

Keolis (UK) Limited

Modern slavery statement for the financial year ending 31 December 2019

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Keolis (UK) Limited's slavery and human trafficking statement for the financial year ending 31 December 2019. It sets out the steps that Keolis (UK) Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Keolis (UK) Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Keolis (UK) Limited operates through its subsidiaries the Wales & Borders railway franchise, the Docklands Light Railway in London and the urban light rail networks in Nottingham and Manchester.

Our supply chains

Our supply chains include the provision of goods and services that are required in the ordinary course of business (such as IT, employee payroll and PR) as well as in connection with our bids for new franchises or concessions to operate new franchises. Keolis (UK) Limited expects the highest standards from all of its suppliers and has put in place various measures to reduce the risk of slavery or human trafficking taking place in its supply chains or in any part of its business.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Guide for Ethical Business Conduct. This guide provides a framework for the principles that underpin the actions of Group employees. This guide calls upon all Group employees to adhere to and promote professional ethics in conducting business.





Contracting with Third Parties

Keolis (UK) Limited conducts due diligence checks on third parties prior to entering into contractual relationships. Regardless of whether Keolis (UK) Limited has previously contracted with a particular third party, a due diligence check will be conducted when entering into a new contract to ensure information that Keolis (UK) Limited has on the company is up to date. The due diligence procedure includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery. In addition, Keolis (UK) Limited uses contractual provisions in any sub-contracting arrangements with third parties to confirm their adherence to the Modern Slavery Act 2015 and Keolis (UK) Limited's Modern Slavery Policy and only allows subcontracting (if applicable) with companies that also confirm their adherence to equivalent obligations.

Communication and Awareness of Modern Slavery

All Employees are required to read the Modern Slavery Policy and sign a form confirming that they have read and understood the policy and that they will follow its requirements.

Financing Procedures

Keolis (UK) Limited has internal financing procedures to ensure that prompt payment is made to employees and third parties, as well as good planning.

Approval for this statement

This statement was approved by the Board of Directors on 17 June 2020.

A handwritten signature in black ink, appearing to read "Alistair Gordon".

Alistair Gordon, Chief Executive Officer
Keolis (UK) Limited
Date: 18 June 2020

