

Interim Modern Slavery Statement 2023/24

Following the transfer of First TransPennine Trains Limited (“**FTPE**”) to public sector ownership on 28th May 2023 (the “**Transfer Date**”), TransPennine Trains Limited (“**TPT**”) (trading as TransPennine Express) was formed to operate and deliver sustainable train services for the benefit of its customers, the environment, and for communities in the North of England and into Scotland.

At TPT we are committed to conducting our relationships to the highest ethical and moral standards and acting with integrity and professionalism in all our activities. This is in line with our corporate values and the expectations of our colleagues, customers, and stakeholders, we include the prevention of modern slavery and human trafficking in all its forms and extends to all business dealings and transactions in which we are involved, regardless of location or sector.

We regard our commitment to preventing modern slavery to encompass all forms including slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude, and inhumane treatment.

Scope and coverage of this statement

Under the Modern Slavery Act 2015 (the “**Act**”), a legal obligation to publish a statement applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36m. The Modern Slavery provisions of the Act applied to FTPE and have applied to TPT since its incorporation.

TPT wishes to issue this interim statement to:

- acknowledge its understanding of FTPE’s position for the Financial Year ending 31 March 2023 and up to the Transfer Date; and
- to confirm TPT’s commitment and endorsements for the period from the Transfer Date to 31 March 2024.

Statements and actions in relation to obligations prior to the Transfer Date remain with FTPE. However, TPT confirms that it is not aware of any modern slavery allegations having been made to FTPE during the period FY 2022/2023 and from the end of FY 2023 up to and including the Transfer Date.

This interim statement is made in support of TPT’s commitment to upholding the aims of the Act and sets out the steps taken, and steps which will be taken by TPT from the Transfer Date to 31 March 2024 to prevent modern slavery and human trafficking in our business and supply chains.

This interim statement has been approved and adopted by the board of TPT for the purposes of transparency and demonstrating its commitment to the principles of the Act.

A full statement in respect of TPT’s obligations for FY2023/2024 pursuant to Section 54(1) of the Act will be made following financial year end 2024, in accordance with the requirements of the Act.

Organisation and structure

TPT is owned by DfT OLR Holdings Limited (“DOHL”). DOHL is owned by and reports to the Secretary of State of the United Kingdom. On the Transfer Date, TPT took over the operation and functions of FTPE by way of transfer of that operation to public ownership.

Our objective is to provide a transportation service which helps connect our customers to the Northern communities and cities. The objective is built on the strong commitment of sustainability and drive to be the leader in safe, innovative, reliable, and sustainable transport. TPT investment is focused across customer experience, people, sustainability, health and safety, and business management. Please see our website at www.tpexpress.co.uk

Policies in relation to slavery and human trafficking

Our Code of Conduct on Anti-Slavery and Human Trafficking Prevention sets out our commitment to the prevention of modern slavery in our business and supply chains. We also have a Whistleblowing Policy to encourage and protect those who come forward, supported by a reporting hotline. There have been no reports relating to modern slavery or human trafficking to the hotline following the Transfer Date.

Our Supplier Code of Conduct incorporates prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Supplier Code of Conduct applies to all suppliers and partners who supply products or services to TPT.

Risk management and due diligence

We assess, monitor, and mitigate risks relating to slavery and human trafficking on a category basis. A review was undertaken of the modern slavery risks. While no significant risks were identified, the assessment highlighted two areas for improvement – more regular employee training and raising awareness of policies and procedures relating to modern slavery. The “Employee training and policy awareness” section, below, sets out further details of how these will continue to be addressed by TPT in FY 2023/2024.

Supply Chain & Procurement

We have supplier due diligence processes in place to help identify and address potential risks of modern slavery. These processes are supported by our Procurement Policy. We continue to screen strategic suppliers to assess the level of associated social risk, conduct audits, and follow up issues identified where necessary. In addition to current practices, we are working towards introducing a new toolset to enhance this capability and during the following year will be expanding assurance across our wider supplier chain on a risk impact basis.

Where cases, or allegations, of forced labour are identified within our supply chain, we commit to investigate any concerns thoroughly. There have been no such cases or allegations following the Transfer Date. Our standard contracting terms continue to incorporate specific obligations on our suppliers to comply with applicable anti-slavery and human trafficking laws, including the Act. Our terms also reference our Supplier Code of Conduct which reiterates these principles. No breaches of our Supplier Code of Conduct relating to modern slavery have been identified since the Transfer Date.

Employee protection

We pay a fair wage reflecting local market demands and conditions. TPT is an accredited Living Wage Employer and pays the Real Living Wage to employees and to third-party contractors working directly

for them in accordance with the Living Wage Foundation rates of pay. There is also a requirement for suppliers to comply with the anti-modern slavery contractual terms which form a schedule in the Goods and Services contract terms/PO terms which commits supplier compliance with UK modern slavery regulations.

Employee training & policy awareness

Raising colleagues' awareness of modern slavery principles and safeguarding is key in identifying and helping to prevent, and take appropriate action against, modern slavery.

Onboard teams receive training to assist with:

- identifying potential safeguarding risks and concerns across the rail network; and
- complying with TPT's reporting procedures.

During the FY to 2024, relevant employees within supply-chain related business functions will be required to complete a dedicated online training module and to read and attest to the Modern Slavery Code of Conduct. These requirements will be implemented across TPT during the year, with completion expected by the end of FY2024.

Where implementation is complete, rates of compliance with the mandatory training requirements will be reported to the TPT Executive Directorate team.

Board Commitment

TPT recognises the importance of the provisions of the Act and the Directors' aims to ensure that slavery and human trafficking have no part in the operations and supply chain. TPT will continue to be vigilant about the welfare of our colleagues, customers, suppliers, and stakeholders and aims to be transparent in its practices. TPT welcomes the opportunity to state its firm commitment to a zero-tolerance approach to modern slavery and human trafficking.

This statement has been approved by the Board of Directors.

Mr Chris Jackson
Managing Director
May 2023