

# Modern Slavery and Human Trafficking Policy

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires companies doing business in the UK to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

Haigh Rail Ltd is proud of the measures it takes in this regard. Haigh Rail Ltd efforts to eradicate slavery and human trafficking in its supply chain and own business include the following: -

# SupplyChain

## Written policies and procedures

Haigh Rail Ltd strictly prohibits the user of slavery or human trafficking in its direct supply chain.

Our supply chain vetting process will require that the Haigh Rail Ltd supply chain validates their compliance with the Modern Slavery Act as part of the application process, with regard to issues of forced labour, slavery and human trafficking.

## **Contractual Obligations**

No supplier is engaged by Haigh Rail Ltd until they have completed a 'Supplier Questionnaire', which is then subsequently vetted. This ensures that they will adhere to the guidelines and expectations that Haigh Rail Ltd would expect. Haigh Rail Ltd contractual arrangements make reference to the approval process and the evidence submitted by the supplier, and thus mandate the necessary level of compliance with Legislation; Codes of Practice; International including ILO/UN, National and Client Standards.

# **Supply Chain Monitoring**

Haigh Rail Ltd reserves the right at any time to monitor its suppliers for compliance against agreed contractual requirements, including and not limited to the Modern Slavery Act.

Compliance with the Modern Slavery Act by Haigh Rail Ltd supply chain will be undertaken using the details found within the Supplier Questionnaire.

#### Violations

Haigh Rail Ltd has a zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking.

Haigh Rail Ltd contractual agreements permit the termination of suppliers for a single violation.

#### Our Own Business

#### Written policies and procedures

Haigh Rail Ltd Management system details the rules and procedures by which we should treat fellow employees. This includes...

• Transparent and fair behaviour, such as protecting human rights and reporting issues



• Compliance with legislation, including fundamental rights at work - in particular freedom of association and elimination of discrimination throughout employment

## **Employee Training**

Haigh Rail Ltd conducts briefings for all employees to emphasis the importance of acting with integrity and in line with our own internal values. Guidance regarding the Modern Slavery Act is incorporated into company training sessions and documentation.

#### **Human Rights**

Haigh Rail Ltd pledges to monitor its position with regard Human Rights Compliance too ensure that all areas of its business are compliant with current legislation, International Human Rights Standards and our own internal values.

We strive constantly to ensure that all employees are treated in a fair and transparent manner. This includes adherence to the Working Time Directive and the Minimum Wage.

## Violations

Haigh Rail Ltd disciplinary policy details the processes to be followed, if any employees are found to be involved in any breach of the law with regard to forced labour, slavery and human trafficking.

Haigh Rail to will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

The company Director and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training,etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and available on the department's notice boards and can be obtained from the HSEQ Manager upon request.

If you suspect you or another worker are a victim of modern slavery, you can call the free confidential Modern Slavery Helpline for advice and to report any problems on 08000 121 720

This policy statement will be reviewed annually and published.

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Chris Haigh (Managing Director)