

## Modern Slavery and Human Trafficking Statement 2019/2020

### Our Organisation

GB Railfreight Limited was established in 1999 and became part of Hector Rail group in 2016. We are the third largest rail freight company in the UK with a turnover in excess of GBP 180m transporting goods by rail across the UK and through the Channel Tunnel for our UK and European customers in the intermodal, infrastructure, construction, biomass, coal and petrochemical markets. Most of our staff are directly employed. We have over 850 employees working across the UK.

### Our Policy

As a company we are committed to playing our part in combatting unlawful and unethical practices in relation to modern slavery and human trafficking. We will not knowingly use child labour or forced labour in any of our services or accept goods or services from suppliers that are not taking similar steps to combat such unlawful practices.

### Our Actions

We have set out our commitments to combat modern slavery and human trafficking in a number of policies:

- **Anti-Slavery and Human Trafficking Policy:** helps us minimise and address any risk of modern slavery in our supply chain.
- **Whistleblowing Policy:** encourages staff to report concerns, including concerns relating to modern slavery and human trafficking.
- **Staying on Track:** sets out our group-wide approach to the protection of fundamental rights including, fair employment practices, conduct at work and supplier relationships.

We continue to review the risk of modern slavery in our supply chains. We have identified and are engaging with UK based suppliers who are high risk, which is where we believe we can have the biggest positive impact. This includes facilities management and transport companies, particularly where the roles are low skilled and attract a low remuneration package.

Our contracts and terms of business include provisions to ensure that we have the right to terminate any supplier contracts which infringe modern slavery legislation. We have developed standard clauses on modern slavery which are added to all new and renewed contracts.

Over the past year, we have focused our internal awareness raising on senior management colleagues involved in supplier management. We also produced a modern slavery article on the risk of modern slavery and human trafficking in the UK, which is available to staff through our internal news mobile application.



## Our Commitment

As part of our ongoing commitment, over the next 12 months we will continue with our goal to raise awareness and engage with suppliers as well as to enhance our due diligence procedures to help us ensure that our suppliers adhere to the modern slavery legislation.

Specific actions include:

1. Continue to engage with high risk suppliers to reduce the risk of modern slavery in our supply lines.
2. Follow our agreed Rail Map plan to raise awareness of the dangers of modern slavery across the business and embed training in the induction of new employees.
3. Invest in risk management software to automate the supplier approval process and make risk more transparent by improving visibility and the requirements to review outstanding responses.
4. Widen awareness within the company of the Rail Industry Supplier Qualification Scheme ("RISQS"), as the industry standard. We encourage staff to use RISQS as part of the supplier selection process for suppliers who are registered to the scheme, in addition to our own processes.

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.

  
**John Smith**  
Managing Director – GB Railfreight Limited

Dated: 27/3/19

