



### Introduction

It is our policy to conduct all our business activities in an honest, transparent, fair and ethical manner.

We take a zero-tolerance approach to modern slavery and human trafficking within the Company and its suppliers and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

### Company Responsibilities

This Policy sets out our requirements in relation to the prevention of human trafficking and slavery, in accordance with the Modern Slavery Act 2015.

We fully support the government's objectives to eradicate modern slavery and human trafficking.

### Company Policy

Key employees of the Company who are involved in the prevention of modern slavery and human trafficking shall receive appropriate training.

We shall apply robust pre-employment verification checks as part of our recruitment process in accordance with Company Procedure NR-CMS-PR-16 : Employee Recruitment.

Our payroll systems shall also be used to check the eligibility of employees in the UK.

Our supplier approval process as per Company Procedure NR-CMS-PR-02 : Management of Suppliers shall incorporate the same controls adopted by Novus Rail, which shall be verified either by review or audit.

Imported goods from sources outside the UK and the EU are potentially more at risk of slavery and human trafficking issues, thus the level of controls for such goods shall be investigated more thorough.

We are satisfied from our own due diligence that there is no evidence of any act of modern day slavery or human trafficking within our Company or suppliers.

Signed:

Mark McMahon, January 2017

