



## Company Policy Statement: **Modern Slavery Policy**

Portfolio: Governance and Assurance  
Portfolio Director: Mr Roger Clarke

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Chief Executive Officer	Mr Frank Lloyd-Murray	Wednesday, 21 June 2023

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Name	Business Area	Reason and Use
Director (Project Management)	Senior Leadership	Sign-Off and Acceptance
Director (Rail Systems Engineering)	Senior Leadership	Sign-Off and Acceptance
Director (Business Development)	Senior Leadership	Sign-Off and Acceptance
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- What exactly is a Policy Statement? ..... 1*

**MODERN SLAVERY POLICY STATEMENT ..... 2**



# Section: 2 – The Policy Statement

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## What exactly is a Policy Statement?

A policy statement is an organization-level document that prescribes acceptable methods or behaviours. Essentially, a policy is simply the way things are done within an organization.

Policies are different from procedures and standard operating procedures because they are applicable to an entire organization and are primarily intended to set direction.



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## MODERN SLAVERY POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The company has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

The company is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

The Company Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. They also have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training or guidance.

All staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Company Directors as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Staff are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.



The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Training and guidance on this policy, and on the risk our business faces from modern slavery in its supply chain, will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The company may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed as Approved this day, Wednesday, 21 June 2023

Signature

Position

**Mr Frank Lloyd-Murray**  
**Chief Executive Officer**

