

## TRANSPARENCY ACT STATEMENT

### INTRODUCTION

The Norwegian Transparency Act (**the Act**) requires larger enterprises operating in Norway to 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 that have been conducted to ensure the general public access to information.

The Act applies to Alstom's Norwegian entity, Alstom Transport Norway AS (**Alstom Norway**). Alstom Norway approves and releases this statement in compliance with the Act for fiscal year ending 31 March 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 high-speed 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, customised services (maintenance, modernisation), infrastructure, signalling and digital mobility solutions.

#### 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.

Alstom Norway's supply chain also includes 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

### Commitments to human rights

The respect for, and adherence to, human rights is at the heart of Alstom's social responsibility. The consideration of fundamental human rights concerns the entire value chain.

Alstom is committed to respect all laws governing human rights and fair labour practices applicable in the jurisdictions Alstom operates, and recognizes international human rights and labour rights standards, including:

- The United Nations Universal Declaration of Human Rights (UDHR)
- The United Nations Guiding Principles on Business and Human Rights (UNGPR)
- The Core Conventions of the International Labour Organisation (ILO)
- The Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The rules of conduct of the International Chamber of Commerce (ICC)

In addition, Alstom is a member of the United Nations Global Compact (UNGC), promoting the respect of human rights within its sphere of influence. The commitment to the 10 principles of the UNGC was renewed by the chairman and CEO of the Alstom Group in March 2022.

### Governing documents regarding human rights

Alstom has developed the following policies and guidelines to ensure compliance with applicable law and recognized international standard regarding human rights and decent working conditions:

- Alstom Code of Ethics
- Alstom Anti-Discrimination and Anti-Harassment Policy
- Alstom Sustainable Procurement Policy
- Alstom Sustainability and Corporate Social Responsibility Policy
- Alstom Environment, Health and Safety Policy
- Alstom Ethics and Compliance Policy
- Alstom Diversity and Inclusion Charter
- Alstom Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors
- Alstom Position Paper on Conflict Minerals

The governing documents apply to the entire Alstom Group, including Alstom Norway.

Alstom sets the same requirements for ethical business conduct to their suppliers and contractors. These requirements encompass adherence to applicable laws, regulations, international labour and human rights conventions, as well as compliance with the health and safety requirements of Alstom. All suppliers are required to comply with the Ethics and Sustainable Development Charter for Alstom's Suppliers and Contractors. This charter outlines Alstom's expectations and is a mandatory prerequisite for entering Alstom's supplier panel. In 2023/24, 97% of Alstom's purchase amount was covered by the key suppliers having signed the charter.

Compliance with the requirements in the charter is a part of Alstom's general procurement terms and conditions and by adhering to the charter, each supplier accepts to be assessed or audited by Alstom or by a third party

mandated by Alstom. Compliance with the requirements in the charter is ensured by control mechanisms in the supplier contracts.

### **Alert Procedure**

Alstom has established an alert procedure, the Alstom Alert Procedure, which allows any employee or any third party in relationship with Alstom to report 24/7, according to the applicable legislation, possible violations of the Code of Ethics or Alstom rules and policies or the laws, on a nominative or anonymous basis.

### **Training**

Training is an essential component of Alstom's risk management, governance, compliance framework and Alstom's values. Training the employees helps ensure employees are aware of their legal, regulatory and compliance responsibilities. When new employees start working at Alstom, they are required to complete a suite of mandatory online compliance training courses, including training on the Alstom Code of Ethics. Mandatory refresher training is provided to employees every two years or earlier if required due to changes in corporate governance compliances or as required by new legislation. As part of Alstom's training governance framework and also individual employee performance management, Alstom monitors, reports and manages mandatory training completion rates.

## **DUE DILIGENCE ASSESSMENT**

### **Routines**

The analysis and prioritisation of human rights related risks are established at different levels within Alstom:

- a global risk mapping for human rights is performed every third year to determine and prioritise human rights that were most likely to be affected by Alstom's activity.
- a risk mapping per country is established on the basis of different indexes by international organisations and NGOs such as the United Nations, the International Labour Organisation (ILO), the European Union, the World Bank, International Trade Union Confederation and Transparency International;
- a risk mapping of the suppliers (including contractors) is performed every year.

In the risk mapping of suppliers, the suppliers are evaluated based on corporate social responsibility criteria, using five methods:

- online screenings, provided by an external solution provider;
- online documentary assessments, carried out by an external company 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, the CERES Roadmap, and the UN Guiding Principles on Business and Human Rights;
- onsite evaluations, run by Alstom's procurement teams;
- onsite audits, led by Alstom's supplier quality teams;
- onsite corporate social responsibility audits, conducted by external specialized companies 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 laws.



Suppliers are assessed using one or more of methods mentioned above, cumulatively in some cases, depending on the level and type of risk they represent. 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 provide assistance and support to suppliers throughout the improvement process.

In addition to the yearly risk mapping of the supply chain, Alstom's procurement teams carry out preliminary evaluations for all new suppliers. The teams address questions related to the suppliers' corporate social responsibility activities. If the results of the preliminary evaluations are satisfactory, more extensive audits are conducted by Alstom's supplier quality teams. These audits include questions aimed on corporate social responsibility risks, including compliance with a minimum level of social practices, as well as dedicated questions on child labour, working conditions, hazardous substances and waste management and recycling processes.

## **Identified risks**

The last global risk mapping was performed in FY2021/22, and covered Alstom's activities, supply chain and partnerships and the following stakeholder families: workers in the value chain, Alstom workers, local communities and end-user of solutions. Taking into account the remediability, namely the ability to restore the damages potentially caused, the most salient human rights risks that have been identified to include:

- inadequate health and safety conditions in the production sites of Alstom or throughout the supply chain;
- harassment or discrimination in the workplace;
- non-responsible sourcing of raw-materials (conflict minerals, mica & cobalt);
- bounded / forced labour in the supply chain;
- human trafficking by logistical subcontractors;
- indirect contribution or link to controversial projects.

## **Preventive and mitigating measures**

To strengthen the Alstom's capacity to address risks relating to human rights, a specific Human Rights Risk Scorecard for new tenders and projects has been developed taking into account country risk mapping, type of activity and project structure amongst others. 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 where relevant, rolling out awareness sessions for the project teams, naming a corporate social responsibility representative in the project team or establishing a bespoke mitigation plan. To mitigate the risk of human rights violations in projects with a higher exposure to human rights or corporate social responsibility risks, external consultants has been appointed by Alstom and developed enhanced corporate social responsibility due diligence guidelines.

Due to the nature of on-site activities and the scale of these projects, Alstom has prioritized living conditions, working conditions, and labour and recruitment practices on construction sites. To mitigate any adverse impacts on these conditions, Alstom has integrated assessments of living conditions into the audit procedures for identified high-stakes projects where workers are provided with accommodation. Additionally, Alstom has partnered with external specialists to conduct an audit programme 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.

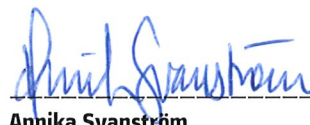
## Additional information

For more detailed information about Alstom Norway's work with due diligence assessments, please see Alstom's Universal Registration Document for FY2023/24, c.f.:

[20240515\\_Alstom\\_Universal\\_Registration\\_Document\\_EN.pdf](#)

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26 June 2024

  
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**Robert Whyte**  
Board member (chairman)  
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**Annika Svanström**  
Board member  
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**Patrice Houdou**  
Board member  
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**Carl Åge Bjørgan**  
General Manager

