

### Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> October 2023 to 30<sup>th</sup> September 2024 and our plans for this coming financial year 1<sup>st</sup> October 2024 to 30<sup>th</sup> September 2025.

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 England, Wales and Scotland and we directly employ around 400 employees solely in Great Britain.

### High Risk Activities

As a business we do not have any activities that are considered to be potentially high risk of modern slavery or human trafficking.

### Responsibility

Responsibility for the Companies anti-slavery initiatives is as follows:

- **Policies:** The HR Manager is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.
- **Risk assessments:** The Compliance Director is responsible for risk assessments in respect of human rights and modern slavery. The process of our modern slavery risk assessment is the evaluation of the likelihood that goods or services procured by Trackwork is made fully, or in part, by slave labour.
- **Due diligence:** The Company Secretary is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.
- **Supply Chain:** The Procurement Manager is responsible for ensuring that all supply chain routes comply with modern slavery and human trafficking policies and processes.

### 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 staff to undertake training. See below KPI's.

### 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 (Employee Code of Conduct)** - The Ethics Policy 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 & Inclusion 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 for Slavery and Human Trafficking

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 the risk of 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.

### Performance Indicators – 2024/2025

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including:

- Anti-slavery advocate appointed to oversee the business activities;
- 100% of identified key supply chain partners invited to complete modern slavery assessments;
- 100% of all suppliers who are legally obliged to produce a Modern Slavery statement to provide a copy;
- 100% of Senior Management team undertaken Modern Slavery e-learning course by 30<sup>th</sup> September 2025;
- 100% of employees receiving awareness training by 30<sup>th</sup> September 2025;

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- 100% of supply chain partners signing up to Code of Conduct by 30<sup>th</sup> September 2025;

**What we have done in 2023/2024**

As part of our commitment to ensuring modern slavery is not present within Trackwork, we have taken the following action in 2023/2024.

- Reviewed our Modern Slavery and Human Trafficking policy.
- Reviewed the Supplier Code of Conduct.
- Reviewed the Ethics Policy (Employee Code of Conduct).
- Reviewed the staff training.
- Continued to review all policies to ensure compliance with this policy.

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.

The nominated person within the business that has the responsibility for ensuring arrangements are in place for preventing Modern Slavery in the business is Gail Rusling, Company Secretary.

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

Name: Gail Rusling  
Position: Company Secretary  
Date: 15/10/2024

Signature:

