



Shannon Rail Services Limited

Modern Slavery Statement

2022-2023

Prepared by: Bill Alexander, HSQE Adviser

Authorised by: Martin McAnulty, Managing Director

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1. Introduction

Shannon Rail Services Limited (hereafter Shannon Rail) is fully committed to eradicating any risk of modern slavery within the organisation or any part of its supply chain. Shannon Rail recognises the importance of conducting business responsibly, in a manner that is consistent with UK legal and international ethical standards. While Shannon Rail is not required to publish an annual modern slavery statement in accordance with the Modern Slavery Act 2015, it will voluntarily publish annual statements commencing with this statement covering the financial year 2022-2023. Future statements will be published in the autumn of each year (Shannon Rail year end is 31 August).

Modern slavery is a blight on society which must be eradicated. Shannon Rail acknowledges the link between modern slavery, organised crime and international terrorism, and will therefore take action to identify threats and prevent any potential harm to employees and workers, their families and the wider community. Shannon Rail's Modern Slavery Policy Statement (Shan/Bus/Pol/005) is made available to its staff in induction packs, on noticeboards, and is accessible electronically via the staff portal.

Shannon Rail actively supports Network Rail and principal contractors within the railway industry and the wider construction sector in their actions to identify and eradicate modern slavery or the perception of modern slavery.

This statement outlines the policies and processes that Shannon Rail followed in 2022-23 to mitigate the risk of modern slavery within its own operations and supply chains. There were no instances of modern slavery to report in 2022-23 that directly or indirectly involved Shannon Rail.

2. Shannon Rail Structure and Business Activities

Shannon Rail Services Limited is a UK incorporated company, company number 04351029, with its Registered Office at 17 Pennine Parade, Pennine Drive, London N2 1NT and Head Office at Watford Depot, Orphanage Road, Watford, WD17 1PG.

Shannon Rail is an SME with an annual turnover in excess of £10m. The number of staff deployed is variable according to demand and is drawn from a pool of between 150 and 200 registered operatives. The business operates primarily within the UK rail industry, supporting rail infrastructure maintainers and major projects. It holds contracts with Network Rail and with its principal contractors including Balfour Beatty, Colas Rail and Volker Rail. Shannon Rail provides a variety of services including:

Site Access Control, Site Welfare & Site Transport

Security Guarding (SIA - Security Industry Authority Licenced)

Track Labour

Road Haulage

Rail Skills Training

Medical and Alcohol & Drugs Screening Services for Rail Staff

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3. Code of Business Ethics

Shannon Rail has a Code of Business Ethics with the following key sections:

Business Integrity

Attracting & Retaining the Best People

Managing Our Commitment to Clients and Suppliers

Compliance

Listening to Our People – Speak Up

The Shannon Rail Business Code of Ethics is reviewed on an annual basis in line with the annual review of Shannon Rail Policies and procedures. It reinforces the organisation's commitment to ensure that Modern Slavery is not present within the company, and that any suspicion of modern slavery wherever it is identified must be reported.

4. Whistle Blowing

Shannon Rail firmly believes in open and honest governance. It is the policy of Shannon Rail that all those who raise honest concerns about anything Shannon Rail does will be treated with respect, supported and protected from any adverse treatment. Shannon Rail is committed to the highest possible standards of openness and probity.

The essence of the whistle blowing system is that employees and workers should be able to by-pass their direct management line, as this may be the area about which their concerns arise. Staff must be able to go outside the organisation if they feel the overall management is engaged in an improper course of action. To facilitate this Shannon Rail is a members of the Rail Industry Confidential Reporting Scheme (CIRAS), which is publicised within the business.

Shannon Rail's Whistle Blowing Policy (Shan/Bus/Pol/006) applies throughout the organisation and is a key safeguard to ensure that any concerns around modern slavery that may be difficult to raise within the business for whatever reason can still be reported and investigated.

5. Shannon Rail Workforce

Shannon Rail managers and operatives are paid a fair wage to reflect their roles and responsibilities, and strictly in accordance with relevant employment legislation. All staff are paid in excess of the UK living wage and Shannon Rail is an accredited member of the Living Wage Foundation. Where staff are paid via an umbrella company, they are done so in line with the requirements laid down by the Freelancers and Contractor Services Association (FCAS) code of compliance.

6. Recruitment

Shannon Rail takes care to ensure that recruitment practices are conducted in accordance with UK employment laws and that the best people are recruited to provide our service to clients.

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Shannon Rail's Equality, Diversity & Inclusion Policy (Shan/Bus/Pol/001) ensures that there is no discrimination against any individual regarding protected characteristics and actively encourages applications for employment from under-represented groups.

Shannon Rail does not operate a policy which specifically targets the recruitment of migrant workers although eligible migrant workers are welcome to apply for roles that they are qualified for.

All potential recruits are interviewed face to face by a Shannon Rail manager and are assessed for their ability to converse in English and additionally undertake a basic English Language written test.

All potential recruits are required to demonstrate that they have the right to be employed in the UK as covered by Shannon Rail's Checking Eligibility to Work in the UK Policy (Shan/Bus/Pol/009).

The eligibility to work checks are another key method of preventing modern slavery activities from penetrating the business as it is a fact that persons without a legal right to work in the UK are more likely to be exploited and become victims of modern slavery..

7. Supply Chain

Shannon Rail has a limited supply chain given the nature of its business activities and operations. The main elements involve:

- Road Vehicles: Purchase/Servicing/Repair/Fuel/Insurance
- Mobile Welfare Units: Purchase/Servicing/Repair
- Safety: Personal Protective Equipment*/First Aid Supplies/ Fire Extinguishers
- Training Services: Rail*/SIA/CPC
- Lifting Equipment: Purchase/Testing/Certification
- Medical/A&D: Equipment*/Laboratory Services*/Occupational Health Physician*
- Office: Equipment & Furniture/IT Services/Catering Supplies/Cleaning Supplies

* RISQS (Railway Industry Supplier Qualification Scheme) accredited suppliers

Shannon Rail holds long standing relationships with its suppliers who are expected to work to the same ethical standards as Shannon Rail and in full compliance with UK legal requirements. Shannon Rail maintains a register of Approved Suppliers who are RISQS accredited, and who are subject to external audits (Shan/SQE/Proc/025).

Where suppliers are not RISQS accredited and are not obliged to publish an annual Modern Slavery Statement under the Modern Slavery Act 2015 Shannon Rail will seek assurances that they have appropriate policies and safeguards in place to prevent modern slavery within their organisations. Failure to provide acceptable assurances may lead to the cessation of the business relationship..

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8. Looking Ahead

Shannon Rail will continue remain vigilant about current and emerging modern slavery risks.

Shannon Rail will regularly review its operations and business practices to ensure that it is taking effective action to identify, mitigate and eliminate any indicators of modern slavery within its operations and supply chain.

Future annual statements will feature more detail on our supply chain building on work currently in progress to further strengthen our already rigorous supplier approval process.