

MODERN SLAVERY

Statement

Virgin Trains' view on Modern Slavery

At Virgin Trains, we are inspired through our relationships to continuously re-imagine rail travel for good, and this is at the heart of why we do what we do.



Phil Whittingham
Managing Director
of Virgin Trains

Being responsible in business is embedded through our values and behaviours; our leadership, management and operations. Virgin Trains fully supports the principles of the Modern Slavery Act, and we find any violation of human rights unacceptable. We are committed to promoting inclusive and rewarding experiences of employment for everyone in Virgin Trains.

Who we are

Virgin Trains West Coast has operated the West Coast passenger train franchise since 1997 and is the trading name for Virgin Rail Group Holdings Limited and its subsidiaries. We employ over 3000 people and work with over 700 suppliers operating mainly in the UK delivering a wide variety of goods and services in the UK. The categories of suppliers include Catering, Marketing, Facilities Management, Technology and Train Fleet. The supply base is made up of blue-chip companies, Small and Medium sized Enterprises (SME's) and a Social Enterprise, which supplies our coffee. Our Procurement and Contract Managers primarily manage our relationships with these suppliers and work closely with our Responsible

Business team to ensure we are delivering on our Corporate Social Responsibility commitments.

Governance around Modern Slavery

We have a department that focuses on Responsible Business, ensuring we operate ethically and with integrity to our purpose and values, both internally focussing on our direct employees and externally with our supply chain and third parties. We want to ensure we meet our legislative requirements and compliance obligations.

Modern Slavery risks and how our suppliers manage these are a very important issue for us. Our Supplier Code of Conduct covers a wide range of social and environmental impacts. The human rights principles within our code of conduct are based on the Ethical Trading Initiative Base Code and ILO international labour standards, and include:

- Suppliers must not use child labour.
- Suppliers must not use forced labour.
- Employees should be free to choose to work for an employer and be free to leave after reasonable notice is served.
- Employees should be paid a fair wage.

As a Responsible Business we are passionate about how we treat our people. We ensure all our people are paid a fair wage, determined by the Government's National Living Wage, including any apprentices we employ. The safety of our people is a top priority for us and we ensure that relevant training is given to ensure safety both as frontline or HQ staff. We offer a Rewards and Recognition Scheme where amazing work is recognised by the business.

“Our business is passionate about the people who work for us and with us.”

Strengthening our Governance

To mitigate the risk of slavery and human trafficking in our supply chain in the past year we have reviewed our Responsible Supplier Code of Conduct, so it holds the strength to ensure our suppliers take slavery and human trafficking seriously.

Modern Slavery and our Supply Chain

We regularly review the potential risks in our supply chain by carrying out an assessment of suppliers for goods and services.

In our Food & Beverage (F & B) supply chain category, we have focused on different initiatives to de-risk this area. We pre-screen our suppliers before we source, and they go through a due diligence process to ensure they are ethically compliant. We have suppliers who are part of the Fair-Trade certification and Rainforest Alliance. We source locally wherever possible, with 50% of our F & B supply chain being SME's. Our close relationship and our desire to work with Social Enterprises /SME's provides us with greater transparency and allows us to easily monitor the supply chain.

3000

Employee's work for Virgin Trains

700

Suppliers work with Virgin Trains

50%

of our F&B supply chain are SME's

Raising awareness of Human Trafficking

Our business is passionate about the people who work for us and with us. We have a high level of interaction with customers, suppliers and third parties and it is important that we identify any signs and symptoms of Modern Slavery. We believe that our internal team of Contract Managers and Procurement Managers need to understand how to reduce the risks of Modern Slavery and how to report any incidents or concerns. To support this, we have had bespoke training delivered by an external Modern Slavery expert which was designed to equip our Contract Managers and Procurement Managers with knowledge and tools to minimise risk.





Our plans for the next year

Our ambition is to work towards achieving the ISO 20400 Sustainable Procurement standard. We will understand the detailed requirements of the standard, baseline our current position, and will work together with our supply chain to create an action plan and road map for achieving this.

We will continue to collaborate with our Tier 1 supply chain to create sustainable action plans to help reduce the risk of slavery and human trafficking occurring in our supply chain with supporting measurement tools.

We will be training our front-line colleagues on how to identify any individuals who may be subjects of slavery or human trafficking whilst travelling on our services and act accordingly.

Finally, when selecting suppliers, demonstrating their capability to act as a Responsible Business will be a key part of our decision-making process on whether we work with

them. We will be expecting our suppliers to show the same commitment as we do and comply with our Responsible Supplier Code of Conduct. If suppliers are not in agreement then we will take the necessary action required, being mindful that in some cases ceasing to engage with the supplier may not tackle the problem. Actions include:

- Avoid commencing a relationship with suppliers that do not sign up to our Code of Conduct
- Ceasing to trade with a supplier that does not sign up to our code of conduct
- Developing an action plan towards compliance with specific milestones, in cases where there is clear societal risk in disengaging with a supplier

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Virgin Trains West Coast's slavery and human trafficking statement for the current financial year.