

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

CK Rail Solutions Ltd. is committed to preventing acts of modern slavery, forced or compulsory labour and human trafficking within our organisation, operations and supply chains. We recognise our responsibilities under the Modern Slavery Act 2015 and are committed to maintaining effective systems and controls to ensure modern slavery is not taking place anywhere within our business or associated supply chains.

This policy applies to all employees, directors, agency workers, subcontractors, suppliers, consultants and business partners engaged with CK Rail Solutions Ltd.

CK Rail Solutions Ltd. maintains a zero-tolerance approach to modern slavery and human trafficking and expects the same standards from all organisations and individuals working on our behalf.

Organisation Structure, Business and Supply Chains

CK Rail Solutions Ltd. is a UK-based rail construction and infrastructure contractor operating within the rail and civil engineering sectors. The organisation provides construction, maintenance, project delivery and associated support services to clients within the UK rail industry.

Our supply chains include, but are not limited to:

- Subcontracted labour providers
- Plant and equipment hire companies
- PPE and workwear suppliers
- Materials and consumables suppliers
- Professional service providers
- Recruitment agencies and temporary labour providers

The majority of our suppliers operate within the UK; however, certain goods and materials may originate from international supply chains, including higher-risk regions outside the UK and EU.

CK Rail Solutions Ltd. recognises that the construction and rail sectors can present elevated risks associated with labour exploitation due to the use of subcontracted labour, temporary workers and multi-tiered supply chains. We are committed to identifying and managing these risks appropriately.

Policies Relating to Slavery and Human Trafficking

CK Rail Solutions Ltd. is committed to ethical business conduct and compliance with all applicable employment and human rights legislation, including:

- Modern Slavery Act 2015
- Employment Rights Act 1996
- Equality Act 2010
- Children and Young Persons Act 1933

Our Integrated Management System (IMS), aligned to ISO 9001, ISO 14001, and ISO 45001 standards, supports our commitment to ethical working practices and labour welfare.

Through our policies and management systems we ensure:

- Workers are free to terminate employment voluntarily
- Freedom of movement and association is respected
- Violence, harassment, intimidation, and coercion are prohibited
- Child labour is strictly prohibited
- Discrimination is prevented
- Workers are not charged recruitment fees

- Original identification documents are not withheld or confiscated
- Overtime arrangements comply with legal and ethical standards

CK Rail Solutions Ltd. will not knowingly engage with organisations involved in modern slavery or human trafficking.

Due Diligence Processes

CK Rail Solutions Ltd. implements due diligence processes designed to identify, assess, and mitigate the risk of modern slavery within our operations and supply chains.

These controls include:

- Supplier approval and onboarding procedures
- Supplier compliance assessments and reviews
- Procurement controls and supplier monitoring
- Verification of supplier competence and legal compliance
- Risk-based evaluation of suppliers operating in higher-risk sectors or geographic regions
- Ongoing supplier performance monitoring through our Supplier Management process

Suppliers and subcontractors are expected to comply with this policy and demonstrate their own commitment to ethical labour practices.

Failure to comply with anti-slavery requirements may result in corrective action, suspension or removal from CK Rail Solutions Ltd.'s Approved Supplier List.

Risk Assessment and Risk Management

CK Rail Solutions Ltd. acknowledges that certain areas of the construction and rail industry may present increased risks of modern slavery and labour exploitation.

Potential higher-risk areas include:

- Temporary and agency labour
- Subcontracted manual labour
- Low-skilled labour supply chains
- Imported goods and materials sourced from outside the UK and EU
- Multi-tier subcontracting arrangements

To assess and manage these risks, CK Rail Solutions Ltd. applies:

- Supplier approval and monitoring processes
- Risk-based procurement reviews
- Workforce verification procedures
- Incident reporting and escalation mechanisms
- Periodic review of supplier performance and compliance
- Management oversight through the Integrated Management System

Where concerns are identified, appropriate investigations and corrective actions will be undertaken.

Effectiveness and Performance Monitoring

CK Rail Solutions Ltd. monitors the effectiveness of its anti-slavery controls through ongoing review and management processes.

Performance indicators may include:

- Completion of employee training and awareness programmes
- Supplier compliance reviews and onboarding checks
- Monitoring of reported concerns and incidents

- Corrective actions implemented and closed out
- Internal audits and management reviews conducted through the Integrated Management System
- Supplier performance monitoring and procurement reviews

Findings from these activities are reviewed periodically to support continual improvement in preventing modern slavery and human trafficking.

Governance and Accountability

The Directors and Senior Management Team are responsible for implementing this policy and ensuring adequate resources, training and management controls are in place to support compliance.

Overall responsibility for oversight of this policy rests with the Chief Executive Officer.

CK Rail Solutions Ltd. monitors the effectiveness of its anti-slavery controls through ongoing supplier reviews, training completion records, incident reporting trends, corrective actions, and periodic management review within the Integrated Management System. Findings are used to continually improve the organisation's approach to preventing modern slavery and human trafficking.

Formal disciplinary procedures apply to breaches of this policy, and non-compliance will be treated as a serious matter.

Training and Capacity Building

CK Rail Solutions Ltd. is committed to raising awareness of modern slavery risks and ensuring staff understand their responsibilities.

Training arrangements include:

- Employee awareness training during induction
- Periodic refresher training for employees and managers
- Guidance on recognising indicators of modern slavery and human trafficking
- Reporting procedures and escalation routes
- Supplier onboarding materials and compliance expectations

Training content is periodically reviewed to reflect changes in legislation, industry guidance and best practice.

Reporting and Incident Management

Any suspected or confirmed instances of modern slavery or human trafficking must be reported immediately to senior management.

Employees and workers may also report concerns through the following channels:

- **Modern Slavery Helpline:** 08000 121 700
- **Police (Non-emergency):** 101
- **Emergency Services:** 999 in urgent situations

All reports will be treated confidentially, and individuals raising concerns will be protected from retaliation in accordance with the company's Whistleblowing Policy.

All incidents are managed in accordance with CK Rail Solutions Ltd.'s Incident Management Process and associated IMS procedures.

Victim Support and Remedy

CK Rail Solutions Ltd. is committed to ensuring that appropriate action is taken where modern slavery concerns are identified.

Where applicable, the organisation will support access to:

- Appropriate safeguarding measures
- Reporting to relevant authorities
- Access to support services
- Remedy, compensation and justice in accordance with UK law

Oversight of victim support arrangements rests with senior management.

Policy Review

This policy shall be reviewed annually by the Directors to ensure continued suitability, effectiveness, and compliance with current legislation and industry best practice. The latest version of this policy and the [Modern Slavery Act 2015](#) will be made available to employees, suppliers, subcontractors, and relevant stakeholders upon request.

Signed: Mr Matt Lees 

Position: Chief Executive Officer & Board Member

Dated: 11th March 2026