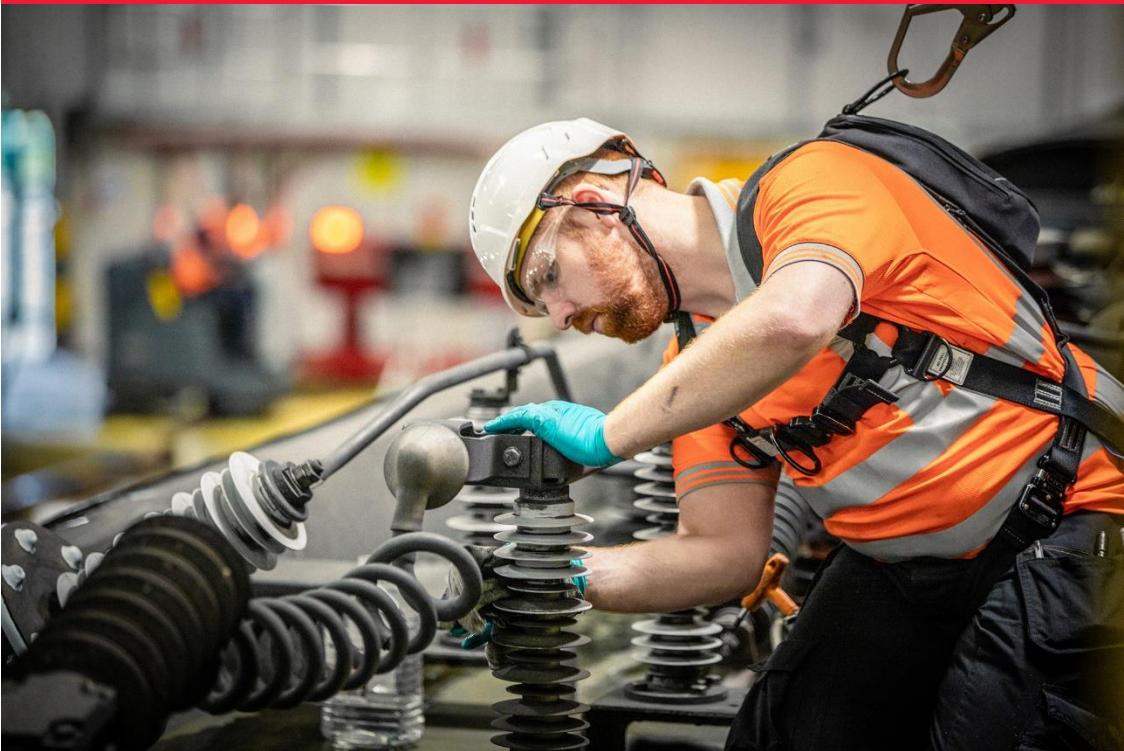


Hitachi Rail Policies

Last updated: July 2026



01 Scope

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Purpose

This document collects all core policies of the Railway Systems Business Unit (RSBU, hereinafter also Hitachi Rail) as deliberate system of principles to guide decisions, define Company objectives and achieve rational outcomes.

Applicability

This document applies to all RSBU Rail Legal Entities including Hitachi Ltd and relevant Legal Entities.



02 Terms

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Acronyms and Abbreviations

CE	Circular Economy
CM&BC	Crisis Management and Business Continuity
COTS	Commercial-Off-The-Shelf
ISMS	Information Security Management System
OECD	Organisation for Economic Co-operation and Development
RSBU	Railway Systems Business Unit

Definitions

Organization	Person or group of people that has their own functions with responsibilities, authorities and relationships to achieve its objectives (ISO 9000:2015, ISO 14001:2015, ISO 27001:2022, ISO 45001:2018; ISO 22301:2019)
Policy	Organization intentions and direction of an organization as formally expressed by its Top Management (ISO 9000:2015, ISO 14001:2015, ISO 27001:2022, ISO 45001:2018; ISO 22301:2019)
Top Management	Person or group of people who directs and controls an organization at the highest level (ISO 9000:2015, ISO 14001:2015, ISO 27001:2022, ISO 45001:2018; ISO 22301:2019)

03 References

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Reference Documents

ISO 14001:2015	Environmental management systems — Requirements with guidance for use
ISO 22301:2019	Security and resilience – Business continuity management systems – Requirements
ISO 22361:2022	Security and resilience — Crisis management — Guidelines
ISO 45001:2018	Occupational health and safety management systems – Requirements with guidance for use
ISO 9000:2015	Quality management systems – Fundamentals and Vocabulary
ISO 9001:2015	Quality management systems - Requirements
ISO/IEC 27001:2022	Information security, cybersecurity and privacy protection – Information security management systems – Requirements
ISO 22163:2023	Railway applications – Railway quality management system – ISO 9001:2015 and specific requirements for application in the railway sector
ISO/IEC 17025:2018	General requirements for the competence of testing and calibration laboratories
CMMI	Capability Maturity Model Integration
SA8000:2014	Social Accountability
ISO 50001:2018	Energy management systems — Requirements with guidance for use
ISO 30415:2021	Human resource management — Diversity and inclusion



04 RSBU Policies

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The following pages represent the Commitment of Hitachi Rail Management. It includes:

Health, Safety and Environment Policy

Quality and Product Safety Policy

Crisis Management and Business Continuity Policy

Information Security Policy

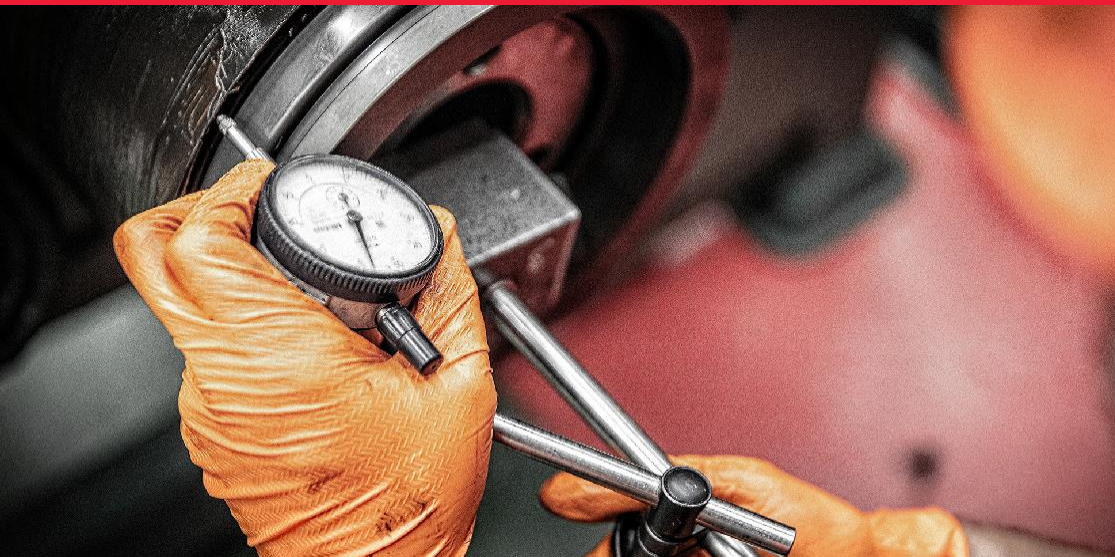
Conflict Minerals Policy

Human Rights Policy

Diverse Perspectives Policy

Circular Economy Policy

Product Ecodesign Policy



Management Commitment

Hitachi Rail is a company that can be trusted by Governments, Municipalities, and private companies to construct any project/product related to rail transportation.

In the frame of the implementation of each project, Hitachi Rail accounts for the social, economic, logistical, architectural, environmental, and infrastructural scenarios in which it operates, offering the best possible combination of safety, efficiency and return on investments.

To meet this mission, Hitachi Rail relies on an integrated Global Business Management System meeting the requirements of the international standards CMMI, ISO 9001, ISO 22163, ISO 22301; ISO/IEC 27001, ISO 17025, ISO 14001, ISO 45001, SA 8000, ISO 50001, ISO 30415 and also acts respecting all the legal, regulatory and contractual ones.

In the depicted context, the Hitachi Rail Management commits itself to implement and make effective the policies defined in the following pages, reflecting Hitachi Rail values, with the aim of satisfying all applicable requirements and customer expectations.

Hitachi Rail Management reviews policies on yearly basis during the Global Management Review meeting. Following the decisions taken during the meeting, one or more policies can be updated and the present document republished.

Health, Safety and Environment Policy

Hitachi Rail is driving the mobility transition - helping every passenger, customer, and community enjoy the benefits of more connected, seamless and sustainable transport.

Championed by our values of Harmony, Sincerity and Pioneering Spirit, our purpose, to Build Trust, Prevent Harm, will support the sustainable performance of our company by instilling a culture of care in our workplace, where we all thrive by taking care of each other and the planet, every day.

To achieve this, it is our objective to see everybody return home every day without injury or illness; minimise environmental impact throughout the product life cycle and optimise use of natural resources to prevent climate change impact.

We will also provide everyone with the conditions for a high level of wellbeing, contributing to motivation; these are key to individual fulfilment at work and company performance.

We transform these ambitions into actions and results by:

- Equipping leaders to create a psychologically safe workplace and demonstrate their **commitment through visible felt leadership**.
- Providing a **Systematic Approach** to HSE and Wellbeing management that ensures proactive identification and control of HSE hazards; compliance with all relevant laws and regulations; learning from failure and success for continuous improvement and sharing of good practice.

- **Engaging our people**, social partners and contractors to proactively report and address HSE concerns while attaining the skills they need to take care of their safety, their wellbeing, and the environment.
- **Embedding HSE and Wellbeing into our value chain**, to make them an integral part of how we do business, end-to-end.
- **Leveraging digitisation and innovation** to improve outcomes, monitor and report.

As a colleague or contractor, each of us has a responsibility for progress at our individual level to create a safe, healthy and sustainable working environment, putting people and the planet at the centre of everything we do.

Ulderigo Zona

Chief Safety, Health, Environment & Quality Officer

Quality and Product Safety Policy

Hitachi Rail is driving the mobility transition - helping every passenger, customer, and community enjoy the benefits of more connected, seamless and sustainable transport.

Championed by our values of **Harmony**, **Sincerity**, and **Pioneering Spirit**, our purpose is to provide safe, quality and fit for purpose systems, products and services to our customers making our own the following order of priorities:

S (Safety) >> Q (Quality) > D (Delivery) > C (Cost)

To achieve this and to transform those ambitions into actions, Hitachi Rail implements a Quality management System, embedded in its Global Business Management System, that encompasses the following principles:

- **Compliance with internal and external parties' expectations** including Corporate strategic guidelines, Legal obligation and Applicable National and International Standards.

- **Customer Focus approach** striving to exceed customers' expectations, guaranteeing that technical, safety, economical and schedule requirements are met and monitoring, on a regular basis, customer satisfaction.
- Exercise a clear **Leadership** deploying a culture of accountability and awareness in which people are committed to achieve the organization's quality and safety objectives.
- Implement **process approach & continuous improvement** through the capitalization of knowledge, risk analysis, propagation of Lesson Learned and culture of Problem Solving, understanding of causes and effect relationships and more generally by enhancing the maturity of its organization and teams always leveraging on **evidence-based decision making**.
- Use **Innovation and Digitalization** to improve quality of products and services across the entire value chain.

- **People Engagement and Teamwork**, relying on the commitment and the motivation of all employees, putting in place necessary actions to enhance, at all levels of the organization, the ability to create and deliver value through appropriate managerial behaviors, First-Time-Right approach and continuous training.
- Promote **Safety Culture** in relation to Products / Systems throughout the organization by emphasizing that everyone contributes to overall safety. Cooperate with all the stakeholders, including suppliers, encouraging hazard reporting, and communicating this policy and safety objectives.

Employees and managers are expected to support the implementation of this policy and ensure that their work is performed in accordance with the stated quality principles, as far as reasonably practicable.

Ulderigo Zona

Chief Safety, Health, Environment & Quality Officer

Crisis Management and Business Continuity Policy

Hitachi Rail Management commits itself 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.

To achieve this, Hitachi Rail implements and maintains a robust and effective Crisis Management and Business Continuity (CM&BC) Management System, in the frame of the Global Business Management System, that formalizes roles, rules, processes and procedures to restore and deliver continuity of services in the event of a business disruption in accordance with the requirements of the ISO 22301:2019 standard.

In addition, the CM&BC Management System expands its scope to include any kind of crisis that could threaten the organisation's reputation, operation or strategic objectives in accordance with the guidelines ISO 22361:2022.

Therefore, Hitachi Rail:

- ▶ Establishes this policy that is appropriate to the purpose and context of the organisations, supporting its strategic direction;
- ▶ Considers this policy maintained in the Global Business Management System and communicated to the relevant parties.

The CM&BC Policy at Hitachi Rail is as follows:

1. The **identification of internal and external interested parties' requirements**, including Corporate strategic guidelines, to ensure alignment of BC objectives with the organizational context;
2. The **definition of specific roles, responsibilities and governance mechanisms**, ensuring that Top Management provides strategic direction for coordination and monitoring;
3. The **deployment of awareness and engagement initiatives for engage the people**, through targeted training and communication, to foster a Business Continuity oriented culture and mindset;

4. The **commitment for ensuring an adequate allocation of human, technological and financial resources**, with the objective to effectively support the achievement of Business Continuity objectives and solutions;
5. The **effective management of internal and external stakeholder relationships**, even in a crisis situation, working in a proactive way to achieve Hitachi Rail resilience;
6. The **continuous improvement** through periodic monitoring and verification of policies, procedures, systems and identified solutions, reporting at regular intervals.

Employees and Managers are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out to fulfil the above principles.

Ulderigo Zona

Chief Safety, Health, Environment & Quality Officer

Information Security Policy

Hitachi Rail Management commits itself 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.

To achieve this Hitachi Rail implements an Information Security Management System (ISMS) in the frame of the Global Business Management System in accordance with the requirements of ISO/IEC 27001 standard.

Therefore, Hitachi Rail:

- ▶ Establishes an Information Security Policy that is appropriate to the purpose and context of the organization, supporting its strategic direction;

- ▶ Considers the Information Security Policy maintained in the Global Business Management System and communicated to the relevant stakeholders.

The Information Security Policy at Hitachi Rail is as follows:

1. Information is handled to respond to changes in the context of the organization as appropriate, within a cycle of continuous improvement;
2. Information is protected according to an appropriate level of confidentiality, integrity and availability, in line with relevant legislative, regulatory and contractual requirements, those relating to data protection and in accordance with the Hitachi Rail information security objectives;

3. Information is safeguarded where necessary in accordance with its classification level against inappropriate disclosure; is accurate, timely and attributable; and is available to those who should be able to access it.

All employees and managers are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out to fulfil the above security principles.

Tim Coles
Group CIO

Conflict Minerals Policy

Hitachi Rail is committed to responsible procurement activities as its policy to ensure that the procurement of materials containing conflict minerals (tin, tantalum, tungsten, and gold) and cobalt does not encourage:

- ▶ Activities of armed groups,
- ▶ Human rights violations, including child labour,
- ▶ Corruption, and
- ▶ Environmental destruction in the conflict and high-risk regions.

Hitachi Rail also respects the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and conducts more detailed investigations based on the Guidance while understanding social issues and the expected roles of companies in the regions.

Hitachi Rail will continue to inquire its suppliers into their minerals' country of origin and supply chains using the Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI) and request them to procure minerals from smelters certified under RMI's Responsible Minerals Assurance Program (RMAP).

Maiya Shibasaki

Chief Sustainability Officer & Chief Diversity,
Opportunity and Inclusion Officer

Christophe Gourlay

Chief Procurement Officer

Human Rights Policy

Hitachi Group contributes to society through the development of superior, original technology and products, and delivering innovations that answer society's challenges. As a prerequisite to this, Hitachi Group is committed to fulfilling its responsibility to respect human rights throughout its value chain.

The Hitachi Group Human Rights Policy applies to all officers and employees of Hitachi Group. Hitachi Group expects all business partners across the value chain to also respect and not infringe upon human rights and will respond appropriately when this is not happening.

In this context, Hitachi Rail is committed to implementing the Hitachi Group Human Rights Policy by adapting it to its context and operations, as well as highlighting the specificities of the Business Unit.

- ▶ **Commitment.** Hitachi Rail is committed to fulfilling its responsibility to respect all internationally recognized human rights, as enshrined in the International Bill of Human Rights, and set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the UN

Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the Ten Principles of the United Nations Global Compact and the principles of Standard SA8000 (Social Accountability).

Hitachi Rail will comply with human rights laws and regulations in each of the regions in which it operates. Where there is a gap between local laws and the international standards, Hitachi Rail will seek ways to meet the spirit of the international standards. We do not tolerate threats, intimidation, or physical or legal attacks against human rights defenders.

- ▶ **Governance.** The Hitachi Group Human Rights Policy was discussed and approved by the Senior Executive Committee.

In Hitachi Rail, the Chief Sustainability Officer and the Chief Human Resources Officer are appointed as the person in charge of human rights to continue to promote efforts to respect human rights in accordance with this policy. Necessary actions to promote respect for human rights are discussed by the RSBU Sustainability Committee and reported to the RSBU Board of Directors as appropriate.

- ▶ **Salient Human Rights Issues.** Hitachi Rail periodically review the human rights risks relevant to the nature of its business and global footprint. These periodic reviews take account of feedback from internal and external stakeholders, findings from grievance channels or sustainability audits, as well as independent external organisations.

Based on a mapping of human rights risks, the following salient human rights issues have been identified for Hitachi Rail:

- (1) Occupational Health and Safety
- (2) Forced Labour and modern slavery, including violation of migrant workers' rights
- (3) Child Labour
- (4) Environmental impact (i.e. pollution and impact on health)
- (5) Inadequate wages
- (6) Equal pay for equal work or work of equal value
- (7) Discrimination
- (8) Violation of Freedom of Association
- (9) Harassment

Human Rights Policy

- ▶ **Human Rights Due Diligence Process.** Hitachi Rail will undertake continuous human rights due diligence to manage human rights risks and impacts and will also reflect the results of such due diligence in its policies and internal systems for human rights initiatives and improve them. Our Human Rights Due Diligence process includes identifying and assessing potential or actual human rights impacts, taking appropriate actions to prevent or mitigate risks, and establishing indicators to verify the effectiveness of measures. We also fulfil our accountability to stakeholders by appropriately disclosing information about our efforts to making business in compliance with human rights.

Our Human Rights Due Diligence approach entails taking action by working with our business partners, including procurement partners throughout the value chain. For all procurement partners, Hitachi Group Sustainable Procurement Guidelines are established, which require all of our procurement partners to respect all internationally recognized human rights.

Hitachi Rail recognizes the need to identify vulnerable hot spots and high risks across a broad

global value chain. We evaluate our procurement partners through document-based survey and on-site audits and have developed a variety of measures to seek to prevent potential adverse impacts.

In case a human rights violation is found, Hitachi Rail will use its leverage with its business partners to meaningfully address the impacts and actively support them in their efforts to correct the situation. However, depending on the willingness of the business partner to effectively address the issues, we may need to eventually terminate our relationship with them since, as a principle, we endeavour to do business with business partners that comply with this policy.

- ▶ **Grievance Mechanism.** Hitachi Group operates a Global Compliance Hotline that is run by an independent third party. The hotline is available 24/7 and allows concern raisers to remain anonymous, where permitted by law. The hotline is open to both internal and external parties to report concerns.

Concern raisers are protected from retaliation as a result of reporting or consulting through the

grievance mechanism. If it becomes clear that Hitachi Rail's activities have caused or contributed to an adverse impact on human rights, we will identify the problem in accordance with international standards and take appropriate actions to remedy. We will also address the issue with fairness and impartiality, and we will provide the necessary cooperation to ensure a resolution and prevent a recurrence.

- ▶ **Stakeholder Engagement and Disclosure.** Hitachi Rail is committed to engaging in ongoing dialogue and consultation with stakeholders to understand their lived experience and take meaningful steps to address potential or actual human rights impacts affecting them.

Disclosure of Information

We will report regularly on our efforts to respect human rights through our website and other means.

Maiya Shibasaki

Chief Sustainability Officer & Chief Diversity,
Opportunity and Inclusion Officer

Rob Luijten

Chief Human Resources Officer

Diverse Perspectives Policy

Diverse perspectives are an essential source of innovation and growth, and for Hitachi Rail they are a vital asset to better serve our partners and customers across the globe.

Enhancing the Hitachi inspiring fundamental values of Harmony, Sincerity and Pioneering Spirit, Hitachi Rail is committed to adhering and implementing the Hitachi Diverse Perspectives Policy, in line with the Hitachi Group Code of Ethics and in line with the applicable legal provisions and main international conventions and standards.

This Policy supplements the Human Rights Policy.

At Hitachi Rail:

- ▶ We welcome differences in colleagues' background, age, gender, sexuality, family status, disability, neurodiversity, race, nationality, ethnicity, religion, and world view;
- ▶ We respect and value everyone's uniqueness: we recognize that our colleagues are different and may have different needs. We strive to allow everyone to access the same opportunities and to help them realise their potential, regardless of their individual needs;
- ▶ We are committed to all our employees being respected, heard and valued, and to our teams reflecting the local communities we operate in;
- ▶ We promote allyship in order to create an environment where everyone feels safe and free to truly bring themselves to work;
- ▶ We educate our workforce to develop the skills and competence needed to create and sustain an inclusive workplace.

All employees are expected to actively support the implementation of this Policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out in line with this Policy.

Maiya Shibasaki

Chief Sustainability Officer & Chief Diversity,
Opportunity and Inclusion Officer

Circular Economy Policy

At Hitachi Rail, the overriding principle in Circular Economy (CE) Governance is to minimise the impact on planetary resources (biodiversity, water, air, and land), in line with Hitachi's values of Harmony and Pioneering Spirit. The goal is to create more value from fewer materials by transforming the business model from linear to circular.

Hitachi Rail is committed to enhance circularity by complying with relevant international legislation, embracing the 5R Principles which are implemented as follows including principles on materials flow:

- ▶ **RETHINK** – Use of Eco-design and innovation for all new products through Life Cycle Analysis in order to enhance design for high durability, recyclability, and easy disassembly. Modular architectures, long-term software maintainability, backward compatibility, and secure upgradability for both Products & Manufacturing.
- ▶ **REDUCE** – Apply Frugal Design as a guiding principle. Adoption of techniques using secondary raw materials and reused components. Traceability of substances of concern throughout the full life cycle and elimination where feasible
- ▶ **REUSE** – Design to maximise reuse and repurposing potential. Reuse of Software objects and application of platform concepts, remote diagnostics, and predictive maintenance. Support for refurbishment and restoration at end of life.
- ▶ **REPAIR** – Extended maintenance services and design for high durability. Proactive component lifecycle monitoring, functional equivalence strategies Commercial-Off-The-Shelf (COTS) replacement, emulation, virtualisation, to avoid premature system scrapping.

- ▶ **RECYCLE** – Design for minimal waste at end of life, ensuring recyclability and easy disassembly. Waste management at manufacturing sites and project sites that prioritises recycling over disposal.
- ▶ **CIRCULAR INFLOW & OUTFLOW** – Governs the full material loop: sourcing recycled content and secondary raw materials as inputs and designing products for recyclability and recovery as outputs — closing the resource cycle across the entire asset lifecycle.

This Policy applies to hardware, electronics, software, digital architectures and integrated systems, including both manufactured and procured product components as well as company premises. This Policy is supplemented by the Product Ecodesign Policy and the implementation of CE principles shall not under any circumstances compromise rail safety, system availability or cyber security. All employees are actively expected to support and contribute to the effective implementation of this Policy

Luca D'Aquila
Chief Operating Officer

Mariella Guerricchio
Chief Innovation and Technology Officer

Maiya Shibasaki
Chief Sustainability Officer & Chief Diversity,
Opportunity and Inclusion Officer

Product Ecodesign Policy

Hitachi Rail is committed to contributing to society by providing more sustainable and more resilient railway products, systems and services (hereinafter also products) and demonstrating its responsibility by responding to stakeholders' demand.

To achieve this Hitachi Rail aims to reduce the ecological footprint of its products throughout their lifecycle, from design and manufacturing to usage and disposal where feasible and meaningful.

In this context, Hitachi Rail is committed to:

- ▶ Promote Ecodesign practices by designing products for durability, repairability, and recyclability. Encourage the reuse of components and materials to extend the life cycle of Products and reduce waste.
- ▶ Ensure Products compliance with environmental and sustainability regulations.
- ▶ Ensure effective and efficient Life Cycle Assessment providing transparency and accountability in environmental performance reporting to respond to public and private sectors demand on sustainability assessments in railway projects.
- ▶ Adopt a lifecycle perspective that considers environmental impacts at all stages, including design, production, transportation, operation, and end-of-life disposal or recycling.
- ▶ Provide a comprehensive view of effective Ecodesign including upstream and downstream processes, enabling informed decision making.
- ▶ Optimize the use of materials and resources throughout the lifecycle of railway systems and products. This includes minimizing the consumption of raw materials, using renewable resources, and promoting recyclability.

- ▶ Ensure energy-efficient operation of all Products. This includes reducing energy consumption during manufacturing, operation, and maintenance, as well as promoting the use of renewable energy sources where feasible.
- ▶ Minimize the environmental footprint of Products, including air and noise pollution, land use, water consumption, and waste generation.
- ▶ Prioritize the use of sustainable, low-impact, and non-toxic materials in the design and manufacturing of products. Where possible and meaningful, opt for biodegradable, recycled and/or recyclable materials.
- ▶ Invest in research and innovation to develop new technologies, processes, and materials that can further reduce the environmental impact of railway systems. Continuously monitor and improve environmental performance.
- ▶ Improve skills and competences needed to implement Ecodesign principles and methodologies across the organization.

All employees are expected to actively support the implementation of this Policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out in line with this Policy.

Luca D'Aquila
Chief Operating Officer

Mariella Guerricchio
Chief Innovation and Technology Officer