

## Anti-Slavery and human trafficking.

### Introduction

The Rail Academy (TRA) is committed to opposing modern slavery in all its forms and taking steps to prevent it from occurring. Our zero-tolerance attitude to Modern Slavery is not only expected from all employees working for and on behalf of TRA but from all companies and organisations that we contract directly with.

### Purpose of this Policy

- Modern Slavery is a criminal offence under the Modern Slavery Act 2015. Modern Slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking. Regardless of the form, the basis of each is the deprivation of a person's liberty by another, with an intention to exploit for personal or commercial gain.
- TRA have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We shall implement and enforce effective systems and controls that will ensure modern slavery is not taking place anywhere in our business or those of our suppliers.

### Steps to Prevent Modern Slavery

- TRA is committed to ensuring transparency in our business and in our approach to tackling modern slavery through our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015 and TRA-L2-GOV-102 Supplier Assessment and Management.
- All employees will be briefed on this policy to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.
- Anyone who is employed by, or is acting on behalf of TRA, will be obliged to report any incidents or suspected incidents of modern slavery.
- Whilst we recognise the statutory obligations to set out the steps to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations within them. We therefore will:
  - Engage with our suppliers both to convey to them our anti-slavery Policy, and
  - As part of our supplier selection process, understand the measures taken by them to ensure modern slavery is not occurring in their business.

### Responsibility for the Policy

- Responsibility for the prevention and protection against modern slavery rests with the Company's leadership. The Managing Director, supported by senior management, has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. All employees will be given adequate training on this policy and the issue of modern slavery.

### Reporting

- All TRA staff are encouraged to report any concerns about suspected modern slavery associated with the company or our suppliers directly to senior management.
- Modern Slavery concerns can be reported anonymously through the Home office 24-hour Modern Slavery help line 0800 0121 700 or through their online form found on [www.modernslavery.co.uk](http://www.modernslavery.co.uk)

### Safeguards

- TRA encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions that modern slavery is or may be taking place within the business or within any of our supply chains.
- Any claims or allegations made which are found to be malicious may result in disciplinary action being taken against the individual.

### Communication

- Our zero-tolerance approach to modern slavery shall be communicated to all suppliers, contractors and business partners at the outset of all business relationships and reinforced as appropriate thereafter.

### Cath Bellamy, Managing Director

The Rail Academy Limited

Date: June 2023



Document Number: TRA-L1-HRS-200.	Issue No: 1	Issue Date: 16/06/2023	Page: 1 of 1
Function lead / Approver: MD	Document Owner: OD	Next Review Date: 16/06/2026	