

Anti-Slavery and Human Trafficking Policy



Version 1.2

Owner: Group General Counsel

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Approved by: People Sub-Committee of the Executive Leadership Team

Version	Date	Comment
1.0	January 2017	Version 1.0 published.
1.1	May 2017	Minor amendments to wording.
1.2	May 2020	Version 1.2 published. Section one renamed and examples of different types of modern slavery provided. Policy restructure resulting in the addition of sections two, four, five, six and seven – no significant amends to content. Section eight amended to reference mandatory ethics training. Section five in version 1.1 removed and replaced with section nine in version 1.2. Reference to 'Business Integrity Department' replaced with 'Counter Fraud and Investigation Services team'.

1. Introduction

- 1.1 Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, threat, coercion and/or deception. This is a violation of fundamental human rights and is not tolerated in our business or our supply chain.
- 1.2 Modern slavery can take many different forms, including:
- **Trafficking of people** – the recruitment, harbouring or transportation of people for the purposes of exploitation
 - **Forced labour** – victims are forced to work against their will, under threat of punishment (e.g. violence, restriction of movement or confinement to the workplace, debt bondages, withholding of wages or excessive wage deductions, retention of identity documents, threat of denunciation to the authorities)
 - **Domestic servitude** – victims are forced to work in predominantly private households, performing domestic chores and childcare duties
 - **Criminal exploitation** – the exploitation of people to commit a crime

- **Sexual exploitation** – includes, but is not limited to, sexual abuse and forced prostitution.

2. Scope

2.1 This policy applies to everybody who works for us or on our behalf, in any capacity, across the whole Network Rail group organisation. This includes, but is not limited to, all employees, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners.

3. Responsibility for the policy

- 3.1 This policy is a statement of our commitment to reduce the risk of modern slavery taking place in any part of our business or within any of our supply chains.
- 3.2 The Board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.3 The Board are responsible for endorsing our modern slavery strategy, of which this policy is part.
- 3.4 Primary and day-to-day responsibility for this policy and modern slavery programme has been delegated to the Group General Counsel.
- 3.5 All managers are responsible for ensuring those reporting to them are aware of and understand this policy.

4. Our commitments

- 4.1 Network Rail complies with all applicable legislation, including the Modern Slavery Act 2015 (which includes the publication of an annual anti-slavery and human trafficking statement) and the Human Rights Act 1998.
- 4.2 We respect the human rights of our employees and provide them with a safe working environment and fair terms of employment.
- 4.3 We have a commitment to:
- do all that we reasonably can to prevent all forms of modern slavery within any part of our business or our supply chains
 - act ethically and with integrity in all our business dealings and relationships
 - implement and enforce effective systems and controls.

5. Third parties

- 5.1 We expect high standards from all our contractors, suppliers and other business partners. We expect them to comply with all applicable laws and regulations and publish an annual anti-slavery and human trafficking statement, where they are legally required to do so.
- 5.2 Consideration of modern slavery risk is built into our procurement processes as part of our due diligence activities.

- 5.3 Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant policies, including our Code of Business Ethics, Code of Conduct (for suppliers/contractors) and Speak Out (whistleblowing) policy. We also include specific requirements that our suppliers implement due diligence procedures for their own supply chains and use reasonable endeavours not to purchase raw materials, resources or products from organisations using forced labour.
- 5.4 We expect our suppliers to hold their own suppliers to these same high standards.
- 5.5 We may terminate our relationship with individuals and organisations working on our behalf if they are found to be in breach of the Modern Slavery Act.

6. The warning signs to look out for

- 6.1 You should familiarise yourself with some tell-tale signs that may indicate something is wrong. This may include:
- workers who don't have written contracts of employment
 - workers who have had to pay fees to obtain work
 - workers who are not able to prove they are legally entitled to work in the UK
 - workers showing signs of physical abuse and/or appear malnourished or unkempt
 - workers who seem to have few personal possessions or often wear the same clothes
 - workers who appear frightened or reluctant to talk to others
 - workers who are dropped off or collected for work by the same person regularly, possibly very early or very late at night
 - a large number of people listed as living at the same address
 - multiple people being paid into the same bank account
 - multiple people providing the same next of kin details
 - agencies charging suspiciously low rates against standard industry pricing.

7. Speaking out

- 7.1 You have a duty to speak out about any concerns you might have. You can do this in any of the following ways:
- Raise your concerns through your line manager or another senior manager
 - Use our reporting service, Speak Out (Tel: 0808 143 0100 or Online: www.intouchfeedback.com/networkrail). You can make a report anonymously if you wish
 - Contact the ethics team (ethics@networkrail.co.uk)
 - Contact the Director of Risk & Internal Audit or the Group General Counsel
 - You can also contact the Modern Slavery Helpline (Tel: 0800 012 1700 or Online: www.modernslaveryhelpline.org/report)

- If you suspect someone might be a victim of modern slavery and are concerned that they are in immediate danger, contact 999.

7.2 Network Rail does not tolerate any form of victimisation, bullying or harassment of those who raise concerns.

7.3 For more information about speaking out, read our [Speak Out \(whistleblowing\) policy](#).

8. Communication and awareness of this policy

8.1 All employees are expected to complete mandatory ethics training, which includes content on modern slavery.

8.2 Additional tailored training will be provided to specific teams where necessary.

8.3 Our commitment to preventing all forms of modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

9. Responses to reports of suspected breaches of the Modern Slavery Act

9.1 Modern slavery is a criminal offence and Network Rail's Counter Fraud and Investigation Services team (previously the Business Integrity Department) will review any reported suspected breaches of the Modern Slavery Act and take appropriate action. This may include reporting the case to the police for investigation.