KEOLIS amey

DOCKLANDS

Keolis Amey Docklands Limited's Modern Slavery statement for financial year ending 31 December 2023

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 ("the Act"). This statement sets out the steps that Keolis Amey Docklands Limited ("KAD"/ "we"/ "our") has taken, and is continuing to take, to ensure that modern slavery is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We take a zero-tolerance approach to any and all forms of modern slavery. We maintain a commitment to improving our practices and are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within our business or supply chain.

Our business

Our registered office address is Milton Gate, 60 Chiswell Street, London EC1Y 4AG and the company is a joint venture formed between Keolis (UK) Limited and Amey Limited. We are the operator and maintainer of the Docklands Light Railway pursuant to a franchise agreement with Docklands Light Railway Limited. Our franchise agreement commenced on 7 December 2014 and will continue until 1 April 2025, subject to a possible further extension.

Our commercial activity covers a range of categories including transport operations and support works, construction, maintenance, rail signalling, rolling stock, facilities and property management.

Procurement is one of our support functions, which is provided in-house, affording us a great deal of control over our supply chain. As an overview of the structure of our supply chain, our top 55 suppliers represent 80% of our total outlay on goods and services which we rely on to operate and run services on the DLR. 95% of our suppliers are based in the UK.

Our policies

We operate a number of policies to ensure that we conduct our business in an ethical and transparent manner. Our Managing Director takes managerial responsibility for driving and implementing these policies. These include:

Modern Slavery Policy: This policy sets out the organisation's stance on modern slavery and explains how our employees can identify any instances of this and where they can go for help.

Guide for Ethical Business Conduct: This guide addresses ethical business practices to protect workers from abuse and exploitation both within our company and our supply chains. This guide sets out the ethical and professional standards of conduct for all employees.

Procurement and Purchasing Policy: This policy reflects our commitment to responsible and sustainable business principles throughout the supply chain and references various company processes used to ensure that all suppliers within our supply chain are committed to modern slavery prevention.

Whistleblowing Policy: This policy sets out the process for our staff to report suspected wrongdoing, including in relation to modern slavery concerns, without fear of reprisal.

Contracting with suppliers

We maintain a preferred supplier list which is limited to suppliers and service providers in respect of whom we have conducted due diligence. Our due diligence processes include use of the RISQS Rail Industry Supplier Qualification Scheme, among other tools and systems, which includes checks to ensure that have published modern slavery statements, where required to do so, and has appropriate policies in place. Even where we have previously contracted with a supplier we will conduct a due diligence check prior to entering into any new contract with them to ensure the information that we have in relation to the relevant company is up to date.

Our due diligence procedures include a pre-qualification questionnaire completed by potential suppliers and service providers, which we review before a decision is made as to whether we will contract with them. We are also members of SEDEX (Supplier Ethical Data Exchange), which supports our ability to effectively manage ethical risks within our supply chain.

During our financial year ending on 31 December 2023, we continued working on implementing our policies in line with our zero-tolerance approach. We have made sure our suppliers support our approach by including provisions in our contracts by which suppliers commit to comply with anti-slaveryand human trafficking regulations and ensure their employees working wholly or mainly on our sites are paid no less than the London Living Wage (and otherwise with the minimum wage).

Awareness of modern slavery and training

All our staff have access to our Modern Slavery Policy and our Whistleblowing Policy.

Effectiveness

Our standard contract terms impose obligations on our suppliers to comply with all applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015. These terms are reviewed periodically and provisions relating to modern slavery prevention have been enhanced, including requiring suppliers to adopt and implement policies to prevent modern slavery, provide regular staff training, refrain from any conduct that would be in breach of the Modern Slavery Act 2015, include appropriate obligations in sub-contracts and certify compliance on an annual basis.

Other activities

We have been working proactively with RISQS to include the auditing of supplier policies regarding modern slavery and human trafficking within the rail sector.

Approval for this statement

We remain dedicated to strengthening our practices to continuously reduce our exposure to modern slavery and human trafficking risks.

This statement is made pursuant to section 54(1) of the Act and constitutes our Modern Slavery statement for the purposes of the Act.

Statement approved by the Board of Directors on 24th June 2024 and signed by Richard Graham (Managing Director).

Name: Richard Graham

Signature: 

Date: *25 June 2024*