Anti-Slavery Policy

A) INTRODUCTION

Rail Operations Group is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.

Annual statement

Although Rail Operations Group does not meet the requirements of the Modern Slavery Act 2015 that would legally require Rail Operations Group to produce a slavery and human trafficking statement, we recognise the importance of preventing modern slavery and therefore we will voluntarily produce an annual slavery and human trafficking statement. A link to this statement will be on the homepage of our website and will be signed and approved by David Burley.

David Burley is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Rail Operations Group has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

B) CONTENT OF THE STATEMENT

The following items will be included in the statement.

1) The structure of our organisation, the business operations of the organisation and the supply chains.
2) Our policies in relation to slavery and human trafficking.
3) The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
4) Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking taking place, and the steps that we have taken to assess and manage the risk.
5) An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
6) A statement that training about slavery and human trafficking is available to all employees.

C) ADDITIONAL ACTION POINTS

In addition to producing the annual statement, Rail Operations Group is committed to:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure

- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015
- identifying and addressing any areas of high risk in our supply chain
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

January 2025