

Corporate Social Responsibility Policy

This Policy shall be implemented, maintained and communicated to all employees and shall be made available to third parties upon application to Nomad Digital.

Approved by: **Nick Camara**
Role: Global HR Director
Date of Approval: October 2023

Approved by: **Emmanuel Henry**
Role: Managing Director
Date of Approval: October 2023



Contents

1	Introduction	3
2	Environment	4
3	Ethical Practice	5
4	Wellbeing	6
5	Health & Safety at Work	7
6	Corporate Philanthropy & Community Volunteering	8
7	Diversity and Inclusion	9
8	Reporting & Results	10

1 Introduction

With demand for global mobility on the rise, we are convinced that access to transport is an essential factor of social progress and economic development. To this end, **Nomad Digital** are committed to building innovative & sustainable mobility solutions that consider principles that demonstrate we act responsibly. As a wholly-owned subsidiary of **Alstom**, our approach to sustainability incorporates Alstom's corporate values and environmental objectives.

Our Corporate Social Responsibility (CSR) company policy details our commitments toward our environment, our people, and our endeavours to become an employer of choice regarding Diversity, Inclusion and rigorous Ethical practices. This document provides an overview of Nomad's Corporate Social Responsibility (CSR) positioning towards our 6 Key Principles:

Wellbeing, Environment, Ethical Practice, Health and Safety at Work, Corporate Philanthropy and Community Volunteering and Diversity & Inclusion.



Nomad understands that all stakeholders, whether they are employees, customers, public authorities or shareholders, all have vested interests in CSR and how this is embedded into organisational culture.

- **Employees** want to work for a company committed to protecting the planet and creating a safe working environment.
- **Customers** want to collaborate with responsible partners who actively integrate CSR and Sustainability into their processes, products and services. As such, they increasingly include specific criteria in tenders
- **Public authorities** are looking for service providers whose active commitment to CSR and sustainability means they respect local, national and international regulations.
- **Shareholders** want to be reassured that they have also made a profitable and sustainable long-term choice

2 Environment

It is the company's policy to promote the establishment and continual improvement of environmentally sound practices through the participation and education of all company employees in all regions.

Nomad uses impacts and analysis to assess their significant risks and, create objectives within a framework to achieve them from these identified risks.

The company is committed to a clean and sustainable environment and will work to create and develop procedures and practices to manage its environmental operations accordingly within its Business Systems:

Nomad Digital understands the importance of reducing the environmental impact of our operations and strives to make sustainable choices at every step, from transportation & global footprint to recycling waste and to our supply chain & manufacture.

Nomad's commitment to environmental management is underpinned by our continued certification to ISO 14001, which is the international standard that specifies requirements for an effective environmental management system.

We seek to continually improve alignment across our offices worldwide, in relation to our environmental compliance.

Our CSR Team regularly promotes environmental best practice and ideas to every corner of Nomad's Global operations, employees, and other relevant stakeholders.

To this end, we have a specific policy that details our Environmental Policy.

NOMAD'S KEY OBJECTIVES ARE TO:

- reduce our impact on the environment by recycling and reducing waste by:
 - Considering environmental concerns into all of our decision-making activities
 - Promoting recycling activities across the business where applicable and achievable
 - Conserving resources through efficient use and careful planning of recycling and waste reduction
 - Nomad has promoted our 'small change, big difference' outlook, which encourages employees to recycle and use alternative eco-friendly products. We have also held seminars promoting schemes in the UK, such as EcoBricks, Terracycle and Food2Go, encouraging a more sustainable lifestyle. Nomad's global head office Newcastle upon Tyne now donates all plastic bottles to Sainsbury's (UK supermarket) recycling facilities.
- **work with suppliers to reduce an impact on the environment by:**
 - ensuring they recognise and reduce the environmental impact of their products and transportation.
 - including environmental related topics /focus areas in all supplier audits and assessments
 - Ensure that our suppliers are committed to all aspects of responsible and sustainable resourcing and routinely review and audit key suppliers in terms of their performance and operations.
 - **Monitor and seek ways to reduce our carbon footprint by:**
 - Tracking and identifying our environmental impacts and assessing these on a continuous basis.
 - Capturing all employee travel and reviewing mileage travelled with relevant CO2 footprint reducing our travel where possible
 - Encouraging all employees to work smarter in terms of reducing travel wherever possible and commit to video conferencing facilities across our key operations

Other relevant Nomad Policies:

- BMS-PROC-POL-001 Conflict Minerals Sourcing Policy
- BMS-PROC-FOR-015 Ethics and Sustainable Development Charter for Nomad Digital's Suppliers and Contractors
- BMS-QHSE-POL-020 Energy Consumption Policy
- BMS-HUMR-POL-005 Ethical Code of Conduct

3 Ethical Practice

Nomad is committed to the practice of responsible corporate behaviour and through its business practices.

Ethical behaviour is more than a statement on a piece of paper. Still, by putting our commitment in writing, we clearly set out the business practices that Nomad Digital ('Nomad' or the 'Company') will operate and set clear standards of correct behaviour for everyone in our organisation.

If Nomad is to continue its record of success and growth, we all need to work to the same code of behaviour, which will guide our thinking, decision making and ultimately the way we service our customers. Anything less would impact our reputation, damaging our ability to do business and serve our customers.

To this end, we have a specific policy that details our

NOMAD'S KEY OBJECTIVES ARE TO:

- **ensure that all of its stakeholders are entitled to their human rights by:**
 - ensuring that both our internal and external stakeholders are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
 - publicly stating our opposition to the use of slavery or trafficking in all forms and publishing a specific policy on AntiSlavery & Human Trafficking.
 - not entering into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach their human rights of those affected by the organisation's activities.
 - auditing our activities and suppliers to ensure that this is actively being monitored.
- **ensuring our employees have full access to their workers' rights by:**
 - complying with all relevant employment legislation and regulations - Cultural and legislative differences mean that this will be managed in different ways in different countries, but policies should be clear and well communicated to employees.
 - regularly reviewing policies and procedures on an annual basis or sooner if legislation demand.
- **proactively manage the risks around both Conflicts of Interest & Bribery and Corruption by:**
 - providing clear rules aimed at minimising the possibility of conflicts of interest and avoiding risks associated with bribery and corruption.
 - conducting regular training about Ethics and Compliance
 - continuing to internally publicise our Anti-Corruption and Bribery and Whistleblowing Policies to our employees

- educating our workforce on the various methods of reporting any violations, including using the Alstom Integrity Hotline

Other relevant Nomad policies and resources:

- BMS-HUMR-POL-013 Anti-Corruption & Bribery Policy
- BMS-HUMR-POL-008 Whistleblowing Policy
- BMS-HUMR-POL-036-1 Anti-Slavery & Human Trafficking Policy
- The Alstom Alert Procedure
- Ethical Code of Conduct

4 Wellbeing

Nomad Digital recognises the protection of health and the promotion of wellbeing as important factors in sustaining both attendance and performance at work – this further supports job satisfaction and career success resulting in lower attrition.

Nomad is committed to providing a working environment for its people, which minimises risk to health and promotes positive wellbeing.

We want to support the physical and mental wellbeing of all our staff and will provide appropriate support for staff who are suffering from illness, stress or mental ill health, on a confidential basis where appropriate, regardless of its source.

Nomad has a specific policy on wellbeing that underscores our response and commitment to wellbeing.

NOMAD'S KEY OBJECTIVES ARE TO:

promote the health and wellbeing of staff by:

- educating our employees through our support services, information networks, and by means of regular health promotion campaigns.
- **educate and support our Managers to encourage Work Life Balance by:**
 - monitoring direct reports' working time and encouraging them to take the rest breaks and leave that they are entitled to in the course of their employment.
 - monitoring workload to ensure allocated tasks are capable of being completed within the time and resources allocated and are within the competency of the relevant employee.
 - consulting appropriately with the members of their team over aspects of their employment, role and anything else which may significantly impact upon their health, especially any planned changes.
- **provide an environment in which employees who have health problems that may affect their performance receive suitable support by:**
 - encouraging employees to declare any relevant health or wellbeing matters to enable Nomad to identify and implement appropriate measures to actively support them.
 - ensuring that steps are taken to make reasonable adjustments to their work circumstances to enable them to achieve their full potential.

- **Promote and support the mental wellbeing of all staff through:**
- providing information and raising awareness about mental wellbeing
- providing opportunities for employees to look after theirs & their colleagues mental wellbeing
- promoting policies and practices that promote wellbeing and social cohesion.
- the provision of our Mental Health first aider program

Mental Health First Aiders have a responsibility to:

- Promote and signpost information and resources for supporting mental wellbeing.
- Provide appropriate information, support, and advice to anyone in the workplace who wants to discuss mental wellbeing.
- Where appropriate, communicate any concerns about the mental health and wellbeing of anyone in the workplace, for example to an appropriate manager or to Human Resources.
- Follow Nomad Digital's policies and procedures on how MHFA is implemented – see MHFA Charter.

Other relevant Nomad policies and resources:

- MHFA Policy

NB: Nomad will respect employee confidentiality and will ensure that information is only shared where it is appropriate to do so (i.e. to support the individual or to prevent harm to the individual or others).

5 Health & Safety at Work

Nomad Digital recognises that Occupational Health and Safety (OH&S) is an integral part of its business and will provide adequate and appropriate resources to foster a safe and healthy work environment for all. Wherever it operates around the world, Occupational Health and Safety remains an utmost priority for the entire company, its employees and its contractors.

Nomad is committed to ensuring compliance with existing and future OH&S legislation and other requirements to which the company subscribes whilst maintaining a continual improvement framework of setting and reviewing OH&S objectives and targets - Nomad will maintain its compliance to ISO 45001 to convey its commitment to OH&S for all activities undertaken and continually improve where practicable.

- Health and Safety Policy
- BMS-HUMR-POL-035- 03 Workplace Mental Wellbeing Policy

NOMAD’S KEY OBJECTIVES ARE TO:

- **Reduce the risk arising through Nomad activities by:**
- identifying and seeking best practices to reduce incidents, prevent accidents and eliminate all severe accidents.
- achieving a high level of performance with compliance to legal requirements as a minimum
- **ensure that each person is aware of their responsibility for their own safety and that of colleagues when conducting their duties by.**
- ensuring our policy and practices are implemented, maintained, and communicated to all employees using noticeboards, communications, emails and our mandatory training sessions
- ensuring that an adequate standard of instruction and training in OH&S matters is maintained at all levels
- actively encouraging employee involvement and consultation through the Global HSE committee, town halls and working groups.
- educating each employee to actively report any instances of unsafe acts, unsafe conditions or a safety concern, incident or injury using correct reporting procedures (the safety observation card and highlighting formally with management).

6 Corporate Philanthropy & Community Volunteering

Nomad is keen to engage in various charitable initiatives, whether they be initiated by Nomad itself or by our employees - employee volunteering can make a positive difference within our communities while also providing benefits to the individuals involved and the Company.

These types of initiatives will look to benefit global communities and be centred around areas of the world where we do business. Nomad and its employees may look to support initiatives centred around undeveloped countries as well.

Benefits for Community	Benefits for Employee	Benefits for Nomad
Improves the lives of individuals within the community.	Personal achievement and satisfaction from giving back to the community.	Strengthens local reputation and creates positive brand awareness.
Supports the development of robust and resilient societies.	Develops personal skills and enhances professional development.	Builds relationships with the wider community.
	Builds and strengthens relationships and provides networking opportunities.	Enhances employee skills and develops teams;
	Increases social health and well-being.	
	Employee volunteers contribute time, skills and enthusiasm to get things done.	

NOMAD'S KEY OBJECTIVES ARE TO:

- **support employee's charitable goals by:**
- promoting our Nomad Charity Days scheme that apportions each Nomad employee two paid days off per year to fulfil a charitable programme on behalf of the public good, focusing on care for people within their communities.
- **be involved in corporate fundraising by:**
- Introducing Nomad charitable enterprises across our global workforce that are linked to health and wellbeing charities and environmental initiatives.
- Chose and match fund these initiatives according to the Alstom E&C directives on corporate giving.
- To meaningfully partner with **The Alstom Foundation** to sponsor at least one project submission on an annual basis.

Other relevant Nomad policies and resources:

- The Alstom Foundation

7 Diversity and Inclusion

Our work at Nomad Digital is based on building meaningful, enduring and respectful relationships across the multiple cultures that transverse both our global footprint and those of our customers. We cannot do this without a strong commitment to diversity and inclusion and seeking to bring people from diverse backgrounds together.

To reflect this intention, we want Nomad to be an inclusive place to work and create equality of opportunity, reducing barriers for everyone, particularly under-represented groups.

We are committed to making sure there is no discrimination in our processes for both recruitment and selection, performance management and pay, and that promotion and retention is fairly granted across all our operations.

NOMAD'S KEY OBJECTIVES ARE TO:

- **encourage and educate our people to understand the benefits of Diversity and Inclusion by:**
- holding training and learning initiatives, educating on the importance of D&I to advance more inclusive behaviours.
- **seek to foster a more inclusive workforce by:**
- strengthening our internal recruitment practices to become a truly inclusive place to work for everyone by inclusive scripting of all recruitment advertising and employment documentation that speaks to a broader range of candidates.
- embracing flexible working practices to improve work-life-balance making us more attractive to those who find family life non-conducive to their career aspirations.
- **enthusiastically promote our industry within demographics that are not traditionally active in order to encourage a more diverse talent pipeline by:**
- partnering with STEM centres that proactively seek to expand its members from lower represented groups.

- working with universities to promote our tech disciplines, targeting more diverse students and graduates.

8 Reporting & Results

Every year, Nomad will set specific targets for all areas of our CSR activities in order to gauge the effectiveness of our initiatives. These targets will change from year to year but will reflect, in principle, the targets of our parent company, Alstom.

Nomad will report on a quarterly basis, its activities and tracking against our objectives.

As an empirical benchmark of our aspirations and commitments, we will also use the **EcoVadis** platform to evaluate and enhance our performance. The objective of the **EcoVadis** assessment is to assess the quality of a company's CSR management system through its policies, actions and results.

The CSR issues are based on international CSR standards such as the Ten Principles of the UN Global Compact, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standards, the ISO 26000 standard, the CERES Roadmap, and the UN Guiding Principles on Business and Human Rights. The **EcoVadis** assessment covers four broad areas of scope:

Environment, Labour and Human Rights, Ethics and Sustainable Procurement*

*Scoring is based upon evidence from supporting documentation provided by suppliers, stakeholders' representatives (360 data), and third-party organisations (e.g. audit reports). The overall score is a weighted average of the four theme scores. To fully understand the real impact of an organisation, the assessment framework is customised for each company according to its activity, size and location of its operations.