



MGRL-POL-0010

Modern Slavery Policy

Meridian Generic Rail Limited (MGRL) operates an ethical and open approach to the way we do business. We do not tolerate any form of unethical behaviour and are committed to creating and ensuring a non-discriminatory and respectful working environment for our people. We want all our people to feel confident that they can expose wrongdoing without any risk to themselves.

Modern slavery is criminal activity and a violation of human rights. The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable. For these reasons, slavery and human trafficking are a matter of zero tolerance at MGRL.

Modern slavery can take many different forms, including:

- **Trafficking of people** – the recruitment, harbouring or transportation of people for the purposes of exploitation
- **Forced labour** – victims are forced to work against their will, under threat of punishment (e.g. violence, restriction of movement or confinement to the workplace, debt bondages, withholding of wages or excessive wage deductions, retention of identity documents, threat of denunciation to the authorities)
- **Domestic servitude** – victims are forced to work in predominantly private households, performing domestic chores and childcare duties
- **Criminal exploitation** – the exploitation of people to commit a crime

MGRL complies fully with all applicable legislation, including the Modern Slavery Act 2015 and the Human Rights Act 1998. We are committed to maintaining and enforcing effective systems and controls to prevent all forms of modern slavery and human trafficking within any part of our business and ensuring that our supply chains are free from modern slavery and human trafficking.

We respect the human rights of all personnel who work on our behalf and provide them with a safe working environment and fair terms of employment.

This policy applies to all members, employees, contractors, agents, consultants, and those parties in our supply chain, wherever in the world they operate. Any reported breach of this policy will be investigated and may lead to legal proceeding or disciplinary action, which subsequently could result in employee dismissal.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We expect high standards from all our contractors, suppliers and other business partners and require them to comply with all applicable laws and regulations and publish an annual anti-slavery and human trafficking statement, where they are legally required to do so.

Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant policies, including our Supplier Code of Conduct. We also include specific requirements that our suppliers implement due diligence procedures for their own supply chains.

We expect our suppliers to hold their own suppliers to these same high standards.

We may terminate our relationship with individuals and organisations working on our behalf if they are found to be in breach of the Modern Slavery Act.

Our recruitment and people management processes are designed to ensure that all prospective employees and contractors are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.



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We will embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow [modern slavery procurement guidance on GOV.UK](#)
- ensuring that consideration of the modern slavery risks and prevention are added to MGRL’s policy review process as an employer and procurer of goods and services
- continuing to take action to embed a zero-tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices
- Appointing a senior management strategic lead to further support raising awareness on all matters relating to modern slavery. Rosemarie Prendeville, Compliance & Competency Manager can be contacted on Rosemarie@mgrl.co.uk.

The detection and reporting of slavery are the responsibility of all of us. You have a duty to raise any concerns or suspicion you may have in any part of our business or supply chain. You can do this in any of the following ways:

- Raise your concerns through your line manager or another senior manager
- You can contact the Modern Slavery Helpline Tel: 0800 012 1700 or Online: www.modernslaveryhelpline.org/report
- If you suspect someone might be a victim of modern slavery and are concerned that they are in immediate danger, contact 999.

Signed: A.Tilson

Date: 13th July 2022

Andrew Tilson
Managing Director
Meridian Generic Rail Ltd

Revision History

REVISION	DATE	DETAIL	AUTHOR
V2	13/07/2022	Updated to reference embedding our strategic principles, including examples of different types of modern slavery provided, referencing Human Rights Act 1998, inclusion of third-party expectations and further clarifying reporting mechanisms,	R.Prendeville
V1	14/04/2020	New policy	R.Prendeville

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