



**MODERN SLAVERY  
STATEMENT**

May 2025



**In today's interconnected world, businesses have a fundamental responsibility to uphold human rights and ensure ethical labour practices. Modern slavery, in all its forms, remains a significant global challenge, and we are committed to preventing any form of exploitation within our operations and supply chains.**

**We continue to implement proactive measures to assess, mitigate, and address the risks associated with modern slavery. Through close collaboration with our partners, we strive to uphold fair working conditions and safeguard human dignity across all aspects of our business.**

## OUR COMMITMENT TO COMBATING MODERN SLAVERY

### **Human Rights & Compliance**

We uphold human rights and comply with all employment laws.

### **Zero Tolerance**

We have a strict zero-tolerance policy for modern slavery and human trafficking.

### **Fair Pay & Working Hours**

We ensure fair wages, reasonable hours, and ethical working conditions.

### **No Forced Labour**

We do not permit forced, bonded, compulsory, or child labour.

### **Freedom of Association**

We respect employees' rights to organise and bargain collectively.

### **Ethical Business Partnerships**

We refuse to work with any organisation that disregards human rights.



## OUR ROADMAP

Since publishing our first Modern Slavery Act (MSA) statement in 2017, we have taken progressive steps to strengthen our approach to managing modern slavery risks. From conducting an initial risk assessment in 2018 to implementing formal policies, staff training, and awareness initiatives by 2020, we have continued to build internal capability. In 2022, we developed an online training package to broaden accessibility, and in 2024, we are focused on aligning our practices with emerging standards and guidance.



## PROGRESS TOWARDS OUR COMMITMENTS 2023 / 2024

### BUILDING AWARENESS

#### OUR 2024 COMMITMENT

We are committed to raising awareness of modern slavery and its warning signs among our staff, utilising all available communication channels within our business.

#### OUR PROGRESS

We continue to educate our workforce and reinforce awareness of their responsibility to identify and report potential signs of modern slavery. This year, we have met our commitment through three distinct communication channels.

#### COMPANY WIDE TRAINING

One of the most effective strategies for combating modern slavery is education. To build an informed workforce, we provide resources and training to our employees. We are pleased to have transitioned to an annual training schedule, replacing our previous bi-annual approach.

Currently, we offer two training courses:

- **Modern Slavery Act: Preventing Exploitation**
- **Modern Slavery: A Practical Overview**



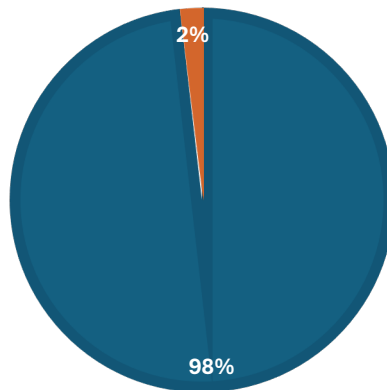
Below are our course completion statistics:

- **275 employees** enrolled in *Modern Slavery Act: Preventing Exploitation*
- **126 employees** enrolled in *Modern Slavery: A Practical Overview*

These figures reflect participation from our workforce of over 1,300 employees. While this represents an important foundation, we recognise the need to broaden awareness across the organisation. We are committed to expanding our course offerings and increasing enrolment in the coming year to reach a wider group of staff.

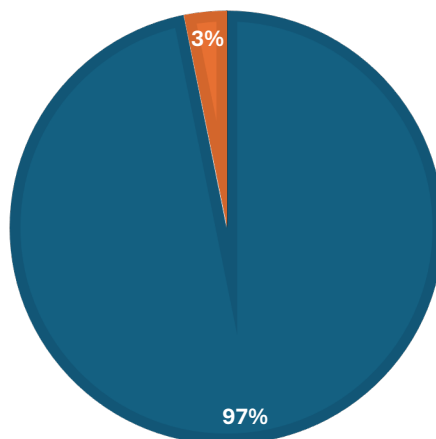
### PREVENTATIVE EXPLOITATION COMPLETION (275)

■ Complete ■ Not Complete



### A PRACTICAL OVERVIEW (126)

■ Complete ■ Not Complete



## AWARENESS NEWS ARTICLES

We continue to publish articles on our intranet to enhance awareness of modern slavery within our operations and supply chains. Engagement with these posts has been positive, and we plan to expand our communication efforts over the next year.

### Call To Action: How You Can Help?

At GB Railfreight, our strength lies in our people. Every one of us, regardless of role or seniority, can make a meaningful difference in the fight against modern slavery. By building awareness and remaining vigilant, we can ensure that our company operates ethically and that no part of our supply chain contributes to exploitation. Understanding modern slavery and recognising the signs is the first step to protecting the rights and dignity of everyone connected to our operations.



## SITE SIGNAGE

We have installed signage and posters across the majority of our sites. These materials are strategically placed in communal areas at eye level to maximise visibility and support our awareness initiatives.



## POLICY & GOVERNANCE

### OUR 2024 COMMITMENT

In 2024, we committed to:

- Utilising our Ecovadis Labour & Human Rights scorecard results to identify strengths and areas for improvement, ensuring continuous enhancement of our policies and processes.
- Collaborating with our sustainability team to develop a Sustainable Procurement Policy that aligns with our shareholders' governance standards and our core values.
- Integrating sustainability criteria into supplier selection and competitive market exercises.

### OUR PROGRESS

ESG clauses and commitments have been incorporated into our fuel and intermodal wagon tenders. Building on this, we are exploring ways to further embed ESG considerations into procurement practices.

## LEGISLATION & GUIDANCE

### OUR 2024 COMMITMENT

Following the release of the government's review of **PPN 02/23: Tackling Modern Slavery in Government Supply Chains** and the publication of the **BSI Standard BS 25700 – Organisational Responses to Modern Slavery – Guidance**, we committed to reviewing and incorporating their recommendations into our internal policies, governance structures, and staff training. These frameworks are intended to strengthen our overall approach to identifying, preventing, and responding to modern slavery risks.

### OUR PROGRESS

We have reviewed the key recommendations of PPN 02/23 and the guidance outlined in BS 25700. While full integration into our internal systems is still in progress, the insights from both documents are helping to shape our next steps.

## OUR ORGANISATION STRUCTURE & SUPPLY CHAINS

### OUR ORGANISATION

GB Railfreight Limited (“GB Railfreight”, “we”, “our”) remains one of the fastest-growing companies in the UK railway sector, with a turnover exceeding £300 million. Established in 1999, the company is currently owned by **Infracapital**, the unlisted infrastructure equity arm of **M&G Prudential**.

As a **Freight Operating Company (FOC)**, our core services involve transporting goods by rail across the UK and through the Channel Tunnel for both UK and European customers. We operate across various market segments, including **intermodal, infrastructure, bulk, and rail services**.

### OUR SUPPLIERS

As an FOC, our primary capital expenditure relates to **rolling stock and heavy maintenance** on locomotives and wagons, including associated components. Our rolling stock is predominantly manufactured in the **EU**, with our **Class 66 fleet** built in **North America**. All rolling stock is serviced within the UK, with Class 66 locomotives maintained by the **original equipment manufacturer**.

Fuel is sourced from UK providers, while other ancillary expenditure includes **road haulage and terminal handling, facilities management, travel and subsistence, IT and telecoms, office supplies, uniforms and PPE, and company vehicles**—all of which are procured from UK-based suppliers. However, we acknowledge that our extended supply chain has a **global reach**.

We do not manufacture or maintain rolling stock ourselves and therefore do not operate factories or handle raw materials. The majority of our third-party spend is with **financiers or providers of equipment, maintenance, and services** that support our day-to-day operations.

We continue to work alongside our **strategic supplier panel** to ensure that all suppliers meet our required standards of assurance, maintaining consistency with previous years. As a **prerequisite**, we require all **current and newly onboarded** suppliers to comply with our **Supplier Code of Conduct (SCoC)**, accessible via our website. This commitment is reinforced by embedding the SCoC in all **contract templates, requests for quotations, invitations to tender, and expressions of interest**.

As part of our **standard compliance clauses**, suppliers must warrant that:

- Neither they, nor their employees or contractors, have been convicted of or are under investigation for **modern slavery or human trafficking**.
- They maintain **anti-slavery policies** throughout their engagement with us.
- They will **immediately notify us** if they become aware of any suspected slavery in their supply chains.

## OUR PEOPLE

GB Railfreight employs over **1,300 people** across **more than 35 locations** nationwide, including regional offices and depot sites. Our fleet consists of **approximately 180 locomotives and over 2,000 wagons**, transporting over **25% of Britain's rail freight**.

Our commitment to reducing the risk of modern slavery begins with our **robust recruitment process**. The majority of our staff are recruited directly through an **online recruitment platform**, ensuring compliance with applicable **employment laws**. As part of this process, we conduct '**right to work**' checks to verify the candidate's **age and work eligibility** before issuing employment contracts.

Where agency staff are required, we exclusively partner with **reputable employment agencies** whose practices meet or exceed our own high standards.

We prioritise staff development and wellbeing through:

- **Online learning and benefits platforms**
- **A dedicated wellbeing programme** promoting physical and mental health
- **Regular training, workshops, and intranet articles** to enhance awareness
- **Wellbeing Champions** to provide support across the business

As part of our **commitment to equality, diversity, and inclusion**, we signed the **Rail Industry Equality, Diversity and Inclusion Charter** in **2021**. Through this pledge, we align our business with the **United Nations Sustainable Development Goals**.

This year, we have introduced **Harassment in the Workplace** training for all employees and will expand our training initiatives in the future.

## POLICIES

We are committed to ensuring that **modern slavery and human trafficking have no place in our business or supply chains**. This commitment is reflected in our policies, which are guided by a **people-focused culture**. We believe this approach has driven **sustained growth, job security, and high performance** across our workforce.

### ANTI-SLAVERY & HUMAN TRAFFICKING POLICY – REVIEWED 2022

This policy affirms our commitment to working only with individuals who choose to work freely, with rights to **equal opportunity, freedom of association, and collective bargaining**.

### WHISTLEBLOWING POLICY – REVIEWED 2024

GB Railfreight encourages employees to report any concerns, including issues relating to modern slavery and human trafficking, without fear of retaliation.

### EMPLOYEE CODE OF CONDUCT – REVIEWED 2024

This policy outlines our approach to **fair employment practices, workplace conduct, and supplier relationships**, ensuring that fundamental human rights are upheld.

### SUPPLIER CODE OF CONDUCT – REVIEWED 2022

All suppliers must comply with our Supplier Code of Conduct, reinforcing our **zero-tolerance** approach to modern slavery and unethical labour practices.

### ANTI-BRIBERY & CORRUPTION POLICY – REVIEWED 2024

This Policy highlights ‘red flags’ that are also potential indicators of modern slavery, such as cash payments, unusual payments to a third party or any close family.



## OUR RISK ASSESSMENT

GB Railfreight has conducted a **comprehensive risk assessment** to identify the areas within our operations and supply chains that present the highest risk of modern slavery or human trafficking. This assessment was based on the following key factors:

### **Size of Company**

Smaller companies often have fewer resources to assess and monitor modern slavery risks within their supply chains.

### **Location of Operations**

Suppliers operating in, or sourcing components from, high-risk countries as identified in the **Global Slavery Index (GSI)** may pose an elevated risk.

### **Industry Risk Score**

Suppliers operating within high-risk industries, as defined by the **GSI**, require closer scrutiny.

### **Modern Slavery Act 2015 Compliance**

We assess whether suppliers meet the **£36 million turnover threshold** and review their **annual modern slavery statements** to evaluate their actions in mitigating modern slavery risks.

## LATEST RISK ASSESSMENT

Our **initial risk assessment** identified the following areas within our supply chain as presenting the highest risk:

- **Cleaning providers**
- **Taxi services**
- **Office supplies**
- **Facilities management**
- **IT equipment**

## OUR COMMITMENTS 2025 – 2026

### 2026 MODERN SLAVERY STATEMENT

We will continue to publish our **annual modern slavery statement**, reaffirming our commitment to compliance, transparency, and the eradication of modern slavery within our operations and supply chains.

### UPDATED RISK ASSESSMENT & QUESTIONNAIRE SUBMISSION

We will conduct a **renewed risk assessment** next year, using the results to distribute **modern slavery questionnaires** through our newly selected **supplier assurance system**. This will enable us to identify suppliers requiring **further scrutiny** based on our **initial desktop audit**.


To strengthen our oversight, we will explore **advanced supply chain monitoring software** to enhance visibility beyond **Tier 1 suppliers**, gaining greater insight into **Tier 2 and Tier 3 suppliers**. This will allow us to assess the broader supplier networks of our key partners and evaluate any increased risk profiles.

### ENHANCING AWARENESS & TRAINING

We have recently launched a **new training portal**, where we will continue to educate employees on identifying **modern slavery and human trafficking**. The results of this initiative will be shared in our **next annual statement**. Our planned training includes:

As part of our ongoing commitment, we will remain informed of the latest **modern slavery education and guidance** from **Hope for Justice**. We will also focus on raising awareness among suppliers deemed **high risk** based on our **risk assessment findings**.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been endorsed by the Board of Directors of GB Railfreight Limited.

DocuSigned by:  
  
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John Smith

Chief Executive Officer– GB Railfreight Limited

Dated: 07/07/2025

[gbrailfreight.com](http://gbrailfreight.com)

**GB Railfreight**