



Railston

Modern Slavery & Human Trafficking Policy

Railston


**Whitehill Lane Industrial Estate
Whitehill Lane
Royal Wootton Bassett
Wiltshire
SN4 7DB**

**Last update: 2nd January 2024
Issue 1**

REVISION AND AMENDMENT REGISTER

Date	Page Number	Clause Number	Revision Details	Issue Number
23/07/19	All	N/A	Policy transferred to new template	1
08/01/20	All	N/A	Annual review	1
06/01/21	All	N/A	Annual review	1
05/01/22	All	N/A	Annual review	1
05/01/23	All	All	Annual Review	1
02/01/23	All	All	Annual Review	1

This Policy is reviewed and updated at least every 12 months

Name	Position	Signature	Date
Geoff Owen	Managing Director		2nd January 2024

Contents

(i)	Introduction
1	Policy
2	Modern Slavery Statement
3	Railston Ltd Business Description
4	Commitment to Employees
5	Supply Chain Overview
6	Training and Awareness
7	Ongoing Review
8	Failure to Comply

Railston Modern Slavery & Human Trafficking Policy

(i) Introduction

This document is Railston's policy on modern slavery and human trafficking and its statement under s. 54 of the Modern Slavery Act 2015

This document will be reviewed at least annually and updated when necessary

1 Policy

Railston has a zero-tolerance approach. We are committed to transparency in our own business and in our approach to modern slavery throughout our business relationships, consistent with disclosure obligations

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse. Railston takes the responsibility to be alert to these risks within its own business, and within the supply chain, very seriously

Railston is committed to conducting all aspects of its business in an ethical and transparent manner and acknowledges the duties and responsibilities under the Act

Railston ensures all workers are treated with dignity and respect. Railston is opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace

Railston requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do

Railston will terminate business relations with any sub-contractor or supplier found to be in breach of anti-slavery and human trafficking obligations

2 Modern Slavery Statement

This statement is made by Railston Ltd on its own behalf and on behalf of its subsidiary company Railston (Czech) s.r.o. registered in the Czech Republic

This statement sets out the approach that Railston Ltd and its subsidiary companies have either already taken during the financial year to 31 December 2023, or intend to take during the current financial year, to prevent modern slavery and human trafficking in its business and supply chains

3 Railston Ltd Business Description

Railston is a global retail display equipment designer and supplier. Installation services are offered throughout Europe. Additionally, principal contracting services are offered throughout the UK. Railston's clients are predominantly well-known retailers with large retail estates

Retail display equipment is manufactured in the UK, Europe and China. Railston buy directly from factories and handle the complex procurement and logistical process to import display equipment parts into the UK or Czech Republic. Railston has extensive storage facilities which enable bulk purchasing. Clients can call off their equipment in smaller quantities as required by their new store / refurbishment programme

Railston use sub-contractors for installation of retail display equipment and principal contracting

Railston Ltd turnover in 2022 was £35million per annum (not yet audited) and there were 74 employees. Railston head quarters are in Royal Wootton Bassett, Wiltshire. Railston's Czech subsidiary is located in Brno, Czech Republic

4 Commitment to Employees

Railston values it's employees and understands that their passion and dedication is what ensures clients receive the best possible service. In return Railston is committed to providing a great place to work. Railston complies with local minimum age and wage laws as a minimum standard, and does not employ child labour

Employees are:

- Paid by bank transfer; no payment will be made into third party bank accounts, thus minimising the risk of forced or compulsory labour; and
- Vetted for the right to work in the country where they are employed. Where employees require a work permit / VISA Railston ensures they have the necessary documentation in place

Welfare of employees is taken seriously and Railston provides comfortable and safe working conditions. Staff are trained in H&S matters and encouraged to take an active role in ensuring the workplace, work equipment and policies promote a healthy working environment

The whistleblowing policy encourages employees to report wrongdoing in any form

Railston provides further training for those wishing to be a first aider, mental health first aider or fire marshal

5 Supply Chain

Railston believes the greatest risk in relation to modern slavery and human trafficking is within the supply chain – either within the supplier base or within sub-contractors

In relation to the retail display equipment side of the business, Railston works with suppliers in the UK, Europe and Far East. Suppliers must pass Railston's Check of Competency before they are used. The process differs depending on location.

UK suppliers are assessed 'on paper' and then visited before they can be approved. Their policy and practices in relation to modern slavery and human trafficking is part of the Check of Competency. Once approved they will be regularly audited directly by Railston

Non-UK suppliers must comply with Railston's Non-UK Supplier Code of Conduct. This specifies expected employment practices, minimum standards of health, safety and welfare, commitments to being environmentally responsible and legal and business standards – with modern slavery and human trafficking included. A supplier which will not, or cannot, meet all requirements of the Code of Conduct will not be used. Any non-UK supplier is audited using Railston's Non-UK Supplier Audit. The audit involves a physical inspection of the premises as well as a review of documentation and employment practices. Railston uses an independent 3rd party partner in China to conduct the audits there. European audits are completed either by Railston or by a retained independent partner. Audits are completed annually but most facilities will be visited more than once a year

Railston acknowledges that monitoring compliance in non-UK locations is not simple and is actively looking at ways to develop and improve this

In relation to installation services and principal contracting, there is also Check of Competency process in place. These services are only offered in the UK and Europe. The Check of Competency requires sub-contractors to confirm they meet minimum standards, including those relating to modern slavery and human trafficking. Sub-contractors are audited by an independent partner company during the year and all their documents will be reviewed annually

Railston acknowledges that some sub-contractors may further sub-contract the works. Railston requires that the 1st tier sub-contractor notifies Railston before further sub-contracting takes place. Railston would be informed of the 2nd tier sub-contract details and arrangements and would ask further questions which would cover policies about modern slavery and human trafficking. Railston appreciates that this solution is not fail safe and is looking for ways to improve assessment of the whole sub-contract supply chain further.

6 Training and Awareness

New staff are introduced to all of Railston's policies, including this Modern Slavery & Human Trafficking Policy as part of their induction

Railston are implementing further training for those working in specific teams where there is greater risk of modern slavery and human trafficking – personnel, procurement, supply chain management. The training will consist of an e-Learning module initially. Railston intends to build on this training by expanding to more staff / teams

7 Ongoing Review

The Policy will be reviewed and re-signed annually at a minimum. Significant changes, information or updates to legislation during the year may require the Policy to be updated more frequently

8 Failure to Comply

A failure to comply with the Act, and/or this policy statement will be deemed to be a material breach of the terms of our standard commercial agreements and contracts of employment.

Further information can be obtained from associated policies:

Railston Corporate Social Responsibility
Staff Handbook
Non-UK Supplier Code of Conduct
Railston Check of Competency