

## London North Eastern Railway Limited

### Slavery and Human Trafficking Statement

London North Eastern Railway Limited (LNER) supports the objectives of the Modern Slavery Act 2015 (“the Act”) of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act for the financial year ended 31<sup>st</sup> March 2021

Risks relating to slavery and human trafficking are considered within LNER. The Act requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This obligation applies to organisations that carry out business in the UK and which have a total annual turnover in excess of £36million. This statement is therefore made by LNER in accordance with the Act but also seeks to recognize LNER’s commitment to improving transparency and preventing slavery and human trafficking.

We recognise that LNER has a responsibility to manage the risk of slavery and/or human trafficking occurring in our supply chain. The United Kingdom has developed a culture of ethical business practice and strong labour regulation. Our suppliers are mostly based in the UK and as such we have assessed the overall risk of LNER contracting with organisations that engage in slavery or human trafficking as being low.

We have in place a dedicated modern slavery working group - assembled from representatives within our procurement function - in order to ensure ongoing monitoring of, and compliance in, our supply chain. As part of the working group’s mission to assess and address the risk of modern slavery, we are undertaking the following activities:

- continuing to risk assess prospective suppliers by requiring, as part of the procurement process, confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.

Suppliers are asked to sign up to the LNER Supplier Code of Conduct which places the following obligations onto suppliers:

- As a minimum level of assurance, we expect our suppliers to ensure that all locations used by them or their suppliers in the manufacture of products meet the provisions of the [Ethical Trading Initiative \(ETI\) Base Code](#) or similar standards and are monitored by independent third parties. This includes our suppliers’ own first and second tier suppliers, with the aim of including third tier suppliers over time.
- LNER suppliers must maintain accountability standards and procedures for employees or contractors that fail to meet these standards. Suppliers must also confirm that they provide employees and managers who have direct responsibility for supply chain management with training on the mitigation of labour abuses and environmental standards.
- So if a supplier manufacture, or source, products in countries at high risk for child labour (Extreme Risk ranking on Maplecroft Child Labor Index) or slave labour ( US TIP report LNER requires that they actively participate in one of the following:
  - An internationally recognised programme with third party verification to bring better labour standards to the region. Internationally recognised programmes include ILO Better Works, Fairtrade Labelling Organizations International, SIA Social Fingerprint and the Fair Labour Association; or
  - A country-specific programme for sourcing companies, such as BSR’s China Training Initiative or Health Enables Returns.
- In relation to supply chains which are known to include products with a high risk of egregious labour standards for inputs (including but not limited to cotton, precious metals, gemstones, and tropical hardwoods), we require the supplier to provide evidence that they are proactively working with sourcing communities, directly or through other organisations, to ensure the highest labour standards.
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- continuing to regularly review incumbent suppliers to assess if they pose a medium to high risk, based on the level of spend by LNER and in respect of those suppliers that manufacture goods or provide services in

countries and/or sectors where instances of modern slavery are more likely to be prevalent.

- Incorporating any relevant procedures into existing LNER policies in order to inform employees of the process to follow where instances of slavery and human trafficking are suspected and to raise awareness and profile of the issue generally across LNER's workforce.
- Mandatory training on Modern Slavery and LNER's policies on Modern Slavery for all managerial staff. This is provided as part of the onboarding of new managerial staff, and has been rolled out as e-learning to all incumbent staff. In addition to the mandatory training, the topic of Modern Slavery and how to spot instances of it, has been raised in internal communications such as the weekly manager's update call.
- LNER has a whistle blowing hotline that allows staff to raise concerns about modern slavery and trafficking in a confidential manner.
- Storing information about suppliers' compliance with the Act in LNER's contract database.
- The Modern Slavery Working Group will continue to meet on a quarterly basis to ensure ongoing compliance with these commitments.

Following a review of the effectiveness of the steps we have taken this year we intend to take the following additional steps in order to identify any issues and ensure continued compliance with the Act:

- Implement the Social Responsibility Alliance's standard Modern Slavery and Human trafficking risk assessment tool with incumbent suppliers identified in the review mentioned above, as well as with new suppliers as part of the onboarding process.

Produce a report on the Modern Slavery Risk within LNER's supply chain, which will be shared with the Business Leadership Team and the Business Responsibility Group with the aim to identify and implement mitigations where relevant.

We will continue to monitor LNER's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place within LNER's supply chain.

This statement is made on behalf of LNER, a written copy of this statement will be provided upon request.

*Approved by the Board of LNER 16<sup>th</sup> July 2021*



Mr David Horne  
Managing Director