

The Policy

Rhomberg Sersa Rail Group 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 Rhomberg Sersa but from all companies and organisations that we contract directly with.

1. Purpose of this Policy

- 1.1 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.
- 1.2 As a group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. Rhomberg Sersa Rail Group intend on implementing and enforcing effective systems and controls that will ensure modern slavery is not taking place anywhere in our business or those of our suppliers.

2. Steps to Prevent Modern Slavery

- 2.1 Rhomberg Sersa Rail Group 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. To ensure the same high standards from all our contractors, suppliers and other business partners, Rhomberg Sersa Rail Group agree to include in all our contracting processes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.
- 2.2 All employees of Rhomberg Sersa Rail Group are to familiarise themselves with 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. Adherence to this policy forms part of all the team members' obligations under their contract of employment.
- 2.3 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. Rhomberg Sersa Rail Group intend on implementing the following measures:
 - I. conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - II. engage with our suppliers both to convey to them our anti-slavery Policy and to gain understanding of the measures taken by them to ensure modern slavery is not occurring in their business;
 - III. where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening and self-reporting for our suppliers on safeguard controls;

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- IV. introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and supply chain, both routinely and at times of reasonable suspicion.

3. Responsibility for the Policy

- 3.1 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.
- 3.2 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.

4. Reporting

- 4.1 All Rhombberg Sersa Rail Group staff are encouraged to report any concerns about suspected modern slavery associated with the company or our suppliers directly to senior management.
- 4.2 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

5. Safeguards

- 5.1 Rhombberg Sersa Rail Group 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 (Detrimental treatment includes dismissal, disciplinary action, threats or unfavourable treatment connected with raising a concern).
- 5.2 Any claims or allegations made which are found to be malicious may result in disciplinary action being taken against the individual.

6. Communication

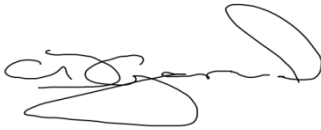
- 6.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of all business relationships and reinforced as appropriate thereafter.
- 6.2 This policy and accompanying action programmes must be communicated widely and effectively throughout the workforce and to all potential employees.

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7. Review

- 7.1 This policy will be reviewed by the Managing Director and supporting senior management on a regular basis (at least annually) and may be subject to amendments. All changes to this document will be communicated to Employees and Suppliers at the earliest opportunity.

Signed:



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Carl Garrud
Managing Director

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