



Policy

Labour Rights, Human Rights & Occupational Health and Safety

This Policy is effective from 1st May 2026 and is subject to periodic review. The next review is due in May 2028.

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Alpha Trains (Luxembourg) Holdings S.à r.l. and its subsidiaries (Alpha Trains) are committed to fostering a working environment and conditions that prioritise and uphold the principles of labour rights, human rights and high standards of health and safety in the workplace for both employees and third parties such as suppliers, contractors, customers, investors, and the communities with which the company works. This integrated policy further outlines our strong commitment to creating a workplace that prioritises the well-being and dignity of our employees.

Embedded in our corporate values, these principles are integral to the company ethos and Alpha Trains is committed to achieving and upholding these standards by seamlessly integrating them in our business culture and day to day work with all stakeholders.

Through the implementation of this comprehensive labour rights, human rights, and occupational health and safety policy, our objective is not only to meet legal requirements but to exceed them.

Therefore, our commitment extends to alignment with globally recognised frameworks, including but not limited to the OECD Guidelines for Responsible Business Conduct, the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Guidelines and Principles, the UN Global Compact, the Global Real Estate Sustainability Benchmark (GRESB), the Global Reporting Initiative (GRI), the EcoVadis assessment and the ISO 45001 standard.

Specifically, Alpha Trains undertakes to:

Labour Rights

- Provide equal opportunities for employment, advancement, and training, irrespective of race, gender, age, religion, disability, sexual orientation, or any other protected status.
- Adhere to local and international labour laws and standards regarding working hours, breaks, wages, and other employment conditions.
- Value open communication, fostering a culture where employees feel empowered to voice concerns, suggestions, and feedback.
- Establish regular communication channels, including employee surveys, town hall meetings, and open-door policies, to promote transparency, collaboration and social dialogue.

Human Rights

- Uphold the principles of non-discrimination, equality, and human dignity in all aspects of operations.
- Prohibit forced labour, child labour, and any form of involuntary or exploitative work.
- Respect employees' rights to freedom of association and other lawful assembly.

Occupational Health and Safety

- Prioritize the safety and well-being of employees by complying with all current relevant laws and regulations.
- Measure and monitor health and safety performance and develop annual and long-term health and safety objectives to achieve continuous, sustainable improvement.
- Continually improve safety standards and foster a health and safety-centric culture.
- Manage health and safety effectively by developing, implementing, and maintaining a best practice, process oriented, integrated management system.
- Conduct regular audits and risk assessments, implement preventive measures, and provide necessary training to mitigate workplace hazards.

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- Take all reasonable precautions to ensure that the equipment provided for employees' use is safe and fit for its purpose when properly used.
- Ensure that appropriate systems, services, and advocacies are in place to ensure that rolling stock and other railway equipment for which Alpha Trains' subsidiaries have responsibility is safe to operate when it is delivered to rail operating companies and that, as far as is reasonably practical, it is maintained in a safe and operable condition and in accordance with the obligations contained within the relevant lease agreement.
- Enhance the health and safety of our employees and that of others through constant instructions, training, qualification, as well as near miss and incident reporting and ongoing information on health and safety topics.
- Obligate our management to act responsibly and in an exemplary manner in keeping with the principles of health and safety protection and support them in doing so to obtain optimal safety results.
- Encourage employees to actively participate and engage in maintaining and enhancing a safe workplace and reporting any safety concerns.
- Ensure, through due diligence on new suppliers and the Know Your Customer (KYC) process, that Alpha Trains works with customers, suppliers, contractors, and premises management who ensure that their business is conducted with proper regard to health and safety and to require them also to apply appropriate principles to their stakeholders as well.
- Ensure that priority is given to providing adequate funding and obtaining necessary external advice for any safety matter required by law and/or any other project aimed at improving or maintaining high standards of health and safety. Such requirements and projects will be assessed using suitable risk assessment techniques.
- Become a leader in health and safety performance and making health and safety a core value of what we do.

Monitoring, Reporting and Continuous Improvement

Alpha Trains monitors labour rights, human rights and occupational health and safety performance on an ongoing basis through proportionate risk assessments, internal controls, audits, incident and near-miss reporting and periodic management review, taking account of applicable legal requirements and recognised international standards.

Employees and relevant third parties are encouraged to report any actual or suspected material breach of this policy, or any material labour rights, human rights or occupational health and safety incident, concern or near miss, through the appropriate channel, including Alpha Trains' whistleblower process where appropriate.

Routine individual employment matters and standard labour disputes should generally be handled through normal management, HR or employee relations processes, rather than under this section.

Reported matters should be assessed and prioritised based on their nature, severity, impact, legal or regulatory implications, and whether prompt containment or escalation is needed. Material incidents and serious breaches may be escalated to the appropriate management level and, where relevant, to the Chief Executive Officer, the Board or other designated functions.

Alpha Trains will consider reported matters proportionately and, where appropriate, review, investigate or otherwise address them and take corrective or preventive action. Where a material breach of this policy is identified, appropriate measures may be taken in line with applicable law,

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internal procedures and contractual arrangements. Depending on the circumstances, these may include remediation, training, disciplinary action, contractual review or, where justified, termination of a business relationship.

Key themes, material incidents and improvement actions may be reviewed periodically by management and, where relevant, reflected in Board, governance or sustainability reporting. Based on these reviews, Alpha Trains seeks to improve its practices, controls and policies over time, taking account of identified risks, regulatory developments and evolving good practice.

Alpha Trains will not tolerate retaliation against anyone who raises a concern or makes a report in good faith, including through the whistleblower process.

Direction and oversight of this policy is the responsibility of the Alpha Trains (Luxembourg) Holdings S.à r.l. Board, with day-to-day management responsibility to the Chief Executive Officer of the Alpha Trains group, who is supported by specialised resources such as the Sustainability Manager, Head of HR and H&S Officer, reporting back to the Board regularly.

This policy embodies our pledge to uphold the highest standards of responsibility in labour, human rights, and occupational health and safety, aligned with our mission of creating long-term sustainable value for all stakeholders.

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