

MTR Corporation Modern Slavery and Human Trafficking Statement

This statement details the steps MTR Corporation Limited (“MTR”) has taken to identify and mitigate the risks of modern slavery and human trafficking within our direct operations and supply chain. It also covers the measures we will implement to monitor the effectiveness of our actions and to drive continuous improvements in this area.

Introduction by the CEO

We understand the importance of tackling the presence of modern slavery and human trafficking and the misery caused by this global problem. We take our responsibilities as a corporate citizen very seriously and work with our suppliers to ensure positive labour standards across all of our supply chains.

Our business, operations and structure

MTR is a world-class operator of sustainable rail transport services headquartered in the Hong Kong Special Administrative Region and listed on the Hong Kong Stock Exchange. Our core operations consist of the construction and operation of a mass transit passenger railway network in Hong Kong. We also have a number of subsidiaries with similar core businesses of constructing and operating rail systems in Mainland China and overseas markets.

In Hong Kong and the Mainland of China, our business portfolio also includes station commercial businesses, the development and sale of residential and commercial properties in partnership with property developers and the provision of property management services.

MTR is recognised as a global leader in safe, reliable and sustainable railway transit. With more than 50,000 dedicated staff around the globe, MTR carries over 10 million passengers worldwide every weekday. The MTR workforce comprises engineers, subject matter experts and non-engineer employees.

Our supply chains, sourcing approach and due diligence

Our supply chains support our rail and property businesses through the procurement of goods and services such as rolling stock, infrastructure and electrical and mechanical equipment, stations and depot maintenance and estate and shopping mall management services. Our suppliers are categorised based on the products / services which they provide and the part(s) of our business which they serve, including transport services, property businesses, railway extension projects and corporate support. We are committed to ensuring that workers employed in our supply chains are treated fairly and equitably. We have in place various policies / procedures which are relevant to this objective, including:

- Code of Conduct
- Supplier Code of Practice
- Procurement Procedures
- Whistle-blowing Policy

We have clear procedures and guidelines in place setting out the process, responsibilities, approvals and authority levels for the procurement of works, goods, spares and services. Having regard to the complexity, value and risk of particular procurement activities, prospective tenderers are assessed before they are selected as MTR suppliers.

We require our suppliers to comply with our Supplier Code of Practice which mandates our suppliers to support the prohibition of forced labour, child labour and modern slavery. Our suppliers are also required to ensure that their own suppliers, subcontractors and other business partners comply with our Supplier Code of Practice. We reserve the right to terminate supplier contracts where a supplier engages in any activity, practice or conduct that would breach the Supplier Code of Practice.

Risk analysis and monitoring

We recognise the complexity of modern slavery issue and the many different forms it can take. As a business, we use risk assessments where appropriate to gain a greater understanding of our supply chain network as a whole.

We are actively enhancing our supply chain risk management across the procurement process with the adoption of risk control measures across the procurement lifecycle, including supplier pre-qualification, tender assessment and post-award performance management. We have further improved our real-time supply chain event monitoring and risks assessment capabilities, through the implementation of third-party risk management digital platforms integrating internal and external data sources to enhance the detection, assessment and treatment of supplier and supply chain risks.

We are also further embedding our corporate Environmental, Social and Governance (ESG) targets within our procurement and supply chain strategies, requiring greater transparency from our key suppliers on their current and planned ESG capabilities, and encouraging enhancement on their ESG performance.

Awareness across the business

It is everyone's responsibility to ensure that working practices are in line with our company vision and objectives. We look for opportunities to provide training to our staff and organising exchange sessions with our suppliers to share knowledge and best practices to enhance the prevention of modern slavery.

Monitoring the effectiveness of our actions

We have developed a set of key performance indicators to track and monitor supplier performance and compliance to MTR requirements, including the compliance to our Supplier Code of Practice. We will continue to conduct supplier review audits and supplier review meetings covering ESG in 2025.

We will continue to engage with our employees and our suppliers to raise awareness about modern slavery and human trafficking and endeavour to avoid any of these within our business and our supply chains.

This Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2024 has been approved by MTR's Executive Committee.

A handwritten signature in black ink, appearing to read 'Jacob Kam', written in a cursive style.

Dr. Jacob Kam
CEO, MTR Corporation Limited
26 June 2025