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**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

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Version 3



## 1. POLICY STATEMENT

- 1.1 Modern slavery (**Modern Slavery**) is a crime and a violation of fundamental human rights. Under the Modern Slavery Act 2015, it can take various forms, such as slavery, servitude, forced and compulsory and child labour<sup>1</sup> and human trafficking, all of which have in common the deprivation of a person's liberty and freedom by another in order to exploit them for personal or commercial gain.
- 1.2 We have a zero-tolerance approach to Modern Slavery. To ensure that Modern Slavery is not taking place in our own business and to combat the risk of Modern Slavery taking place in our supply chains, we are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and maintaining effective systems and controls.
- 1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and our contracting processes will progressively reflect this expectation more formally. We expect that our suppliers will hold their own suppliers to the same high standards.
- 1.4 The Angel Trains Group (**ATG**) supports the principles underpinning the Modern Slavery Act 2015 and this policy applies to ATG's core operating company, Angel Trains Limited (**ATL**), as well as The Great Rolling Stock Company PLC and other operational subsidiaries (Angel Leasing Company Limited and Angel Locomotive Leasing Limited).
- 1.5 This policy applies to all our:
- (a) customers, suppliers and business partners; and
  - (b) employees at all levels which for the purposes of this policy include, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives.

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<sup>1</sup> Whilst child labour may not itself always be a form of modern slavery, the worst forms of child labour are very likely to constitute modern slavery and our approach seeks to combat risks associated with child labour in a manner which is consistent with relevant International Labour Organisation standards. Therefore our approach will seek to identify and manage risks associated with the following situations, where:

- children below 12 years are working in any economic activity;
- those aged between 12 to 14 are engaged in more than light work (as defined by article 7 of the ILO Convention No 138); and
- all children engaged in the worst forms of child labour (as defined by article 3 of ILO Convention No.182).

1.6 This policy does not form part of any employee's contract of employment nor existing or future contractual arrangements with our contractors, suppliers and other business partners (unless agreed). However, it is our clear expectation that all of these stakeholders confirm their overall commitment to the ethical policy position set out in this policy and act consistently with it.

1.7 As part of the implementation of our policy commitment concerning our operations and supply chain, our contracting processes will be based upon a risk based approach to identifying and assessing the risk of modern slavery and including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children or other requirements, as appropriate.

## 2. RESPONSIBILITY FOR THE POLICY

2.1 The board of directors of ATL has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

2.2 The Compliance Officer (the Head of Legal) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and maintaining internal control systems and procedures to ensure they are effective in addressing the risks of Modern Slavery.

2.3 Management at all levels are responsible for ensuring:

- (a) the employees reporting to them understand and comply with this policy and are given adequate and periodic training on it and the issue of Modern Slavery in our business and our supply chains; and
- (b) the contractor, supplier and business partner relationships which they are responsible for also understand and comply with the expectations set out in this policy and provide training as may be appropriate in light of the potential risks of Modern Slavery associated with their business and the type of goods and services that they provide to our business.

## 3. COMPLIANCE AND REPORTING AND/OR RAISING CONCERNS UNDER THE POLICY

### Compliance

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or at our direction.

- 3.3 You are required to take all reasonable steps to avoid any activity that might lead to, or suggest, a breach of this policy.

### Reporting and/or raising issues or concerns

- 3.4 If you believe or suspect a breach of, or conflict with, this policy has occurred or that it may occur you must notify the Compliance Officer at [reporting@angeltrains.co.uk](mailto:reporting@angeltrains.co.uk) or, for employees, you can also report it to your manager or in accordance with our Whistleblowing Policy as soon as possible so that we can consider and/or take appropriate steps which aim to address any risks of engaging in Modern Slavery. Where appropriate, and with the welfare and safety of local workers or other vulnerable persons as a priority, we will aim to give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 3.5 You are encouraged to raise concerns about any issue or situation of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains, constitutes any of the various forms of modern slavery, raise it with your manager, or the Compliance Officer at [reporting@angeltrains.co.uk](mailto:reporting@angeltrains.co.uk).
- 3.6 We encourage openness and will support anyone who raises genuinely held concerns under this policy.
- 3.7 In respect of our employees, we want to ensure that they are confident they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their concern that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, victimisation or other unfavourable treatment (including unwarranted disciplinary action) connected with raising a concern. If (as an employee) you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found [here](#).

## 4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risks of Modern Slavery in the context of our business operations and supply chains, forms part of the induction process for all individuals who work for us and periodic training will be provided as necessary.

4.2 In accordance with and as part of our contracting processes, our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners as part of our business relationship with them either at the outset for all new relationships or reinforced, as appropriate, for existing relationships and thereafter be regularly repeated. Supplier performance in respect of compliance with our policy will be considered as part of our procurement decisions.

4.3 More generally, we are committed to supporting industry engagement and raising awareness on the issue of modern slavery in the context of the UK rail industry.

## 5. BREACHES OF THIS POLICY

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

5.2 We may terminate our relationship with any contractors, suppliers and/or business partners working on our behalf, under our control or at our direction, if they breach this policy. Where appropriate, we will consider credible assessment of potential adverse impacts on the welfare and safety of local workers and other vulnerable persons which may be associated with any decision to terminate any business relationship.

## 6. REVIEW OF THIS POLICY

6.1 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer.

6.2 The Compliance Officer will periodically review this policy, taking account of feedback and experience, as appropriate.

6.3 This policy may be amended at any time with approval by the Board.