



## **Modern Slavery Act 2015: Slavery and human trafficking statement.**

This declaration constitutes our slavery and human trafficking statement for the financial year ended 31<sup>st</sup> December 2023.

### **Statement from Debbie Francis OBE, Managing Director**

It continues to be a priority for Loram UK Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain and reflects our commitment to ensure that modern slavery, in any form, is not occurring anywhere in our organisation and our supply chain.

### **Organisation's structure**

We are a provider of railgrinding, rail vehicle overhaul and maintenance services in the rail sector. We are a part of the Loram Maintenance of Way (Group), who has its head office in the United States of America. Our ultimate parent company is Coril Holdings Ltd. who have its head office in Canada. The Group has over 1,600 employees worldwide and operates in 27 countries.

For the financial year ended 31<sup>st</sup> December 2023, Loram UK had an annual turnover of £38,470,899.

### **Our business**

Loram UK, employees approximately 165 employees and is organised into 5 business units:

- Operations – split into
  - o Rail Grinding – We currently operate a rail grinding train throughout the UK as well as overseas in the Middle East and Europe.
  - o Rail Operations – This team supports all Loram train movements on the UK network as well as on our site in Derby.
  - o Maintenance – Providing all the maintenance and overhaul activity for Network Rail's fleet of On Track Machinery (OTM) out of our site in Derby and remotely across the UK.
  - o New Build and Projects – This department is responsible for the Projects we are currently working on. We have started to build our own Rail Grinder, which will go onto track in 2025.
  - o Engineering Services – Provide key support to the other 4 Operations departments, including planning, project management and project engineering, as well as providing key engineering support to the Commercial team.
- Finance – incorporating

- Finance - responsible for all the financial implications of the business from ensuring that all our colleagues are paid correctly, through to ensuring that the business pays tax appropriately.
- Procurement - responsible for the material resources (purchasing, storage and distribution) for the business, ensuring that the Maintenance teams are able to fulfil all customer requirements in a timely and efficient manner.
- Human Resources – incorporating
  - Human Resources - enables all the people in the business to perform at their best, ensuring that new colleagues are recruited and brought into the business, developed during their time in the business and supported to grow and progress throughout their careers into retirement and ensuring that we operate in a legally compliant way with regards to our people.
  - Business Services - ensures that all the work output performed by the technicians are recorded correctly so that we can charge work back to our customers accurately and in a timely fashion, as well as reviewing and improving the welfare facilities that we have across the sites and supporting administrative requirements across the business.
  - Business Systems - responsible for all the IT infrastructure from CCTV cameras to laptops, tablets and phones as well as all the different software that we run to enable everyone in the business to operate effectively.
- Commercial - responsible for building a customer pipeline through tender/bid identification and submission as well as customer relationship management.
- Assurance - responsible for health, safety, environment and quality for compliance and governance on the railway. Essentially ensuring that we always operate a safe working environment.

## **Our supply chains**

Loram UK has a national supply chain consisting of businesses of all sizes, ranging from international companies to SMEs and micro-organisations providing a variety of goods and services. We engage with our supply chain on a regular basis and have expectations, that like us, they apply high ethical standards and work to prevent modern slavery.

## **Our policies on slavery and human trafficking**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure

slavery and human trafficking is not taking place anywhere in our supply chains. Due diligence processes for slavery and human trafficking are constantly evolving to ensure that we keep up with the challenges of the changing external environment.

As an organisation that operates overseas as well as in the UK, we understand that the following areas give rise to the highest modern slavery risks:

- Use of subcontractors and employment agencies increase the risk of modern slavery taking place on our sites and within our supply chain, through not completing appropriate checks and higher turnover of people.
- Procurement of materials, particularly from high-risk countries for modern slavery and where the enforcement of employment laws is poor.
- External pressures through international conflicts and changing trade agreements potentially prompting the use of lesser-known suppliers, with reduced visibility and greater uncertainty.

As part of our initiative to identify and mitigate risk we aim to make it difficult for modern slavery to thrive by equipping people to identify modern slavery and know what to do if they suspect it.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Supplier adherence to our values**

We have zero tolerance to modern slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. This consists of:

- ISO9001 or QMS Management
- Operational Management
- Current Certifications and Insurances
- Supplier Approvals
- ISO14001

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Assurance.
- Human resources.



- Procurement.
- Commercial.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

## Our effectiveness in combating slavery and human trafficking

We are implementing the following key performance indicators (KPIs) to measure how effective we are in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

Audits – Conduct internal audits on our own records and have external audits conducted on us, part of which ensures that we have carried out the relevant right to work checks in line with the Government BPSS guidelines on our own employees.

Worker Induction Checks – Conduct reviews with our recruitment partners to ensure that all relevant checks are carried out.

Supply Chain Governance – Loram UK requires all of our supply chain partners to work collaboratively with us to prevent modern slavery and human trafficking. To support this Loram UK Ltd will conduct an annual audit requesting declarations from our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2023. It was approved by the board on 12<sup>th</sup> April 2024.

**Debbie Francis – Managing Director**

A handwritten signature in blue ink, appearing to read "Debbie Francis".

Loram UK Limited

**Date:** 15<sup>th</sup> April 2024