



TransPennine Trains Limited
(trading as TransPennine Express)

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

It continues to be a priority for TransPennine Trains Limited (TPT) 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. TPT supports the objectives of the Modern Slavery Act 2015 (“the Act”) of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act.

The Act requires commercial organisations to publish a statement detailing the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This requirement applies to organisations operating in the UK with an annual turnover exceeding £36 million. TPT therefore issues this statement in compliance with the Act; to underscore our commitment to transparency; and to highlight our dedication to preventing slavery and human trafficking within our operations and supply chain.

We directly employ over 1800 staff and agency workers. We have strict recruitment processes in place and work closely with our approved recruitment agencies. Agencies are required to give contractual commitments to comply with the Act and put in place appropriate policies and practices to ensure our staff and agency workers have the appropriate right to work and (to the extent possible) are paid the Real Living Wage and / or London Living Wage. As such, we believe that the risk of forced or trafficked labour being employed by TPT, either directly or through agencies, is low.

The United Kingdom and EU has developed a culture of ethical business practice and strong labour regulation. We recognise that TPT has a responsibility to manage the risk of slavery and, or human trafficking taking place within our supply chain. Our suppliers are mostly based within these countries, and we have assessed the overall risk for TPT contracting with organisations that engage in slavery or human trafficking as being low. This is determined by the nature of the services provided, the supplier’s geographic location and their obligation to comply with the Act and/or the EU Charter of Fundamental Rights.

Organisation and Structure

TransPennine Trains Limited is a publicly owned subsidiary of DfT OLR Holdings Limited (DOHL).

We are a member of the Rail Delivery Group (RDG), which brings together the companies that run Britain’s railway into a single team with one goal - to deliver a safe more reliable & efficient railway for our passengers, the British public and our communities.

Policies in relation to Modern 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.

TPT’s anti-slavery and human trafficking approach reflects our continued commitment to respect the human rights of those who work on our behalf.

We are committed to preventing acts of modern slavery or human trafficking in our supply chain and/or in any part of our business. Our contracts reflect our commitment to acting ethically and with integrity

in all of our business relationships and to implementing and enforcing effective due diligence through the procurement process and contractual compliance to prevent slavery and human trafficking in our supply chain.

TPT operates a responsible Procurement Policy which details our commitments to sustainable and socially responsible procurement. This reinforces our suppliers' statutory commitments to tackle modern slavery and human trafficking in their supply chain. This requirement is included in our tenders and when offering and awarding business to suppliers and is integrated into supplier contracts.

We monitor compliance within our supply chain by reserving the right to visit suppliers' and sub-contractors' facilities to audit performance. Furthermore, we reserve the right to audit any tier of our supply chain. Where we find concerns, we work with suppliers to create a corrective action plan for achieving compliance in clearly defined and reasonable timeframes.

We also take direction from the RDG, who have a function to develop policy and provide responses to government consultations on behalf of the whole industry.

Due diligence and Risk Assessment processes for slavery and human trafficking

Each year TPT assesses the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain. We continue to believe that those areas, which carry the highest risk of employing slave or trafficked labour, are all manufacturing processes or other areas of labour such as cleaning, security and gate line colleagues.

TPT risk assesses prospective suppliers by requiring, at the outset of the procurement process, confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.

We intend to continue to mitigate as much risk as possible by procuring in compliance with Utilities Contract Regulations 2016 and we are working toward training our staff to procure in accordance with the Procurement Act 2023 when this comes into force in February 2025 and utilising frameworks where it is commercially viable and legislatively possible to do so. For example, we use the Crown Commercial Service frameworks, which are tendered under Public Contracts Regulations 2015 procurement rules and perform extensive due diligence when vetting prospective suppliers.

We continue to include a pre-qualification questionnaire as part of the tender process for all new suppliers. These questions require suppliers to provide information on how they monitor their supply chain to combat modern slavery and ensure adherence to the Act.

Training and Reporting on Modern Slavery and Trafficking

Relevant employees within supply-chain related business functions are required to complete a dedicated online training module and to read and attest to the Modern Slavery Code of Conduct. All TPT colleagues also have access to the TPT Whistleblowing Policy and Whistleblowing hotline which allows them to identify and report any legitimate concerns that they may have had without recrimination and in a confidential and secure manner.

We also have an ongoing commitment to act swiftly and conclude investigations in response to any complaints relating to acts of modern slavery either internally or from suppliers.

Supplier Adherence to the Act

As part of our zero-tolerance approach to modern slavery and human trafficking within our business and supply chain, we include mandatory contractual terms and conditions in our contracts with suppliers which require compliance with the Act. Existing clauses in our standard procurement terms enhance the strength of our contractual promises from suppliers in the area of modern slavery and human trafficking and require them to comply with our anti-slavery and trafficking policy, or their own equivalent. This enables us to enforce these requirements or terminate business with non-compliant organisations.

Our effectiveness in combating slavery and human trafficking

We have reviewed the effectiveness of the current steps we have taken, and we intend to continue to undertake these activities to reinforce TPT's commitment to working towards being an ethical business. In addition, during 2025 and beyond, as part of our continuing commitment to further reduce the risk of slavery and human trafficking, TPT will be:

- working towards developing a sustainable way of procuring which includes developing better due diligence processes so that we can understand how to respond to risk of modern slavery in our supply chain and adapt our procurement strategies to address the challenges and key risks of modern slavery through the procurement process.
- requesting information from suppliers during the tender stage regarding the initiatives they have taken throughout the local and global supply chain to strengthen the identification, monitoring and reduction of risks of modern slavery and unethical work practices occurring downstream in their supply chain.
- strengthening its procurement contracts to include provisions that require medium-to-high-risk suppliers to take practical steps to monitor its downstream supply chain and provide TPT with assurance of the steps it has taken in the form of an auditor's report.
- exploring the use of the Governments Modern Slavery Assessment Tool (MAST) for our medium-to-high-risk suppliers.
- reviewing and updating our Modern Slavery Code of Conduct.
- reviewing and updating the modern slavery training for relevant staff.

Board Sign-off

The Board of TransPennine Trains Limited, a subsidiary of DOHL, have endorsed, approved and adopted this Modern Slavery Act statement for and on behalf of TransPennine Trains Limited.

Chris Jackson

Managing Director

TransPennine Trains Limited