



Professional



Responsible



People



Teamwork



Passionate

## **MODERN SLAVERY AND HUMAN TRAFFICKING** **POLICY STATEMENT**

Global Rail Construction Limited is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, our suppliers including sub-contractors.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Global Rail Construction Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with our supply chain partners [suppliers of goods and services to the organisation].

The requirement to publish a slavery and human trafficking statement for each financial year of the organisation will be undertaken when the Global Rail Construction Limited meets the threshold required.

As part of the companies due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all workers electronically and can be obtained from the HR department upon request.


This Policy takes into account, and supports, the policies, procedures and requirements documented in our Management Systems, compliant with the requirements of ISO 9001, ISO 14001 and OHSAS 18001. The implementation and operation of this management system underlines our commitment to this policy.


Formal procedures concerning slavery and human trafficking will be developed, including disciplinary procedures where they are breached to support the policy. The company will ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

It is the responsibility of everyone in the business to comply with this policy and its associated arrangements as an integral part of their day to day business.

The policy will be reviewed annually, as a minimum by the Directors in consultation with the Head of Compliance and amended as required by law should new legislation come into force or to ensure it remains relevant and appropriate to the organisation. This has been endorsed by the Management team at Global Rail Construction Limited who take direct responsibility for its execution.

Signed on the 8<sup>th</sup> June 2018 for and on behalf of Global Rail Construction Limited.

Signed:   
M G Lombardelli  
Managing Director

Signed:   
P. Coleman  
Head of Compliance