

MODERN SLAVERY ACT STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“**Modern Slavery Act**”) and is made by Betjeman Holdings JVCO 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

(the “**HS1 Group**”), for the financial year that ended 31 March 2020.

This statement sets out the HS1 Groups’ actions to understand potential modern slavery risks related to its businesses and to take steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. The HS1 Group is fully supportive of the aims of the Modern Slavery Act and is committed to preventing slavery and human trafficking in its corporate activities and its supply chains.

The statement covers all purchasing activity of the HS1 Group in connection with the goods and services that it procures and/or supplies.

Business and organisational structure

The main operational company within the HS1 Group is HS1 Limited. HS1 Limited operates in the transport sector and 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 Amsterdam, 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 HS1 Limited’s 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**)).

The HS1 Group is jointly owned by (1) Equitix HS1 Holdings 1 Limited, (2) Agincourt (1) LLP and (3) Infrastructure Investments Betjeman Limited.

Staffing

HS1 Limited operates only in the UK and as at 31 March 2020 had 55 employees. There are no employees in any of the other legal entities within the HS1 Group.

HS1 Limited conducts all requisite checks to ensure that staff are able to demonstrate their eligibility to work in the UK and requires all contractors and agency staff to undergo an eligibility check before commencing work with HS1 Limited.

We have an employee training programme to ensure that all individuals working at within the HS1 Group understand our obligations under the Modern Slavery Act and are committed to ensuring that we act within the spirit of those requirements. Previous training has involved briefings in company-wide meetings, and we require all employees to complete online training on modern slavery and pass an accompanying test.

HS1 Limited provides employees with an anonymous forum which enables staff to raise any concerns they may have, including those relating to modern slavery and human trafficking issues. This is monitored on a regular basis and responses provided to all concerns raised. To date no issues or concerns of this nature have been raised.

All employees also have access to an Employee Assistance Programme which provides an advice service and which employees may utilise to seek advice about any modern slavery or human trafficking issues personally affecting them or their families.

Supply chains

The HS1 Group's procurement activities take place in the UK and our contractors and suppliers are predominantly UK and EU based. We actively encourage our suppliers with whom we have a direct contractual relationship to require similar standards (to those set out within this statement) of their own contractors.

Contractual obligations

We continue to include contractual obligations relating to the Modern Slavery Act (for example, warranties and audit rights) in our 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 a robust due diligence process when taking on new suppliers.

- We cover modern slavery within our pre-qualification questionnaire and invitation to tender documentation issued in OJEU tender processes;
- We also include due diligence questions relating to risks of slavery and human trafficking in our pre-qualification questionnaire issued in non-OJEU tender processes;

We completed a bi-annual refresh of our due diligence questions and re-circulated them to our key suppliers and to selected at-risk suppliers (based on perceived risk), to understand how they deal with risks of slavery and human trafficking.

Supplier activities

Key areas of the supply chain which we focus 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. We consider 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.

Compliance

We have an anti-slavery steering 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. This group is made up of representatives from legal, procurement, HR and operations and is headed by the General Counsel & Corporate Services Director. The anti-slavery delivery group meets throughout the year to discuss and monitor the HS1 Group’s compliance 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, and which has been updated recently as part of HS1 Limited’s People Strategy.

We also have a supplier-facing anti-slavery policy setting out the standards which we provide to all our suppliers and expect them to achieve. Our standard contractual provisions regarding modern slavery also require suppliers to comply with our anti-slavery policy provided to them from time to time.

We are monitoring the effectiveness of our processes and continue to seek ways to further improve these. To measure the effectiveness of the steps taken during the financial year to 31 March 2020, we are using the following key performance indicators (“KPIs”):

- Number of key suppliers/selected at-risk suppliers providing satisfactory information following our initial questionnaire/bi-annual request:
 - o Of our key suppliers – 100% have provided satisfactory responses to our due diligence questionnaires; and
 - o Of our selected at-risk suppliers – 100% have provided satisfactory responses to our due diligence questionnaire.

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

- Our supplier facing Modern Slavery Act policy has been rolled out to all of the HS1 Group's suppliers and not just our key/at-risk suppliers.
- Number of concerns raised to the HS1 Group regarding modern slavery type issues:
 - One MSA type concern was raised. In procuring the services of a new supplier, HS1 Limited made a specific intervention before entering in to contract to ensure that (i) all staff employed by the supplier to deliver the services were paid the London Living Wage; and (ii) all necessary employment checks had been undertaken by the supplier to ensure their staffs' eligibility to work in the UK.

This statement has been approved by Betjeman Holdings JVCO Limited board of directors.


Keith Ludeman (Sep 4, 2020 16:13 GMT+1)

Signed (Director)

Betjeman Holdings JVCO Limited

Date: 04-Sep-2020






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