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## **MODERN SLAVERY POLICY STATEMENT**

This statement is made pursuant to section.54 of the Modern Slavery Act 2015 and sets out the steps that KSG RAIL & CONSTRUCTION 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. has a KSG RAIL & CONSTRUCTION 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**

KSG RAIL & CONSTRUCTION operations out of London England with one sole head office based in that country.

### **Our high risk areas**

The company is involved in the rail industry which has seen an influx of workers from the European and African continent that have gravitated towards working in the rail industry. There is the potential for these individuals to be taken advantage of when seeking training, and guidance in obtaining the correct certification for working in the rail industry.

### **Our policies**

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

Fair and Just Culture Policy, Ethical procurement policy and our Anti Bribery Policy for example:

1. Anti-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. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. 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.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



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## **Our suppliers**

KSG RAIL & CONSTRUCTION operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

## **Training**

We are a small company who are intimately familiar with each member of staff and have retained independent guidance on Health & Safety. We are all made aware of the scourge of modern slavery/human trafficking, and what to do if they suspect that it is taking place within our supply chain.

## **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Documentation received upon registering a sponsored candidate does not reveal any indication the candidate is under duress or that they are unable to produce such documentation because it is being held by a third unauthorized party.



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**Keith Gibson**  
**KSG Rail & Constructions Ltd**  
**Managing Director**  
**Dated 01.05.24**