

Modern Slavery Statement

2024



Introduction.

The UK Modern Slavery Act (2015) requires businesses to report the actions they have taken during the financial year to ensure modern slavery or human trafficking in any form is not taking place in their operations and supply chains.

At Belvoir Rail we are fully committed to preventing modern slavery and human trafficking in our business and supply chain. We strongly support transparency and accountability to eliminate the risks of modern slavery.

As one of the UK's leading rail supply businesses with access to a global supply chain, we recognise that we have a responsibility to take action to prevent the exploitation and use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

We have a zero-tolerance approach to any form of modern slavery. We are dedicated to acting ethically and with integrity in all our business operations and we expect our suppliers to share and uphold this commitment.

This statement sets out the steps taken by Belvoir Rail to assess, prevent and mitigate the risks of modern slavery and human trafficking in its business operations and supply chains during the financial year ending on the 31 March 2023.

Our business and supply chains.

Belvoir Rail is a leading manufacturing and supply business in the UK railway transport industry. We provide engineering solutions and products for rolling stock, including parts, manufactured products, overhauls, repair, kitting, and assembly services. Our customer base includes Train Operating Companies, Rolling Stock Leasing Companies, Train Maintainers and Rail Vehicle Manufacturers.

Belvoir Rail is a small to medium enterprise headquartered in Cotgrave, Nottingham. We currently employ 11 people and subcontract various parts

of our work including design and installation. In addition to our own manufacturing and assembly facilities, we work directly with several suppliers that provide us with raw materials, parts, and finished products. These suppliers are predominantly located in the UK and Europe.

Belvoir Rail is a driving force for positive change and committed to creating a positive impact. Our strategic focus is on customer experience, people, and partnerships underpinned by a strong commitment to corporate responsibility, quality, and excellence.

Although our annual turnover is less than £36m and we are not legally required to publish a statement, as a responsible supplier we feel it is ethically right to do so.

Our policies and commitment.

We have implemented policies and procedures to ensure that modern slavery and human trafficking do not occur in our business or supply chains. These include:

- An Anti-Slavery and Human Trafficking Policy, which sets out our approach to preventing modern slavery and human trafficking.
- A Whistleblowing Process, which encourages employees to report any concerns they may have about modern slavery or human trafficking.

Due diligence processes.

We undertake due diligence when assessing new suppliers and regularly review our existing suppliers to ensure that they are complying with our standards.

Operational Safeguards

Our operational processes are equipped with adequate safeguards designed to identify, report, and address any suspected cases of modern slavery or human trafficking within our supply chain. We have established

clear mechanisms and channels for reporting concerns and ensure that our employees are trained to recognise and respond to these issues.

Vetting Suppliers

We vet prospective and new key suppliers through our procurement and supplier framework. This process involves an evaluation of their commitment to ethical practices and their ability to adhere to our Anti-Slavery and Human Trafficking policy.

Risk assessment.

Before entering into contractual agreements, we conduct a risk assessment of each key supplier. This assessment includes evaluation of the risk of slavery and human trafficking within the supplier's operations, particularly in high-risk sectors or regions.

Supplier engagement.

We actively engage with our suppliers to encourage them to implement their own anti-slavery and human trafficking policies. Where legally required, we ensure that suppliers submit evidence of their annual anti-slavery and human trafficking statement. Furthermore, we recommend and support regular audits of their operations to ensure compliance with modern slavery legislation and policies.

Issuing Policies to Suppliers

We communicate our values and expectations to our suppliers in writing, emphasising the importance of ethical and responsible business practices that align with the principles outlined in our anti-slavery and human trafficking policy.

We issue our anti-slavery and human trafficking policy to all our suppliers and contractors. This policy communicates our strong stance against modern slavery and human trafficking and sets the foundation for our working relationship.

Our approach is to work with suppliers to address root causes and promote continuous improvement and ensure breaches, or concerns that may lead to a breach are remedied within a reasonable period. However, if we identify high-risk issues, we demand an urgent response is taken by the supplier and reserve the right to terminate the business relationship if no action is taken.

Training and awareness.

We provide access to training to all salaried employees on the risks of modern slavery and human trafficking in our business and supply chains. This training is provided to all new employees as part of their induction and is regularly refreshed for existing employees.

Reporting mechanisms.

We empower employees and those working for us to promptly report any concerns or suspicions of slavery or human trafficking through our robust reporting mechanisms. We offer multiple channels for reporting a breach in policy that may occur in the future. These include:

- Internal Management and Senior Leaders
- Designated Safeguarding Officer
- Whistleblowing Procedure
- External Modern Slavery Helpline

Effectiveness.

There were **zero** reports identifying Modern Slavery or Human Trafficking over this reporting year at Belvoir Rail or in our supply chain.

We completed **one** supplier audit of the supply chain, which included checks related to modern slavery with **zero** issues or non-conformities observed.

We continue to monitor the effectiveness of our efforts to prevent modern through regular audits and reviews of our policies, procedures, and training. We also engage with our suppliers to ensure that they are meeting our standards.

We investigate and act on all reports we receive. We take the confidentiality and protection of whistleblowers seriously and are committed to safeguarding the anonymity of all reports.

In cases where suppliers are found to be in violation of our slavery policy, we take swift and appropriate corrective action. This may include engaging with the supplier to rectify the issue or, in severe cases, terminating our business relationship with them.

Future plans.

We support increasing consciousness and action towards human rights around the globe. Over the coming year, we are committed to continuing to uphold human rights in our business and supply chain by:

- Ensuring 100% of the workforce has received Modern Slavery training
- Continuing to review and update our anti-slavery policies and practices to adapt to evolving risks and challenges
- Further developing our auditing framework
- Increase the number of supplier audits

Signed.

This statement was approved by the Belvoir Rail Board of Directors on the 08 January 2025

James Brown
Managing Director



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