



Siemens Mobility Limited

2025 Modern Slavery Act Statement

Financial Year Ended 30 September 2025

INTRODUCTION

This statement describes the steps that Siemens Mobility Limited (“the Company”) has taken, and continues to take, to ensure that modern slavery is not taking place within our business or supply chain. It is made in accordance with s.54 of the Modern Slavery Act 2015, where the offence of modern slavery encompasses slavery, servitude, forced or compulsory labour, and human trafficking. We are committed to acting ethically and dedicated to performing all business dealings with integrity and transparency, together with putting effective systems and controls in place to prevent any form of modern slavery taking place within our business or our supply chain. Sustainable practices are firmly anchored in our corporate culture, based on our company's values of being responsible, innovative, and excellent.

OUR BUSINESS STRUCTURE & SUPPLY CHAINS

Siemens Mobility Limited is part of the Siemens group of companies worldwide, with Siemens AG as its ultimate parent. It has been a leader in intelligent transport solutions for more than 175 years. The Siemens Mobility portfolio includes rolling stock, rail automation and electrification, a comprehensive software portfolio, turnkey systems, and related services. Siemens globally has a substantial and complex supply chain and at fiscal year-end 2025 the Siemens Mobility group employed over 39,000 people worldwide. Siemens Mobility Limited employs over 4,000 employees and contractors, situated in various locations including sales offices, manufacturing plants and service depots and utilises approximately 2,100 suppliers across 32 countries. Further information is available at: www.siemens.com/mobility. Siemens Mobility Limited is a member of the Modern Slavery Solution Sharing Group (MSSSG), run by the Rail Safety and Standards Board (RSSB). The MSSSG's purpose is to share knowledge and best practice between industry partners, looking for ways to work collaboratively towards reducing the risk of modern slavery within the rail industry. Siemens Mobility Limited also has its own Modern Slavery Working Group with oversight of the topic and related activities within the business.

OUR POLICIES ON MODERN SLAVERY

Various internal policies ensure our business is conducted in an ethical and transparent manner. The Siemens Mobility Limited Modern Slavery Policy was introduced last year. The policy applies to all individuals working for, or on behalf of, Siemens Mobility Limited in any capacity and provides guidance on the policy's objective, scope, responsibilities, reporting, communication, and training. The policy has four key drivers, which are: (1) Identifying and evaluating potential risk areas in our company and supply chain, adopting necessary processes to monitor and remove the potential for modern slavery. (2) Raising awareness of modern slavery and its risks, to all individuals working on behalf of Siemens Mobility Limited and supply chain. (3) Requiring all our suppliers to work towards eradicating modern slavery in their supply chains. (4) Ensuring all recruitment processes and procedures identify and act on potential cases of modern slavery.

Our respect for human rights is fundamentally rooted in the Siemens Business Conduct Guidelines (BCGs), which establish the core principles and standards governing our approach to human rights across the company, our customer relationships, external partnerships, and broader stakeholder engagement. At Siemens Mobility Limited, we recognise that human rights protection constitutes a cornerstone of ethical business practice, and adherence to applicable human rights legislation and regulatory frameworks is non-negotiable.

The BCGs explicitly require all employees to uphold the United Nations Global Compact Principles 1-6, encompassing the safeguarding of internationally recognised human rights, the protection of workers' rights, and the prevention of complicity in human rights violations. As binding obligations for every Siemens Mobility Limited employee, the BCGs are integrated into all employment agreements. During the recruitment process, each employee must formally acknowledge receipt and comprehension of the BCGs through a signed attestation. To maintain awareness and compliance, all employees must participate in mandatory BCG refresher training every three years. We monitor this commitment through a Key Performance Indicator (KPI) targeting 100% completion; as of fiscal year-end 2025, we achieved a 99.2% completion rate, demonstrating our workforce's strong engagement with these standards.

Our BCGs commit us to act with integrity, to act in accordance with the law, and to respect every individual's dignity and personal rights. Six ethical principles help guide us with acting responsibly and are adopted within business operations by requiring employees to examine at an early stage the possible adverse effects on stakeholders' human rights from the decisions they make.

Siemens offers protected channels for reporting violations of external and internal rules to all employees, managers and external third parties. Our global Compliance policy provides guidance on securely reporting compliance violations to the Siemens Ombudsperson or to the compliance whistleblower hotline (Tell Us). As part of our formal compliance case handling process, potential human rights violations are subject to investigation, and our training modules encompass key aspects of human rights compliance.

The Company maintains a rigorous recruitment policy, including verifying all employees' eligibility to work in the UK, to prevent human trafficking and protect individuals from being forced into work against their will. Siemens is committed to maintaining robust processes and policies that prevent, mitigate, and address potential human rights violations related to our core working and employment standards for all employees. These standards are also supported by our internal governance document on human rights related to working and employment conditions, which prohibits child labour, forced labour, and all forms of slavery, fair employment, including remuneration and working hours, freedom of association and collective bargaining and non-discrimination or intimidation.

DUE DILIGENCE PROCESSES

We continue to incorporate human rights considerations into our day-to-day business operations. For relevant projects, a specific set of due diligence questions are applied concerning human rights and are a mandatory topic in risk assessment deep dives. Our updated Siemens Code of Conduct for Suppliers and Third-Party Intermediaries (the "Code") is based on the United Nations Global Compact Principles referred to above. The Code specifically prohibits the use of forced labour and child labour by our suppliers. All the Company's suppliers are required to commit to the Code, and we explicitly encourage our suppliers and third-party intermediaries to extend these values further into their own supply chain. The Code requires our suppliers to respect the employment rights of their workers. Suppliers located in higher risk countries; receive additional due diligence checks are conducted prior to selection: suppliers complete a Corporate Responsibility Self-Assessment (CRSA) to determine whether they meet the requirements of our Code. Our due diligence process drives a step-by-step approach to identify potential risk in the supply chain at an early stage and ensures that measures are taken to minimise the risk.

RISK ASSESSMENT

Our suppliers are risk assessed at selection stage. Annual risk assessments are performed for suppliers located in higher risk countries or who provide commodities where modern slavery is perceived to be more prevalent.

Siemens Mobility Limited has 85% of its suppliers based in the UK, and, of the remainder, the majority are either based in the European Union or in low-risk countries. Suppliers based in countries where potential sustainability risks or suspicions identified of non-compliance with the Code, must undergo an External Sustainability Audit (ESA) performed by independent auditors. (In fiscal year ending September 2025, a total of 34 audits were performed). If the CRSA or ESA reveal infringements of our requirements, the consequences are either exiting the supplier relationship, (in the case of serious infringements, such as evidence of modern slavery), or notice to remedy the non-compliance, where it must be remedied by the suppliers within a reasonable period.

An annual desktop assessment is carried out to identify suppliers that must report on their modern slavery prevention measures. They are invited via our supplier portal to inform us about the extent of their modern slavery activities. For example, asking if a Modern Slavery Statement is produced, whether high risks of modern slavery were identified in their supply chain, what training had been provided to their employees and how they engage with their own supply chain.

Additionally, an AI-powered platform delivers intelligence on our supply chain risk, including modern slavery. Alerts are generated and notifications sent out, should any risk be identified with our suppliers. Finally, we have reduced the period within which we pay our suppliers significantly in 2025, thus reducing the pressure on supply chain via late payments.

MEASURING EFFECTIVENESS

During fiscal year 2024, Siemens Mobility Limited formed a cross functional Modern Slavery Working Group (MSWG) responsible for the implementation of modern slavery-related activities within the Company. The MSWG identified and works across four focus areas for development, with assigned leads for the following four workstreams: Policy and Procedures, Training and Communication, Supply Chain Risk and Audit, and KPI Development.

Progress has been made across all areas this year, from the publication of a new response procedure to the launch of business-specific modern slavery training for all staff.

Following completion of a Modern Slavery Assessment Questionnaire conducted for a key customer, Siemens Mobility Limited followed the recommendation to establish Key Performance Indicators (KPIs) across areas of the business to quantify and track progress in our modern slavery prevention initiatives. In response to this recommendation, the Modern Slavery Working Group developed a KPI framework comprising of four indicators aligned with our critical focus areas: Policies, Due Diligence, Risk Assessments, and Employee Training and Awareness.

During the initial implementation phase, two KPIs were deployed to evaluate the operational effectiveness of our whistleblower protection policy and the completion of our internal modern slavery training program. The remaining two KPIs were introduced this year, enabling Siemens Mobility Limited to establish a measurement and monitoring system across our designated focus areas.

The following KPIs were used to measure the key focus areas:

- **Employee Policy Awareness %** is one of two measures applied to evaluate the effectiveness of our policies. At fiscal year-end 2025, 21.7% of Mobility employees had confirmed their awareness of our Modern Slavery policy.
- **Incident Reporting %** measures the effectiveness of our whistleblower policy. Our compliance whistleblower policy supports a “speak up” culture by guiding individuals on how to report an incident of modern slavery using the Tell Us reporting channel and internal safeguarding process. At fiscal year-end 2025, Siemens Mobility Limited received a total of 15 Tell Us reports, none of which were related to modern slavery.

- **The % of Assessed Suppliers Audited and Supplier Maturity Profile %** These measures enhance *the visibility of modern slavery risks within our supply chain*, through the evaluation of supplier responses to our modern slavery questionnaire. This risk-based approach evaluated 100% of the assessed suppliers audited to the supplier population. The results from our Modern Slavery Questionnaire identified that 85% of suppliers surveyed had produced a modern slavery statement. Within our supply chain, 90% had identified a modern slavery risk in their lower tiers, whilst 65% had offered training to their employees on modern slavery. A further 70% ensured their suppliers had signed a code of conduct and approximately 66% confirmed the terms of their code of conduct were complied with.
- **Employee Training Completions %.** The new training was released late in the current reporting period. A total of 21.7 % of Mobility employees had completed their modern slavery training, against a 100% target for fiscal year. Whilst 887 employees (approx. 22%) completed the previous training course in the same fiscal year.

TRAINING

In addition to the Safeguarding and Prevent web-based training that was made available and completed by 79% of employees last year, Sustainability in the Supply Chain training courses were also made available, together with advanced level courses for employees with purchasing responsibilities. The modern slavery topic is also included within the site-based induction for all our Rail Infrastructure projects.

This year the MSWG led the development of a bespoke in-house modern slavery training course for all Siemens Mobility Limited employees. The web-based training course draws from credible external resources and has been identified by Senior Management as one of three mandatory trainings for completion by all staff in fiscal 2026.

FURTHER INFORMATION

Our ultimate parent company, Siemens AG, annually publishes a Sustainability Report which transparently documents our progress with Human Rights activities. The report describes our management and responsibilities regarding Human Rights issues, our continuous improvement measures, our human rights due diligence approach along the entire value chain, our commitment to human rights and international standards, our grievance mechanisms as well as our global business alliance platforms. Throughout the year, we have been communicating with key stakeholders like investors, shareholders, employees, customers, suppliers, and non-governmental organizations to ensure an effective dialogue on human rights related topics.

Ensuring commitment to Human Rights at Siemens:

<https://www.siemens.com/global/en/home/company/sustainability/humanrights.html>

Sustainability in the Supply Chain:

<https://www.siemens.com/global/en/home/company/sustainability/sustainablesupplychain.html>

OUR COMMITMENT

Siemens Mobility Limited will not tolerate any violations of applicable law, and if it does happen, we will take strong action. We will continue to apply a zero-tolerance approach towards modern slavery in any form, in our business and supply chain.

APPROVAL FOR THIS STATEMENT

This statement was approved on 15/12/2025 by the Board of Directors with respect to the financial year ending on 30th September 2025 and was signed by a director.

Marko Feulner CFO (Chair of the Board of Directors)

Date

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