

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 2025.

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 £36 million. 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:

- Established an intranet page dedicated to modern slavery risks, including training, materials, guidance, and policies related to modern slavery.
- Active participation in the RSSB Modern Slavery Group.
- The procurement team have maintained CIPS corporate ethics mark, emphasising our commitment to ethical procurement practices to colleagues across the company, but also to our suppliers.
- Increase internal awareness and capability to address modern slavery risks for procurement staff through CIPS training and learning.
- Integration of additional modern slavery due diligence within our workwear contract.
- We undertook an ISO 20400 assessment by Action Sustainability and improved by one level from our previous assessment, placing us firmly in the 'Mature' group.
- Inclusion of modern slavery as a topic within our responsible business group. Where an internal presentation on modern slavery and sustainable procurement was delivered.

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.
- Mandatory training on Modern Slavery for all managerial staff.
- Modern Slavery Working Group (MSWG) meeting on a regular basis.
- Continued delivery of safeguarding awareness through the Safeguarding on Rail Accreditation Scheme which helps staff identify all forms of vulnerability, and which includes relevant procedures 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.

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:

- Increase due diligence of contracts, including supply chain mapping and hotspot analysis of risks relevant to our contracts, to identify areas of spend where there may be a considerable risk of modern slavery.
- Establish a supplier grievance mechanism accessible to all staff within our supply chain, promoting a responsive and transparent process for addressing concerns.
- Explore the incorporation of a modern slavery section within our responsible business report. To communicate our efforts within this area to colleagues and stakeholders.
- Review our due diligence within our procurement processes.

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

David Horne

Managing Director

