

Alstom's due diligence process related to forced labour, child labour, and modern slavery

July 2026



Alstom applies the highest standards of ethical and legal conduct and confirms it is committed to act in full compliance with all applicable laws and regulations, and in respect of international law wherever it operates in the world. As stated in its Code of Ethics, Alstom supports the elimination of all forms of illegal, forced or compulsory labour, in particular child labour. Illegal, forced, or compulsory labour by Alstom's suppliers and contractors is strictly prohibited.

These commitments apply everywhere Alstom operates, in its own operations as well as in its supply chain, Joint Ventures and Consortiums.

Sustainable Procurement process

Through a structured global and local procurement organisation, Alstom ensures that its suppliers and subcontractors expressly commit to eliminating forced labour on all its projects, including through the signature of the "Ethics and Sustainable Development Charter for Alstom's Suppliers and Subcontractors".

Before onboarding and throughout the business relationship, suppliers undergo due diligence screenings — including checks against sanctions lists — via a recognised tool (ADIT) in line with the Sapin II regulation and Alstom's Ethics & Compliance policy. As part of this risk management process, internal teams conduct initial on-site audits incorporating CSR criteria, including risks of forced labour.

Alstom requires suppliers to undergo CSR assessments via a recognized tool (EcoVadis), as well as on-site audits where necessary based on the level of CSR gross risk of each supplier.

A non-compliant evaluation triggers the implementation of an action plan by the supplier, followed by a reassessment. In particular on the CSR on-site audits, to follow up on the closure of major and critical non-conformities, documentary reviews and/or follow-up audits are performed if necessary. Following this action plan, Alstom reserves the right to terminate the business relationship in case of non-compliance.

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Forced Labour Risks

To mitigate forced labour risks, particularly in sensitive areas at heightened risk, Alstom also monitors and investigates human rights alerts and potential issues raised within the supply chain through Alstom's Alert Procedure, or identified through NGOs, screenings, or internal procedures through supplier inquiries and site visits. A structured remediation process is established to close the alert, as well as specific monitoring of the supplier which may include Alstom's pluriannual social audit program by internationally recognized third parties. In case of a substantiated risk of forced labour, Alstom reserves the possibility to terminate the business relationship if a non-compliant supplier refuses to implement corrective actions or to commit to progress.

These measures apply globally, including in sensitive regions such as areas at risk of forced labour. As Alstom acknowledges the heightened risks of forced labour in China, and particularly in sensitive regions, the vigilance is reinforced with alert procedures, investigations, and removal from the supplier panel in cases of non-cooperation or substantiated risks. Specific actions have also been integrated in the management of procurement in China by the local team. These have included physical classroom trainings for buyers by external providers, according to recognised methodologies, and the identification of a CSR sponsor within the China Procurement team.

Following the publication of the ASPI report in March 2020, Alstom has undertaken a review of potential forced labour issues in the KTK Group factories supplying Alstom and ex-Bombardier Transport, using all relevant means and specific due diligence measures as detailed above. Alstom has conducted several social audits through external world-leading audit companies including in 2020 following the publication of the ASPI report, in 2022 based on the SMETA methodology, and in 2023, 2024 and 2026 dedicated, but not limited to, human rights and working conditions topics. As part of Alstom's pluriannual and multidimensional efforts to investigate and monitor this specific case, including the monitoring of findings from regular external social audits, no human rights incidents were identified on the plant that supplies Alstom.

Alstom discloses its sustainable sourcing and due diligence practices regarding child labour, forced labour, and modern slavery risks yearly through the Universal Registration Document available on the company website, and which includes Alstom's Vigilance Plan.

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