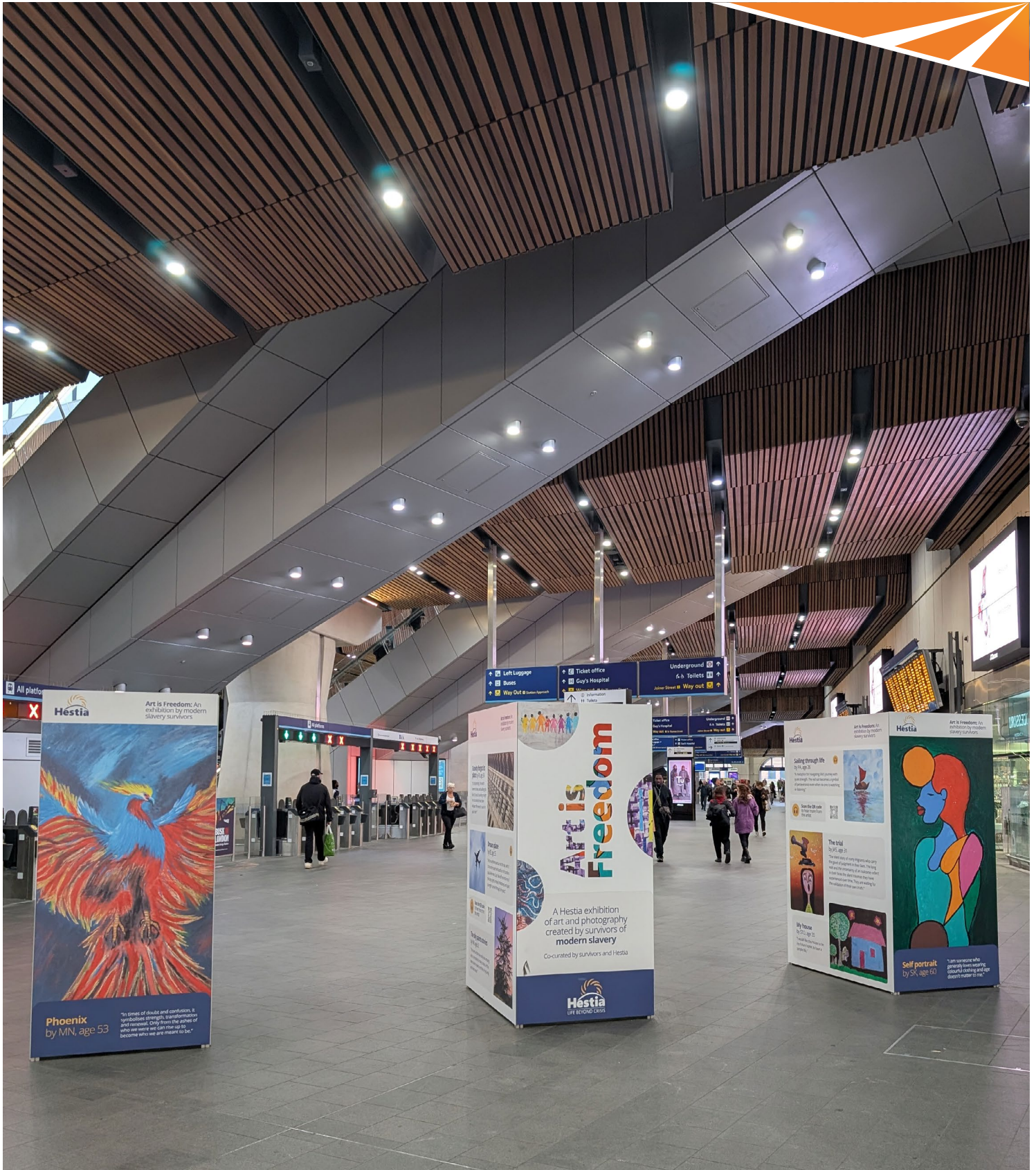




Network Rail

Modern Slavery Statement

2025 – 2026 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 and supply chain. It covers the 2025/26 financial year and takes us up to 31 March 2026.

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:



42,276 Employees



20,000 Miles of Track



30,000 Bridges,
Tunnels & Viaducts



20 Managed Stations



£8.6 Billion Supply
Chain Spend Per Year



91% British Suppliers
or British Subsidiaries



4,414 Total Number
of Suppliers



2528 (57%) Number of
Small & Medium Sized
Enterprises (SMEs)

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 technology. 91 % of our suppliers are British-based companies or subsidiaries with our Commercial & Procurement (C&P) professionals

leading on procurement and contract management typically carried out by a business representative.

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 as well as having a corporate 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 maintain a suite of policies to manage modern slavery risk. These policies enable a joined-up approach with our suppliers, support effective risk mitigation, and set out our responsibilities for responding to issues or concerns

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](#)

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 the Confidential Incident Reporting & Analysis System (CIRAS), a confidential safety reporting hotline for the UK transport industry.

3. Risk assessment, prevention & mitigation

This year we’ve started to focus our efforts on increasing our 2nd line assurance of GB suppliers that we procure services from. This includes car wash sites we use for our fleet vehicles. Working with our partners, Slave-Free Alliance, we’ve created an audit plan to visit some of our most frequently used locations. The visits will be undertaken at the start of the next financial year and will see us work alongside our fleet management suppliers to review the welfare and facilities of what is commonly known to be a high-risk industry for modern slavery.

Our existing top 3 risk areas are contingent labour, facilities (soft services), and off-track civil engineering projects. However, this year we’ve analysed our wider procurement pipeline and have started developing a risk assessment for upcoming products and categories of spend over the next 2 years. Once complete, the results of the assessment will ensure we’re aware of any emerging risks and can take appropriate mitigating action as part of our pre-contract checks and assurance.

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, which are based on the Government guidance on tackling modern slavery.

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 which all employees must complete every three years. The training package contains an animation explaining modern slavery and highlighting the fact that it can happen in the UK.

This year also saw us deliver face to face training to hundreds of our apprentices and graduates as part of their corporate induction. The ethical session highlighted what modern slavery is and how they can report concerns.

Alongside our training, we produced a modern slavery communications campaign around Anti-Slavery Day and our ongoing collaboration with London-based charity, Hestia. We used concourse space at London Bridge station to host an art exhibition produced by Hestia's clients, who are all survivors of modern slavery (which can be seen on our front cover). Our chief executive at the time, Sir Andrew Haines, and group general counsel, Susan Beadles, visited the exhibition along with an estimated 3.2 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 93 % of our entire workforce has completed our ethics training.

This year, we received one concern reported through our Speak Out service that related to operational environments and working conditions within the supply chain which, following investigation, was unsubstantiated. Nonetheless, we attempted to contact the reporter to request additional information, highlighted the concern to the affected business area, sought advice from experts at Slave Free Alliance, and used the intelligence to inform our future on-site risk assessment workstream.

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 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. We'll 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:

- Continuing to review our high-risk areas of spend and gaining a greater understanding of the layers of our supply chain from a modern slavery perspective
- Continuing to work with Slave-Free Alliance to carry out more car wash site visits and ensure improved actions are tracked and shared.
- Continuing to recognise Anti-Slavery Day (18th October) and promote awareness of this important topic.

We remain committed to 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 02/07/2026
- the Board of Network Rail (High Speed) Limited on 24/07/2026
- the Board of Network Rail International Limited on 08/07/2026

Signed by

A handwritten signature in black ink, appearing to read 'Richard George', with a long horizontal stroke underneath.

Richard George, chair