

Human Trafficking and Slavery Policy QD 064

Introduction

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns and management are expected to act upon them.

This Policy is made pursuant to the Modern Slavery Act 2015

Organisation's Structure

Trackwork Limited is a manufacturer and supplier of rail materials in the UK in addition to undertaking repairs, maintenance and enhancements works on the UK rail infrastructure.

Our Supply Chains

Our supply chains include the sourcing of raw materials related to the provision of mainly wood, rail and cast metal items from global sources.

Our Policies on Human Trafficking and Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to the implementing and enforcing of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence for Human Trafficking and Slavery

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. As part of our initiative to identify and mitigate risk we expect that the workplace practices of our suppliers include that:

- They do not use slave labour, illegal child labour or forced labour
- They will ensure that the overall terms of employment are voluntary
- They shall follow all local applicable laws relating to minimum age requirements, wages, overtime and benefits
- They will follow all local applicable laws relating to the number of hours worked in a seven day period.
- They will periodically certify that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country(s) in which they are doing business.

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of Trackwork Limited and it will conduct internal verification of product chains to evaluate and address risks of human trafficking and slavery.

Trackwork Limited will maintain internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and human trafficking. Trackwork Limited will thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or slave labour. If a supplier to Trackwork Limited is found to be in violation of this policy, Trackwork Limited will take prompt, remedial measures to address the violation.

Training

Trackwork Limited will provide training to its employees (including those who have direct responsibility for supply chain management), on the laws and Trackwork's policy against human trafficking and slavery.