



safe secure reliable



Direct Rail Services Limited Modern Slavery Statement 2020/2021



Introduction

The Modern Slavery Act 2015 (“the Act”) requires organisations within the U.K, who supply goods or services and with an annual turnover of £36 million or more to publish within six months of its financial year ending, a modern slavery and human trafficking statement. This has to disclose the steps that are being taken to ensure modern slavery and/or human trafficking is not taking place in any area of its business or supply chains.

DRS as a business, in accordance with the provisions above is committed to preventing this. To ensure this, accountability is assigned to DRS’s Managing Director with a cross-functional team undertaking day to day management.

This statement sets out our position on modern slavery, our understanding of the risk and implications, the steps that we are taking to mitigate the risks of any breaches and/or incidents of modern slavery and/or human trafficking within DRS or within our supply chain and finally, the steps that we intend to take as a business to continue to develop and monitor compliance.

Who we are

DRS is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA). The Company was established in 1995 as a lynch pin supplier of rail transport and associated services to the nuclear industry. Whilst DRS continue to support the decommissioning activities of its parent company, we have extended our service offerings into a number of new rail market sectors and employ over 400 staff nationwide.

DRS Direct Suppliers

We have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. Over 90% of DRS direct spend is with UK based companies. Having undertaken a high-level review of our supply chain, DRS is content that our suppliers generally work in low risk areas. Our direct spend is relatively low for imported goods from sources outside the U.K and E.U.

However, as a business we are aware that some areas are potentially at a higher risk. Therefore, our level of management control required for these sources is and will be continually monitored.

Our Employees

Before colleagues start working with us, we use pre-employment checks to confirm their identity and right to work in the UK. In regards to remuneration, we pay all directly recruited labour at least the living wage. Where recruitment





agencies are used, they are required to go through the same checks as all our other suppliers. This includes, the need to publish an annual modern slavery statement not only if under a legal obligation to do so but out of good practice. These procedures collectively help to address our ongoing commitment to eliminate all forms of forced and compulsory labour.

Due Diligence Processes

DRS acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods or services to DRS. All new suppliers are vetted before they are admitted to an approved supplier list and are subject to ongoing review. DRS expects all those in its supply chains for materials, services and labour, to comply with its policies and values.

We have well-developed existing checks and balances within our business in relation to procurement and due diligence and we use industry-standard resources to help identify potential areas of modern slavery and/or human trafficking in our supply chain.

Our tender documentation includes the mandatory exclusion (subject to self-cleaning provisions) of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

We also have a confidential and independent reporting helpline operated by an independent company, Safe call, which specialises in handling concerns at work. Once a complaint has been made to Safe call, it will be forwarded to a high-level official within DRS who will decide how it is to be investigated. Any concerns will be fully investigated in line with this regime.

How we are implementing this

At DRS we are keen to develop and improve our knowledge around modern slavery compliance and making sure our employees are aware of our requirements as a business. In order to demonstrate our current steps, we have noted below, actions that we have completed as part of our 2019/2020 statement, along with the actions we plan to do within the next financial year.

Action one within our 2019/2020 Statement was to continue to publish our Annual Modern Slavery Statement in line with the 2015 Act, this has been completed by publishing our 2020/2021 Statement.

Action two within our 2019/2020 Statement was to nominate a Modern Slavery Compliance Champion. For DRS, this will be the Paralegal within the Legal Team who is responsible for chasing and implementing the actions on DRS's annual statements alongside the development and review of the Modern Slavery Compliance Policy and Code of Conduct.





Action three within our 2019/2020 statement was to develop a Modern Slavery Compliance Policy and Code of Conduct. Both documents have been developed with our sister company International Nuclear Services "INS". Within the Policy we address our expectations on monitoring modern slavery in our supply chains and business relationships. To ensure transparency we have made the Policy applicable to all persons working for us or on our behalf in any capacity. This being employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. The Code of Conduct addresses the measures DRS have in place to prevent modern slavery in its own business, the key risk areas to be aware of and warning signs to look out for. If you wish to receive an electronic copy of either of these documents, please contact the DRS legal department (legal@drsl.co.uk) who will provide this to you within 7 working days of your request.

Action four within our 2019/2020 Statement was to roll out training to employees who are involved within the supply chain and/or the formation of business relationships within DRS. A basic training course has been rolled out to all the employees as we were keen to ensure the whole business has an overview of what the Modern Slavery act is, the situations this can arise in and also how to spot incidents of Modern Slavery. Our aim for this next financial year of 2020/2021 will be to roll out extensive/higher level online training courses to specific employees who deal with the supply chain and/or formation of business relationships on a daily basis.

Further to this, we have continued to carry out a full review of our supplier approval process and have involved appropriate key managers to develop this. In doing so, we continue to use our Supplier Questionnaire document. This requires our prospective suppliers to demonstrate that they provide safe working conditions, pay their staff in line with legal requirements, treat workers with dignity and respect and act ethically in line with legal requirements regarding the use of labour. Our questionnaires are approved by subject matter experts within the business.

In addition, we are continuing to monitor and ensure modern slavery clauses are included within our contracts. Whilst doing so, we ask all our suppliers and/or new business relationships to ensure they provide us with copies of their policies and procedures in line with the 2015 Act.

As of the date of this statement no instance of slavery or human trafficking has been identified.

Next Steps

This year we intend to take the following further steps:

1. **Reporting** – DRS will continue to publish and produce an annual statement. The aim is to be transparent in our steps that we are taking to





monitor any breaches and/or incidents of modern slavery. This in turn, ensuring that our supply chains are aware of this expectation in line with our obligations.

2. **Action plan** – DRS will develop an action plan on how we are implementing an effective culture and approach. Once developed this will be available upon request.
3. **Training** – DRS will roll out extensive/higher level training to those specific employees who are involved within the supply chain processes so our employees can confidently identify warning signs and monitor compliance.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes DRS's modern slavery and human trafficking statement for the financial year ending 31st March 2021.

DocuSigned by:

548A6BB328D045B...

Chris Connelly

Managing Director, Direct Rail Services Limited

Date: 1st September 2020

