



UK Modern Slavery Act Statement 2023

This report is prepared by GATX Corporation (“GATX”) on behalf of itself and its wholly owned UK subsidiary, GATX Engine Leasing Ltd. (“GEL” and collectively with GATX, the “Companies”, “we”, “our” or “us”) pursuant to the *UK Modern Slavery Act 2015* (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 help prevent slavery and human trafficking from taking place in any part of the Companies’ supply chains and in any part of the Companies’ own business.

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 GATX and its approach to human rights can be found on our website at www.gatx.com/sustainability.

Organization structure and supply chain

GATX, a New York corporation founded in 1898, is a leading global provider of transportation assets, including railcars, aircraft spare engines, and tank containers.

GATX owns and leases aircraft spare engines through its Rolls-Royce & Partners Finance joint ventures (collectively, the “RRPF affiliates”) and GEL.

The initial RRPF affiliates were first established in 1993 and are GATX’s 50% owned joint ventures with Rolls-Royce plc, a leading manufacturer of commercial aircraft jet engines. The RRPF affiliates lease aircraft spare engines to a diverse group of commercial aircraft operators worldwide as well as to Rolls-Royce for use in its engine maintenance programs.

In 2021, GATX formed GEL in the UK as a wholly owned subsidiary of GATX. Through GEL, GATX invests directly in aircraft spare engines. As of December 31, 2023, GEL owned 29 aircraft spare engines. Approximately half of these wholly owned aircraft spare engines are leased to airline customers, and the other half of these engines are employed in an engine capacity agreement with Rolls-Royce for use in its engine maintenance programs. The RRPF affiliates manage all leases of GEL’s aircraft spare engines.

As an asset owner, GEL has a limited supply chain. It includes Rolls-Royce plc, the manufacturer of all GEL’s aircraft spare engines as of December 31, 2023; the RRPF affiliates, which manage the lease administration of aircraft spare engines on GEL’s behalf; and other professional service firms, including legal and accounting.

GEL employs one discrete employee, a Senior Finance Manager who is full-time and based in the UK. Other employees of GATX, based in GATX's Chicago headquarters, are involved in GEL's business in various capacities such as finance, legal, and accounting.

Policies and due diligence processes in relation to slavery and human trafficking

We are 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 slavery and human trafficking in our activities and supply chains. These include GATX's [Human Rights Policy](#), [Code of Business Conduct and Ethics](#) (the "Code"), and [Supplier Code of Conduct](#).

The Human Rights Policy and the Code apply to GATX and all GATX's wholly owned subsidiaries, including GEL, and include specific language on prohibiting the use of all forms of forced labour and human trafficking and requiring compliance with all applicable laws and regulations relating to wages, work hours, overtime, and benefits. The Supplier Code of Conduct outlines GATX's expectations for suppliers when working with us and states that we do not tolerate the use of illegal child labour, forced labour, human trafficking, or slave labour and that we expect suppliers to comply with all applicable laws and regulations relating to wages, work hours, overtime, and benefits. All these policies are available to employees on the GATX intranet and are also available to employees, suppliers, customers, partners, and the general public on GATX's website, www.gatx.com.

Further, 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 modern slavery and human trafficking. 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.

Slavery and human trafficking risks

GATX and GEL have not undertaken a formal process to identify parts of our supply chains that carry a risk of modern slavery and human trafficking. Rolls-Royce plc, the manufacturer of all GEL's aircraft spare engines as of December 31, 2023, publishes an [anti-slavery and human trafficking statement on its website](#), which covers the RRPf affiliates, and considers its exposure to modern slavery and human trafficking risk to be low and concentrated in its deeper supply chain. Further, the sector of GEL's other primary suppliers (professional services) is considered low risk for modern slavery and human trafficking.

Within our own operations, we consider the Companies' exposure to modern slavery and human trafficking risks to be low. When hiring new employees, GATX confirms 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.

Performance Indicators

In 2023, no instances of modern slavery or human trafficking in our own activities and/or in our supply chains were brought to our attention through grievance processes or through other sources. In the event that any future investigation identifies potential or confirmed instances of modern slavery or human trafficking, we will take appropriate remediation measures in accordance with our investigation policy.

Training

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 modern slavery and human trafficking, the Code specifies that GATX operates under programs and policies that prohibit child labour, forced labour, and human trafficking.

All GATX 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.

Approval

This statement has been prepared in accordance with section 54(1) of the United Kingdom Modern Slavery Act 2015 and was approved by the Board of GATX Corporation on behalf of GATX and GEL. It constitutes the Companies' slavery and human trafficking statement for the financial year ending December 31, 2023.



Robert C. Lyons
Director, President and Chief Executive Officer, GATX Corporation

May 21, 2024