

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 31st March 2023

Risks relating to slavery and human trafficking are identified by LNER, and appropriate mitigation strategies are then implemented.

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 operations and 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, its operations, and using its services to transport victims. The United Kingdom has developed a culture of ethical business practice and strong labour regulation. Our suppliers are mostly based within the UK 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 (MSWG) - assembled from representatives within our business- in order to ensure ongoing monitoring of, and compliance within our workforce, our supply chain, and our customers. . As part of the working group’s mission to assess and address the risk of modern slavery, we have undertaken the following activities:

- We have been assessed by Action Sustainability under the ISO20400 sustainable procurement standard and received feedback on this relating to our supply chain modern slavery risks and how we can continue to improve within this area.
- Established an intranet page dedicated to modern slavery risks, including training, materials, guidance, and policies related to modern slavery.
- Actively participated in the RSSB Modern Slavery Group.
- The procurement team have gained the CIPS corporate ethics mark, emphasising our commitment to ethical procurement practices to colleagues across the company, but also to our suppliers.
- Added further modern slavery due diligence within our tenant’s contract award process.

We are continuing to do the following activities:

- 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 for all managerial staff.
- Modern Slavery Working Group (MSWG) meeting on a regular basis.

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:

- Explore the use of the government's Modern Slavery Assessment Tool within our practises.
- Investigate the new modern slavery BS 25700 standard and review if we can begin to work towards this standard.
- Increase due diligence of contracts alongside undertaking supply chain mapping and hot spotting of risks relevant to our contracts to identify contracts and areas of spend where there may be a considerable risk of modern slavery.
- Increase internal awareness and capability to address modern slavery risks for procurement staff through training and learning.

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

Mr. David Horne
Managing Director