



MODERN SLAVERY STATEMENT OF TSO

FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2019

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This is the modern slavery and human trafficking statement of TSO SAS (“TSO”) for the financial year ending 31 December 2019. The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. TSO is committed to combatting all such forms of modern slavery.

About TSO

TSO is a construction business headquartered in France that renews and maintains rail and metro tracks and systems and overhead catenary systems around the world. TSO is a part of the global construction group NGE (the “Group”). Further information on TSO and its projects can be found on its website - www.tso.fr - and further information on the Group can be found on www.nge.fr

TSO’s business relies on a wide range of supplies and services in order to, for example, lay concrete sleepers, weld track and electrify rail networks. Its engineers also require the technical equipment and resources to design and deliver its projects. TSO draws on the supply networks of the wider NGE group.

TSO recognises that there is a risk of modern slavery being connected to its business and supply chain and has taken steps relevant to the risk area and to promote compliance in other related areas.

Steps relevant to addressing modern slavery risk

TSO operated under NGE’s compliance framework. Over the financial year, the following policies, procedures and steps helped address slavery risk and encourage ethical behavior and practice more generally.

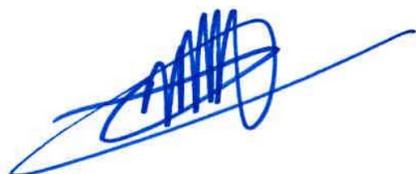
- TSO operates under a Code of Ethics, which is applicable to the whole Group, which can be accessed on www.nge.fr. The Code of Ethics is aimed at putting people first and applies not only to all employees but also business partners and suppliers. It affirms the Group’s commitment to combatting illegal employment and forced labour and also to upholding key anti-modern slavery principles (including the UN Global Compact (“UNGC”) principles, the international Labour Organisation’s Conventions, the Universal Declarations of Human Rights and the OECD Guidelines for Multinational Enterprises).
- TSO has procedures to ensure that it does not employ illegal workers in its business, thereby reducing its exposure in this key risk area.
- The Group became a UNGC member in February 2016 and thereby committed to the UNGC’s ten principles including in respect of human rights and forced labour. TSO

- formally adhered to UNGC's principles in January 2017. The Group's membership continues and it reported on progress against those principles in the financial year.
- The Group has in place a whistleblowing procedure by which any conduct in breach of the Code of Ethics can be reported, including to the Group's Compliance Officer.
- UNGC principles are included in the Group's conditions of purchase with suppliers.
- TSO's standard terms and conditions for supply of goods and services contain relevant contractual provisions by which suppliers are required to comply with its Code of Ethics. TSO shall be entitled to terminate contracts if the supplier is failing to deal with the risk of forced labour.
- TSO has policies and procedures in place to uphold standards in other compliance areas including for example health and safety and quality management which assist in ensuring safe and compliant places of work.
- The Group Ethics Committee is responsible for implementing and monitoring the ethics programme through training, awareness-raising and education initiatives. The Compliance Officer of the Group is supported by personnel in Group operating teams. Compliance with the Code of Ethics and the implementation of the ethics programme are subject to regular internal and external evaluations.

The procedures of TSO and the Group are assessed against published guidance. TSO is evaluating enhancements to its procedures in respect of modern slavery risk through further steps including risk assessments, enhanced due diligence on suppliers and reviewing contractual provisions in respect of modern slavery risk.

This statement is made on 11 June 2020

Jean BERNADET,
Chairman,

A handwritten signature in blue ink, appearing to be 'Jean Bernadet', written over a horizontal line.