

Modern Slavery and Human Trafficking Statement for financial year ending 31 March 2016

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is made by HS1 Limited for and on behalf of the following legal entities:

Betjeman Holdings JvCo Limited
Betjeman Holdings Midco Limited
Betjeman Holdings Limited
Helix Holdings Limited
Helix Midco Limited
Helix Bufferco Limited
Helix Acquisition Limited
High Speed Rail Finance PLC
High Speed Rail Finance (1) PLC
HS1 Limited
CTRL (UK) Limited
High Speed One (HS1) Limited

for the financial year that ended 31 March 2016.

MODERN SLAVERY ACT STATEMENT

HS1 LIMITED

This statement sets out HS1 Limited's actions to understand potential modern slavery risks related to its business and to take steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain. HS1 Limited is fully supportive of the aims of section 54 of the Modern Slavery Act 2015 and committed to preventing slavery and human trafficking in its corporate activities and its supply chain. This statement is made by HS1 Limited, on behalf of all members of the HS1 group who are required to publish a statement under section 54 of the Modern Slavery Act 2015. The statement covers all purchasing activity of the HS1 group in connection with the goods and services that it supplies.

HS1 Limited's business and organisational structure

HS1 Limited holds the 30 year concession from the UK Government to operate, manage and maintain High Speed 1 (**HS1**), the high speed rail line connecting St Pancras International to the Channel Tunnel. The line is used for high speed domestic services throughout Kent; international passenger services to destinations in continental Europe including Paris and Brussels; as well as freight traffic. The concession includes the stations along the route: St Pancras International, Stratford International, Ebbsfleet International and Ashford International (the **Stations**), as well as freight and operational sidings.

Network Rail (High Speed) Limited (**NR(HS)**) is our contractor for maintaining and operating the railway infrastructure and three of our stations, St Pancras International, Stratford International and Ebbsfleet International. Ashford International is run by another third party contractor (Mitie Technical Facilities Management Limited (**Mitie**)).

HS1 Limited is jointly owned by OMERS Administration Corporation and Ontario Teachers' Pension Plan (both Canadian pension funds) and there are several group companies between HS1 Limited and its ultimate shareholders.

HS1 Limited operates in the UK transport sector, with third party train operating companies running passenger and freight services on HS1 and with third party retailers and the public using its Stations. HS1 Limited operates only in the UK and as at 28 September 2016 has 45 employees.

HS1 Limited's supply chain

HS1 Limited's procurement activities take place in the UK and our contractors and suppliers are predominantly UK and EU based. At present we are focusing our attention on suppliers with whom we have a direct contractual relationship but we do intend to progress our anti-slavery and human trafficking procedures further down our supply chain in due course.

Contractual obligations

HS1 Limited will be introducing contractual obligations relating to the Modern Slavery Act 2015 (for example, warranties and audit rights) in new contracts, especially those which are considered at particular risk of slavery and human trafficking and we will be gradually introducing these provisions into variations of our existing contracts which are considered at risk.

Due diligence

As part of our commitment to identify and mitigate risk we will be improving our due diligence processes when taking on new suppliers.

- We have introduced a question within our pre-qualification questionnaire issued in OJEU tender processes, relating to compliance with the Modern Slavery Act 2015;
- We are producing due diligence questions relating to risks of slavery and human trafficking which will be distributed to new suppliers as well as our key suppliers and any at-risk suppliers so that with the answers we can further analyse the risks in our supply chain; and
- We will re-submit the questions annually to our key suppliers and at-risk suppliers.

Supplier activities

HS1 Limited has assessed which of its corporate activities could be at risk of slavery or human trafficking and has concluded that such risks lie within its supply chain, as opposed to within the business itself. Key areas of the supply chain which we will be focusing on for the purposes of our due diligence are: where low paid employees are providing services – such as cleaning and construction services; and where low value goods are manufactured and sold to us or our key suppliers.

HS1 Limited's compliance

We are introducing an anti-slavery delivery group to ensure that key areas of the business are aware of our obligations and are involved in improving our policies and processes to take account of the Modern Slavery Act 2015. This group will be made up of representatives from legal, procurement, HR and operations and will be headed by the General Counsel and Company Secretary.

We will be putting in place an anti-slavery policy to reflect our commitment to acting ethically and with integrity in all of our business relationships. This will apply internally within our organisation to all employees and contractors. We also have a general whistleblowing policy in place which encourages employees to report any concerns. We intend to roll out a supplier-facing anti-slavery policy to our key suppliers in due course.

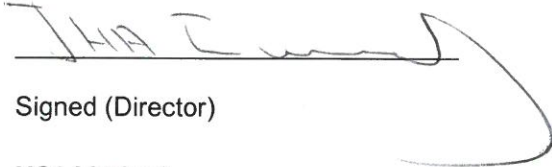
We will be rolling out training to all employees within HS1 Limited to ensure that all employees understand our obligations under the Modern Slavery Act 2015 and are committed to ensuring that we act within the spirit of those requirements.

We will monitor the effectiveness of the steps taken and seek ways to further improve our policies and processes. To measure the effectiveness of the steps taken, we will use the following key performance indicators:

- Number of key suppliers/at-risk suppliers providing satisfactory information following our initial questionnaire/annual request;
- Percentage of employees who have completed training on the Modern Slavery Act 2015; and

- Number of key suppliers/at-risk suppliers our supplier facing modern slavery act policy has been rolled out to.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HS1 Limited's slavery and human trafficking statement for the financial year ending 31 March 2016. This statement has been approved by HS1 Limited's board of directors.

A handwritten signature in black ink, appearing to read 'JHA', is written over a horizontal line. A large, sweeping flourish extends from the end of the signature to the right.

Signed (Director)

HS1 Limited

Date: 28 September 2016