

voestalpine Turnout Technology UK Ltd.	INTEGRATED MANAGEMENT SYSTEM	Doc: DOC858
	Statement	Revision: 08
	Modern Slavery Statement	Created: 25/07/23

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by voestalpine Turnout Technology UK during the fiscal year ending 31st of March, 2023 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 80 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 Turnout Technology 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 Policy, which we intend to communicate to all our suppliers in the year ahead.

Respecting human rights is a fundamental principle guiding the actions of all voestalpine companies. The company's commitment to respecting and upholding human rights is enshrined in detail in the chapter of the voestalpine Code of Conduct entitled "Human Rights, Respect and Integrity." 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. (Please see <https://www.voestalpine.com/group/de/konzern/compliance/> for details.)

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 and during regular team briefings. This policy is communicated to all suppliers during the onboarding and approval process. We have a central, web-based whistle-blower system installed that can be used by both employees and external whistle-blowers. This whistle-blower system can be accessed at <https://www.bkms-system.net/voestalpine>

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Any reports of human rights violations or any other wrong doings within the business will be taken extremely seriously and thoroughly investigated. (Please see <https://www.voestalpine.com/group/en/group/corporate-responsibility/human-rights/> for details).

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 QHSE, Finance, Information Security & Purchasing Teams 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.

voestalpine AG have developed an online training program in collaboration with renowned experts to ensure that human rights are respected and upheld with the Group. It is designed to inform all our employees to their heightened responsibility for observing human rights and given them important information as well as instructions on how to act. This training provides a general introduction to and an explanation of the concept of "human rights", describes human rights in our day-to-day work – especially working conditions and non-discrimination and addresses human rights in the supply chain.

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 course to senior management to perform desktop audits of the supply chain in regards to human trafficking and modern day slavery
2. Provide a one day course for supply chain on issues connected with human trafficking and modern day slaver
3. Renew instructions to all staff on how to escalate serious concerns about the signs of human trafficking and modern day slavery

Matjaz Korosec

Ian Fillingham

Managing Director - CFO

Managing Director - CEO

NB: This document is digitally signed as per group guidelines

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