Modern Slavery and Human Trafficking Policy & Statement BP17

1. Policy

1.1. Introduction

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibly 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. The organisation's Modern Slavery Policy sets out our commitment to preventing forced labour, human trafficking and exploitation. This Policy is made pursuant to the Modern Slavery Act 2015.

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.

1.2. Responsibilities

All employees, workers and contractors are responsible for remaining vigilant to the risk of modern slavery and human trafficking and for reporting any concerns through the appropriate channels. Managers are responsible for ensuring that concerns are taken seriously, investigated appropriately and escalated where necessary. The Managing Director is responsible for ensuring effective measures are in place to prevent modern slavery within the organisation and its supply chain.

1.3. Due Diligence

Trackwork Limited has zero tolerance for modern slavery, human trafficking, forced labour and any form of exploitation. 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 and it will conduct internal verification of product chains to evaluate and address risks of human trafficking and slavery. Trackwork will maintain internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and human trafficking. Trackwork will thoroughly investigate any

claim or indication that a supplier is engaging in human trafficking or slave labour. If a supplier to Trackwork is found to be in violation of this policy, Trackwork will take prompt, remedial measures to address the violation.

1.4. Reporting Concerns

All employees and workers have a responsibility to report any suspicion, concern, allegation, or evidence of modern slavery as soon as reasonably practicable. A person does not need proof before reporting a concern. Reasonable suspicion is sufficient. Any concerns regarding actual or suspected modern slavery, human trafficking or forced labour must be reported immediately to a line manager, HR Manager, Director or through the Company's Whistleblowing Procedure. Where possible, the following information should be documented:

- Date and time of concern, Location, Individuals involved, Description of observations or allegations, Any supporting evidence and Immediate risks to the individual concerned

The recipient will assess whether there is immediate danger to an individual, risk of harm, intimidation, or retaliation, urgent safeguarding concerns or potential criminal activity.

Where there is an immediate threat to safety or evidence of criminal activity:

- Emergency services should be contacted where appropriate.
- The Modern Slavery Helpline or relevant law enforcement authorities may be notified.
- Appropriate safeguarding measures should be implemented

The organisation will take reasonable steps to:

- Protect the individual from retaliation
- Maintain confidentiality
- Avoid actions that could place them at further risk
- Provide support where appropriate

The HR Manager or designated investigator will be appointed to undertake the investigation. Where suppliers are involved, Procurement and relevant management representatives may support the investigation.

The investigation will seek to:

- Establish the facts
- Assess the credibility of concerns
- Identify any indicators of modern slavery
- Determine the extent of any non-compliance
- Identify required corrective actions

Information will only be shared with those who have a legitimate need to know. Records will be handled in accordance with data protection requirements.

Where appropriate, the organisation may:

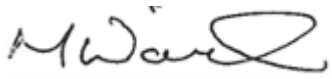
- Notify senior management
- Suspend business activities with a supplier
- Require corrective action plans
- Refer matters to law enforcement agencies
- Contact the Modern Slavery Helpline
- Report concerns to regulatory or statutory bodies

1.5. 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.

1.6. Monitoring and Review

This policy will be reviewed periodically to ensure continued compliance with legislative requirements and good practice.



Mark Waind, Managing Director - 30.09.26

2. Modern Slavery Statement

2.1. Scope

To ensure compliance with Section 54 of the Modern Slavery Act 2015 Trackwork Ltd have produced and published the following statement relating to actions and activities during the financial year 01.10.25 to 30.09.26 and our plans for this coming financial year 01.10.26 to 30.09.27.

2.2. Organisational Structure and Supply Chains

Trackwork Limited is a manufacturer and supplier of rail materials and undertakes railway infrastructure works throughout Great Britain.

The Company's supply chain includes the procurement of rail products, timber, concrete, steel, cast metal products, plant, equipment, subcontract services and other operational support services from UK and suppliers. The Company currently operates in England, Wales and Scotland and we directly employ around 360 employees solely in Great Britain.

2.3. High Risk Activities

Trackwork do not undertake any activities that are considered to be potentially high risk of modern slavery or human trafficking.

2.4. Responsibilities

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

- Policies: The HR Manager is responsible for reviewing policies relating to the prevention of modern slavery to ensure continued compliance with legislative requirements and good practice.
- Risk assessment: The Compliance Director is responsible for ensuring risk assessments in respect of human rights and modern slavery are produced and reviewed regularly. 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 managing 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. Where suppliers are legally required to publish a Modern Slavery Statement, Trackwork requests and reviews a copy as part of its supplier due diligence process.

2.5. Training

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. Trackwork provides awareness training to relevant employees and managers to assist them in identifying the indicators of modern slavery and understanding the action to take if concerns arise.

2.6. 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 out 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.

2.7. Due Diligence

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.

2.8. Risk Assessment

We directly employ around 360 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.

While the risk of modern slavery occurring within our directly employed workforce is assessed as low, the Company recognises that certain supply chains, particularly those involving raw materials, manufacturing processes and overseas sourcing, may present elevated risks. Due diligence measures are therefore focused on identifying and mitigating these risks through supplier engagement and assessment.

Where suppliers are legally required to publish a Modern Slavery Statement, Trackwork requests and reviews a copy as part of its supplier due diligence process. 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.

2.9. Performance Indicators – 2026/2027

The following key performance indicators (KPIs) will be used 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:

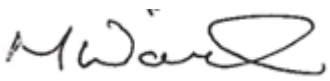
- 100% of identified key supply chain partners invited to complete modern slavery assessments
- 100% of all suppliers who are legally obliged to produce a Modern Slavery statement to provide a copy
- 100% of Senior Management team undertaken Modern Slavery e-learning course
- 100% of employees receiving awareness training
- 100% of supply chain partners signing up to Code of Conduct
- 100% of new suppliers assessed for modern slavery risk prior to approval
- 100% of suppliers identified as high risk subject to enhanced due diligence
- 100% of identified modern slavery concerns documented and subject to a corrective action plan
- 100% of new employees undergo right-to-work verification prior to commencement of employment
- Zero substantiated incidents of modern slavery within direct operations.

As part of our commitment to ensuring modern slavery is not present within Trackwork, we have taken the following action in 2025/2026.

- Anti-slavery advocate appointed to oversee the business activities.
- Reviewed our Modern Slavery and Human Trafficking policy.
- Reviewed the Supplier Code of Conduct.
- Reviewed the Ethics Policy (Employee Code of Conduct).
- Reviewed staff training arrangements.
- 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 team 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 Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Trackwork Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2026.



Mark Waind, Managing Director - 30.09.26