



## Fighting Against Forced Labour and Child Labour in Supply Chains Report 2023

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This report is prepared by GATX Corporation (“**GATX**” or the “**Company**”) and its wholly owned Canadian subsidiary, GATX Rail Canada Corporation (“**GRC**” and collectively with the Company, the “**Companies**”, “**we**”, “**our**” or “**us**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) for the financial year ending December 31, 2023. The report highlights steps we have taken during the financial year ending December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Companies.

At GATX, our mission is to provide innovative, unparalleled service that enables our customers to transport what matters safely and sustainably while championing the well-being of our employees and communities. Over our 125-year history, we have earned a strong reputation for integrity and ethical excellence. We are committed to conducting our business according to the highest ethical standards for our stakeholders, employees, customers, and communities in which we operate. These standards are integrated into our daily operations and permeate all areas of our business.

Further details about our Company and approach to human rights can be found on our website at [www.gatx.com/sustainability](http://www.gatx.com/sustainability).

### Steps to prevent and reduce risks of forced labour and child labour

GATX is committed to promoting values that foster and respect human rights, both inside and outside of our organization. We have several foundational policies in place that aim to prevent and reduce the risks of forced labour and illegal child labour in our activities and supply chains. These include GATX’s [Human Rights Policy](#), [Code of Business Conduct and Ethics](#), and [Supplier Code of Conduct](#). These policies apply to GATX and GRC and include specific language on prohibiting the use of illegal child labour and forced labour and requiring compliance with all applicable laws and regulations relating to wages, work hours, overtime, and benefits.

All employees globally are required to attest that they have reviewed and understand the Code of Business Conduct and Ethics within 30 days of their start date. Additionally, all employees globally are required to take a mandatory focused course on the Code of Business Conduct and Ethics annually, including in 2023.

In addition to our Supplier Code of Conduct, which outlines our expectations for suppliers when working with us, Rail North America’s standard supply agreement contract language for railcar components and supplies includes a clause in which the supplier represents and warrants that all goods sold under the agreement comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. We send the Supplier Code of Conduct to GATX Rail North America’s major suppliers, and it is also available on our website at [www.gatx.com](http://www.gatx.com).

Furthermore, as part of our continuous efforts to maintain reciprocal transparency and effective collaboration with our suppliers, we periodically send our major suppliers in North America a survey meant to assess their ESG-related practices to help us better understand our supply chain with regard to our Supplier Code of Conduct. Specifically in 2023, the survey to our major suppliers included a question on whether in the past three years, the supplier had received any fines, prosecutions, or warnings by federal, state, or local agencies related to child labour, forced labour, or other related matters. According to the suppliers who completed the survey, none had received such fines, prosecutions, or warnings.

Rail North America has a centralized sourcing and procurement function for railcar materials, equipment, and supplies. This structure helps promote compliance with our policies and procedures.

Finally, GATX has an Ethics & Compliance Portal for employees, suppliers, customers, partners, and the general public to confidentially and anonymously raise issues, ask questions, and report any non-compliance with any of our policies, including those related to the use of illegal child labour and forced labour. Reports can be made via phone call or through an online platform.

## Structure, activities, and supply chains

Founded in 1898 and headquartered in Chicago, USA, GATX is a New York corporation and a leading global provider of railcar leasing and services in North America, Europe, and India. In addition to our wholly owned portfolio of aircraft spare engines, jointly with Rolls-Royce plc we own one of the largest aircraft spare engine leasing portfolios in the world. Finally, through Trifleet, we own, lease, and manage a global fleet of tank containers. As of December 31, 2023, GATX employed 2,020 persons globally, including 209 in Canada and 1,098 in the United States.

Rail North America is GATX's largest business segment and accounts for GATX's operations in Canada, the United States, and Mexico. GATX operates in Canada through its wholly owned subsidiary, GRC, which is a corporation existing under the *Canada Business Corporations Act*. In North America, GATX leases tank cars, freight cars, and locomotives to 840 customers. Rail North America primarily provides railcars pursuant to full-service leases under which the Companies maintain the railcars and provide other ancillary services.

In North America, our supply chain primarily comprises the railcars we lease to customers, railcar components and service equipment we use to maintain the railcars, as well as services to support our operations and maintenance network.

GATX and GRC do not produce or manufacture the railcars we lease in North America. Rather, we purchase newly built railcars from railcar manufacturers, including Trinity Rail Group, LLC (HQ: United States), The Greenbrier Companies, Inc. (HQ: United States) and its subsidiaries, National Steel Car Ltd. (HQ: Canada), and FreightCar America, Inc. (HQ: United States). We also acquire previously built railcars in the North American secondary railcar market. Conversely, we sell existing railcars from our fleet and the associated leases in the secondary railcar market.



Further, we operate a network of maintenance facilities in the United States and Canada dedicated to performing safe, timely, efficient, and high-quality railcar maintenance services for customers. We have six major full-service railcar maintenance facilities in North America, three of which are located in Canada; three smaller railcar repair locations in North America, two of which are located in Canada; and one locomotive repair base in North America. Rail North America's maintenance network is supplemented by a number of preferred third-party maintenance providers and railroads.

Railcar maintenance services include interior cleaning of railcars, routine maintenance and general repairs to the car body and safety appliances, regulatory compliance work, wheelset replacements, interior blast and lining, exterior blast and painting, and car stenciling. To perform this work, GRC imports railcar components, service equipment, and related goods to our maintenance facilities in Canada directly from our U.S. storage facilities and from third-party suppliers in the United States. Examples of these goods include, but are not limited to, valves and fittings, coils, axles, wheels, coatings and linings, etc.

The pool of direct suppliers in the North American railcar industry is limited. As such, Rail North America sources materials primarily from the same suppliers year over year. These suppliers are mostly corporations based in the United States. Further, our suppliers are mostly members of the Railway Supply Institute, a trade association that represents the full supply chain for the railroad system, of which GATX is also a member, as well as certified suppliers by the American Association of Railroads, meaning they must adhere to strict quality and compliance standards.

GATX engages with regulatory agencies in North America, including the U.S. Department of Transportation, Transport Canada, and the U.S. Surface Transportation Board, to advocate for sound safety and economic policies. In addition, we provide leadership to industry trade association initiatives that focus on improving the safety and efficiency of the North American freight rail system. Finally, GATX is recognized as a Responsible Care Partner by the Chemical Industry Association of Canada and the American Chemistry Council.

## Policies and due diligence processes

GATX has several foundational policies in place aimed to prevent and reduce the risk of forced labour and illegal child labour in our activities and supply chains, including our Human Rights Policy, Code of Business Conduct and Ethics, and Supplier Code of Conduct.

These policies apply both to GATX and GRC and include specific language prohibiting the use of illegal child labour and forced labour and requiring compliance with all applicable laws and regulations relating to wages, work hours, overtime, and benefits. Further, these policies are available to GATX employees on GATX's intranet and are also available to GATX employees, suppliers, customers, partners, and the general public on GATX's website, [www.gatx.com](http://www.gatx.com). We also send the Supplier Code of Conduct to our major suppliers.

GATX has an Ethics & Compliance Portal for employees, suppliers, customers, partners, and the general public to confidentially and anonymously raise issues, ask questions, and report any non-compliance with any of our policies, including those related to the use of illegal child labour and forced labour. Reports can



be made via phone call or through an online platform. In accordance with our non-retaliation policy, GATX prohibits retaliation against any employee who seeks advice, makes a good faith report of a concern to GATX or any relevant government authority, or participates in a related investigation. Every report made is reviewed and/or investigated by GATX's global Ethics and Compliance Department in partnership with relevant internal stakeholders and business units, depending on the subject matter of the report. From there, appropriate corrective actions are taken as necessary, depending on the investigation results.

## Forced labour and child labour risks

GATX and GRC have not undertaken a formal process to identify parts of our Rail North America supply chains that carry a risk of forced labour or illegal child labour. We recognize that there may be a risk of forced labour or illegal child labour at all levels of our supply chain, particularly concentrated in our deep supply chain in relation to the supply of raw materials.

As part of our continuous efforts to maintain reciprocal transparency and effective collaboration with our suppliers, we periodically send our major suppliers in North America a survey meant to assess the suppliers' ESG-related practices to help us better understand our supply chain with regard to our Supplier Code of Conduct. In 2023, we sent these suppliers a survey that included a question on whether in the past three years the company had received any fines, prosecutions, or warnings by federal, state, or local agencies related to child labour, forced labour, or other related matters. According to the suppliers who completed the survey, none had received such fines, prosecutions, or warnings. Furthermore, our suppliers are mostly businesses based in the United States, many of which have their own established policies prohibiting the use of forced labour and illegal child labour in their own businesses and supply chains. We recognize that there may be a risk of forced labour or illegal child labour deeper in our supply chain where we have little visibility and control. As such, we rely on the cooperation of our major suppliers with whom we have direct contractual relationships to meet the highest standards of ethics outlined in our Supplier Code of Conduct.

Within our own operations, we consider our Companies' exposure to forced labour and illegal child labour risks to be low. When hiring new employees, GATX and GRC confirm all employees are legally able to work in the country in which they are employed and are recruited voluntarily, in compliance with employment standards therein.

## Remediation measures and remediation of loss of income

GATX and GRC have not undertaken a formal process to identify parts of our Rail North America supply chains that carry a risk of forced labour or illegal child labour. In 2023, no instances of forced labour or illegal child labour in our own activities and/or in our supply chains were brought to our attention through grievance processes or through other sources; therefore, no remediation measures were undertaken. Accordingly, no measures were taken to address any resulting loss of income to vulnerable persons. In the event that any future investigation identifies potential or confirmed instances of illegal child labour or forced labour, we will take appropriate remediation measures in accordance with our investigation policy.



## Training

GATX's Code of Business Conduct and Ethics (the "Code") is GATX's road map for doing business the right way. The Code covers a variety of topics, including GATX's commitment to upholding human and workplace rights throughout our global operations. With respect to the use of forced labour and child labour, the Code specifies that GATX operates under programs and policies that prohibit child labour, forced labour, and human trafficking.

All GATX and GRC new hires are required to complete an online training on the Code within 30 days of their start date. As part of the training, employees are required to acknowledge that they have completed the training on the Code, have read and understand and will comply with the Code's guidance, and agree to promptly report any act or situation that may violate our Code.

Furthermore, all GATX employees globally, including senior management and executive-level staff, are required to take an online course on the Code annually, including in 2023, and we track employee completion of this training. In 2023, we also conducted live training sessions on the Code for employees at two of our maintenance facilities in Canada.

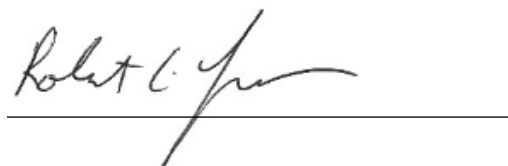
## Assessing effectiveness

GATX and GRC have not taken any formal actions to assess effectiveness in ensuring that forced labour and illegal child labour are not being used in our activities and supply chains. However, in 2023, no instances of forced labour or illegal child labour in our own activities and/or in our supply chains were brought to our attention through grievance processes or through other sources.

## Attestation

This report has been prepared in accordance with Part 2, section 11 (1) and 11 (3) of the Act for the financial year ending December 31, 2023 and applies to GATX and GRC. Pursuant to subparagraph 11(4)(b)(ii) of the Act, the report has been approved by the Board of Directors of GATX.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Robert C. Lyons

Director, President and Chief Executive Officer, GATX Corporation

I have the authority to bind GATX Corporation and GATX Rail Canada Corporation.

May 21, 2024

