

Siemens Mobility Limited

Modern Slavery Act Statement

Financial Year Ended 30th September 2022

INTRODUCTION

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Siemens Mobility Limited 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.

Sustainable value creation is the path we choose to achieve our goal of profit-driven, long-term growth. As a global business, Siemens Mobility Limited with its innovative capability and investment strength, assumes joint responsibility for worldwide sustainable development. We create added value for the societies in which we operate. At the same time, our business activities, both directly and indirectly, impact the lives of many. Siemens Mobility Limited is aware of its responsibility for ensuring the respect of human rights. For us, this responsibility is the fundamental basis of responsible business conduct. Building on our Business Conduct Guidelines, we have defined the respect of human rights in additional guidelines and principles.

Sustainable practices are firmly anchored in our corporate culture, based on our company values of being responsible, innovative, and excellent. We apply globally binding principles that require all employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental, and social progress.

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.

OUR BUSINESS

Siemens is a technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, we create technology with purpose adding real value for customers. Our businesses and local organizations enjoy the entrepreneurial freedom to serve their customers and markets in the best way possible, the structure is geared toward creating value for customers, creating technology with purpose, and consequently changing the lives for billions of people for the better. As a company, we support our customers in generalizing carbon-neutral passenger and freight transport, from

door to door, in cities, and in-between: with rolling stock, rail infrastructure, intermodal solutions, rail services, and turnkey solutions.

Siemens has been active in the United Kingdom for over 170 years. Siemens Mobility Limited is one of several legal entities trading in the UK and employs over 3,900 employees, situated in various locations including sales offices, manufacturing plants and warehouses. We enable operators to shape current and future passenger and freight transportation with a comprehensive portfolio including vehicles (like trams, light rail, metro, commuter and regional trains, high-speed and very high-speed trains), together with infrastructure, automation and electrification solutions, turnkey systems, and related services. We offer intermodal services using apps, providing travellers with access to comprehensive Mobility as a Service, throughout their journey.

OUR HIGH-RISK AREAS

Compliance risk management is an ongoing focus in all aspects of business activity. In 2022, business transformation changes and a rapidly changing external regulatory environment prompted an update to our integrated Risk Management process. Annually, global risks are assessed in a Headquarter Workshop, with risk topics subsequently cascaded throughout the organisation to ensure proper management focus. The results from continuous risk discussions with local Business Management together with the results from the annual Compliance Risk & Performance Review were included in the annual global Headquarter Workshop. In addition, as an output from the Headquarter Workshop in 2020 an 'awareness package' was 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.

In 2021 a guide entitled 'Human Rights in product and solutions businesses' was produced to further raise awareness and promote discussion within relevant business operations. During 2022, the Company has worked to implement 'ethical' decision making, alongside the existing focus on integrity in business. This will enhance the Company value of 'responsible' and further promote the topic of Human Rights, including Modern Slavery.

OUR POLICIES

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

1. Code of business conduct:

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.

Our Business Conduct Guidelines require that our employees recognise and apply globally relevant anti-slavery principles specifically including the International Labour Organisation's Tripartite Declaration of Principles, and its Declaration on Fundamental Principles and Rights at

Work, with respect to the elimination of child labour, abolition of forced labour, prohibition of discrimination, and rights to freedom of association and collective bargaining.

Each employee is required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process.

Siemens also expects its suppliers and business partners to share Siemens' values and comply with all applicable laws as laid out in the respective code of conduct.

Following a fundamental revision of the Business Conduct Guidelines (BCG), (where the current version came into force from 1st January 2019), a dedicated section specifically on Human Rights, further emphasizes the importance of this topic within Compliance. A new web-based training course covering the Business Conduct Guidelines was circulated to all employees in early 2020 for mandatory completion. In June 2021, the Siemens DEGREE Framework was launched, committing clear ambitious targets for core ESG topics. One internally driven activity under this framework is that BCG training will be refreshed every three years, with our Siemens Managing Board's KPI aspiration to achieve 100% completion of the BCG training by all participants. As of 30th September 2022, Siemens Mobility Limited achieved a completion rate of 99.9% using the current BCG version.

2. Compliance policy:

This policy, in the form of a globally binding, all-encompassing compliance circular, sets out the organisation's stance on Anti-Corruption, Anti-Trust, Anti-Money Laundering, Data Protection, Ethics (includes Human Rights) and Export Control.

The circular specifically highlights the need to comply with local law and thereby the requirements of the Modern Slavery Act. In particular, the circular requires Business Units and employees to act always in accordance 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 thirteen 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 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.

We support all our suppliers through our “Sustainability in the Supply Chain” and “Code of Conduct for Siemens Suppliers and Third-Party Intermediaries” brochures, and the basis of all our supplier relationships is the commitment of our suppliers to observe the principles of the code. Furthermore, we explicitly encourage them to extend these values further into their own supply chain and this is also a commitment within our Sustainability Charter, to create a network of interactions and business relations that are built on trust. All signatories of our Sustainability Charter agree to support Siemens Mobility in working towards the three pillars of environmental, social, and economic sustainability. As well as reflecting our Business Conduct Guidelines, our supplier code is based on the UN Global Compact and principles of the International Labour Organisation.

The code specifically prohibits the use of forced labour and child labour by our suppliers. It requires our suppliers to respect the employment rights of their workers and requires our suppliers to use reasonable efforts to promote compliance with the code amongst their own.

Suppliers commit to the code by signing the Corporate Responsibility contract clause as part of the onboarding & qualification process, and for all new and extended procurement contracts, via the Corporate Responsibility declaration or by acknowledging the Conditions of Purchase.

Prior to selection, all suppliers undergo various due diligence checks. Our Vendor Master Data Tool automatically activates a Corporate Responsibility Self-Assessment (CRSA) should the tool identify certain risk criteria. The assessment questionnaire enables suppliers to judge whether they meet the requirements of our Code of Conduct. 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 continually 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 of conduct are subjected to an in-depth assessment from an External Sustainability Audit (ESA) 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. Likewise, suppliers are required to comply with the principles and requirements of the Code of Conduct.

Employee Training

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 of Conduct for Siemens Suppliers together with Third-Party Intermediaries and are mandatory for all employees with purchasing responsibility. Training requirements are automatically activated with any new updates made to the training. During the year, Siemens Mobility Limited launched bespoke web-based training on Modern Slavery that had been developed by an external provider. In total, 231 managers and supervisors performed the online Modern Slavery training, and this was further supplemented by an all-employee email communication. In addition, for those employees who did not have access to the online training, managers and supervisors raised and discussed the topic during their team meetings.

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.

The sustainability roadmap, developed by Siemens, included a recommendation to implement a Corporate Social Responsibility (CSR) related platform to actively manage and assess suppliers on a regular basis. Siemens has developed a global platform to track all ESG metrics. Siemens Mobility Limited is actively assessing the outputs to validate the benefits of implementation within the UK, together with reviewing additional metrics for tracking. Siemens Mobility Limited partners the Supply Chain Sustainability School (SCSS), and this partnership enables our suppliers to take due diligence checks.

Supply Chain Management (SCM) is represented on the Siemens UK Sustainability Board, with a view to ensuring corporate initiatives and requirements are introduced into the supply base. Siemens SCM has developed a specific section in the Siemens Equality, Diversity, and Inclusion

(ED&I) statement, to further support the strategy on the topic and are now in the process of assessing how to develop our approach to Tier 1 Suppliers. Our continued collaboration with the UK Social Enterprise network, demonstrates our commitment. As an example, Siemens is a now a corporate partner to the Social Enterprise UK Buy Social Corporate Challenge.

During the year, our work with Social Enterprises (SE) has resulted in positively impacting the lives of more than 1,500 disadvantaged people including children (to date Siemens Mobility Limited have spent £335,000 with social enterprises and £802,000 with not-for-profit organisations). There is a clear strategy to further roll out Social Enterprises in the UK, supported by Siemens being 1 of 5 partners who will help Social Enterprise UK develop their social value approach in putting to the Social Value Act 2032 and we encourage our suppliers, to do the same.

Siemens is a "Real Living Wage" employer, accredited by the Living Wage Foundation within the UK Engineering Sector. Our site-based Suppliers and 3rd Party Contractors are paid in accordance with the living wage foundation guidelines

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 2022.



Julie Owen (Director)

Date 13th March 2023