

**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 2019.

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 on 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 supply chain. The United Kingdom have developed a culture of ethical business practice and strong labour regulation. Our suppliers are mostly based within these countries and we have assessed the overall risk for LNER contracting with organisations that engage in slavery or human trafficking as being relatively 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 are undertaking the following activities:

- continuing to risk assess prospective suppliers by requiring, at the outset of the procurement process, confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.
- conducting an audit of suppliers identified as posing 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.

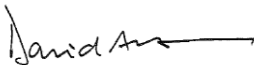
Following a review of the effectiveness of the steps we have taken this year we intend to take the following additional steps in order to identify any issues and ensure continued compliance with the Act:

- Request further detailed information from those suppliers identified as medium to high risk as to the steps they have taken to address slavery and human trafficking in the territories in which they operate, including the outcome of any due diligence carried out on their own businesses and high risk suppliers further down the supply chain.
- Incorporate 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.
- Set up a central database for sharing information collected about suppliers’ compliance with the Act across LNER.

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 on 23<sup>rd</sup> April 2019.*



Mr David Horne  
Managing Director