Modern Slavery and Human Trafficking Statement for
Porterbrook Holdings I Limited
Porterbrook Holdings II Limited
Porterbrook Investments I Limited
The Porterbrook Partnership
Porterbrook Rail Finance Limited
Porterbrook Leasing Mid Company Limited
Porterbrook Leasing Company Limited
Porterbrook Maintenance Limited
Porterbrook March Leasing (4) Limited
Porterbrook Leasing Asset Company Limited
("Porterbrook") for the 2022 financial year

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (Act).

We are committed to doing all that we can to combat slavery and human trafficking (Slavery) and we realise that it can occur in many forms, such as forced labour, child labour, domestic servitude and workplace abuse.

We have a zero tolerance approach to Slavery and this statement sets out the steps that Porterbrook has undertaken, and is continuing to take, to ensure that it is not taking place within our business or supply chain.

Our organisation

The Porterbrook group operates in the United Kingdom, specialising in the leasing of all types of railway rolling stock and associated equipment. Not all legal entities within the group, as listed above, fall within the criteria defined in the Act, but the policies and procedures in place to prevent Slavery, and hence this statement, apply to all such entities.

Our policies

We operate a number of internal policies to help ensure that we are conducting business in an ethical and transparent manner. These include:

- **Anti-slavery and Human Trafficking policy** (which can be accessed ***here***). This policy reflects our commitment to acting ethically and with integrity in all our business relationships. It sets out the roles and responsibilities of Porterbrook employees in identifying any instances of Slavery and how they should be acting on them.

- **Whistleblowing policy** (which can be accessed ***here***). This policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

- **Code of Conduct for Suppliers** (which can be accessed ***here***). This code sets out the standard of behaviour expected of suppliers to our business.

- **Code of Practice** (which can be accessed ***here***). This is a voluntary code setting out Porterbrook's business philosophy and our core working values.

Risk Assessments

We undertake periodic assessments of the risk of Slavery within Porterbrook's supply chain, as well as within our own operations.

For our own operations, we consider: the location of our operations, the roles being performed, the recruitment processes and whether there have been any reports of concerns regarding Slavery. We also undertake “right to work” checks on all of our employees prior to them commencing their role. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work. Based on these risk assessments, we deem the risk of Slavery occurring within our employee population (including our agency and contract staff under our direct supervision) to be very low.

For our suppliers, the risk assessments include mapping out our supply chains to assess particular industry and geographical risks to cover the entire scope of Porterbrook’s operations. We assess the risk after considering where our suppliers are based, the products and services we procure from them, the volume of spend and the content of any Slavery statement they may publish. We recognise that our biggest exposure to Slavery is in our supply chain and so we have put in place systems to mitigate these risks.

Our suppliers

We conduct due diligence on our suppliers and have a rigorous onboarding and accreditation process to approve them before use. Many of them hold international quality standards and accreditations and are regularly audited both by the issuing authorities and ourselves (or agents acting on behalf of Porterbrook) to ensure ongoing compliance to quality standards and regulatory requirements.

Our due diligence process and commitment to ensuring transparency in our supply chain involves requiring suppliers to operate under a code of conduct and meet the minimum standards outlined in it. This includes confirmation that they:

- will adhere to minimum age provisions of applicable laws and regulations, including being proactive in ensuring wages, working hours and conditions are appropriate for their employees;
- will not use forced, bonded, compulsory labour or servitude or any form of human trafficking; and
- must ensure their workers and employees receive training regarding compliance with the Act to ensure compliance with the code of conduct.

Suppliers are also required to complete a self-assessment questionnaire which, among other things, asks them to confirm whether:

- they have a Slavery policy;
- staff are trained to identify the risks of Slavery; and
- they have a process to allow communication of any grievances or concerns.

Our contracts with suppliers also seek to contain terms which require them to comply with the Act and provide for a right of audit, where we consider it to be appropriate to do so.

Training

All new members of staff receive training on Slavery as part of their induction and periodic training is provided for all staff so that they are aware of the issues surrounding it and what to do if they suspect that it is taking place within our supply chain.

Effectiveness in combating Slavery

The measures identified above are regularly assessed to determine their effectiveness in preventing Slavery in Porterbrook’s supply chain. The following KPIs are measured to assist in this assessment:

- % of staff who have received Slavery training in the last three years;
- review of Porterbrook's Slavery policy and update as required at least once every three years; and
- number of reports identifying concerns of Slavery and number of subsequent investigations satisfactorily completed each year.

No reports identifying concerns of Slavery were made in 2022.

Approval for this statement

This statement was approved by the relevant Boards of Directors /Partnership Board on 25th May 2023.



Chris McClure

Director/Company Secretary/Manager

25th May 2023