

## MODERN SLAVERY ACT STATEMENT 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and is made by Betjeman Holdings JVCO Limited for and on behalf of the following legal entities:

Betjeman Holdings JvCo Limited  
Betjeman Holdings Midco Limited  
Betjeman Holdings Limited  
Helix Holdings Limited  
Helix Midco Limited  
Helix Bufferco Limited  
Helix Acquisition Limited  
High Speed Rail Finance PLC  
High Speed Rail Finance (1) PLC  
HS1 Limited (trading as London St Pancras Highspeed)  
CTRL (UK) Limited  
High Speed One (HS1) Limited

(the “**HS1 Group**”), for the financial year that ended 31 March 2025.

This statement sets out the actions taken by the HS1 Group to understand potential modern slavery risks related to its businesses and to take steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. The HS1 Group is fully supportive of the aims of the Act and is committed to preventing slavery and human trafficking in its corporate activities and its supply chains.

The statement covers all purchasing activity of the HS1 Group in connection with the goods and services that it procures and/or supplies.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The HS1 Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

### **Business and organisational structure**

The main operational company within the HS1 Group is London St Pancras Highspeed (the trading name of HS1 Limited). London St Pancras Highspeed operates in the transport sector and holds the 30-year concession from the UK Government to operate, manage and maintain High Speed 1, the high-speed rail line connecting St Pancras International to the Channel Tunnel. The line is used for high-speed domestic services throughout Kent; international passenger services to destinations in continental Europe including Amsterdam, Paris and Brussels; as well as freight traffic. The concession includes the stations along the route: St Pancras International, Stratford International, Ebbsfleet International and Ashford International (the **Stations**), as well as freight and operational sidings.

Network Rail (High Speed) Limited is London St Pancras Highspeed's contractor for maintaining and operating the railway infrastructure and three of the stations, St Pancras International, Stratford International and Ebbsfleet International. Ashford International is managed by ABM Limited.

The HS1 Group is jointly owned by: (1) Equitix HS1 Holdings Limited; (2) Agincourt (1) LLP; and (3) Infrastructure Investments Betjeman Limited.

## **Staffing**

London St Pancras Highspeed operates only in the UK and as at 31 March 2025 had 59 employees. There are no employees in any of the other legal entities within the HS1 Group. London St Pancras Highspeed is a living wage employer.

London St Pancras Highspeed conducts all requisite checks to ensure that staff are able to demonstrate their eligibility to work in the UK and requires all contractors and agency staff to undergo an eligibility check before commencing work with London St Pancras Highspeed.

We have an employee training programme to ensure that all individuals working within the HS1 Group understand our obligations under the Act and are committed to ensuring that we act within the spirit of those requirements. This training is carried out when new staff are inducted and then annually.

London St Pancras Highspeed provides employees an anonymous forum via their Speaking up Policy which enables staff to raise any concerns they may have, including those relating to modern slavery and human trafficking issues. This is monitored on a regular basis and responses provided to all concerns raised. To date no issues or concerns of this nature have been raised.

All employees also have access to an Employee Assistance Programme which provides an advice service and which employees may utilise to seek advice about any modern slavery or human trafficking issues personally affecting them or their families.

## **Supply chains**

The HS1 Group's procurement activities take place in the UK and our contractors and suppliers are predominantly UK and EU based. We actively encourage our suppliers with whom we have a direct contractual relationship to require similar standards (to those set out within this statement) of their own contractors.

### *Contractual obligations*

We continue to include contractual obligations relating to the Act (for example, warranties and audit rights) in our standard contracts. Where possible we have negotiated the inclusion of such provisions in contracts on suppliers' standard terms especially with those suppliers which are considered at particular risk of slavery and human trafficking (as further detailed below).

### *Due diligence*

We consider that our biggest exposure to modern slavery is in our supply chain and therefore as part of our commitment to identify and mitigate the risk of modern slavery we have a robust due diligence process when taking on new suppliers.

- We cover modern slavery within our pre-qualification questionnaire and invitation to tender documentation issued in Public Procurement tender processes.
- We also include due diligence questions relating to risks of slavery and human trafficking in our pre-qualification questionnaire issued in tender processes which are not covered by the Procurement Act.

### *Supplier activities*

Key areas of the supply chain which we focus on for the purposes of our due diligence are:

- Key suppliers – being those suppliers that are perceived to present a high risk to any of the HS1

Group and are subject to a contract with a value that exceeds £1 million per annum; and

- At-risk suppliers – being those suppliers that are perceived to be at a higher risk of breaching the Act, through application of specified assessment criteria, such as sector, type of contract (works, supply or services), value, duration, and, low paid suppliers that provide services such as cleaning and construction services and suppliers that provide low value manufactured goods.

## Compliance

During the year our Business Ethics Group, chaired by our General Counsel and Company Secretary, meet to discuss and monitor the HS1 Group's compliance and to consider whether any concerns or issues have arisen regarding modern slavery in our supply chain and/or business. The Group has been undertaking a review and gap analysis of a number of HS1 policies to ensure that we monitor and report on compliance. This is reported to the Audit and Finance Committee of the Board of London St Pancras Highspeed. This year we have joined as a member of Slave Free Alliance and are about to commence a Modern Slavery specific gap analysis and look forward to working with them to see where we could improve.

We have an anti-slavery policy to reflect our commitment to acting ethically and with integrity in all of our business relationships. This applies internally within our organisation to all employees and contractors. We also have a Speak Up Policy to ensure people know how to raise concerns, should they have any.

We also have a supplier-facing anti-slavery policy setting out the standards which we provide to all our suppliers and expect them to achieve. Our standard contractual provisions regarding modern slavery also require suppliers to comply with our anti-slavery policy provided to them from time to time.

We continue to monitor the effectiveness of our own processes and to seek ways to further improve these. To measure the effectiveness of the steps taken during the financial year to 31 March 2025, we used the following key performance indicators ("KPIs"):

KPI	Result for financial year to 31 March 2025
Number of suppliers selected to be subject to an annual due diligence questionnaire	8 (being approximately 10% of suppliers other than key suppliers)
Percentage of suppliers that provided satisfactory information following the annual due diligence questionnaires	100%
Percentage of key suppliers/selected at-risk suppliers that have received a copy of the HS1 Group Modern Slavery Act Policy and have provided the HS1 Group with a copy of their own Modern Slavery Act Policy	100%
Number of modern slavery concerns brought to the attention of the HS1 Group	None

This statement has been approved by Betjeman Holdings JVCO Limited board of directors.



Keith Ludeman (Jun 27, 2025 09:25 GMT+1)

Signed (Director)

**Betjeman Holdings JVCO Limited**

Date: **27/06/25**