

## **Modern Slavery and Human Trafficking Statement for financial year ending 31 March 2018**

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 2018.

## 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 chains. 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 chains. 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 ("HS1") holds the 30 year concession from the UK Government to operate, manage and maintain High Speed 1, 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 is jointly owned by (1) Equitix HS1 Holdings 1 Limited, (2) Agincourt (1) LLP and (3) Infrastructure Investments Betjeman Limited and there are several group companies between HS1 Limited and its ultimate shareholders.

HS1 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 operates only in the UK and as at 14 June 2018 has 45 employees.

#### **HS1 Limited's supply chains**

HS1'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 and we are encouraging our suppliers to require similar standards (to those set out within this statement) of their own contractors.

#### *Contractual obligations*

HS1 continues to include contractual obligations relating to the Modern Slavery Act 2015 (for example, warranties and audit rights) in its standard contracts. Where possible we have negotiated the inclusion of such provisions in contracts on suppliers' standard terms especially with those suppliers which are considered at particular risk of slavery and human trafficking (as further detailed below).

### *Due diligence*

We consider that our biggest exposure to modern slavery is in our supply chain and therefore as part of our commitment to identify and mitigate the risk of modern slavery we have improved our due diligence process when taking on new suppliers.

- We now cover modern slavery within our pre-qualification questionnaire and invitation to tender documentation issued in OJEU tender processes;
- We have also included due diligence questions relating to risks of slavery and human trafficking in our pre-qualification questionnaire issued in non-OJEU tender processes;
- During 2017, we circulated due diligence questions requesting detail as to how our category one and 'at risk' suppliers deal with risks of slavery and human trafficking and we are starting to roll out these questions to certain of our category two suppliers; and
- We have started an annual refresh of the due diligence questions by re-submitting them to our category one suppliers and we will be starting this with our at-risk suppliers later in 2018.

### *Supplier activities*

Other than our category one and two suppliers, key areas of the supply chain which we are 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. HS1 considers such suppliers to be 'at-risk' and therefore, due diligence is being conducted on these suppliers regardless of the value of goods/services provided by them.

### **HS1 Limited's compliance**

We have an anti-slavery delivery group whose role is 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 is made up of representatives from legal, procurement, HR and operations and is headed by the General Counsel & Corporate Services Director. The HS1 anti-slavery delivery group meets every quarter to discuss HS1's compliance and progress with its new processes and to consider whether any concerns or issues have arisen regarding modern slavery in our supply chain and/or business.

We have an anti-slavery policy to reflect our commitment to acting ethically and with integrity in all of our business relationships. This applies 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 have produced a supplier-facing anti-slavery policy setting out the standards which we expect our suppliers to achieve. This has been rolled out to all of HS1's suppliers. Our standard contractual provisions regarding modern slavery also require suppliers to comply with the HS1 anti-slavery policy provided to them from time to time.

We have rolled out training to employees within HS1 to ensure that all individuals working at HS1 understand our obligations under the Modern Slavery Act 2015 and are committed to ensuring that we act within the spirit of those requirements. Previous training has involved a briefing in a company-wide

meeting and an online training session (which is mandatory for all employees). We are considering ways to refresh the training this year.

We are monitoring the effectiveness of the steps taken and continue to seek ways to further improve our processes. To measure the effectiveness of the steps taken during the financial year to 31 March 2018, we are using the following key performance indicators (“KPIs”):

- Number of key suppliers/at-risk suppliers providing satisfactory information following our initial questionnaire/annual request
  - o Of our category one suppliers – 100% have provided satisfactory responses to our initial due diligence questionnaire;
  - o Of our category two suppliers that questions have been sent to – 100% have provided satisfactory responses to our initial due diligence questionnaire;
  - o Of our at-risk suppliers – 100% have provided satisfactory responses to our initial due diligence questionnaire;
  - o Of the annual refresh with category one suppliers, 83% have provided satisfactory responses;
  - o No suppliers have provided unsatisfactory responses to HS1 as at the date of this statement, however, several suppliers have not yet provided a response, as shown by the percentages above.
  
- Percentage of employees who have completed training on the Modern Slavery Act 2015
  - o In 2016/2017 we conducted online employee training on the Modern Slavery Act 2015 which 100% of employees completed. We are looking at ways to refresh the training with new starters during 2017/2018.
  
- Number of key suppliers/at-risk suppliers our supplier facing modern slavery act policy has been rolled out to
  - o Our supplier facing Modern Slavery Act policy has been rolled out to all of HS1's suppliers and not just our key/at-risk suppliers.
  
- Number of concerns raised to HS1 regarding modern slavery type issues
  - o No MSA type concerns have been raised to HS1.
  
- Number of suppliers (in addition to the category one and at-risk suppliers) that our due diligence questions have been rolled out to
  - o We have now rolled out our due diligence questions to ten of our category two suppliers.

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 2018. This statement has been approved by HS1 Limited's board of directors.

A handwritten signature in blue ink, appearing to read 'Ben', is written over a horizontal line.

Signed (Director)

**HS1 Limited**

Date: 14 June 2018