

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the VTG Group (VTG) slavery and human trafficking statement for the financial year ending 31st December 2021 and has been approved by the Executive Board of VTG Aktiengesellschaft, the group parent company.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

VTG Aktiengesellschaft operates through three divisions offering services in the railcar leasing, rail logistics and tank container logistics markets

- Headquartered in Hamburg, Germany.
- Subsidiaries and associated companies are primarily located in Europe, Russia, and Asia.
- As of December 31, 2021, the VTG Group had 68 fully consolidated companies in addition to VTG Aktiengesellschaft itself
- Effective December 31, 2021, the VTG Group employed around 2,150 people worldwide

Whilst the majority of our business is in mainland Europe, VTG Rail UK Limited is the largest railcar leasing business in the UK. In addition, our railcar and logistics divisions carry out a modest amount of their business in the UK.

Our supply chain includes suppliers across a range of sectors including railcar manufacturers and maintainers, railcar component and parts manufacturers and suppliers, railfreight suppliers, road transport suppliers and other logistics related service providers. The vast majority of these suppliers are located in the EU, where high social, safety and labour standards apply.

OUR POLICIES

VTG is committed to acting ethically and with integrity in all our business dealings and relationships. The Executive Board of VTG Aktiengesellschaft has therefore issued a Code of Conduct that applies to all officers, executives, and employees of the companies of the VTG Group. Further information about VTG's Code of Conduct can be found under the 'Responsibility' section of the Group's website.

Within the framework of our supplier management, we assess regularly our suppliers with regards to product quality, (work) safety and basic labour standards. Additionally, VTG Rail UK, the main operating company of VTG Group in the UK, has issued a Modern Slavery Policy which stipulates a zero-tolerance approach to slavery and human trafficking.

OUR DUE DILIGENCE PROCESSES

VTG is committed to ensuring that our suppliers meet the high standards of ethics, quality and performance that underpin our business, and we assess this through the robust procurement policies and processes that we have in place. VTG Rail UK has included specific Modern Slavery provisions within the standard terms and conditions of its direct supplier contracts and compliance is monitored through our supplier headquarter audits.

To properly and transparently address the risks of slavery and human trafficking we intend to prepare a Modern Slavery Policy at Group Level, setting out the background to the legislation, our policies and procedures in this regard as well as providing guidance to our employees on how to report any suspicions they may come across. To this end the VTG Integrity Line has been set up allowing employees to report suspected violations of applicable laws and VTG's internal guidelines (anonymously, if desired).

OUR EFFECTIVENESS

We will periodically review our processes in order to determine the extent to which they are effective in identifying and managing the risks of slavery and human trafficking.



Oksana Janssen
Chief Operating Officer Eurasia & Far East



Mark Stevenson
Chief Financial Officer (CFO)



Sven Wellbrock
Chief Operating Officer Europe & Chief Safety Officer