

### Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> October 2019 to 30<sup>th</sup> September 2019.

The statement sets down Trackwork Group's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### Organisational Structure and Supply Chains

This statement covers the business activities of Trackwork Ltd which are as follows:

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

The Company currently operates in the following countries:

- England
- Scotland
- Wales

We directly employ around 400 employees solely in Great Britain.

### High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking:

- We have a high risk area in regards to the import of timber from around the Globe. However, all supply must be from valid FSC suppliers. FSC, as part of the certification award, cover areas such as this to ensure the whole supply chain from the forest through to the end user is managed responsibly.
- We use a factory in India and they adhere to the Indian Factory Act 1948. As per section 2 of the Act, they only employ people 18 years and above to work in factory, therefore it means they do not recruit children.

### Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Ethics Policy** - The Code of Conduct sets down the actions and behaviour expected of employees when

representing the Company.

- **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.
- **Equality & Diversity Policy** - The Company is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.
- **Recruitment Policy** – Trackwork ensures the process of recruiting employees is fair, consistent, professional and non-discriminatory to all candidates.

### Due Diligence Processes

The Company undertakes due diligence when employing staff. The Company's due diligence process includes:

- Zero tolerance for modern slavery and respect for human rights throughout the business by providing training and awareness raising.
- A Grievance Policy and Whistleblowing Policy in place that is accessible to all workers to raise complaints or concerns.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes:

- Building long-standing relationships with suppliers and making clear our expectations of business partners;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

### Risk Assessment

We directly employ around 400 employees solely in Great Britain. We have strict recruitment processes in place, ensuring all our employees have the appropriate right to work and are paid at least the Minimum Wage or National Living Wage. As a result of this we believe that forced or trafficked labour being directly employed by us is very low.

Our suppliers provide us with a copy of their slavery and human trafficking statements. This provides us with assurance that modern slavery risk is considered throughout their business as part of the due diligence procedures that supply chain compliance is in place.

### Training for Staff

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to undertake training.

### What we have done in 2018 / 2019

As part of our commitment to ensuring modern slavery is not present within Trackwork, we have taken the following action in 2018 / 2019.

- Reviewed our Modern Slavery and Human Trafficking policy.

- Created the training information.
- Began the training process of staff.
- As part of our supplier approval process, suppliers are asked in the supplier questionnaire to detail their compliance.

**What we will do in 2019/2020**

As part of our ongoing commitment to ensuring modern slavery is not present with Trackwork, we will look to take the following action in 2019 / 2020

- Continue to raise awareness amongst all employees through training and tool box talks.
- Review all policies to ensure compliance with this policy.
- Write to suppliers to confirm our expectation of compliance with the Act.
- We will monitor the supplier questionnaire responses more closely and take action as required.
- Implement a supplier Code of Conduct.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Senior Management endorse this statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

**Gail Rusling, Company Secretary**  
January 2020

A handwritten signature in black ink, appearing to read "g.rusling".