

## Modern Slavery and Human Trafficking Statement for

Porterbrook Holdings I Limited  
 Porterbrook Holdings II Limited  
 The Porterbrook Partnership  
 Porterbrook Rail Finance Limited  
 Porterbrook Leasing Mid Company Limited  
 Porterbrook Leasing Company Limited  
 Porterbrook Maintenance Limited  
 Porterbrook Leasing Asset Company Limited

(“Porterbrook”) for the financial year that ended 31 December 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“**Modern Slavery Act**”).

We are committed to doing all that we can to combat slavery and human trafficking and we realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude and workplace abuse (“**Modern Slavery**”).

We have a zero tolerance approach to Modern Slavery and this statement sets out the steps that Porterbrook has undertaken, and is continuing to take, to ensure that Modern Slavery is not taking place within our business or supply chain.

### Our organisation

The Porterbrook group operates in the United Kingdom, specialising in the leasing of all types of railway rolling stock and associated equipment. Not all legal entities within the group fall within the criteria defined in the Modern Slavery Act, but the policies and procedures in place to prevent Modern Slavery are common across all companies within the Porterbrook group. This statement is therefore made and is applicable to all companies within the Porterbrook group, as listed above.

### Our policies

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

1. **Anti-slavery and Human Trafficking policy.** This policy reflects our commitment to acting ethically and with integrity in all our business relationships. The policy sets out the roles and responsibilities of Porterbrook employees in identifying any instances of Modern Slavery and how they should be acting on them. A link to this policy is here: [Anti-slavery and Human Trafficking policy](#)
2. **Whistleblowing policy.** This sets out the 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. A link to this policy is here: [Whistleblowing policy](#)
3. **Code of Conduct for Suppliers.** This code sets out the standard of behaviour expected of suppliers to our business. A link to this code is here: [Code of Conduct for Suppliers](#)
4. **Code of Practice.** This is a voluntary code setting out Porterbrook’s business philosophy and the company’s core working values. A link to this code is here: [Code of Practice](#)

### Risk Assessments

We have undertaken stringent risk assessments of slavery and human trafficking within Porterbrook’s supply chain, as well as within our own operations.

For our own operations, we considered: the location of our operations, the roles being performed, the recruitment processes and the absence to date of reports of concerns regarding slavery and human trafficking. We also undertake “right to work” checks on all of our employees prior to them commencing their role. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work. Based on these risk assessments, we deem the risk of human trafficking occurring within our employee population (including our agency and contract staff under our direct supervision) to be low.

For our suppliers, the risk assessment includes mapping out our supply chains to assess particular industry and geographical risks to cover the entire scope of Porterbrook’s operations. We considered the risks based on where our suppliers are based, the products and services being supplied and the volume of spend. We recognised that our biggest exposure to Modern Slavery would be in our supply chain so put in place systems to mitigate these risks.

### Our suppliers

We conduct due diligence on all of our suppliers and have a rigorous supplier accreditation process before we approve them. Many of our suppliers hold international quality standards and accreditations and are regularly audited both by the issuing authorities and ourselves (or agents acting on behalf of Porterbrook) to ensure ongoing compliance to quality standards and regulatory requirements.

Our due diligence process and commitment to ensuring transparency in our supply chain involves evaluating our active suppliers by considering their response to our supplier self-assessment questionnaire. The information that we require from the questionnaire includes:

1. whether they have a programme to ensure that forced labour does not exist in their operations and supply chain;
2. whether they work with third parties to identify the risks of slavery and human trafficking;
3. the number of suppliers they have (direct and indirect);
4. whether they have identified any instances of slavery in their supply chain;
5. whether they have a process to remediate abuses; and
6. whether their audits include specific provisions on slavery and human trafficking.

In addition to the above, our supplier accreditation process requires all our suppliers to operate under our Code of Conduct for Suppliers and meet the minimum standards outlined in it. This includes that:

1. suppliers will adhere to minimum age provisions of applicable laws and regulations, including being proactive in ensuring wages, working hours and conditions are appropriate for the employee;
2. suppliers will not use forced, bonded, compulsory labour or servitude or any form of human trafficking;
3. suppliers will provide employees and workers with a central grievance procedure without fear of reprisals; and
4. suppliers must ensure their workers and employees receive training regarding compliance with our Code of Conduct for Suppliers.

### Training

We conduct Modern Slavery training for all staff so that they are aware of the issues surrounding Modern Slavery and what to do if they suspect that it is taking place within our supply chain. All employees have been provided with a Modern Slavery briefing note on the Modern Slavery Act.

Approval for this statement

This statement was approved by the Board of Directors on 29 November 2018.



Chris McClure  
Director & Company Secretary  
29 November 2018