

Effective Date:	Sept 2020
Issue 1	2 Pages



Anti-Modern Slavery and Human Trafficking Policy

INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

This Direct Rail Services (DRS) Limited and International Nuclear Services (INS) Limited Policy represents DRS's and INS's direction to the business on this matter. All employees of INS and DRS must ensure that they read, understand and comply with this policy.

PURPOSE AND SCOPE

1. POLICY STATEMENT

INS and DRS are committed to ensuring that no modern slavery and human trafficking exists in any of its operations and/or supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and reasonable controls to monitor that modern slavery is not present in any of our supply chains and that as a business we are ensuring that, prior to entering into agreements with suppliers and contractors we are asking that they have policies and procedures in place in accordance with the Modern Slavery Act 2015 or equivalent legislation where appropriate.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors and suppliers.

COMMITMENTS

2. RESPONSIBILITY FOR THE POLICY

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of Procurement & Supply Chain has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, ensuring vetting is undertaken effectively when tenders are submitted, continually monitoring suppliers already used by our business and/or supply chains and auditing internal control systems and procedures to ensure effectiveness in countering and monitoring modern slavery.

Heads of Departments and Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and understand the issue of modern slavery in supply chains. If any of employees have concerns, they are encouraged to discuss these concerns with the Head of Procurement.

This policy will be reviewed periodically to ensure that all measures put in place for our business continues to comply with the requirements of the Modern Slavery Act 2015. Our review will ensure that improvements in monitoring are considered to encourage efficient and effective control measures.

3. COMPLIANCE WITH THE POLICY

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Head of Procurement & Supply Chain or contact Safe-call the confidential helpline as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you must raise it immediately or as soon as practicable with your Manager and/or the Head of Procurement & Supply Chain for INS & DRS or if you do not feel comfortable raising it with either of these, you must contact Safe-call.

We aim to encourage 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 suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Subject to the above, for avoidance of doubt, detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Procurement & Supply Chain for INS & DRS immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure via INS or DRS HR department.

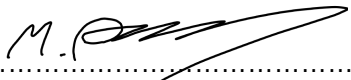
4. COMMUNICATION AND AWARENESS OF THIS POLICY


Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers and contractors at the outset of our business relationship with them and reinforced as appropriate thereafter. Any supplier or contractor that shows non-compliance as to their own obligations under the Modern Slavery Act 2015 or equivalent, will form the basis of our refusal to form a business relationship with them.

5. BREACHES OF THIS POLICY

Any employee who breaches this policy or fails to notify their Manager and/or Head of Procurement & Supply Chain of situation and/or concern in regards to Modern Slavery in any of our supply chains or business relationships, if such is later found to have been concealed will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Further to this, if it is brought to our attention that our supply chains or business relationships are in breach of the policy, if after thorough investigations we are not satisfied that the actions taken have eradicated these incidents of Modern Slavery, we will endeavour to terminate our relationship of those who are found to be in breach of this policy and/or any sub-contractor or third party working on their behalf.

This policy is duly signed and understood by all;


..... (INS and DRS Head of Procurement & Supply Chain)


..... (International Nuclear Services Limited Director)

DocuSigned by:

.....548A6BB328D045B:..... (Direct Rail Services Limited Director)