

# 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 2023 and has been approved by the Executive Board of VTG GmbH, the group parent company.

## OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

In 2023, VTG GmbH operated 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
- Effective December 31, 2023, the VTG Group employed around 2,020 people worldwide
- As of December 31, 2023, the VTG Group had 57 fully consolidated companies alongside VTG GmbH itself.

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, rail freight suppliers, road transport suppliers and other logistics related service providers. The vast majority of these suppliers are located in the UK and 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 GmbH 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/Governance' 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 have in place the VTG Group Code of Conduct and the VTG Integrity Line which has been set up allowing employees to report suspected violations of applicable laws and VTG's internal guidelines (anonymously, if desired) and policies covering Anti-Corruption. Furthermore, VTG adopted a Declaration of Principles on the respect of human rights and related environmental standards in December 2023, which is published on the VTG website. In 2023, VTG also developed a Supplier Code of Conduct, which is to be used as standard for supplier and service provider contracts from 2024. In addition, VTG has expanded the existing integrity line for reporting risks relating to human rights and environmental concerns within the meaning of the German Supply Chain Due Diligence Act that affect the supply chain. In January 2024, VTG has appointed two Human Rights Officers.

## 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.

**Alberto Nobis**  
Chief Executive Officer (CEO)

**Kerstin Kamphaus**  
Chief People & Culture Officer (CPCO)