

GB Railfreight

Railfreight

MODERN SLAVERY STATEMENT

May 2022



Modern slavery is the exploitation of another person for commercial or personal gain. It is an umbrella term for human trafficking, sexual exploitation, domestic servitude, forced and bonded labour. As a company, we are committed to playing our part in combatting unlawful and unethical practices in relation to modern slavery. We will not knowingly use child labour or forced labour in any of our services or accept goods or services from suppliers that are not taking similar steps to combat such unlawful practices.

OUR COMMITMENT TO COMBATING MODERN SLAVERY

We respect human rights and comply with all applicable employment laws.

We have a zero-tolerance approach to modern slavery and human trafficking in all its forms within our business and our supply chain.

We uphold the rights of everyone working for us or with us and believe that everyone should be rewarded fairly for their skill and contribution and should not be required to work excessive hours.

We do not tolerate the use of forced, bonded, compulsory or child labour.

We recognise and respect employees' rights to freedom of association and collective bargaining, where permitted by law.

We refuse to do business with anyone that fails to respect and protect basic human rights.

OUR ACTIONS SINCE MARCH 2021

In completing our actions, we took guidance and used examples from the Stronger Together initiative. We also engaged with the Slave-Free Alliance for expert advice on improving our existing processes, awareness programme and training.

- **Government's Modern Slavery Registry**

- The 2021 statement was uploaded to the new registry in addition to being posted on our website giving greater transparency

- **Raising Awareness**

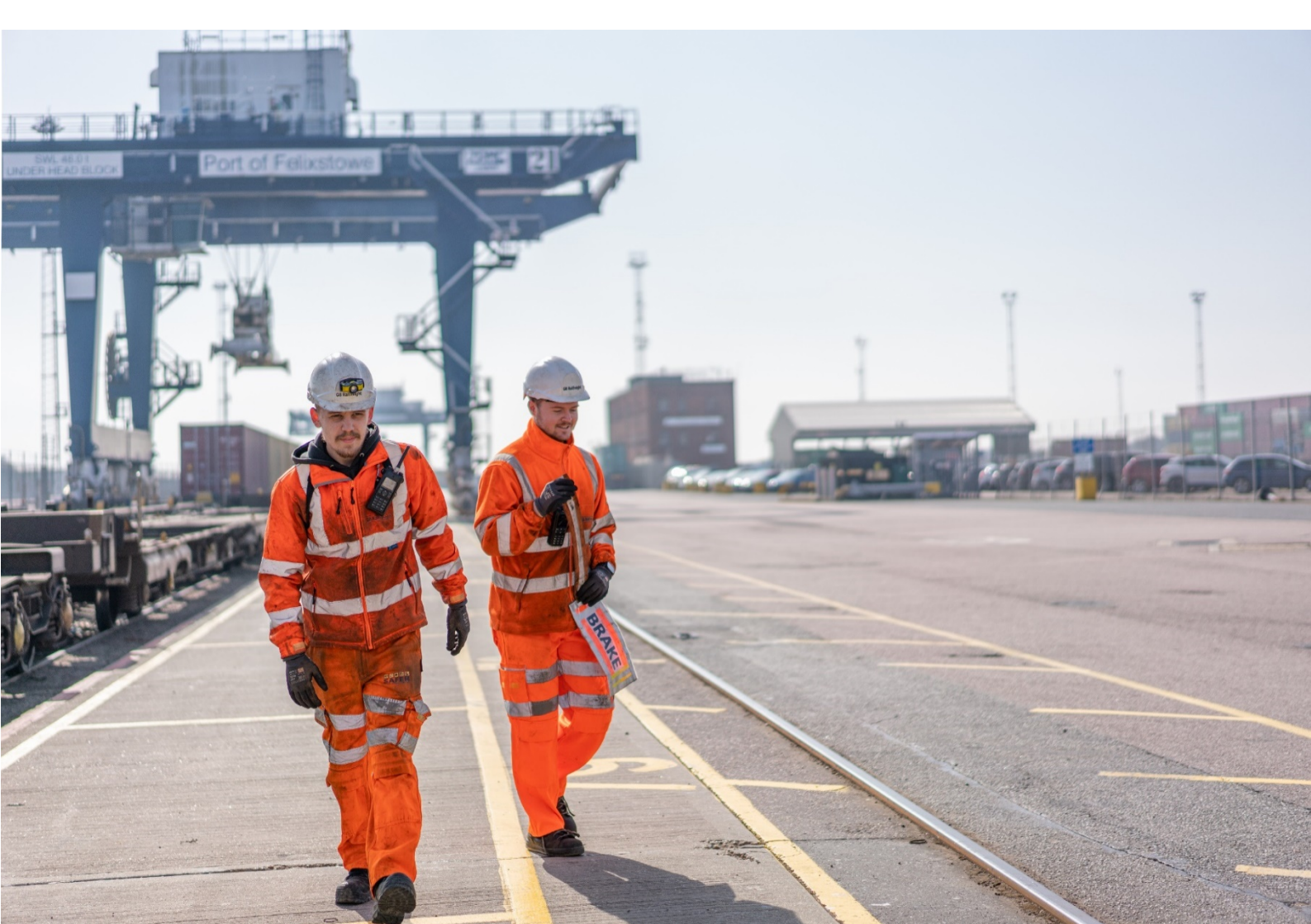
- Awareness Collateral – We produced a new awareness poster in 2021
- A digital version of the poster was supplied to all remote workers (1000+) through the RS Docs software they use to obtain all work documents, rosters etc

Training

- We continued to explore options to deliver bespoke training to our staff using 3rd party providers
- We refreshed our internal training materials in advance of rolling out the biannual refresher training and training for new entrants

- **Supply chain engagement**

- Supplier Code of Conduct, which includes zero-tolerance approach to modern slavery, is sent to all new suppliers as part of the onboarding process



OUR ORGANISATION

GB Railfreight Limited (“GB Railfreight”, “we”, “our”) is the third largest rail freight company in the UK with a turnover in excess of £200 million. The business was established in 1999 and is currently under the ownership of Infracapital, the unlisted infrastructure equity arm of M&G Prudential.

Our core services as a Freight Operating Company (“FOC”) involve transporting goods by rail across the UK and through the Channel Tunnel for our UK and European customers. The market segments in which we operate are the intermodal, infrastructure, bulk and rail services markets, Testimonial from Francesco Ciocia, Head of Logistics Procurement UK, Kuehne + Nagel.

The business directly employs over 1100 people and operates regional offices and in excess of 15 depot locations nationwide. We have a fleet of 158 locomotives and over 2,400 wagons moving 24.5% of Britain’s rail freight.

As a FOC, our main capital expenditure items are rolling stock and heavy maintenance on locomotives and wagons (including associated components). Our rolling stock is largely manufactured in the EU, with the Class 66 fleet being built in North America. All of the rolling stock is serviced in the UK, the Class 66 by the original equipment manufacturer. Fuel is purchased from UK providers. Other ancillary items of expenditure are: road haulage and terminal handling, facilities management, travel and subsistence, IT and telecoms, office supplies, uniform, and company vehicles, all of which are sourced from UK based suppliers. However, we acknowledge that our extended supply chain may have global reach.

After the unprecedented global pandemic in 2020 many hoped for a better year in 2021. However, it was another difficult year for many. We see from research evidence that as a result of extreme and sudden weather events and longer-term climate issues, people most at risk of conflict or inequality are more likely to become victims of modern slavery. These macro environment issues reinforce the need to continually review and always be looking for ways to improve and evolve our processes for Identifying, preventing and combatting Modern Slavery. We continue to explore our tiered supply chain involved in service delivery, developing a deeper understanding and encouraging more transparency.

OUR SUPPLIERS

We have on our system around 675 suppliers. We do not manufacture or maintain rolling stock ourselves, so have no factories or manufacturing facilities, nor do we handle raw materials. We outsource most non-core logistics activities and deal mainly with tertiary suppliers.

In the last 12 months we have continued to work with our trusted partners in the main, consequently our approved and strategic supplier lists are relatively unchanged.

A requirement to comply with our [Supplier Code of Conduct](#) (SCoC) is stated in all of our template contracts, requests for quotation, invitation to tender and expression of interest documents. Within our standard compliance clauses we require suppliers to warrant that neither they nor their employees or contractors have been convicted or are the subject of any investigation in connection with slavery or human trafficking, that they will maintain preventative anti-slavery policies throughout the engagement, will immediately notify us if they become aware of any suspected slavery in their supply chain and that they include similar obligations in their contracts with subcontractors. Non-compliance and/or breaches are treated as material, allowing us to terminate the contract.

The SCoC is shaped by our core values, it sets out the relevant standards and legislation that all GB Railfreight suppliers must adhere to, particularly in relation to labour practices and human trafficking.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains and this is reflected in our policies. Our policies are driven by our culture which places high importance on our people, we believe our people focused culture has allowed us to continuously perform successfully, grow sustainably and offer job security to our loyal and hard working workforce. This culture is underpinned by our five core values which give us a clear sense of purpose and direction:

- PROFESSIONALISM – we treat co-workers and clients fairly and ensure a positive workplace

- **COMMUNICATIONS & VISIBILITY** – we make information accessible to everyone
- **TRUST & EMPOWERMENT** – we believe that openness and honesty make for the best relationships because it leads to trust and confidence
- **ENJOYMENT** – happy, engaged and passionate people are easier to do business with
- **SUPPORT** – we look after our people and they in turn are encouraged to look after each other



POLICY

RELEVANCE

Anti-Slavery and Human
Trafficking Policy – under
Review

This policy makes clear that we only want to work with people who choose to work freely, with rights to equal opportunity, freedom of association, and collective bargaining.

Whistleblowing Policy –
under Review

GB Railfreight encourages staff to report concerns, including concerns relating to modern slavery and human trafficking.

Employee Code of Conduct
– published March 2021

Our Employee Code of Conduct sets out our approach to the protection of fundamental rights including, fair employment practices, conduct at work and supplier relationships.

Supplier Code of Conduct
– published in 2020

Defines the minimum standards that we require of our suppliers, their employees and their suppliers to unconditionally respect and adhere to. In particular, they must respect human rights, provide their employees with safe and healthy working conditions, ensure that they comply with all applicable laws regarding wages and working hours and under no circumstances use or in any other way benefit from forced or compulsory labour or child labour.

Anti-Bribery & Corruption
Policy

This Policy highlights ‘red flags’ that are also potential indicators of modern slavery, such as cash payments, unusual payments to a third party or any close family.

OUR PEOPLE

Our commitment to reducing the risk of modern slavery begins with our robust recruitment process. The majority of our staff are recruited directly. We use an online recruitment platform to log vacancies and progress candidates in accordance with applicable employment laws. The final stage of the recruitment process is to conduct 'right to work' checks to verify the candidates' age and right-to-work status and to issue contracts of employment.

Where agency staff are required, we only work with reputable employment agencies whose practices meet or exceed our own high standards.

We ensure that our staff receive appropriate training and plenty of support. We have online learning and benefits platforms, as well as a wellbeing programme that promotes good physical and mental health and activity through smart fitness trackers, Wellbeing Champions and online resources.

We expect all our people to treat each other and those we deal with dignity and respect. In 2021 we signed the rail industry Equality Diversity and Inclusion charter. As a signatory to this Charter we are pledging to be the best in everything we, and collectively the UK railway sector, do and therefore aim to support the United Nations Sustainable Development Goals.



RISK ASSESSMENT

GB Railfreight completed an initial risk assessment which identified our highest risk areas for modern slavery or human trafficking using the following factors:

- Size of company: we consider smaller companies have less resource to monitor and policy anti-slavery in the supply chain
- Location of operations: we were looking at understanding the operations of the supplier and whether they had locations in Africa, Middle East and Asia where The Global Slavery Index (“GSI”) considers risk to be high
- Risky industry sector: whether our supply chain intersected with The GSI high risk industries
- Modern Slavery Act 2015: using the £36 million turnover criteria, verifying whether the supplier is under the obligation of the Act and reviewing the actions taken to reduce the risk of modern slavery in their supply chain

We found that the main area of high risk involved sectors where workers are low-skilled. If workers for a supplier are highly skilled, they are generally more likely to be in demand, they will have more choice and are in a better position to make informed and independent decisions about who they work for and where. The opposite also holds true: low skilled workers have less bargaining power to make demands about wages and terms and conditions. Therefore, the key areas for GBRf to focus on are cleaning and taxi services, sourcing of office supplies and IT equipment and some facility management services.

DUE DILIGENCE

We have rolled out phase one of our risk assurance software, which has allowed us to automate and standardise the question set in our supplier approval process.

We also recognise rail industry assurance schemes, as part of our supplier selection process when safety critical or rail specific products or services are required.

TRAINING

We provide training on slavery and human trafficking to our staff on a bi-annual basis. In Q1 2022, we refreshed our internal training materials in advance of rolling out the first biannual refresher training programme. Due to growth in the business, we will also offer training for all new entrants going forward.

We are also committed to raising awareness of slavery and human trafficking within our business. We continue to use different media and platforms to inform GB Railfreight employees of key modern slavery facts and statistics, including social media, digital and paper posters, magazine articles and e-newsletters.

NEXT STEPS

Engage on the wider ESG governance piece via our parent company, to benefit from access to subject matter experts and other portfolio company case studies:

- What has worked well
- Any implementation lessons learnt

Continue to keep modern slavery and the signs to look out for in the minds of staff through the use of posters, articles, posting videos/links on social media and other internal communications.

Continue to explore options to deliver bespoke online training for our employees.

We respect human rights and comply with all applicable employment laws.

Reconnect with the Slave-Free Alliance and Stronger Together and reach out to other organisations in this space to bring best practice into our policy and processes including initial supplier selection, our modern slavery risk assessment and awareness strategy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been endorsed by the Board of Directors of GB Railfreight Limited.



John Smith

Chief Executive Officer– GB Railfreight Limited

Dated: 11th May 2022

SO RELIABLE IT
**MAKES
SENSE**

GB Railfreight

gbrailfreight.com