

## **Modern Slavery and Human Trafficking Statement as required under S54 of the Modern Slavery Act.**

### **Introduction from Jo MacPhail**

West Midlands Trains Limited (“WMT”/ “us”/ “we”/ “our”) are committed to ensuring that all of our business dealings are carried out in full compliance with relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited both within WMT and its supply chains. WMT are committed to improving our practices to combat modern slavery and human trafficking and continue to take significant steps to promote our ongoing commitment to eliminating abuse and exploitation in the workplace as detailed in this Statement.

### **A) Organisations structure**

WMT is, predominantly, a provider of public transport services in the UK Rail sector. WMT is part of Abellio Transport Holdings Limited, and has its registered office in London, England. It has over 2,700 employees in the UK and has a turnover of over £450 million.

### **B) Our business**

WMT’s business is separated into two brands, West Midlands Railway and London Northwestern Railway. WMT operates a devolved management structure. Procurement is one of the support functions which is partly provided centrally by Abellio Transport Holdings Limited, however, WMT maintains significant control over the supply chain.

### **C) Our supply chains**

Our supply chains include manufacturing, primarily of rail vehicles, parts and uniforms, support services of non-core services (such as cleaning of stations, vehicles and depots) and outsourced IT hardware and software services. As procurement is a centralised function WMT is able to implement the due diligence and contractual processes referred to below to give effect to WMT’s Modern Slavery policy.

### **D) Our policies on modern slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance to ensure modern slavery and human trafficking is not taking place anywhere in our supply chain and a copy of our Policy can be provided on request.

## **E) Due diligence processes for modern slavery and human trafficking**

WMT has identified the following areas of the business and or supply chain as being areas which carry the highest susceptibility to the risk of employing slave or trafficked labour: all manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning/security/gate line staff (“At-Risk Functions” / “ARFs”).

In order to mitigate the risk of modern slavery and human trafficking occurring in our supply chains, WMT has a Sustainable Procurement Policy and the Standard Terms of Purchase for Goods and Services are being updated to include specific obligations under the Act on our Suppliers.

## **F) 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 support our values on this subject we require our Suppliers to abide by our Modern Slavery policy (or their own equivalent) via our contract terms.

## **G) Training**

Outsourced ARFs – Where an ARF is outsourced we have identified training resources to suit our business and we provide training to those who procure the ARF and those employees who manage the delivery of the ARF. We have also updated our standard contract terms in order that, when signed, Suppliers will be contractually obliged to provide analogous training to their staff who are engaged in the supply of services to WMT.

Self-Provided ARFs – Where the ARF is provided “in-house” we have identified training resources to suit our business and we provide training to all those involved in the establishment and delivery of that ARF.

All staff have access to a whistleblowing process that will allow them to report any concerns that they may have in a confidential and secure manner.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement.

**Jo MacPhail**

**HR Director**

**West Midlands Trains Limited**