

London North Eastern Railway Limited

Slavery and Human Trafficking Statement 2020/21

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 31st March 2020

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. The statement is also made to recognise the importance to approach and improve transparency and prevent slavery and human trafficking from occurring within its supply chain. LNER is therefore making this statement as set out below.

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

We directly employ approximately 3,300 employees and agency workers, solely in Great Britain. We have strict recruitment processes in place, and work closely with our approved recruitment agencies, to ensure all our employees and agency workers have the appropriate right to work and are paid at least the National Minimum Wage. As such, we believe that the risk of forced or trafficked labour being employed by LNER, either directly or through agencies, is 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 within, our supply chain. As part of the working group’s mission to assess and address the risk of modern slavery, we have undertaken the following activities during the last financial year:

- 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.
- regularly reviewing 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.

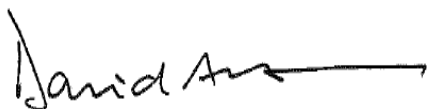
Following a review of the effectiveness of the steps we have taken this year we intend to continue to undertake these activities and take the following additional steps in order to identify any issues and ensure continued compliance with the Act:

- Develop a standard Modern Slavery and Human trafficking risk assessment tool
- Develop and implement policies that reinforce LNER’s commitment to working towards being an ethical business.
- Store relevant information about suppliers’ compliance with the Act in LNER’s contract database.

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 21st May 2020



Mr David Horne
Managing Director