Modern Slavery Act 2015 - Slavery and Human Trafficking Statement - Consolidates actions for the financial period ending December 2022

Introduction

Readypower Group Limited (RGL) and all its subsidiaries have a zero-tolerance approach to Modern Slavery. We believe in acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and maintain effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business and to combat the risk of Modern Slavery taking place in our direct supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (**Act**). We expect the same high standards from all of our contractors, suppliers, and other business partners.

Modern Slavery is a crime and a violation of fundamental human rights. It can take various forms, including slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which have in common the deprivation of a person's liberty and freedom by another in order to exploit them for personal or commercial gain.

This statement is made on behalf of Readypower Group Limited (**RGL**) and all its subsidiaries, including Readypower Rail Services Limited (**RRSL**), Readypower Terrawise Limited (**RTL**) and Readypower Complete Drain Clearance Limited (**RCDCL**).

Overview of RG organisation and operations

Readypower Group (**RG** or the **Group**) is committed to the principles underpinning the current Anti-Slavery and Human Trafficking Policy issued by Angel Trains Limited (**ATL**) as the parent company and to the approach that has been adopted to further the policy objectives.

The steps taken as part of this statement relate to RG's core operational entities which include RRSL, RTL, and RCDCL. RGL is the direct holding company of the core operational entities.

RRSL was formed in 1992 and subsequently changed ownership via a management buyout in 2017. The same year, RTL was added to the Group, followed by RCDCL in 2021. In January 2022, the Group was acquired by ATL, who are one of the largest private investors in the UK rail industry. RGL is a wholly owned subsidiary of ATL.

RG is one of the UK's leading specialist asset-led infrastructure service providers to the rail industry. The Group has an annual turnover in excess of £36m, the financial threshold under the Act.

The business of RG is organised into three main business areas:

- Compliance, Procurement, and Commercial which report to the Chief Executive Officer (**CEO**);
- Subsidiary operating company departments including Operations, Commercial, POS, Engineering Services, and other applicable departments, report to the respective Managing Director (**MD**) of the operating company; and
- Finance, HR, and IT services which report to the Chief Financial Officer (**CFO**).

The MDs, CFO, and Compliance Director all report to the Chief Executive Officer (**CEO**). RGL, RRSL, RTL and RCDCL operate through a unified management structure.

Our Approach

To properly and transparently address the risks of Modern Slavery, RG has developed a risk-based approach to identify and assess the risk of Modern Slavery within our business and direct supply chains. Our focus has been on the operations of RG in the United Kingdom (UK) and Northern Ireland (NI), which is where our offices and staff are located, and our business and turnover is generated.

Since the requirement came into effect we have:

- made the RG Board aware of the requirements of the Act; and
- established a dedicated internal multi-disciplinary compliance team and working group, which continues to review and support the implementation and development of our approach.

In the context of Modern Slavery, our current Humanities Policy (which contains our statement of intent to prevent human trafficking and modern slavery, “Policy”) is applicable to our core operational entities, employees, and RG's relationships with its customers, suppliers, and business partners. This policy details RG's high ethical standards and seeks to support achieving impact and change by clearly communicating the expectation that our suppliers hold their own supply chain to those same standards.

Our Business

RG employs over 230 professional, technical and support staff from its headquarters in Winnersh and offices in Glasgow, Nottingham and Warrington, and various work sites across the UK & NI.

Our primary business operations and direct first tier supply chain relationships are predominantly based in the UK & NI, with indirect second tier supply chain relationships extending outside the UK & NI.

RG has a robust hiring process; our Human Resources Department uses reputable recruitment agencies and ensures thorough vetting of any casual labour used, to minimise risks to RGL's internal operations.

We subscribe to an independent confidential reporting body (CIRAS), providing a safe channel of communication for staff to raise concerns. All employees are made aware of CIRAS during their company induction, and we continue to raise awareness through internal communications to employees.

We promote our Health & Safety Policy, which demonstrates clear commitment from the highest levels in RG, to the safety and welfare of our staff and business. Likewise, our currently applicable Policy has been endorsed by our CEO.

To help ensure anyone joining RG is aware of our Policy, we have included it in our induction process, which requires written acknowledgement from the inductee.

Our operations and supply chain

We implemented our risk-based approach to identify and assess the risk of Modern Slavery by reviewing RG's core business operations and its direct supply chain. As part of our approach, we constituted a multi-disciplinary team and conducted an initial risk analysis of our customers and direct supply chain, which informed our assessment of relevant risks in conjunction with our overall assessment of Modern Slavery risks in the context of our business.

RG's other direct supply chain relationships comprise of manufacturers and maintainers of plant and vehicles, suppliers of parts, logistics contractors, and technical consultancy service companies. The initial risk analysis helped us to identify 35 key direct suppliers who might pose a risk, albeit low and this is being further developed in light of our experience dealing with potential allegations or risks of Modern Slavery associated with indirect suppliers as detailed below.

The key suppliers were identified based on their ability to support and assist in the delivery of RG's core business objectives. These suppliers are proven within the UK rail industry and have track records for treating employees fairly.

Details of the steps we have taken following such analysis, and the steps we will take in the year ahead, are set out in the next section.

Where RG becomes aware of potential allegations or risks of Modern Slavery associated with our direct suppliers, we recognise that termination of such relationships is one of a range of responses and may not be the most sustainable or effective response. RG seeks to review allegations and risks and, where appropriate, work with suppliers to resolve them. This includes engaging with key suppliers to take a similar approach with their own suppliers. Where necessary and appropriate, including in respect of a situation of legal or RG policy non-compliance, RG will review the situation and take appropriate steps, including to cease engagement and/or the business relationship.

Our effectiveness in combating Modern Slavery and Human Trafficking

Over the last financial period ending December 2022, RG has taken the following steps to support the continuing review and development of our risk management approach. We have:

- undertaken the annual review of our currently applicable Policy;
- included our Policy in our company induction process;
- implemented an e-learning program with iHASCO to include Modern Slavery Awareness training, with staff scheduled to revisit this training on an 12 month basis to maintain awareness;
- implemented a supplier evaluation process which is documented and specifically requests the supplier to emphasise their management process for modern slavery;
- ensured suppliers posing any risk are either audited by an external body such as RISQS, or by the Group directly;
- implemented a site assurance process that includes monitoring for modern slavery risks or concerns at site level;
- confirmed that over the course of this period no new reports concerning Modern Slavery were communicated to RG;
- contributed to, and adopted, an assessment and integration plan for the implementation of ATL's Modern Slavery risk management approach to the Group;
- monitored action taken by the UK government (including guidance) in relation to higher risk jurisdictions and the Act, more generally, to inform the continuing review and development of our Modern Slavery risk management approach.

In the financial year ahead, to develop our risk management approach, we will:

- implement ATL's Modern Slavery risk management approach, as appropriate and in line with the assessment and integration plan;
- adapt and roll out ATL's Anti-Slavery and Human Trafficking Policy to the Group, including presenting the policy to the board for adoption;
- provide training to familiarise employees of the Group with the ATL Anti-Slavery and Human Trafficking Policy;
- include the ATL Anti-Slavery and Human Trafficking Policy in our company induction process;
- continue the provision of the e-learning program with iHASCO to include Modern Slavery Awareness training, with staff scheduled to revisit this training on a 12 month basis to maintain awareness and align with the requirements of the ATL Anti-Slavery and Human Trafficking Policy;
- sample through internal audits that new employees have read and understood our current ATL Anti- Slavery and Human Trafficking Policy;
- continue to monitor and assess our approved suppliers, checking they are either RISQS audited or audited by the Group;
- commence an approved supplier review risk assessment;
- continue to monitor for reporting of any concerns related to Modern Slavery;
- report queries, issues or concerns raised to our compliance team to our Board;
- review and address any concerns raised, as appropriate; and
- be open to participate in, as appropriate, business or railway industry initiatives to combat Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement.



Russell Jack
Chief Executive Officer
of RGL, RRSL, RTL, and RCDCL

1st March 2023