

Modern Slavery Statement¹

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by voestalpine VAE UK Ltd during the fiscal year ending 31st of March, 2019 to prevent modern slavery and human trafficking in its business and supply chains. Modern slavery encompasses forced or compulsory labour, as well as trafficking for the purpose of exploitation. It is a crime and a violation of fundamental human rights.

The Business and Supply Chains

We are a UK based company, manufacturing switches, crossings and associated parts for track installation. Our customers include all major operators of national rail infrastructure, tramway and light railway systems in the UK and the Republic of Ireland. We employ over 40 people in our manufacturing and assembling sites across the UK. We have over 300 suppliers of goods and services, from the European Union, the United States and the UK.

Our Values

voestalpine VAE UK actively lives up to its social responsibilities and operates to 3 core principles; protecting free competition, avoiding corruption and observing human rights. These values underpin everything we do and are captured in our Corporate Governance framework and Code of Conduct, which forms the basis for the way we conduct our business.

Our Internal Policies

We expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. To this end we have developed a Modern Slavery and Human Trafficking Policy, which we intend to communicate to all our suppliers in the year ahead.

Additionally, our Code of Conduct prohibits any form of human trafficking, child labour or forced labour. The Code of Conduct promotes human rights, good business practice and establishes confidential channels of communication for employees and suppliers to raise concerns. We expect all our employees and business partners to adhere to our Code of Conduct, and this forms the basis of our supplier approval process.

We will not tolerate the abuse of human rights within any part of our business or our supply chains. To this end we operate a whistle blowing policy, which is clearly communicated to all employees during their induction. This policy is communicated to all suppliers during the approval process. We have a central, web-based whistleblower system installed that can be used by both employees and external whistleblowers. This whistleblower system can be accessed at <https://www.bkms-system.net/voestalpine>

¹ BOARD RESOLUTION 132-2 FROM 11.OCT.2017 MODERN DAY SLAVERY ACT 2015

(Please see <http://voestalpine.net/compliance> for details). Any reports of human rights violations or any other wrong doings within the business will be taken extremely seriously and thoroughly investigated.

Due Diligence

Risk assessments and audits are an integral part of our overall supplier management system. They are the tools which we use to identify risks, compliance gaps and help us identify where action is needed. To that end, we have one internal Compliance Officer, one H&S Officer and one Purchasing Officer who are charged with conducting risk assessments and audits of suppliers. Over the next year, we will be training the internal audit team and other members from Sales, Purchasing, Engineering and Production on modern slavery, and how to identify risks and how to remediate issues.

Training and Capacity Building

We recognize that we need to go beyond our immediate supply chains to prevent human rights violations. We acknowledge that modern Slavery poses a risk to all areas of our business. An annual review of our processes and annual awareness training ensures that we are better placed to tackle the risk of modern slavery in the future.

Our employees and suppliers play a crucial role in helping us to ensure that modern slavery is not taking place in our business and in our supply chains. Over the next year we will deliver training activities to raise awareness of modern slavery and inform our employees about the issue. We will conduct the following activities:

1. Deliver a one day training course to senior members of staff to perform audits of the supply chain.
2. Review our internal processes and procedures to ensure that we are able to identify key risk areas for human rights violation and in particular signs of human trafficking and modern day slavery.
3. Provide communication and guidance to all relevant staff who are in contact with suppliers to enable them to recognize signs of human trafficking and modern day slavery.
4. Provide communication and guidance to all relevant staff to enable them to follow the processes for escalating serious concerns about the signs of human trafficking and modern day slavery.
5. Identify three KPIs in the coming year so that we can track, monitor and improve performance on these issues.

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11.03.2019