

Overview of the Norwegian Transparency Act

Introduction

The Norwegian Transparency Act (the Act) mandates that larger enterprises operating in Norway conduct due diligence assessments to promote and safeguard human rights and decent working conditions in connection with the production of goods and the provision of services. The Act also requires enterprises to publish an annual statement about the assessments conducted to ensure public access to information.

The scope of the assessment is focused on own operations and upstream activities via the supply chain of tier-1 suppliers contributing to our project in Norway. Alstom Transport Norway AS (Alstom Norway) complies with the Act, approving and releasing this statement for the fiscal year ending on 31 March 2025. This report outlines the due diligence processes and findings for Alstom Norway, providing transparency into our efforts to uphold human rights and ensure decent working conditions across our supply chain.

For information on last year's statement visit [Alstom Norway transparency Act 2023/2024](#)

Organisational structure and supply chain

Our business

Alstom Norway is a wholly owned subsidiary of Alstom SA (Alstom), a French multinational company operating in the rail transport markets. Alstom's well-known products include the AGV, TGV, Eurostar and Pendolino highspeed trains, as well as its Citadis trams.

Alstom's mission is to support the transition toward global sustainable transport systems that are inclusive, environmentally friendly, safe and efficient whilst implementing a socially responsible business model. As a promoter of sustainable mobility, Alstom develops and markets systems, equipment and services for the transport sector. Alstom offers a complete range of solutions (from high-speed trains to metros and tramways), passenger solutions, customized services (maintenance, modernization), infrastructure, signalling and digital mobility solutions.

For further information visit Alstom [Norway annual report 2023/2024](#) as well as Alstom Group's [consolidated report](#)

Alstom in Norway

Alstom's activities in Norway mainly consist of supplying trains to Norske Tog, which is a state-owned company established to provide leasing of rolling stock to service operators on Norwegian railway tracks, in addition to services

related to these deliveries. Alstom is also involved in the delivery of ERTMS on-board train control solutions, as well as maintenance of these systems.

Supply chain

Alstom Norway's supply chain includes a large range of goods from a broad range of industries both domestically and internationally, including Alstom's own factories around the world where various stages of manufacture take place.

Also Norway's supply chain also include services that contribute to its operations, such as the cleaning and security companies that service Alstom Norway's offices and manufacturing sites.

Alstom's commitments, policies and procedures in relation to human rights

Respect for human rights policy

Alstom aims to comply fully with the fundamental conventions of the International Labour Organization (ILO) and various international human rights guidelines, such as the United Nations Guiding Principles on Business and Human Rights, OECD Guidelines for multinational enterprises, and the United Nations Global Compact.

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](#) is structured around five main pillars:

- Commitment to the "Ethics and Sustainable Development Charter."
- Assessment of CSR performance.
- Sourcing of eco-designed, environmentally friendly products and services.
- Developing relationships with diverse company sizes.
- Continuous improvement with appropriate indicators.

- Alstom's Environmental and Climate Policy focuses on minimizing environmental impacts through eco-friendly operations, product designs, and corporate strategies.

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.

Anti-corruption and bribery policy

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.

Due diligence assessment

Supply Chain Due Diligence

Alstom systematically investigates and examines risks of violations of responsible business practices in line with the OECD Guidelines for Multinational Enterprises. This diligence continues into 2025 and beyond, with quarterly reporting to our customers ensuring ongoing transparency and accountability.

Assessment of Suppliers

In 2024, Alstom assessed 80 suppliers associated with overall projects delivered to Norske Tog. This assessment involved an updated risk tool to evaluate potential negative impacts:

ERTMS Project

Suppliers Assessed: 36

Risk Closed during the year through a compliant Ecovadis assessment result and a green ADIT screening: 4

1 Medium High risk related to an identified general risk in the manufacturing of electronic components: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours

1 Medium High related to an identified general risk in the manufacturing of electronic components: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours

1 Medium low risk related to an identified general risk in the wholesale of machinery equipment: potential safety issues related to dangerous equipment, work practices and hazardous substance

1 Medium low risk related to an identified general risk in the manufacturing of electronic components: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours

- **Risk Closed during the year due to end of commercial relations with the supplier following the completion of the Delivery scope: 1**

1 medium low risk related to an identified general risk in the manufacturing of electronic components: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours

Outstanding risk under mitigation through ongoing Ecovadis assessment: 1

1 Medium low risk related to identified general risk in the manufacturing of electricity distribution and control apparatus: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours.

MLU72 Project

Suppliers Assessed: 12

- **Risk Closed during the year due to end of commercial relations with the supplier following a Transfer of Production: 1**

1 medium high risk supplier for MLU72 project with an identified general risk in painting industry: potential safety issues related to treatment and coating of metals exposes to heavy metals and chemicals).

- **Risk to be closed following an audit performed due to a non-compliant Ecovadis result: 1**

1 medium low risk was identified related to general risk in the lighting and charging system industry: potential safety issues related to dangerous equipment, work practices and hazardous substance.

N05/N06 Project

Suppliers Assessed: 32

- **Risk Closed during the year through a compliant Ecovadis assessment result and a green ADIT screening: 4**

1 High risk in terms of Human rights risk related to the country location in terms of working conditions

1 Medium high risk related to an identified general risk in the manufacturing of railway equipment: potential safety issues related to dangerous equipment, work practices and hazardous substance

1 Medium low risk related to an identified general risk in the treatment and coating of metals: safety risks related to the exposure to heavy metals and chemicals

1 Medium low risk related to an identified general risk in the manufacturing of electric lighting equipment: potential safety issues related to dangerous equipment, work practices and hazardous substance alongside long working hours.

- **Outstanding risk under mitigation through ongoing Ecovadis assessment: 2**

1 Medium low risk identified related to the treatment and coating of metals: safety risks related to the exposure to heavy metals and chemicals.

1 general risk identified related to the manufacturing of railway equipment: potential safety issues related to dangerous equipment, work practices and hazardous substances.

Summary of Findings and Actions

During the assessments, Alstom identified various levels of risks across different suppliers and projects. For high and medium-high risk categories, specific follow-up actions, including audits and further investigations, are scheduled to mitigate potential negative impacts.

Alstom Norway remains committed to maintaining high standards of human rights and working conditions throughout its supply chain, continuously improving our processes in compliance with the Norwegian Transparency Act.

Due Diligence Methodology

Alstom applies rigorous due diligence methods, evaluating 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;
- 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.

Risk Mitigation Strategies

Annual risk mapping using the Ecovadis IQ module assesses selected supplier sites yearly. Suppliers identified with high CSR risks must undergo detailed evaluations and implement corrective action plans if found non-compliant. Alstom's team supports suppliers in improving their CSR performance.

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 are reassessed by Ecovadis, once the corrective action plans have been implemented, to check their effectiveness.

Environmental Impact Assessments

Assessment of environmental impact focuses on parameters such as CO2 emissions, waste management, and resource conservation. Our policies emphasize continuous monitoring and improvement of environmental performance. Introducing Cabon Tool all suppliers are condition to include their CO2 emissions within their proposal, clarifying their proposed solution CO2 emissions implications.

Additional information

For further information about Alstom's CSR policies and work with due diligence visit [our website](#) as well as Alstom Group's [consolidated report](#).

In accordance with Section 6 of the Act, requests for more information on Alstom Norway's work with due diligence can be addressed at +47 22 89 26 00.

Signatures

25th of June 2025


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Robert Whyte

Board member (chairman)


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Patrice Houndu

Board member


Daniel A. Mangold.

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CSR & Human Rights Manager