



Modern Slavery & Human Trafficking Policy

1. Railscape Limited Policy Statement.

- 1.1 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.
- 1.2 We work with a wide range of different suppliers, sub-contractors and partners, each of which will have their own sub-contractors, affiliates and associate entities. Our business is therefore connected to multiple entities through numerous contractual relationships.
- 1.3 We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensuring that this policy is communicated within our business and supply chains. We are also committed to enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.
- 1.4 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, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Managing Director 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 Manager has 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.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 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 Manager.

DOCUMENT REFERENCE:	RS-HR-POL-09	ISSUE:	03	DATE:	Mar 21	PAGE 1 of 3
---------------------	--------------	--------	----	-------	--------	-------------



Modern Slavery & Human Trafficking Policy

3. COMPLIANCE WITH THE POLICY

- 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 under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Managing Director as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 3.6 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 Managing Director.
- 3.7 We aim 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 of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy, which can be found via YourHR space.

4. DUE DILIGENCE PROCESSES

- 4.1 In order to comply with this policy, we are committed to:
 - 4.1.1 Addressing and directly prohibiting practices that are known to contribute to the risk of modern slavery;

DOCUMENT REFERENCE:	RS-HR-POL-09	ISSUE:	03	DATE:	Mar 21	PAGE 2 of 3
---------------------	--------------	--------	----	-------	--------	-------------

Modern Slavery & Human Trafficking Policy

- 4.1.2 Operating strict procurement processes and ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- 4.1.3 Ensuring our suppliers have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers;
- 4.1.4 Having completed an analysis of assurance information from existing suppliers and partners and followed up where relevant;
- 4.1.5 Following advice and guidance in relation to the Modern Slavery Act 2015;
- 4.1.6 Adding a specific item relating to the Modern Slavery Act 2015 to the agenda of the contract management meetings with suppliers, enabling us to be kept informed of any changes; and
- 4.1.7 Including appropriate terms in our contractual documentation, obliging suppliers and contractors to comply with the Modern Slavery Act 2015 and reserving the right for us to audit suppliers and contractors, where we consider it appropriate.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains shall be provided to our personnel.
- 5.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. BREACHES OF THIS POLICY

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Michael Hayes
Managing Director
Reviewed: 09th November 2023