

Network Rail

# Modern Slavery Statement

2024 - 2025 Financial Year



## **Introduction**

This is our annual statement to show the steps we've taken to manage the risk of modern slavery occurring within our organisation or supply chain. It covers the 2024/25 financial year and takes us up to 31 March 2025.

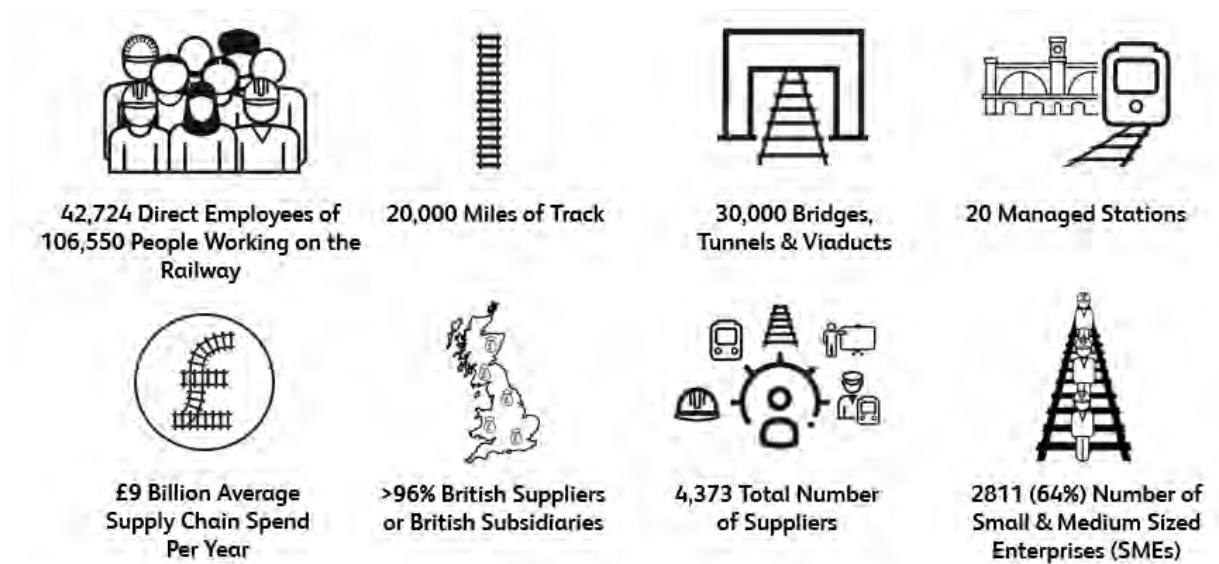
The statement has been broken down into the following sections:

1. Structure, Business & Supply Chains
2. Policies
3. Risk Assessment, Prevention & Mitigation
4. Due Diligence Processes
5. Training & Awareness
6. Effectiveness
7. Looking Forward

### **1. Structure, Business & Supply Chains**

Our purpose is to get people and goods where they need to be and to support our country's economic prosperity. To do this, we own, repair, and develop the railway infrastructure in England, Scotland, and Wales, working with an extensive supply chain. More information on our organisational structure can be found [here](#).

#### **Our Business in Figures:**



Our supply chain plays a huge part in helping us run a safe and efficient railway. We're dependent on our suppliers to help us deliver rail services across Britain including thousands of small & medium sized enterprises (SMEs) who supply us with vital services ranging from track equipment to drone technology. 96 % of our suppliers are British based companies or subsidiaries and are managed by our commercial & procurement (C&P) professionals.

We regularly collaborate with our industry partners to share best practice and tackle wider issues. Currently, we're members of the Department for Transport (DfT) and Rail Safety and Standards Board (RSSB) modern slavery working groups and have renewed our membership with Slave-Free Alliance who provide us with subject matter expert advice and resource. We've also continued to support Hestia, a London-based charity that helps vulnerable people including victims of modern slavery.

Responsibility for our modern slavery policy and programme sits with our group general counsel, reporting directly into the chief financial officer, who sits on the board of directors.

Throughout the statement, 'we' and 'Network Rail' refers to:

- Network Rail Infrastructure Limited (NRIL)
- Network Rail (High Speed) Limited - a subsidiary of NRIL that works with HS1 Limited
- Network Rail International Limited – a consulting subsidiary of Network Rail Infrastructure Limited that shares expertise with rail owners and operators

## **2. Policies**

We have several policies that help us manage our modern slavery risk. They enable us and our suppliers to have a joined-up approach in tackling the threat of modern slavery and help us to understand our responsibilities when responding to issues or concerns.

In order to ensure our policies are effective we regularly seek advice from third parties; benchmark against best practice and gain independent assurance. We also work with our internal audit and assurance functions to review the effectiveness of our modern slavery and whistleblowing controls.

Staff can access our policies on our intranet site or through an internal app called 'EthicsApp', which is available on all work mobile devices. Our policies can also be found on our [external website](#) for our customers and suppliers.

Our key policies in relation to preventing and reporting modern slavery are:

### **Anti-Slavery and Human Trafficking policy**

Our policy includes information on what modern slavery is, our commitments as an employer, our expectations of any third parties we work with, the warning signs to look out for, and how to report concerns.

### **Code of Business Ethics**

Our Code of Business Ethics sets the standard of behaviour expected of our staff, contractors, and suppliers. It has a section dedicated to modern slavery which includes information about our commitment to act responsibly, how to spot the signs of potential victims, and how to raise concerns.

### **Commercial Policies**

Our Commercial & Procurement policy, as well as our procurement management and commercial management frameworks, include references to modern slavery throughout. Our Supplier Code of Conduct also makes reference to our expectations and requirements around modern slavery.

### **Speak Out policy (whistleblowing)**

Our Speak Out policy allows anyone to raise concerns about wrongdoing taking place in Network Rail and its supply chain, including instances of modern slavery. We offer various channels for people to raise concerns – including a confidential 24/7 reporting service called ‘Speak Out’ which allows for reports to be made anonymously and contains a specific ‘modern slavery’ category. We also utilise external reporting tools such as CIRAS.

## **3. Risk Assessment, Prevention & Mitigation**

This year we’ve focussed our efforts on understanding the welfare of our staff and suppliers through site visits. Working with our partners, Slave-Free Alliance, we’ve visited a variety of locations including an enhancement project in East Kilbride, a station redevelopment in Oxford, London St Pancras Station, and one of our largest office spaces in Milton Keynes.

During these visits we conducted a walk around the sites followed by staff discussions. We spoke to permanent members of staff as well as colleagues working for some of our construction, catering, security, and station support providers. We discussed the individual’s recruitment experience, whistleblowing and escalation procedures, work schedules, and many other areas to ensure that no exploitative practices were in place.

We’re pleased to confirm that no major concerns of modern slavery were identified across any of our sites. Some improvements were however identified relating to general awareness of modern slavery and employment practices and these actions are now being tracked.

## **4. Our Due Diligence Processes**

For high-value or high-risk procurement activities (which mostly revolve around labour) a competitive tender process is required. This includes the use of a Procurement Specific Questionnaire (PSQ) and further questions at the Invitation to Tender (ITT) stage. All PSQs contain modern slavery questions as standard with high-risk commercial exercises requiring additional controls to be put in place.

For high-risk categories, additional questions can be included within ITTs to understand how a supplier intends to manage any modern slavery risks within their supply chain over the life of the contract.

Any supplier that falls into a high-risk category will also be asked to submit a Modern Slavery Assessment Tool (MSAT) response. The MSAT is an industry-wide tool, created by the Cabinet Office, that provides us with a risk rating for the supplier in question and accompanying improvement actions for how the rating can be upgraded moving forward. The feedback will form part of our post-contract management plan with suppliers and will ensure that, as an industry, we continue to share knowledge and push for sector-wide continuous improvement.

## **5. Training & Awareness**

Modern slavery is included as part of our ethical training course which all employees must complete every three years. Completing this training gives our staff a good understanding of what modern slavery is and how they can report concerns. The training package was updated last year and contains an animation explaining modern slavery and highlighting the fact that it can happen in the UK.

This year also saw us launch new guidance to cover operational leadership roles across both Network Rail and our supply chain. The guidance is intended to give our operational colleagues an understanding of what modern slavery is, the signs to spot, and what tools and resources they can use should they ever come across a suspected instance of modern slavery on site. Separate to this, new C&P training is also being drafted to make sure everyone is clear on what is required and the tools and processes we have in place to support from a commercial perspective.

Alongside our training, we produced a modern slavery communications campaign around Anti-Slavery Day. We were pleased to continue to use our stations to reach a wide audience in collaboration with London-based charity, Hestia. We used space at London Victoria and Waterloo stations to host an art exhibition produced by Hestia's clients, who are all previous victims of modern slavery (which can be seen on our front cover). One of our regional managing directors, Ellie Burrows, and group general counsel, Susan Beadles, visited the exhibition along with an estimated 3.9 million passengers that passed through the stations in that time.

## **6. Effectiveness**

We recognise that our modern slavery policy and strategy can only be effective if we educate our staff and we're pleased to report that 94 % of our entire workforce has completed our ethics training.

We also monitor and categorise all concerns of wrongdoing reported to us. Whilst we've received and investigated some concerns in relation to operational environments and working conditions this year, we haven't found any evidence of modern slavery taking place on our sites within the last year.

Regular updates on our current risk landscape and the effectiveness of what we're doing to reduce the threat of modern slavery are monitored through quarterly risk meetings and our working group. These discussions give us opportunities to share best practice and escalate concerns or delays in improvement actions up to senior leaders including the Audit & Risk Committee who receive an annual ethics update and can review our forward-facing plans.

## **7. Looking Forward**

We look forward to making further business improvements over the next financial year. Our aim is to continue working closely with Slave-Free Alliance, Hestia, and our industry working groups to improve our internal processes and controls as well as our external facing schemes. Some of the actions in our plan include:

- Updating our commercial guidance and processes to support colleagues dealing with high-risk categories of spend.
- Reviewing our high-risk areas of spend and gaining a greater understanding of the layers of our supply chain from a modern slavery perspective
- Updating our Speak Out website to be more user friendly and supportive
- Continuing to work with Slave-Free Alliance to carry out more site visits and ensure improved actions are tracked and shared.
- Continuing to recognise Anti-Slavery Day (18<sup>th</sup> October) and promote awareness of this important topic.

We remain committed to continuously improving what we do in this area to reduce the risk of modern slavery and we'll report back next year on our further progress.

This statement was approved by:

- the Board of Network Rail Infrastructure Limited on 03/07/2025
- the Board of Network Rail (High Speed) Limited on 18/07/2025
- the Board of Network Rail International Limited on 14/07/2025

Signed by

A handwritten signature in black ink, appearing to read 'Mike Putnam', with a stylized flourish at the end.

**Mike Putnam, acting chair**