

Modern Slavery Statement For the Financial Year Ending 31 December 2025

Introduction

Rock Rail South Western PLC (“**RRSW**”) was established in 2017 to finance, own and lease a fleet of 90 state of the art Aventra trains (the “**Fleet**”) that will be manufactured by Alstom Engineering and Services Limited (“**Alstom**”). This statement is made on behalf of RRSW and its holding companies, Rock Rail South Western (Holdings) 1 Limited and Rock Rail South Western (Holdings) 2 Limited.

Organisation structure and supply chains

RRSW was established with the sole purpose of financing, owning and leasing the Fleet. The Fleet was manufactured in the UK by Alstom, making use of a large international supply chain. The Fleet began a phased entry into service in January 2024.

RRSW has no employees. RRSW’s activities are managed by Rock Rail Management Services Limited (“**RRMS**”) under a management services contract.

Policies in relation to slavery and human trafficking

RRSW is committed to operating its business in an ethical and socially responsible manner. It recognises the seriousness of modern slavery and is dedicated to preventing such practices within its organization supply chain. This policy outlines the RRSW’s commitment to combat modern slavery, in accordance with Section 54 of the Modern Slavery Act 2015.

RRSW strictly prohibits any form of modern slavery, including forced labour, child labour, human trafficking, and any other unlawful exploitation of individuals in any of activity it undertakes. It condemns all practices that violate basic human rights and dignity.

It is therefore RRSW’s policy to only contract with organisations that make a visible and meaningful commitment to the prevention of slavery and human trafficking. This is a foundational principle. The company participates in a highly regulated sector, with clear, firm requirements for the prevention of modern slavery and in which the risks are prevented at a strategic level through strong governmental oversight.

Due diligence processes

RRSW ensures that its policies in relation to modern slavery and human trafficking are adhered to by reviewing the modern slavery policies and statements of its direct suppliers and, where necessary following a risk assessment, its indirect suppliers.

Risk assessment, management and training

RRSW, with RRMS, undertakes a regular assessment of all Environment, Sustainability and Governance risks, with full review being undertaken at least on an annual basis. The risk assessment includes consideration of modern slavery.

RRSW will promptly investigate any suspected incidents of modern slavery and ensure that its suppliers take immediate remedial actions, where necessary, using whatever mechanism are available to it to address them.

RRSW ensures that staff of RRMS are aware of the relevant policies relating to modern slavery and receive training as necessary to promote and maintain awareness of modern slavery.

Key performance indicators

In the financial year ahead, RRSW will continue to meet with its direct suppliers to ensure compliance with their own modern slavery statements and policies.

This statement was approved by RRSW's board of directors. It has been signed below on behalf of the board by Mark Swindell a company director

Name: 

Director of RRSW, Rock Rail South Western (Holdings) 1 Limited and Rock Rail South Western (Holdings) 2 Limited

12th Jan 2026

REV	DATE	STATUS / DESCRIPTION OF CHANGES
1.0	19/06/24	First version
2.0	17/02/25	Second version: annual update
3.0	12/01/26	Third version; annual update