

## **Our slavery and human trafficking statement 2017/18**

Network Rail has published this statement in accordance with the Modern Slavery Act 2015. The Modern Slavery Act requires any organisation with a global annual turnover of £36 million or above, that is operating in the United Kingdom, to produce an annual statement detailing the steps that have been taken during the financial year to ensure modern slavery isn't taking place within any part of their own business, or any part of their supply chains.

This statement is made on behalf of:

- Network Rail Infrastructure Limited; and
- Network Rail (High Speed) Limited.

It sets out the steps taken during the year ended 31<sup>st</sup> March 2018 to prevent modern slavery and human trafficking in these businesses and their supply chains.

Throughout this statement, the term 'Network Rail' refers to the companies listed above.

## **Our business and supply chains**

Network Rail owns and operates Britain's railway infrastructure; that's 20,000 miles of track, 30,000 bridges and viaducts and thousands of tunnels, signals, level crossings and points. We also manage rail timetabling and operate 20 of the largest stations.

We directly employ approximately 38,000 employees and many contractors, working across eight geographically placed routes and a ninth route which operates nationally, serving freight and long-distance operators. These nine routes are supported by a central national framework providing critical services to the routes, including the System Operator, Technical Authority, Infrastructure Projects, Group Digital Railway, Route Services and a corporate core covering activities such as business strategy, functional policy, legal and corporate assurance, and communications.

To find out more about Network Rail, please take a look at our ['About us'](#) document, available in both a summary and full version.

Our supply chain is vast and is essential in helping us run a safe and efficient railway. We support 117,000 jobs and spend over £7 billion through our supply chain each year, procuring items and services ranging from materials and components to build and maintain our track and signals, through to contingent labour, personal protective equipment (PPE), to chairs for our offices and depots.

## **Our commitment**

Modern slavery is a crime and a violation of fundamental human rights, which won't be tolerated at Network Rail. We're committed to doing business in a responsible way, which includes a commitment to do all that we reasonably can to prevent all forms of modern slavery in any part of our own business and our supply chain. We expect our customers and suppliers to share and uphold these same strong ethical values and principles.

## Ownership

At the end of 2016, primary and day-to-day responsibility for our modern slavery policy and programme was assigned by our Executive Committee to the Group General Counsel and Company Secretary, reporting directly into our Chief Financial Officer, who sits on the board of directors. In response to this decision, we set up a working group comprising of representatives from each of the following functions:

- Ethics
- Contracts and Procurement
- Legal
- Policy and Assurance; and
- Sustainability.

The working group have continued to meet regularly since its creation, and are responsible for putting together a programme of works to reduce the risk of modern slavery happening within our business or supply chains.

## Our work in 2017/18

During 2017/18, we:

- Amended our [Anti-Slavery and Human Trafficking policy](#) in May 2017 to make it clearer and easier to understand
- Updated our supplier [Code of Conduct](#) in October 2017 to include our expectations in relation to modern slavery
- Updated our company contract requirements to include specific requirements in relation to modern slavery (due for publication in March 2019). These include complying with Network Rail's Anti-Slavery and Human Trafficking policy and completing modern slavery training, as requested by Network Rail
- Started to risk assess our suppliers to identify those of higher risk, taking into consideration whether the types of goods or service the supplier provides to Network Rail are known to be within a high-risk industry. This exercise has enabled us to identify that the procuring of personal protective equipment (PPE) and contingent labour are two of our highest-risk areas. As a result of this, we will give greater focus to these two areas in 2018/19
- Wrote to over 10,000 of our suppliers in November 2017, setting out the steps we've taken to date to prevent modern slavery, and our expectations of our suppliers and those working for, or on our behalf. This included signposting to our updated supplier Code of Conduct
- Launched mandatory companywide ethics training at the end of January 2018, which covers modern slavery. This new training follows on from our first ethics training programme launched in 2015 and is designed to provide all our employees with basic knowledge of what modern slavery is, the warning signs to look out for and how to report concerns. We have seen strong engagement from the business on this so far, and in the two month period since launch, over 10,000 employees and contractors had completed the training
- Produced a modern slavery 'Toolbox Talk' and 'Safety Hour Discussion Pack', available externally via [Safety Central](#), for all employees, or those working on our behalf, to use in regular team meetings or 'Safety Stand-Downs'.

## Looking ahead

Our approach heading into 2018/19 will cover general awareness-raising activity, alongside greater focus on modern slavery risk in our high-risk areas, specifically during the procurement process. Activities will include:

- Updating modern slavery questions currently asked at 'Pre-Qualification Questionnaire' (PQQ) stage when we're tendering for contracts. The responses we receive to these updated questions will give us greater assurance that any organisation we are considering going into business with, are compliant with the Modern Slavery Act 2015 before the organisation can progress to the next stage in the procurement process
- Working with our Contracts and Procurement teams to implement a process that will ensure all third party responses to the modern slavery questions asked at PQQ stage are assessed in a consistent manner, with particular focus given to PPE and contingent labour contracts
- Embedding modern slavery into the 'Invitation to Tender' stage of the procurement process, to give us confirmation that any organisation we are considering going into business with are committed to tackling modern slavery within their own organisation and supply chains
- Running a pilot to investigate the depth of our PPE supply chain, to gain assurance that modern slavery isn't happening at any stage throughout that chain. As time progresses, we will widen this approach to cover contingent labour, as one of our other high-risk areas
- Updating our Code of Business Ethics to give modern slavery greater focus
- Continuing to monitor completion rates of our mandatory companywide ethics training, using targeted follow-up communications in any function or route where completions are lower than we'd expect
- Launching a communications campaign to further promote our Speak Out whistleblowing service as a channel for raising concerns about modern slavery taking place within Network Rail, or within any of our supply chains.

This statement refers to the financial year ending 31<sup>st</sup> March 2018.

This statement was originally approved by Jeremy Westlake, Chief Financial Officer, on 29<sup>th</sup> May 2018.

It has since been approved by the Board of Network Rail Infrastructure Limited on 3<sup>rd</sup> December 2018 and the Board of Network Rail (High Speed) Limited on 25<sup>th</sup> February 2019.

Signed by

A handwritten signature in black ink, appearing to be "J Westlake", written over a white background.

**Jeremy Westlake**  
**Chief Financial Officer**  
**25<sup>th</sup> February 2019**