



MODERN SLAVERY POLICY

January 2026

Policy Statement

EP Marine & Rail Ltd is committed to acting ethically, with integrity and transparency in all business dealings and relationships.

We have a zero-tolerance approach to modern slavery and human trafficking in any part of our business or supply chains. We are committed to ensuring that slavery, servitude, forced labour, and human trafficking have no place in our operations.

This policy supports compliance with the Modern Slavery Act 2015.

Purpose of This Policy

This policy sets out:

- Our responsibilities in preventing modern slavery
- The responsibilities of those working for or with EP Marine & Rail Ltd
- How risks are identified and managed within our operations and supply chain
- How concerns should be raised and handled

It is designed to ensure that all individuals and organisations working with us understand what modern slavery is, how to recognise it, and how to act if concerns arise.

What Constitutes Modern Slavery

Modern slavery is a serious crime and a violation of fundamental human rights.

It includes several forms of exploitation, including:

- Forced labour: work undertaken under threat or coercion
- Debt bondage: where individuals are forced to work to repay debts under exploitative conditions
- Human trafficking: the recruitment or movement of people through force, fraud, or coercion for exploitation

Modern slavery is often hidden and can exist within complex supply chains, including those in construction, infrastructure, and field-based industries.

Our Commitment

EP Marine & Rail Ltd is committed to:

- Acting ethically and responsibly in all business activities
- Ensuring transparency across our operations and supply chain
- Maintaining awareness of modern slavery risks within our sector
- Taking prompt action if any concerns are identified
- Working only with suppliers and subcontractors who share our standards

We expect the same level of commitment from all individuals and organisations working with us.

Supply Chain & Third Parties

Where we engage subcontractors, suppliers, or third parties, we expect them to:

- Operate in full compliance with applicable labour laws
- Ensure their own supply chains are free from modern slavery
- Act with integrity and transparency at all times

We reserve the right to cease working with any organisation where modern slavery concerns are identified or suspected, and to report matters to relevant authorities where appropriate.

Responsibility for Compliance of This Policy

Everyone working for or on behalf of EP Marine & Rail Ltd is responsible for:

- Remaining alert to the risks of modern slavery
- Avoiding any activity that could contribute to or conceal exploitation
- Reporting concerns promptly
- Cooperating fully with any investigations

Reporting Concerns

If you suspect or become aware of any situation that may involve modern slavery, you must report it:

- Concerns should normally be raised with the CEO, (William Brogden). Where this is not appropriate, concerns may be raised under the EP Marine & Rail Ltd [Whistleblowing Policy](#).
- All concerns will be treated seriously, confidentially, and investigated appropriately

No individual will suffer any detriment for raising concerns in good faith, even if those concerns are not substantiated.

Breach of Policy

Any breach of this policy may result in:

- Disciplinary action
- Termination of employment or contract
- Removal from working with EP Marine & Rail Ltd
- Reporting to relevant authorities where appropriate

We may also terminate relationships with any supplier or subcontractor who fails to comply with this policy.

Monitoring & Review

This policy will be reviewed annually and updated as required.

Status of Policy

This policy does not form part of any contract of employment and may be amended at any time.