

Slavery and Human Trafficking Statement

Gemini Rail Services UK LTD (GRS) believes Modern Slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking, all of which include the deprivation of a person's (an adult or child's) liberty by another (collectively "Modern Slavery").

The following sets out the procedures GRS has put in place intending to prevent opportunities for Modern Slavery to occur within our business or supply chain. In GRS we believe that Corporate Business should play a significant role in preventing Modern Slavery by ensuring the implementation of human rights for all workers in its whole supply chain.

GRS Chief Executive Officer is responsible and committed to making efforts to confront Modern Slavery at its sites and along its entire supply chain, following Section 54 of the Modern Slavery Act 2015 and the International Labour Organisation/UN Guiding principles.

GRS will take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

GRS business is very diverse and covers different areas among telecommunications, security systems, transportation, maintenance and business solutions.

We promote activities with our business partners to meet our CSR responsibilities across our entire supply chain.

GRS Code of Conduct includes requirements on ensuring respect for human rights and that GRS will not employ people against their will.

Chapter 3: Employee Relations

2 Respect for Human Rights

2.2 The Company will not employ people against their will and will not use child labour.

The Company will comply with the employment laws and regulations of the countries and regions in which it conducts business.

Complementing our Code of Conduct is the statement on our efforts concerning fundamental human rights, which covers issues such as working hours, wages, humane treatment, prohibition of discrimination, protection of privacy, concern for the human rights of foreign workers, trainees, and younger labourers, the freedom of association and more. This way we ensure that our business activities contribute to a respectful environment where all employees are treated rightfully.

The risk that Modern Slavery will occur is thought to be especially high in certain regions of the world. We are also aware there are greater human rights and labour related risks in areas where migrant foreign workers are widely employed.

GRS is actively implementing a program of enhanced checks in these regions to ensure compliance with local legislation.

In the context of modern slavery, we recognise that the following human rights and labour violations are likely to occur: passport confiscation, the need to pay recruitment fees, long working hours, restricted and short breaks, the threat of withholding wages as a penalty for not complying with rules, conflict with the working contract, payment below minimum wage, restriction of freedom of movement in and after working hours

As part of our initiative to identify and mitigate risks, we have taken several actions to verify the absence of Modern Slavery in our supply chain.

When recruiting employees, GRS adopts a perspective of protecting fundamental human rights and engages in recruitment activities that comply with the laws and regulations of the respective countries.

GRS has established items to be checked that include ensuring that GRS -affiliated entities are not allowing recruitment/temp agencies to collect any fees and are not retaining workers' passports or identification documents, as well as ensuring that they are providing workers with employment contracts, including terms of employment, in those workers' native languages.

As we recognise the complexity of foreign workers recruitment, GRS has been working to enhance our procedures to recruit employees and accepts temporary workers based on the laws and regulations of the respective country, so that no employees are made to work against their will or are unduly subjected to disadvantageous working conditions.

We conduct inductions for all-new, permanent staff on our Basic Business Philosophy and GRS Code of Conduct. This includes training on compliance with laws and a respect for basic human rights with emphasis on not employing persons against their will and on compliance with local employment laws. We want to ensure our workers can raise any issues safely and feel confident that those issues will be resolved. Thus, we have a protected global whistleblowing hotline for employees. Employees are regularly reminded of the whistleblowing hotline and are encouraged to use it if they suspect any potentially illegal behaviour or practice.

GRS promotes fair and equal procurement activities. When selecting new suppliers, GRS require suppliers to practice CSR. We conduct PQQ (Pre-Qualification Questionnaire) checks that encompass such aspects as human rights, labour, health and safety, protecting the global environment, and information security. We ask each of our suppliers to agree to our Supply Chain CSR Promotion Guidelines, which is a summary of GRS management philosophy, CSR procurement policies, and other matters with which we want our suppliers to comply.

GRS Supply Chain CSR Promotion Guidelines

(Excerpts) 1-1 Prohibition of Forced Labour

Suppliers shall employ all workers of their own free will with no worker being subject to forced labour.

Specific action items

- Suppliers shall not engage in forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery, or trafficking in persons.
- Suppliers shall not impose unreasonable restrictions on entering or exiting dormitories and workplaces.

- Suppliers shall give written notice to a worker concerning working conditions in the national language of the worker before entering into a definitive agreement (in the case of a foreign worker, before leaving his/her home country).
- Suppliers shall permit workers to freely terminate their employment.
- Suppliers, manpower supply companies, and staffing agencies shall not retain any government-issued identification card, passport, working permit (except the case where the retention of a working permit is required by law), immigration application, and any other similar document.
- Suppliers, manpower supply companies, and staffing agencies shall not collect any recruitment fee from workers.
- Suppliers shall inform workers of all items deducted from their salaries.

Our PQQ Check includes items related to CSR such as human rights, safe working environments, and consideration for the environment.

When any of a supplier's answers cause concern, we engage with that supplier further and in some cases, conduct site visits to investigate. We discuss the risks that have been identified with the supplier, and when necessary, we also provide support for corrective action plans.

Hannah Assam

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