

1. Introduction

EWR Co is committed to ensuring that there is no modern slavery or human rights trafficking in any part of our business or supply chain.

EWR was created to build an inclusive railway for all to connect communities from Cambridge to Oxford and beyond. We have a unique remit to meet our purpose of unlocking economic growth.

In fulfilling our remit, we aspire to the highest standards of ethics, honesty, and integrity in all of our activities, and to comply with the relevant legislation at all times.

The Modern Slavery Act 2015 defines 'slavery and human trafficking' as offenses of 'slavery, servitude, and forced or compulsory labour' and human trafficking'.

EWR Co recognises the human rights of all people and aims to treat everyone who works with us with dignity and respect. We take a zero-tolerance approach to modern slavery.

This Statement applies to all employees, interim workers, seconded workers, and contractors and external consultants.

To ensure we follow best practice, we commit to:

- review our policies and processes annually to comply with legal and regulatory requirements;
- annual mandatory Modern Slavery training for all employees;
- brief everyone associated with EWR Co. to ensure understanding of the Modern Slavery Statement and making it available through our communication channels

2. Responsibilities and how to raise a concern

We're all responsible for the prevention, detection and reporting of modern slavery in any part of our business or supply chain.

If you believe or suspect that a breach of this Policy has occurred, or may occur in the future, you must notify your manager or the confidential helpline as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect that a breach of this Policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or through the confidential helpline.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Our employees and interim workers can raise concerns confidentially (e.g., how suppliers, subcontractors and employees behave) through our whistleblowing channels. See our Speak Up (Whistleblowing) Policy.

We're committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy.

This statement outlines our strategy to prevent slavery and human trafficking within our business and supply chain, in accordance with Section 54(1) of the Modern Slavery Act 2015. It details the steps we have taken, or will take, to identify the highest risk areas, leverage our influence, and prioritise our actions.

2.1. Processes

Training & Awareness

Modern Slavery training is an essential component of our annual ethical training course, mandatory for all employees. This training provides our staff with a comprehensive understanding of Modern Slavery and equips them with the knowledge to report any concerns effectively.

Tackling modern slavery through employment

Our recruitment rigorously follows UK employment law. It includes 'right to work' document checks, contracts of employment and checks to ensure everyone we employ is over the age of 16.

Tackling modern slavery through procurement

We have a risk-based approach to tackling modern slavery and our Procurement Policy reflects our responsibility to and focus on ensuring that our suppliers comply with all applicable human rights and employment laws.

As an Arm's length body of the government, we adhere to the Cabinet Office standards for commercial activities, we are compliant to Procurement Policy Note: 02/23 Tackling Modern Slavery in Government Supply Chains and instructed by associated guidance outlining how to identify and manage modern slavery risks in both existing contracts and new procurement activity.

The Policy Lead for our Procurement function is a member of the Department for Transport's Modern Slavery Working Group, we can contribute to the joint modern slavery statement. The working group shares best practice and initiatives against modern slavery which we embed in our policies and processes.

All EWR employees working in the Commercial Function complete training in identifying and managing modern slavery risks in the supply chain. Modern slavery risks are addressed throughout the procurement lifecycle from pre-procurement and market engagement, specification stage, selection stage, award stage, contract conditions and contract management.

Due Diligence

All new procurement projects are risk assessed to ensure that potential suppliers meet Ethical Labour practices. Any procurements identified as high or medium risk will include additional questions on Modern Slavery at both Prequalification and Invitation to tender stage; and include Modern Slavery specific key performance indicators and clauses in the contract for mitigating the risk of modern slavery.

Government's Modern Slavery Assessment Tool (MSAT).

For all medium and high-risk contracts, we can invite suppliers to complete the Government's Modern Slavery Assessment Tool (MSAT). The tool gives suppliers tailored good practice recommendations to mitigate the risk of modern slavery. These recommendations can inform the management of those risks with the supplier.

Assessing existing contracts

We conduct a risk assessment on existing contracts, within scope suppliers can be invited to complete MSAT if appropriate and contract management can collaborate with suppliers on improving risk management.

2.2. Breaches of this Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.