
POLICY INFLUENCE

July 2022

As a global leader evolving in a complex environment, Alstom has always placed integrity, reliability and responsibility at the heart of its actions and values. This commitment is underpinned and driven by a strong culture of ethics and compliance and the initiatives that stem from it.

Our strategic plan entitled "Alstom in Motion" has a clear ambition: be the leading global innovative player for a sustainable and smart mobility. With a focus on sustained growth, green and digital innovation, operational efficiency, and an agile, inclusive and responsible corporate culture - we have set clear targets. Our policy influence is clearly based on that purpose.

Relation with governments, international organisations and think tanks

Alstom is driven by innovation and develops railway systems which are more efficient to operators (smart maintenance, cybersecurity, optimised ownership cost); more attractive to passengers (on-board experience, connectivity, real-time info); and more integrated with other transport modes.

Alstom supports Trade associations and activities that align with its business strategy and values. Alstom's main policy priorities are access to sustainable transport and industrial development of our solutions.

Access to transport is an essential factor of social progress and economic development. Alstom's mission is to support the transition to inclusive, environmentally friendly, safe and efficient transport. Our sustainability approach is driven by strong convictions:

- Curbing global emissions from transport, aligned with the reductions required to keep global warming to 1.5°C scenario, the most ambitious goal of the Paris agreement,
- Efficient and zero emission mobility solutions shall be the backbone of sustainable transport systems,
- The benefits of rail in terms of energy efficiency, local air pollution, safety and urban space optimization, make it a credible alternative to road,
- Decarbonisation of all transport modes via the use of zero-emission technologies (hydrogen for rail, electricity for road).

Alstom does not make any political contributions. According to our Code of Ethics, "Alstom maintains an awareness of political issues and changes that may impact our business, however, we do not make any political contributions. Political contributions are any payments made to a political party, organization, a politician or a candidate running for office. A payment can be anything of value including goods, services, gifts, loans, funding of a political meeting or event, an advertising campaign, or anything of value provided to a politician, political party or political organization such as use of company office space, computer equipment or stationary. We do not make contributions to political parties, politicians or political organizations" (2020). This is again reaffirmed in our Ethics and Compliance Policy (March 2021).

It should be noted that Alstom respects its employees' rights to participate as individuals in their communities and civic affairs. However, all such activities must be done at a personal level, in their name, on their own time, at their own expense, and it must be clear that these activities are not done on Alstom's behalf. Any local political activities must be done in compliance with applicable laws and regulations.

For more information, please visit

- [Alstom's Code of Ethics](#)
- [Alstom's Ethics and Compliance policy](#)

Monetary contributions to advocacy and trade associations

	2017	2018	2019	2020	2021
Advocacy	39 500 €	141 500 €	223 172 €	154 710 €	250 119 €
Trade associations	1 051 102 €	990 088 €	1 058 490 €	1 185 161 €	1 953 077 €
Total financial contributions	1 090 602 €	1 131 588 €	1 281 662 €	1 339 871 €	2 203 196 €

Please note that for the year 2021, the data coverage has been increased by integrating more comprehensively the US, Canada, Germany, Austria and Switzerland. In addition, Alstom's membership fees of several trade associations have increased as a result of the acquisition of Bombardier Transportation.

European Union

As a historical and a global leading player in the field of mobility, Alstom is involved in professional associations gathering private companies from all sectors and aiming at:

- Promoting the role of the industry for economic and social development,,
- Sharing best practices,
- Raising awareness on sustainable development.

Alstom contributes to the public debate around sustainable mobility and rail transport, engaging with governments, EU institutions and think tanks, in the development of policies.

The messages through which Alstom contributes to the policy debate focus on the role of open markets and of fair competition to support sustainable growth, the need for continued investment in sustainable technologies & the importance of long-term, transparent and stable policy frameworks.

Transparency register of the European Union

Alstom joined the European Union's Transparency Register in 2009. It allows for public scrutiny, giving citizens and other interest groups the possibility to track the activities of registrants, who are bound by a common Code of Conduct.

For more information, please visit the [Transparency Register](#).

United States and Canada

Alstom advocates for public policies that improve passenger and freight rail systems in the United States and Canada. As a global technology leader in public transport, public officials frequently ask Alstom for its views on passenger and freight rail policies. The company also has regular engagement with public officials representing Alstom's U.S. and Canadian sites on constituent issues of shared concern.

In the US, Alstom is engaging with green technology stakeholders, including passenger and freight railroad customers, elected officials, the US Department of Energy and industry trade associations, to leverage public funding, such as the \$1.2 billion Infrastructure Investment and Jobs Act (IIJA), to advance battery and hydrogen demonstration projects that meet our customers' objectives of reducing carbon emissions. Alstom is also engaging with regional stakeholders to advance development of zero emissions hydrogen traction systems.

Alstom is also actively engaged with elected officials in Canada at the federal, provincial, and municipal level in promoting sustainable solutions to transit. Most government entities in Canada support strong environmental ambitions for which Alstom positions itself as a trusted partner to reach these goals specifically to the transport sector, one of Canada's most carbon intensive industries. In Canada, Alstom is partnering and has relationships with several local and national organisations.

Alstom does not make contributions to political parties, politicians or political organizations in the United States and in Canada. Though U.S. law allows companies to make such contributions, Alstom maintains strict compliance with its global policy and does not.

Alstom maintains strict compliance with the following principles in all advocacy:

1. All applicable lobbying laws and regulations must be fully complied with;
2. All lobbying must advance sound public policies and consider impacts on all interested stakeholders;
3. Alstom's employees who are lobbying on behalf of Alstom must ensure at all times that they comply with all requirements imposed by applicable laws and regulations and Alstom's internal policies;
4. Gifts, entertainment or hospitality to public officials must be made in strict compliance with applicable anti-corruption laws and regulations, Alstom policies, and other regulations and codes (e.g. internal policies of the policy maker); and
5. Outside lobbyists are strictly limited, subject to stringent approval and thorough due diligence by the Ethics and Compliance Department and bound by contract to a defined scope of work; anti-bribery provisions and commitment to comply with all local regulations.

Alstom makes public filings quarterly to the U.S. Congress, New York State Joint Commission on Public Ethics and LA Metro Ethics Department reporting any lobbying activity. Alstom also reports its lobbying activities regularly, in accordance with the laws applicable in the various Canadian jurisdictions.

Alstom retains membership in more than 30 external groups in the United States and in Canada representing stakeholders in the rail sector and general business community. These organisations include trade associations (representing both rail suppliers and rail operators) and broad rail stakeholder coalitions. These groups build public policy consensus on key rail issues and advocate in support policies that advance rail service in the United States.

Group main contributions

The following table shows the group's main contributions to industry specific organisations.

Trade Associations and others	2021
Fédérations des industries ferroviaires (FIF) - FIF brings together close to 300 member companies representing the whole spectrum of railway equipment industries	700 000€
UNIFE - UNIFE represents more than 100 leading European train builders and rail equipment suppliers	509 850€
VDB (German Railway Industry Association) - VDB represents the German rail industry with more than 200 member companies active in the entire value chain.	270 000€
Associations Françaises des Entreprises privées (AFEP) - AFEP – the French Association of Private Enterprises – represents 112 of the largest private corporations operating in France	70 000€
Union International des Transports Publics (UITP) - UITP is the International Association of Public Transport, a worldwide network to bring together all public transport stakeholders and all sustainable transport modes.	74 635€
Hydrogen Council - The Hydrogen Council is a global initiative of leading energy, transport and industry companies with a united vision and long-term ambition for hydrogen to foster the energy transition.	50 000€
International Transport Forum (ITF) - The International Transport Forum at the OECD is an intergovernmental organisation with 64 member countries. It acts as a think tank for transport policy and organises global dialogue for better transport.	50 000€

N.B.: main contributions amongst international, French, German, Austrian, Swiss, US and Canadian advocacy and trade associations