Modern Slavery Statement
V7 15/06/2022

Groupe Delachaux is committed to ethical business practices and respecting human rights, including conducting operations that are free from human trafficking and forced labor. The Code of Ethics of the Delachaux Group defines and illustrates the behavior that is expected from all employees of Groupe Delachaux, no matter where they are or what type of contract they have.

This statement describes Groupe Delachaux's organization to minimize the human trafficking and forced labor risk in its operations and supply chain, and its commitment that the company, its subsidiaries, its employees and its suppliers shall comply with all applicable laws, including, but not limited to the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act and/or the U.S, Commonwealth Modern Slavery Act 2018. Government's Federal Acquisition Regulation on Ending Trafficking in Persons, as well as local laws in the countries in which it operates.

Under the United Nations Convention against Transnational Organized Crime and the Protocols Thereto (2004), human trafficking is defined as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs."

The International Labour Organization's Convention concerning Forced or Compulsory Labour (1930) defines forced labor as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."

For purposes of this statement, "third party" include all entities and individuals (and their subsidiaries, affiliates, and subcontractors) providing goods or services to the Delachaux Group, including those goods or services for processing, producing, selling, or distributing the Delachaux Group's products.

- **Scope**

Groupe Delachaux is a global player in mission-critical engineered solutions. The Delachaux teams' commitment and know-how reflect their passion for their customers' businesses. Family-owned company created in 1902, Groupe Delachaux generated revenues of €945 million in 2021. It employs at December 31st 2021 more than 3909 people in more than 40 countries.

Present in strategic markets, the Group's Businesses, Pandrol (Rail Infrastructure), Frauscher (Rail Signalling) Conductix-Wampfler (Energy & Data Management Systems) and DCX Chrome (Chromium Metal) are recognized global leaders for their reliability, expertise and innovation capabilities.

This statement applies to all Businesses of Groupe Delachaux.

This includes, but is not limited to, all legal entities located in the United Kingdom, such as the local plants and offices of Pandrol, Conductix-Wampfler or Frauscher.

- **UN Global Compact**

Groupe Delachaux is a signatory to the UN Global Compact. The Global Compact is the world's largest corporate sustainability initiative. Launched in 2000, it now federates more than 12 000 signatories in 170 countries around 10 universal principles in Human Rights, Labour, Environment and Anti-Corruption, including the elimination of forced and compulsory labour.

- **Code of Ethics - Human rights policy**

As stated in the Code of Ethics of Groupe Delachaux, it is the Group's policy to "respect human rights and remain alert to possible human rights violations".

"We protect and promote fundamental human rights in the workplace and in our supply chain. We prohibit child labour and respect a minimum employment age of 18, except under legally established programs (e.g. apprenticeship for teenagers 16 and above). We prohibit forced labour, slavery, and human trafficking. We are on the lookout for any sign of human rights violation in our supply chain."

- **Risk mapping**

The Groupe Delachaux delivers annual actions plan based on the anti-bribery risks maps done by the Businesses in 2021. Each Business has identified, analyzed and prioritized its exposure to the risk of bribery, as detailed in its Anti-Bribery Procedure. Groupe Delachaux considers that this mapping is also relevant to evaluate the risk of human trafficking and forced labor in its operations and it its supply chain.

- **Employee training and awareness**

All employees of Groupe Delachaux are expected to read the Code of Ethics and comply with its principles.

All new employees must follow an e-learning awareness module or to participate to a face-to-face workshop on the Code of Ethics.

As a member of TRACE International, Groupe Delachaux has access to TRACE's "Avoiding Trafficked Labor" e-learning course. This course is available to all employees on Groupe Delachaux's Learning Management System.

A whistleblowing system is put in place across Groupe Delachaux to report any question or issue related to Ethics addressed by employees or stakeholders (providers, customers, commercial agents…). Any potential issue on Human Rights arising through this channel will receive proper attention and be investigated. The Code of Ethics as well as the Anti-bribery procedure of Groupe Delachaux describe the Group's policy on whistleblowing.

- **Third party management**

As written in the Code of Ethics, it is Groupe Delachaux's policy that "everyone working on our behalf and representing our interests signs up to the same ethical standards as we do".

Risk mitigation actions are performed, based on the risk level assessed and the type of third party. Based on the anti-bribery risks mapping, the sales agents were identified as the most critical third party and Groupe Delachaux has created a specific management procedure for Sales Agents with 2 levels of Due diligences conducted by the Businesses and the Group Compliance Committee. It includes:
-Financial, integrity and Sanctions Countries checks
-TRACE self-assessment and certifications,
-Contractual clauses, ensuring that our third party adheres to the Code of Ethics.

The third parties of Delachaux Groupe have also access to the whistleblowing system of the Groupe Delachaux to report any question or issue related to Ethics.

- **Monitoring**

Several indicators are used to manage the risk of modern slavery across the Group, such as:
-Annual track of the number of employees undertaking the Code of Ethics awareness module online or participating to a face-to-face workshop.
-Annual track of the number of employees undertaking the Anti-Bribery training.
-Annual track of the number of due diligences performed on 3rd parties.

- **Remediation**

If cases of human trafficking and modern slavery are detected, Groupe Delachaux will create a remediation plan that will provide redress for individual victims where Groupe Delachaux caused the human trafficking and/or forced labor, as well as remediation of non-conformance with this statement caused by deficiencies in Groupe Delachaux's internal controls or processes.

Groupe Delachaux's third parties and suppliers are expected to create a remediation plan that will provide redress for individual victims where the third party or supplier would have caused the human trafficking and/or forced labor, as well as remediation of non-conformance with this statement caused by deficiencies in the third party's or supplier's internal controls or processes.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022.

Guy Talbourdet,
Chief Executive Officer, Groupe Delachaux
June 2022