



# **Northern Trains Limited**

## **Slavery and Human Trafficking Statement**

### **Introduction**

Northern Trains Limited (NTL) is committed to complying with the objectives of the Modern Slavery Act 2015 ("the Act") of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act for the financial year ended 31 March 2025.

The Act requires UK commercial organisations with an annual turnover in excess of £36million to publish a statement as to the actions they have taken to detect and address any acts of modern slavery in their businesses and supply chains. This statement is therefore made by NTL in accordance with the Act.

### **Organisation and structure**

NTL is a publicly owned subsidiary of DfTO (Department for Transport Operator Limited and is a public corporation of the Department for Transport). and it is one of the largest Train Operating Companies in the UK, with a large geographical spread covering most of Northern England.

NTL plays a vital role in the north of England by connecting tens of thousands of people to work, leisure, education and more every day.

### **Policies in relation to slavery and human trafficking**

NTL's anti-slavery and human trafficking approach reflects our continued commitment to respect the human rights of those who work on our behalf.

NTL operates a Supply Chain Code of Conduct, which details our commitments to sustainable and socially responsible procurement. Contractual obligations to comply with this code of conduct are included in relevant procurements.

We monitor compliance within our supply chain and reserve the right to visit suppliers' and subcontractors' facilities to audit performance. Where we find concerns, we work with suppliers to agree corrective action plans and we reserve the right to apply sanctions, which may include immediate termination of our business relationship.

### **Due diligence and risk assessment**

We assess the overall risk of NTL contracting with organisations that engage in slavery or human trafficking as being relatively low.

We have however identified the following areas as being At-Risk-Functions (ARFs) of the business and or supply chain as being areas which carry the highest susceptibility to the risk of employing slave or trafficked labour: manufacturing processes or other processes where relatively low skilled labour is required or managed, for example, cleaning and security staff.

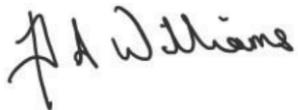
We pay particular attention and vigilance to the ARFs, and this includes strengthening our contractual terms and ongoing plans to develop relevant training. We continue to expand and develop the supply chain audits and management frameworks to improve our supply chain transparency and management.

### **Training on modern slavery and trafficking**

We continue to develop our compliance training across Northern and we have launched the 'How we do things' guide that includes information to help us increase the awareness of Modern Slavery across NTL.

**Board sign-off**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is reviewed annually. It was approved and signed by the Managing Director on behalf of the NTL Board. A written copy of this statement will be provided upon request.

A handwritten signature in black ink, appearing to read "Tricia Williams".

Tricia Williams  
Managing Director  
June 2025