMAN TRAFFICKING

- **E-learning:** A global e-learning module on human rights is available to all staff, with over 2,400 completions by March 2025.
- **Supplier training:** Alstom launched its Supplier University in February 2025. This learning platform offers different modules to strengthen suppliers' skills, including modules on Human Rights. 573 suppliers have been trained on Sustainability in FY 2024-25 (through Sustainable Procurement trainings and through this supplier academy).
- **Awareness sessions:** Specific sessions on the Human Rights Programme are delivered to site teams.
- **External partnerships:** Alstom UK & Ireland partners with the Supply Chain Sustainability School, delivering accredited Modern Slavery Awareness training to over 500 staff, with additional access via Alstom University.

## 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 commencing 1<sup>st</sup> April 2024 ending 31<sup>st</sup> March 2025.

This Statement has been approved by the boards of **ALSTOM Engineering and Services Limited**, **ALSTOM Transport UK Limited** and **ALSTOM Product and Services Limited** on 29 September 2025.



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Copies of Alstom Code of Ethics, Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors and Sustainability & Corporate Social Responsibility Policy are available on the Alstom website ([www.alstom.com](http://www.alstom.com)) or on request.