

## Modern Slavery Act 2015 – Slavery and Human Trafficking Statement

### Introduction

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty and freedom by another in order to exploit them for personal or commercial gain.

Angel Trains Limited (ATL) has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and maintaining effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business and to use our reasonable endeavours to ensure Modern Slavery is not taking place in our supply chains.

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 of our contractors, suppliers and other business partners.

### Organisation's Structure

Angel Trains was formed in 1994 as one of three rolling stock companies in preparation for the privatisation of the UK rail industry.

Angel Trains is one of the UK's leading train leasing specialists, leasing rolling stock to all 19 franchised operators and open access operators in the UK.

Angel Trains' asset base comprises over 4,300 vehicles, with a combined value of over £2.9 billion. The company has invested £3.8 billion in new rolling stock and refurbishment programmes since 1994 and is one of the largest private investors in the UK rail industry.

In 2009, Angel Trains became the first rolling stock company to gain approval to the Railway Industry Supplier Approval Scheme which is being implemented across the UK rail supply industry. As part of its professional approach to asset management, Angel Trains is accredited with ISO 9001.

As a major investor in the railway industry in the UK, Angel Trains participates in various industry groups and has action plans to tackle many of the topics and issues that impact today's railway which in the context of Modern Slavery include an Anti-Slavery and Human Trafficking Policy applicable to both Angel Trains' staff and Angel Trains' customers, suppliers and business partners.

The company employs over 120 professional, technical and support staff at its headquarters in Victoria, London and its second office in Derby. Our primary business operations and direct supply chain relationships are based in the UK.

Angel Trains has an annual turnover in excess of £36m.

### Our Approach

To properly and transparently address the risks of Modern Slavery we have developed a risk based approach to identifying and assessing the risk of Modern Slavery within our business and supply chains.

Our initial focus has been on our ATL operations in England which is where our offices and staff are located and our business and turnover is generated.

We have started this process by reviewing ATL's core business operations and its direct supply chain.

Since the coming into effect of the Modern Slavery Act 2015 on 31 March 2016 we have:

- made the ATL Board aware of the requirements of the Modern Slavery Act 2015; and
- established a dedicated internal multi-disciplinary compliance team and working group to review and support the implementation of our approach.

Going forward, we will scope and assess the profile of our direct supply chain relationships, which include direct key supply chains comprising manufacturers and maintainers of rolling stock, suppliers of parts and technical consultancy service companies.

We are committed to assessing any instances of non-compliance regarding Modern Slavery and human trafficking on a case by case basis. Our Whistleblowing Policy provides a channel of communication for staff who have concerns. We will engage with our key suppliers about this issue.

### **Our Effectiveness in Combating Slavery and Human Trafficking**

We propose to use the following key performance indicators (KPIs) to measure our effectiveness:

- Staff confirmation they have read and understood our Anti-Slavery and Human Trafficking policy
- Formal acknowledgment of our approach by a number of high risk and/or core direct contractors, suppliers or business partners we have engaged with on the issue of Modern Slavery
- Training we have delivered to staff and/or high risk and/or core direct contractors, suppliers and/or business partners
- The number of high risk direct supplier contracts we have reviewed to update with additional Modern Slavery provisions
- Queries, issues or concern raised and/or reported to our compliance team and/or our Board.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement.

**Malcolm Brown**  
**Chief Executive Officer**  
**March 2017**