

1. Introduction

This Statement is made by East West Railway Company Limited (“EWR Co”) pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by EWR Co during the financial year ending 31 March 2026 to help ensure that modern slavery and human trafficking are not taking place in any part of our business or supply chain.

Modern slavery is a crime and a serious violation of fundamental human rights. The Modern Slavery Act 2015 defines ‘modern slavery and human trafficking’ as offences of ‘slavery, servitude, and forced or compulsory labour’ and ‘human trafficking’. EWR Co is committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing proportionate systems and controls to identify, assess, manage and address risk of modern slavery or human trafficking in any part of our business or supply chain.

EWR Co is an arm’s-length body, sponsored by the Department for Transport, and created to build East West Rail: an inclusive new railway for all, connecting communities from Cambridge to Oxford, and supporting sustainable economic growth across the region. In fulfilling our remit, we aim to uphold the highest standards of ethics, honesty and integrity in all of our activities, and to comply with the relevant legislation at all times, including those relating to fair working conditions. We take a zero-tolerance approach to modern slavery and expect the same high standards from those who work for us and with us.

2. Our Commitment to Preventing Modern Slavery

EWR Co is committed to preventing modern slavery and human trafficking in its operations and supply chain. Our approach combines clear standards with proportionate controls to identify, assess and address risk. To support this, we commit to:

- Uphold human rights and operate in line with applicable employment, procurement and human rights legislation, and relevant government standards.
- Not tolerate any form of modern slavery or human trafficking, including forced, bonded or compulsory labour and child labour, and acting promptly where concerns are identified.
- Expect fair pay, reasonable working hours, and safe and respectful working environments for all workers engaged in delivering the East West Rail programme.
- Set expectations for suppliers, contractors and delivery partners on ethical and lawful labour practices through procurement and contract management. This includes proportionate due diligence, contractual provisions and ongoing engagement, with a focus on higher-risk areas. Support workers and stakeholders to raise concerns and ensuring that concerns can be reported and addressed appropriately.
- Review our policies and processes annually to comply with legal and regulatory requirements.

- Provide annual mandatory Modern Slavery training for all employees.
- Make our annual Modern Slavery Statement available through our communication channels.

3. Our Organisation

3.1. Structure

EWR Co exists to deliver a new railway that connects communities, unlocks economic growth, and supports sustainable development across the Oxford – Cambridge corridor. We are responsible for planning, designing, and delivering the railway, ensuring it integrates effectively with existing infrastructure, meets the needs of passengers and freight, and reflects the priorities of the communities it serves. More information can be found [here](#).

As a publicly funded organisation, we operate within a robust governance and assurance framework, working closely with the Department for Transport and a wide range of stakeholders. Delivery is undertaken through a coordinated model that brings together internal teams and an extensive supply chain, ensuring that the programme is executed safely, efficiently, and in line with public accountability expectations. The scale and complexity of this delivery model, including the use of multiple delivery partners and supply chain tiers, informs our approach to identifying and managing modern slavery risk.

Our modern slavery risk profile is primarily concentrated within our supply chain, particularly in relation to third-party contractors, complex subcontracting structures and labour supply arrangements. These risks are inherent in large-scale infrastructure delivery. We also recognise that risks may arise within our own operations, including through the use of agency and contingent labour and outsourced services. We therefore take a risk-based approach across both our direct activities and the wider supply chain.

3.2. Suppliers

Our supply chain includes professional services (for example design, engineering, technical assurance and programme support), surveys and enabling works, and programme and construction delivery partners, who may in turn engage specialist subcontractors. We also procure corporate services, such as IT, legal, and business support.

The highest risks typically arise in labour-intensive activities, complex subcontracting arrangements, and where services or goods are sourced through extended or international supply chain.

While many of our direct suppliers are UK-based, some services supporting EWR Co may be delivered from outside the UK (for example through suppliers' overseas delivery centres). In addition, our extended supply chain may include overseas subcontractors and manufacturers through the goods, materials and equipment used by our delivery partners.

We set clear expectations for suppliers, contractors and delivery partners on ethical and lawful labour practices through procurement and contract management. This includes proportionate due diligence, contractual provisions and ongoing engagement to help identify, prevent and address

modern slavery risk. Where appropriate, we may request additional information from suppliers on how they manage labour standards and supply chain risks, and we will engage with suppliers to drive improvement.

3.3. People

We are committed to fair and lawful employment practices. We carry out appropriate pre-employment checks (including right to work checks) and provide clear terms and conditions for our employees in writing.

Where we engage consultants, interim workers or agency labour, we expect those supplying workers to meet applicable legal requirements and to align with our standards on ethical labour practices. We recognise that modern slavery risk can arise where labour is supplied through third parties, and we seek to maintain appropriate oversight of these arrangements.

We provide training and communications to help our people recognise the signs of modern slavery and understand how to raise concerns.

4. Responsibilities and How to Raise a Concern

Everyone working for or with EWR Co has a role to play in helping the prevention, detection and reporting of modern slavery risk in any part of our business or supply chain.

We encourage employees, contractors, consultants, agency workers and others working with us, as well as individuals within our supply chain, to raise concerns where they believe that modern slavery or human trafficking may be taking place, or where working conditions give cause for concern.

Concerns can be raised through EWR Co's **Speak Up (Whistleblowing)** arrangements, which provide a confidential route for reporting suspected wrongdoing, including modern slavery. These arrangements are available to both employees and third parties.

We are committed to ensuring that concerns are taken seriously and addressed appropriately. Where concerns are raised, we will take steps to understand the issue and determine what action is required, which may include further investigation, engagement with suppliers or delivery partners, and escalation through appropriate governance channels.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

5. Processes

5.1. 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 **identify and** report any concerns effectively.

We also provide targeted training for employees involved in procurement and contract management, reflecting the higher exposure to supply chain risk in these roles.

5.2. Employment Practices

Our recruitment practices follow UK employment law. This includes 'right to work' document checks, written contracts of employment and checks to ensure everyone we employ is over the age of 16.

5.3. Procurement Practices

We have a risk-based approach to tackling modern slavery. This means focusing our due diligence and contract management activity on areas where risk is more likely to arise, including labour-intensive services, complex subcontracting arrangements, labour supply chain, and delivery models involving overseas supply chain.

Modern slavery risk are considered throughout the procurement lifecycle, including:

- pre-procurement and market engagement
- specification development
- supplier selection and evaluation
- contract award
- contract management

For procurements assessed as medium or high risk, we include additional due diligence measures, such as targeted questions during supplier selection and enhanced evaluation of suppliers' approach to managing labour standards and supply chain risks.

Our **Procurement Code** focuses on legal compliance, governance, and ethical procurement processes. We also set expectations for suppliers through contractual provisions, including requirements to comply with applicable laws, maintain appropriate policies, and manage risks within their own supply chain.

For higher-risk contracts, we may also:

- include modern slavery-specific contractual clauses and key performance indicators, where proportionate to the risk and nature of the contract.
- require suppliers to demonstrate how they manage subcontracting and labour supply arrangements;
- seek transparency over extended supply chain where appropriate.

We may invite suppliers to complete the Government's Modern Slavery Assessment Tool (MSAT), which provides a structured assessment of risk and identifies areas for improvement. Outcomes from MSAT may inform contract management and follow-up actions.

Where risks or concerns are identified, we will engage with suppliers to agree improvement actions and, if necessary, escalate through appropriate contractual and governance routes.

As an arm's-length body of the Government, we align our commercial activity with Cabinet Office standards for commercial activities and apply [PPN 009: Tackling modern slavery in government supply chains - GOV.UK](#), and associated guidance, when identifying and managing modern slavery risk 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. The working group shares best practice and initiatives to tackle modern slavery, which we embed in our policies and processes where appropriate.

5.4. Due Diligence

All new procurement projects are risk assessed to help ensure that potential suppliers meet ethical labour practices. Any procurements identified as high or medium risk 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.

5.5. Assessing Existing Contracts

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

Where concerns are identified, we aim to respond proportionately. This may include engaging with the supplier to agree improvement actions and timescales, increasing monitoring and assurance activity, and escalating concerns through appropriate contractual and governance routes.

6. Responding to Concerns and Non-Compliance

Where modern slavery risk or concerns are identified, we aim to respond promptly, proportionately and in a way that prioritises the safety and welfare of any affected individuals.

We recognise that modern slavery can arise within complex supply chain, including at lower tiers, and that effective response may require sustained engagement with suppliers and delivery partners.

When a concern is raised, we will take steps to understand the issue and determine an appropriate course of action. Depending on the nature and severity of the concern, our response may include:

- engaging with the relevant supplier or delivery partner to agree and implement a remediation plan;

- requiring changes to working practices, recruitment practices, labour providers or subcontracting arrangements;
- increasing monitoring and assurance activity to ensure that agreed actions are implemented;
- requiring additional worker awareness measures, including communication of safe routes to raise concerns;
- restricting, removing or replacing individuals, subcontractors or suppliers where necessary to manage risk;
- escalating concerns through internal governance processes and, where appropriate, seeking advice or support from relevant authorities or specialist organisations; and
- taking contractual action, up to and including suspension or termination, where serious issues are substantiated and not addressed.

We are committed to working with suppliers and partners to address risks where possible, while taking appropriate action where standards are not met.

Where appropriate, we will review our policies and processes following any significant issue to strengthen our controls and reduce the risk of recurrence.

7. Effectiveness and Continuous Improvement

We recognise the importance of assessing the effectiveness of our approach to managing modern slavery risk.

We monitor a range of indicators, including:

- completion rates for mandatory training;
- supplier engagement with due diligence processes, including MSAT;
- the number and nature of concerns raised through Speak Up channels; and
- outcomes of supplier engagement and improvement actions.

Over the coming year, we will focus on strengthening our understanding of supply chain risk, enhancing supplier engagement, and embedding good practice across our programme.