

Siemens Mobility Limited

Modern Slavery Act Statement

Financial Year Ended 30th September 2023

INTRODUCTION

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Siemens Mobility Limited (“the Company”) has taken and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. As part of the worldwide Siemens group of companies, Siemens Mobility Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and dedicated to performing all business dealings with integrity and transparency, together with putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Sustainable practices are firmly anchored in our corporate culture, based on our company values of being responsible, innovative, and excellent.

OUR BUSINESS

Siemens Mobility is a separately managed company of Siemens AG. As a leader in intelligent transport solutions for more than 175 years, Siemens Mobility is constantly innovating its portfolio. Its core areas include rolling stock, rail automation and electrification, a comprehensive software portfolio, turnkey systems as well as related services. With digital products and solutions, Siemens Mobility is enabling mobility operators worldwide to make infrastructure intelligent, increase value sustainably over the entire lifecycle, enhance passenger experience and guarantee availability. In fiscal year 2023, which ended on September 30, 2023, Siemens Mobility posted revenue of €10.5 billion and employed around 39,800 people worldwide. Siemens Mobility Limited is one of several legal entities trading in the UK and employs over 4,100 employees, situated in various locations including sales offices, manufacturing plants and service depots. Further information is available at:

www.siemens.com/mobility

OUR POLICIES

We have various internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Business Conduct Guidelines:

All employees are required to comply with our Business Conduct Guidelines which commits each of them to respect the personal dignity, and personal rights of every individual, as well as to act with integrity and in accordance with the law. We have adopted six ethical principles to guide us and help us to act responsibly:

- We are honest and truthful in our dealings
- We engage with reputable and law-abiding partners
- We respect the dignity, privacy, and inherent rights of individuals
- We act in line with our responsibility for the environment
- We protect the health, occupational safety, and personal security of our people
- We explore ethical concerns

We believe that human rights are a core element of responsible business conduct and that compliance with human rights law and regulations is essential. We implement this in our business by requiring our employees to examine the decisions they make on behalf of the Company at an early stage for possible adverse effects on human rights of others, both inside and outside of the Company. Each employee is required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process. We also require every employee to complete a refresher web-based training course on the Business Conduct Guidelines every three years, with a KPI of 100% completion. As of 30th September 2023, we had achieved an 89.9% completion rate.

2. Compliance policy:

This policy sets out the Company's stance on Anti-Corruption, Anti-Trust, Anti-Money Laundering, Data Protection, Ethics (includes Human Rights) and Export Control. The policy specifically highlights the need for Siemens businesses to comply with the requirements of the Modern Slavery Act and with the United Nations Global Compact principles, including without limitation:

Principle 1: that businesses should support and respect the protection of internationally proclaimed Human Rights.

Principle 2: that businesses should make sure that they are not complicit in Human Rights abuses.

Principles 3 to 6: which define fundamental responsibilities for businesses regarding labour.

The following are incorporated in day-to-day business practices and operated throughout the financial year:

- relevant projects include a specific set of due diligence questions in relation to Human Rights.
- the subject of Human Rights is a mandatory topic in risk assessment deep dives.
- potential Human Rights violations are subject to investigation as part of the formal compliance case handling process.
- training modules incorporate key aspects of Human Rights compliance.

3. Whistle-blower Policy:

Siemens has a Compliance whistle-blower hotline (Tell Us) for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in multiple languages, online or via telephone. Reports can also be made anonymously. The hotline can be used by employees and management as well as customers, suppliers, and other stakeholders. Siemens internal whistle-blowers are protected by special regulations that protect whistle-blowers who make reports in good faith and to the best of their knowledge. In addition, the Siemens Ombudsperson is available for the reporting of compliance violations.

4. Recruitment Policy:

The Company operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees, to safeguard against human trafficking or individuals being forced to work against their will. In addition, policies provide freedom for workers to terminate employment, freedom of movement and freedom of association. Furthermore, threats of violence, harassment and intimidation are specifically forbidden as is discrimination.

OUR HIGH-RISK AREAS

Compliance risk management is an ongoing focus in all aspects of business activity. Annually, global risks are assessed in a Headquarter Workshop, with risk topics subsequently cascaded throughout the organisation to ensure proper management focus. An output from the Headquarter Workshop in 2020 was an 'awareness package' produced to assist businesses in managing environmental, social (human rights including modern slavery) and governance (ESG) risks across the entire value chain.

Siemens Mobility Limited mandatorily adopts the use of External Sustainability Audits (ESAs) for certain suppliers, together with the use of management judgement when identifying suppliers in scope of audit, to further support the identification and management of ESG risk. The audits performed by internationally recognised audit firms verify the adherence to our requirements with the 'Code of Conduct for Siemens Suppliers' and assesses the sustainability performance of our supply chain. The audit reports, deliver an in-depth assessment which enables Siemens and its suppliers the ability to identify and manage potential sustainability risks.

During 2023, Siemens implemented 'ethical management' as a frame for existing activities and ethical principles by empowering all employees to consciously "do the right thing", in line with our Business Conduct Guidelines. Ethical Management together with the existing focus on integrity in business, enhanced the Company value of 'responsible' and further promoted the topic of Human Rights, including Modern Slavery.

INDUSTRY ENGAGEMENT

Siemens Mobility Limited is a member of the Modern Slavery Solution Sharing Group (MSSSG), run by Rail Safety and Standards Board. The aim of the group is to share knowledge and best practice with a range of other

industry partners, looking for ways to work collaboratively to ensure we reduce the risk of modern slavery within the rail industry.

OUR EMPLOYEES

Siemens Mobility Limited has made bespoke web-based training on Modern Slavery available to all staff. The training was developed in 2022 by an external provider and is delivered together with Safeguarding and Prevent eLearning. Over 50% of our employees performed modern slavery training in FY23. We also expect our temporary staff to have an awareness of modern slavery by undergoing Modern Day Slavery training arranged by the contracting agency. In addition, Modern Slavery is included as part of the site-based induction for all Rail Infrastructure projects.

OUR SUPPLIERS

According to the UN Global Compact, the “supply chain can make a significant impact in promoting human rights, fair labour practices, environmental progress and anti-corruption policies.” In the UK, Siemens Mobility Limited has approximately 2,900 suppliers across 30 countries. Siemens globally has a substantial and complex supply chain with around 90,000 suppliers across 150 countries. With such a large and geographically dispersed supplier network, Siemens ensures a higher detection priority is given to those suppliers deemed as high risk and has implemented a system of interconnected processes and tools to stay on top of this complexity under the governance of our Global Services Supply Chain Management (SCM) function. Transparency and awareness of supply chain risks is ensured via a three-step process:

- Definition of sustainability risks and categories.
- Identification of the relevant suppliers.
- Development and implementation of necessary procurement processes to cover these risks for example by conducting on-site audits.

An updated Siemens Code of Conduct for Suppliers and Third-Party Intermediaries (the “Code”) was published in September 2023. The Code is based on the principles of the UN Global Compact relating to human rights, labour standards, environmental protection, and anticorruption initiatives. The Code specifically prohibits the use of forced labour and child labour by our suppliers. All our suppliers are required to commit to the Code, and we explicitly encourage our suppliers and third-party intermediaries to extend these values further into their own supply chain. The Code requires our suppliers to respect the employment rights of their workers and use reasonable efforts to promote compliance with the Code amongst their own suppliers. All suppliers are required to commit to the Code.

Prior to selection, all suppliers undergo various due diligence checks. Our Vendor Master Data Tool automatically activates a Corporate Responsibility Self-Assessment should the tool identify certain risk criteria. The assessment questionnaire enables suppliers to judge whether they meet the requirements of our Code. This process raises awareness of these requirements, identifies potential risks in connection with sustainability at an early stage, and ensures that appropriate steps are taken.

Following selection, suppliers are monitored, and risk assessed, particularly those operating in higher risk countries. Suppliers for whom certain potential sustainability risks have been identified or where there are suspicions of non-compliance with the Code are subjected to an in-depth assessment from an External Sustainability Audit by audit experts on site. To ensure independent reporting, external service providers conduct this assessment.

Consequences of non-adherence

If our sustainability self-assessments or audits reveal infringements of our requirements, they must be remedied by the suppliers in question within a reasonable period. Besides follow-up audits conducted by our external audit partners, the responsible procurement units and the suppliers involved, directly agree on the corrective actions defined during our audits. We reserve the right to end the supplier relationship in the event of serious infringements, such as evidence of slavery, servitude, human trafficking and forced labour.

Employee Training

In addition to the Safeguarding and Prevent eLearning for all staff, Siemens has two online training modules entitled “Sustainability in the Supply Chain” and “Supplier Qualification: General Approach.” These trainings

highlight the importance of the Code and are mandatory for all employees with purchasing responsibility. Training requirements are automatically activated with any new updates made to the training.

Know-How Transfer and Building Competence

Our suppliers' commitment to comply with our sustainability principles is most effective when it is based on their own convictions. We are therefore increasingly committed to building their competence and intensifying knowledge transfers related to sustainability. As a supplement to existing programs, Siemens has developed online sustainability training, specifically for supplier's staff.

2024 PRIORITIES

In 2024, the Company will focus on the following actions:

- Form a Modern Slavery Working Group to review our approach to Modern Slavery, coordinate actions and support the development of the annual statement. The group will bring together representatives from relevant business areas including Procurement, HR, Sustainability, Operations, Legal and Compliance.
- Enhance our communications to employees to increase awareness of Modern Slavery
- Continue to collaborate with rail industry partners through the MSSSG.

OTHER INFORMATION

Our ultimate parent company, Siemens AG, produces an annual Sustainability Report, which provides transparency on our progress with regards to Human Rights activities. The Report includes information on the management and responsibilities regarding Human Rights issues, our continuous improvement measures, our Human Rights due diligence approach along the entire value chain, our commitment to Human Rights and international standards, our grievance mechanisms as well as our global business alliance platforms. Throughout the year, we are in exchange with key stakeholders, such as investors, shareholders, employees, customers, suppliers, and non-governmental organizations to ensure effective exchange on Human Rights related topics.

Ensuring commitment to Human Rights at Siemens:

<https://www.siemens.com/global/en/home/company/sustainability/humanrights.html>

Sustainability in the Supply Chain:

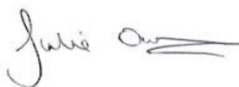
<https://www.siemens.com/global/en/home/company/sustainability/sustainablesupplychain.html>

OUR COMMITMENT

Siemens Mobility Limited will not tolerate any violations of applicable law – and if it does happen, we will take strong action. We will continue to apply a zero-tolerance approach to forced labour, slavery, and human trafficking in any form, in our business and supply chain.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors with respect to the Financial Year ending on 30th September 2023.



Julie Owen (Chair of the Board of Directors)

Date 31st January 2024