

HITACHI

Hitachi Rail

UK Modern Slavery Statement 2025

Hitachi Rail Limited (Hitachi Rail) is the holding company of the Hitachi Railway Systems Business Unit of Hitachi, Ltd. Hitachi Rail GTS UK Limited (Hitachi Rail GTS), formerly known as Ground Transportation Systems UK Limited, was sold by Thales S.A. (Thales) to Hitachi Rail on 31 May 2024, joining the Hitachi Railway Systems Business Unit. For the purposes of this statement Hitachi Rail means Hitachi Rail Limited and Hitachi Rail GTS.

Hitachi Rail is committed to supporting and respecting human rights, including the abolition of modern slavery and all forms of forced or compulsory labour, wherever it does business.

We are committed to acting ethically and with integrity in all our business dealings and relationships and minimising the risk of slavery or human trafficking in our business and supply chains. We engage with our workforce to help them understand what modern slavery is, how to recognise it, and how to act on risk indicators of these issues.

This is Hitachi Rail's eighth statement made pursuant to section 54 of the Modern Slavery Act 2015. This statement sets out the key activities we have undertaken since 1 April 2024 to deliver on our commitments.

Our Business

Hitachi Rail is a fully integrated, global provider of rail solutions across rolling stock, signalling, operations, service & maintenance, digital technology, and turnkey solutions. Our mission is to contribute to society through the continuous development of superior rail transport solutions. We are proud of our global achievements, from our world-famous 'bullet trains', to our signalling solutions and turnkey projects, state-of-the-art traffic management and digital solutions. Drawing on the wider Hitachi Group's market-leading technology and research-and-development capabilities, we strive for industry leading innovations and solutions that can deliver value for customers and sustainable railway systems that benefit wider society.

Snapshot from the Last 12 Months

- ▶ Maintained and continued to develop an independent Compliance team responsible for implementing the global compliance programme, including full integration and applicability to Hitachi Rail GTS colleagues.
- ▶ Continued to ensure that our global workforce undertakes mandatory training regarding the Code of Ethics and Business Conduct (Code of Ethics).
- ▶ Continued provision of our bespoke Modern Slavery training to our global workforce.
- ▶ Continued provision of our EcoVadis refresher training given to our internal buyers and category managers regarding the registration with and use of EcoVadis.
- ▶ Continued provision of our EcoVadis training on corrective actions for procurement.
- ▶ Continued integration activities focusing on a "One Hitachi" principle following the acquisition of Ground Transportation Systems (GTS) from Thales, which was completed on 31 May 2024.
- ▶ Continued to implement a Human Rights Due Diligence process, committing to identifying, preventing, and mitigating human rights risks in its operations and supply chain.

Our Staff

Hitachi Rail is a cornerstone of the UK's rail industry. Operating across 20+ sites across England, Scotland and Wales, we leverage an extensive network of depots, maintenance centres and our factory in the North East. This infrastructure enables us to deliver world-class solutions in rolling stock, signalling, digital maintenance and telecom systems. Our skilled and diverse teams across the region, drive innovation, deliver results for our customers, and nurture the next generation of rail talent across the UK.

Across the UK we have over 3,300 employees. We ensure that all employees are able to demonstrate their eligibility to work in the UK and require all contractors and agency staff to undertake the same before starting work with Hitachi Rail. Some of our supply contracts require additional levels of security clearance. We work with our approved sponsor to ensure that the appropriate security clearance is obtained and maintained.

Our Supply Chain

Our supply chain comprises of other Hitachi Group companies as well as external third-party suppliers. During the reporting period, Hitachi Rail has directly engaged:

- ▶ 10 suppliers from within the Hitachi Group; and
- ▶ 1,328 external suppliers globally (over 84% of which are based within the United Kingdom).

Our Codes and Policies

Hitachi Rail's commitment to prevent modern slavery and human trafficking in our business and supply chains is underpinned by appropriate policies that are regularly reviewed and updated to reflect our evolving business.

Our internal Compliance Programme Manual (2023) describes how we prevent, detect, and respond to compliance risks and misconduct, and promote a culture of ethical conduct. It provides for the architecture, implementation and testing and monitoring of the effectiveness of our compliance programme. This infrastructure provides for governance and oversight as well as the necessary framework and tools to manage, measure, and improve the compliance programme to identify and mitigate potential risks to Hitachi Rail. Our compliance programme is benchmarked periodically against industry and global best practices and aligns to Hitachi Group compliance standards.

Our Code of Ethics (2023) applies to all members of our governance and control bodies, executives, workforce and supply chain. Amongst other things, the Code of Ethics further demonstrates Hitachi Rail's dedication to eradicating slavery and all types of forced or mandatory labour, as well as our pledge to support our communities. The Code of Ethics reflects our commitment to, amongst other things:

- ▶ Abolition of slavery and all forms of forced or compulsory labour;
- ▶ Freedom of association;
- ▶ Equal pay for equal work;
- ▶ Equality at work;

- ▶ Just and favourable remuneration;
- ▶ Non-discrimination; and
- ▶ Protection for the organisation of and participation in collective bargaining.

Hitachi Rail also requires our suppliers to comply with our Expectations of Business Partners (2024) **(Expectations)** where we expressly preclude the use of child, forced, or trafficked labour in our supply chains and where we require our partners to respect human rights and applicable labour laws and comply with legal requirements for abolishing slavery and all forms of forced or compulsory labour. The Expectations were developed in 2024 to replace our supplier code of conduct. They outline Hitachi Rail's requirements for ethical business conduct of all our business partners that we buy from, sell to, or partner with.

Hitachi Rail supplements the above with the following relevant internal policies and manuals that are subject to continuous review and improvement:

- ▶ **Modern Slavery Policy (2024)** that details our commitment to maintaining a culture of integrity and openness in all our business dealings and relationships, including that we take reasonable measures to minimize risks of modern slavery and forced labour in our business, operations, and value and supply chains.
- ▶ **Whistleblowing & Speak-Up Policy (2023)** that promotes a “speak-up” culture whereby anyone can report, in good faith, actual or suspected violations or breaches of laws, regulations, our Code of Ethics, or our policies and emphasises that Hitachi does not tolerate retaliation against those who report concerns or whistleblowers.
- ▶ **Human Rights and Social Accountability Policy (2022)** that reflects our commitment to comply with the Universal Declaration of Human Rights when conducting business. **This policy has been revised and renamed the Human Rights Policy in 2025.**
- ▶ **Diversity, Equity and Inclusion (DEI) Policy (2023)** that sets out our commitment to: creating and sustaining an inclusive workplace, ensuring all our employees are respected, heard and valued, and that our teams reflect the communities we operate in. **This policy has been revised and renamed the Diverse Perspectives Policy in 2025.**
- ▶ **Respectful Workplace Policy (2024)** that sets out our commitment to providing a respectful, safe, dignified, and supportive environment for our workforce; we embrace our diversity and promote trust and fairness; and we do not tolerate workplace-related discrimination and harassment or workplace violence.
- ▶ **Environmental Policy (2022), Quality & Product Safety Policy (2023) and Health and Safety Policy (2022)** that set our commitment to provide safe, effective, quality and fit for purpose systems, products and services to customers, in compliance with good practice, applicable international and national standards and all legal obligations. **These policies have been revised and renamed the Health, Safety and Environment Policy and Quality and Product and Product Safety Policy in 2025.**
- ▶ **Conflict Minerals Policy (2023)** that states our commitment to responsible procurement activities to ensure that the procurement of materials containing conflict minerals and cobalt does not encourage human rights violations, including child labour. **This policy has been revised in 2025.**

- ▶ Other written employment practices and procedures that ensure fair recruitment and treatment of our workforce.

Hitachi Rail continues to make our policies available to our workforce, in multiple languages where appropriate, through publication on our internal document management system and intranet. We regularly review and update our policies.

Due Diligence for Modern Slavery and Human Trafficking

Hitachi Rail has identified certain materials and services procured by our business during the reporting period as giving rise to the highest risk of human rights or of giving rise to the highest risk of forced labour, child labour and trafficking. Hitachi Rail identifies, assesses, controls, and monitors the risk of modern slavery and human trafficking in these industries, and our supply chain more generally, through our supplier due diligence. Core activities include:

- ▶ **Supplier mapping:** Mapping direct supply chain and business relationships to measure and identify areas where there is potential or indirect risk for modern slavery using published data.
- ▶ **Hitachi Rail Assessment & Screening:** Initial desktop assessment of all suppliers based on a compliance risk assessment protocol whereby new suppliers are screened for: i) compliance and reputational risk events (e.g. negative news, regulatory enforcement including fines or other penalties, and legal actions including litigations); ii) export trade sanctions and blacklisting; iii) corruption risk (including corruption perception scores, financial secrecy, and corporate tax haven indices); and iv) human rights risk (including EcoVadis industry and country risks, and worker's rights indices).
- ▶ Prospective suppliers are required to agree to adhere to the Expectations and complete the Hitachi Rail screening questionnaire that includes information to understand the supplier's compliance with regulatory requirements and best practices.
- ▶ **CSR & Sustainability Risk Assessment:** We work with our partner EcoVadis, a global leader in business sustainability ratings, to deliver an internal programme that enhances visibility of supply chain risks in the corporate social responsibility (CSR) and sustainability space. We upload and risk-assess our supply base using the EcoVadis IQ platform which enables us to create a CSR & Sustainability risk profile for our suppliers against 4 key criteria: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. In 2024 we enhanced the screening platform with the implementation of EcoVadis IQ+ using DocuScan with contactless AI data mining to review supplier policies including Labour & Human Rights.
- ▶ The risk assessment was updated in 2024 providing critical insights on the inherent risk profile of our Tier 1 suppliers in terms of the industries they work in and the countries in which they operate. We have also actively invited suppliers, based on spend and risk, to register in the EcoVadis ratings platform, providing more detailed visibility of their CSR and sustainability performance. We now have 1,533 suppliers registered with EcoVadis ratings (up from 954 suppliers in the last reporting period) and continue to engage with suppliers and promote the EcoVadis tool. Through the EcoVadis tool, registered rated suppliers have access to the EcoVadis Academy training which includes e-learning courses on Child Labour, Forced Labour & Human Trafficking topics.

- ▶ **Site Visits and External Audits:** We organise and undertake supplier visits and audits for quality & assurance and health & safety in accordance with Hitachi Rail internal policies and procedures.
- ▶ In our Modern Slavery Statement for 2021 we first advised that a human rights issue was raised following the publication of a report by the Australian Strategic Policy Institute (**ASPI**). This report focuses on the potential forced enrolment of Uyghur people in the supply chains of major international companies. The report mentions one of Hitachi Rail's suppliers.
 - Following the publication of the ASPI report, Hitachi Rail undertook an in-depth review of potential forced labour issues in the supplier referenced, including internal interviews, document reviews and three third party audits.
 - The scope of the audits included in-person checks at the supplier's premises in January 2021, March 2022, July 2023, and March 2025 reviewing key documentation and interviewing management and front-line workers. Based on the scope and methodology of the review, the documentation and information received from the supplier and external audits organised, no instances of forced or compulsory labour were identified at the plants that supply Hitachi Rail. Hitachi Rail will continue to monitor this specific case and assess potential human rights issues in its supply-chains generally.
- ▶ **Internal Audit:** We have a framework in place for all current procurement processes. These are all tested internally and externally through rigorous audits that look at compliance and the application and adherence to processes. Where there is a non-conformity report or recommendation, we build them into the process development.
- ▶ **Whistleblowing & Speak-Up:** Hitachi Rail provides various speak-up channels for any person, internal or external to our business, seeking to report a concern regarding actual or suspected misconduct that may be a violation or breach of any applicable law or regulation, our Code of Ethics, or any of our policies. Our speak-up channels include managers, members of our Human Resources or Legal & Compliance functions, and our dedicated 24-7 Hitachi Global Compliance Hotline, which provides for online or telephonic reporting. Hitachi Rail additionally provides for specific email addresses for supervisory bodies and other eligible recipients as speak-up channels, as required by certain local laws and regulations where we operate. Hitachi Rail does not tolerate retaliation against whistleblowers.
- ▶ **Compliance:** We have a dedicated compliance team, led by our Chief Compliance Officer. The compliance team is supported by all functions over the business, but in particular Internal Audit, Legal, Finance, Human Resources, Procurement and Sales.
- ▶ **Contracts:** Hitachi Rail continues to bind all new suppliers to comply with all applicable laws, including the Modern Slavery Act 2015, and the Expectations.

Training

Raising awareness and building expertise is another process used by Hitachi Rail to manage human rights risks. Hitachi Rail ensures that all new members of our workforce undertake mandatory annual training on our Code of Ethics (translated into 15 languages) within three months of joining. This training is refreshed annually for our whole workforce. The training explains how to spot and report potential or actual breaches of the Code of Ethics, including in relation to human rights, and details the consequences for failing to comply with the Code of Ethics.

Our global bespoke Modern Slavery Awareness e-learning helps our workforce to identify potential instances of Modern Slavery in our business and supply chain and explains our procedures for preventing and reporting the same. Hitachi Rail ensures that all new members of our workforce with access to eLearning undertake Modern Slavery Awareness training and this is refreshed to all our workforce every two years. More than 89% of our UK workforce with access to eLearning have completed the training as part of this 2025 refresh exercise.

We actively work with our procurement teams and management to identify gaps in individual and role training as part of the wider due diligence activities and responsible sourcing programme. Our responsible sourcing training is delivered via the EcoVadis Academy and is accessible to both Hitachi procurement teams and suppliers.

Effectiveness and Further Steps

We continue to monitor the effectiveness of our processes to ensure that we source responsibly, trade ethically and prevent human trafficking within our business and supply chain. This section outlines key performance indicators (KPIs) to help measure progress against our goals.

KPIs

Goal	Status
Ensure new members of the workforce have completed Code of Ethics training within 3 months of new employee start date	Achieved
Ensure that existing workforce have undertaken refresher Code of Ethics training annually	Achieved
Ensure workforce with access to eLearning have completed Modern Slavery every two years	Achieved
Maintain and enforce Hitachi Rail's suite of internal policies (including Modern Slavery Policy, Whistleblowing & Speak-Up Policy, Human Rights Policy, Diverse Perspectives Policy, Respectful Workplace Policy, Health, Safety and Environment Policy, Quality and Product and Product Safety Policy and Conflict Minerals Policy) to mitigate risk	On track
Operationalise the engagement strategy for suppliers that EcoVadis has identified as having a "high" or "very high" inherent sustainability risk profile, inviting suppliers to register and complete the sustainability assessment with EcoVadis.	On track
Continue to ensure that anti-slavery clauses and compliance with the Expectations are embedded into all high-risk contracts	On track
Screen suppliers through EcoVadis, including in respect of child labour, forced labour, human trafficking, and workers' rights	Achieved

This statement was approved by the Hitachi Rail Limited Board of Directors on **17 September 2025**.

Signed version filed with relevant government authority.

Giuseppe Marino
Group CEO