



## **DB Cargo (UK) Limited**

### **Modern Slavery and Human Trafficking Statement**

#### **1. Purpose of this Statement**

This Statement is made by DB Cargo (UK) Limited (**DBC UK**) pursuant to section 54 of the Modern Slavery Act 2015 (**MSA**) and covers the financial year ending 31 December 2024. It outlines the steps taken by DBC UK to remove the risk of modern slavery and human trafficking taking place in any part of its business operations or supply chain and builds on the extensive steps already implemented since the MSA came into force.

#### **2. Our organisational structure**

DBC UK is part of the Deutsche Bahn (DB) Group and is one of the UK's largest rail freight companies. We provide freight, infrastructure and passenger charter trains throughout the UK, as well as added value solutions such as warehousing and product handling. By operating freight services to and from mainland Europe via the Channel Tunnel, DBC UK is able to directly connect into our Group Companies' diverse European network. We also provide traction and train crew for scheduled passenger operators.

#### **3. Our Commitment**

Modern slavery takes many forms including servitude, forced and compulsory labour, human trafficking and deprivation of liberty for personal or commercial gain. DBC UK has a zero-tolerance policy approach to all forms of slavery and human trafficking. These are criminal activities and violate basic human rights.

DBC UK has a proud history of employee welfare. We recognise and work closely with trade unions to ensure our employees have fair and lawful working arrangements. Further information about our existing policies and commitments can be found on the 'Sustainability' page of our website and in the DB Ethics Code of Conduct contained in the 'Compliance' section of our website. This Code of Conduct is also referenced within DBC UK employee contracts.

#### **4. Our Policies and Processes**

The DB Group signed up to the UN Global Compact in 2009 and is a founding member of the rail sustainable procurement initiative "Railsponsible", established in 2015 and since further developed. DBC UK is subject to and implements a number of key Group policies including the 'Code of Conduct for Business Partners', a binding set of rules which guide and support local Group companies when dealing with any ethical challenges that might arise in the course of day to day business dealings with third parties.

The DB Group Central Whistleblowing Management System is utilised by DBC UK to facilitate reporting of (amongst other matters) any concern regarding human rights violations, whether in the supply chain or committed by employees. In the financial year to 31 December 2024, there were no reported breaches relating to modern slavery made to our whistleblowing hotline, nor any instances of remedial action being required with respect to our suppliers. The contact details for the reporting of any issues and



link to our online whistleblowing tool is accessible to employees and third parties on our website (<https://uk.dbcargo.com/rail-uk-en/our-company/compliance>).

DBC UK is committed to implementing the audit standard for environmental, social and governance (ESG) topics, as developed by DB Group to create a common (industry wide) approach for addressing human rights issues.

DBC UK's core document, the "Business Principles", sets out our fundamental commitments and expectations on key areas of compliance including modern slavery and human trafficking. This is available on DBC UK's internal platform for employees and its external website (<https://uk.dbcargo.com/rail-uk-en/our-company/compliance>). A hard copy is also available. It is communicated to employees at corporate induction and at our internal compliance training sessions, and customers, suppliers and other third parties working with DBC UK are provided with a copy. The Business Principles promotes the responsible culture and practices that DBC UK strives to attain in all of its business dealings.

DBC UK's Corporate Responsibility Group continues to oversee and monitor the commitments laid out in the Business Principles. We undertake, in conjunction with DB Group, regular risk analyses in relation to all matters related to compliance. DBC UK welcomes the opportunity to collaborate with employees and third parties to eliminate the risk of improper business practices or conduct across its operations. The company actively encourages a 'speak up' culture to ensure conduct or transactions that are inconsistent with the rules and principles described in this Statement are properly reported and addressed.

#### **4. Our Supply Chain**

DBC UK has over 800 suppliers. It continues to monitor relationships with third parties (new and existing) to ensure compliance with both legislation and DBC UK's own internal rules. DBC UK expects all parts of its supply chain to take necessary action to promote ethical business practices, and compliance with the MSA remains a condition of doing business with DBC UK. Our Framework Agreement for the purchase of Goods and/or Services requires our suppliers to comply (past, present and future) with modern slavery legislation, including a right for DBC UK to be notified in case of any breaches.

#### **5. Raising Awareness**

A communications plan on specific topics from the Business Principles was rolled out across the business in 2024 (as in previous years) to ensure continuing awareness of Business Principles and best practice across DBC UK.

A programme of training across the business was comprehensively rolled out in 2024 which included MSA. Continued roll out and refresher train is planned throughout 2025. This training will also include creation of e-learning which will be continuously available on our online training platform.

To ensure greater transparency, we upload our Modern Slavery and Human Trafficking Statement to our website and also to the Government's Modern Slavery Registry.

#### **6. Endorsement of this Statement**

The Management Board of DBC UK recognises the importance of the matters considered in this



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Statement and the MSA. We will continue to take all measures necessary to ensure that slavery and human trafficking have no place in DBC UK's business operations. The Management Board welcomes this opportunity to restate its commitment to ethical and responsible practices in all parts of DBC UK.

A handwritten signature in blue ink, appearing to read 'A. Rossi', with a stylized flourish extending to the right.

**Andrea Rossi**  
**CEO, DB Cargo (UK) Limited**

**Effective: January 2025**