

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

Section 54 of the Modern Slavery Act 2015 (“the Act”) came into effect on October 29, 2015 and requires those entities carrying on a business or part of a business in the United Kingdom (“UK”), supplying goods or services, and having a total annual turnover of £36 million or more to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organization during the previous financial year.

This statement is made on behalf of Stadler Rail Group (“Stadler”) pursuant to section 54 of the Act and constitutes our slavery and human trafficking statement for the financial year ending on December 31, 2024.

This statement illustrates how we apply our business principles in practice and reflects our continued public commitment to challenge and confront the use of forced, compulsory, trafficked or child labour within our own organisation, our supply chains and our value chain.

1 Organisational structure and supply chains of Stadler

Stadler provides a comprehensive range of products for mainline and urban transport, including high-speed trains, intercity trains, regional and suburban trains, underground trains, tram trains and trams. Stadler also manufactures mainline locomotives, shunting locomotives and passenger coaches. In addition, Stadler is the world’s leading manufacturer of rack railways. In the field of signalling technology, Stadler offers tailor-made digital solutions and services in the mainline, branch line, light rail vehicle, metro and depot segments to ensure efficient, digital and sustainable rail operations.

Stadler has 16 core production sites and component sites across high- and low-cost countries in Switzerland, Europe, Great Britain and the United States. For our service business, we operate over 80 service locations where we offer our customers services ranging from the supply of individual spare parts to full-service solutions.

Stadler’s extensive supply chain covers a large number of suppliers in many countries across the world. Our suppliers provide materials, specific components, IT, communications equipment and services; office and workshop cleaning, maintenance services, transportation, couriers; marketing such as merchandise supplies; office equipment and supplies; and professional services such as auditors, legal counsel, banks, insurers and recruitment agencies.

2 Policies

2.1 Code of Conduct

Wherever we are, we operate in accordance with the Stadler Code of Conduct (“CoC”) which sets forth the business principles and values of Stadler:

- Integrity and legality
- Ethical behaviour
- Sense of responsibility

These business principles guide Stadler's activities and staff across the different places where companies within the group do business.

The CoC describes our ethical standards and mandates compliance with them as well as compliance with local, national and international laws, directives and regulations.

It particularly prescribes that: "Others must therefore always be met with fairness, respect, dignity, politeness and correctness. Professional behaviour and tolerance must be demonstrated at the workplace. A working atmosphere free of discrimination, condescending behaviour and conflict, characterised by equality of opportunity and mutual respect, as well as in conformity with the values and policies of this Code of Conduct must be created and maintained. This working atmosphere should motivate employees, advisers and agents to deliver their best performance."

The CoC bans unethical and unlawful practices, therefore slavery, human trafficking as well as forced or child labour.

2.2 Code of Conduct for Business Partners

Stadler is committed to fair and cooperative business relations as well as social and ecological sustainability. In order to promote Stadler's values in its supply chain it has created a Code of Conduct for Business Partners ("CoC BP"). The CoC BP bans slavery, human trafficking, forced and child labour. See more details in section 3.3.

2.3 Occupational Health and Safety Management System

All Stadler companies operate an Occupational Health and Safety Management System, which ensures that all applicable legislations regarding health and safety of all employees are verifiably complied with. This system is also certified according to the ISO 45001 standard requirements for most companies of Stadler.

2.4 Reporting of breaches

Stadler provides several channels to report any known or suspected breach of the CoC. We explicitly encourage our employees to report any violations. In particular Stadler has implemented a central integrity line for submitting reports about suspected infringements for both internal and external whistleblowers.

Stadler guarantees that the employees do not suffer any disadvantage for reporting breaches of the CoC.

Our CoC has been published on Stadler's intranet.

2.5 Local Policies

In addition to the above policies some companies of Stadler have also their own local compliance policies.

3 Due Diligence, Assessment and Management of Risk and Performance

3.1 General

Stadler is monitoring and evaluating its risks in order to develop proper mitigation actions and processes.

It ensures that all local, national and international laws, directives and regulations as well as Stadler's internal standards are followed.

Stadler has adopted a CoC which requires any signatory party to obey the aforementioned laws, directives as well as Stadler's internal standards.

3.2 Employment

We apply high standards in the recruitment and employment of our people.

In addition to applying internal policies, including our CoC, we seek to ensure that:

- all legal obligations are complied with in the recruitment and on-boarding process;
- for certain positions we conduct an appropriate level of due diligence on our prospective employees prior to them joining the firm, including a robust selection process and taking up employment references;
- we recruit, promote and develop our people on the grounds of merit and capability; and
- we further gender equality and that we have a diverse workforce and an inclusive culture.

Stadler conforms to the living wage for its employees wherever they are.

3.3 Business Partners

As mentioned in section 2.2 Stadler's Business Partners (including suppliers) are required to sign the CoC BP before an order is placed with them or before a contract is signed. In the CoC BP Stadler bans forced labour, child labour, human trafficking and slavery. Stadler's Business Partners are also required to ensure enforcement of the CoC BP in their supply chain. For violations of the CoC BP by a Business Partner Stadler reserves the right for adequate sanctions against the respective Business Partner.

3.4 Monitoring

Stadler continuously evaluates and monitors its programs to ensure all actions are consistent with industry standards. Through such evaluation and monitoring Stadler seeks to ensure that its own business and its supply chains are free from human slavery or human trafficking.

4 Training

Stadler provides regular training for target groups in all relevant areas of the CoC.

Bussnang, May 2025



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Peter Spuhler
President of the Board of Directors



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Dr. Maja Krapf
General Counsel