

Modern Slavery Policy Statement

1. INTRODUCTION & PURPOSE

JSD Rail recognises that there are human traffickers who may attempt to embed their victims into the workforce of reputable companies. JSD Rail also recognise that it is the company's moral and legal responsibility to prevent this happening. JSD have a zero-tolerance approach to 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.

THE JSD anti-slavery policy reflects our promise to act ethically and with integrity in all our business relationships. We have drawn on the principles published by the ILO/UN to implement and enforce effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in our supply chains.

Our supply chains and supplier adherence to our relationships with all suppliers have been established over some years and are built upon mutually beneficial factors. We have close and personal links and contact with the owners, directors or senior management, reflecting the fact that we partner with small and medium-sized operations in the main.

When we appoint new contractors or suppliers, we pre-qualify them through a due diligence process. We look at company performance and seek references from other customers to establish that they are suitable.

To date, we haven't been made aware of any human trafficking or slavery activities within the supply chain. However, if any were highlighted to us, we would act immediately in accordance with our legal and moral obligations.

Due diligence process

JSD have systems in place to:

- Identify and assess potential risk areas when considering new suppliers.
- Regularly review their existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in their supply chains.
- Monitor potential risk areas in their supply chains.
- Protect whistle-blowers.

SCOPE

This policy applies to all areas of the company's endeavours and to all sub-contractors

2. POLICY

Applicants for employment by JSD, must comply with the requirements shown in PER202 Recruitment & Selection of Workers.

Additionally, the interviewing panel must make a judgement that the candidate is applying for the post of their own free will and is not being forced by threat, violence or coercion to attend.

Indications that the candidate may be a 'contemporary slave' include:

- May be of shabby appearance
- Appear withdrawn or frightened
- Give bank account details in a different name
- Provide inconsistent information such as their address
- Are unable to present valid identity documents or permits
- Are driven to and collected from the interview venue.

People that fall under this heading may be forced into one or more of the following

- Forced to work through mental or physical threats
- Controlled by an 'employer' under the threat of some form of punishment
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on their freedom of movement and the choices they way
- They receive little or no pay for their work, or work to 'repay' a so-called debt to their enslavers, even if they had no say in agreeing this debt

Any interviewee who is suspected of being a victim of modern slavery must not be taken on as an employee of JSD Rail and steps must be taken by the managing director to advise the relevant authorities of the individual.

JSD Rail must also ensure that any supplier of contingent labour to work on any of JSD Rail's contracts has a similar policy regarding the selection of their employees or agency workers.

Authorised by



Managing Director

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