



Anti-Slavery and Human Trafficking Policy

Opening Statement from Senior Management

KBH On Train Media will publish an annual slavery and human trafficking statement. A link to this statement will be on the homepage of the website and will be approved and signed by Jessica Garthwaite, Business Director.

Jessica Garthwaite is responsible for ensuring this statement is published and reviewed on an annual basis. This statement will explain the steps KBH On Train Media has taken to ensure that slavery and human trafficking are not taking place in any of its supply chains or any part of its own business.

This policy ensures that KBH On Train Media complies with Section 54 of the Modern Slavery Act 2015 and sets out the steps the company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

KBH On Train Media is committed to acting ethically and with integrity and transparency in all business dealings and putting effective controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

Our Business

KBH On Train Media is a rail advertising company operating in the UK Rail Industry with 8 Train Operating Companies over 15 rail networks. The company creates a range of advertising opportunities inside rail passenger carriages and reaches over 1 bn rail passengers in London and the South of England. The nature of our business means that we have longstanding relationships with a handful of main suppliers such as printers and manufacturers of advertising frames.

Our Policies

We operate a number of internal policies to ensure we conduct business in an ethical and transparent manner. These include:

Recruitment Policy. KBH On Train Media operate a robust recruitment policy, including conducting eligibility checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. The company also adheres to the London Living wage as a base starting salary.

Whistleblowing Policy. KBH On Train Media operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are treated, or practices within the business or supply chain, without fear of reprisals.

Corporate Social Responsibility. KBH On Train Media operate a Corporate Social Responsibility Policy in order to align our business values, purpose and strategy with the social and economic needs of our stakeholders, whilst maintaining ethical business policies and practices. We are committed to full legal compliance in all that we do.

KBH Handbook. This handbook explains the manner in which KBH On Train Media behave as an organisation and how we expect our employees and suppliers to act.

ISO 9001_2015: KBH On Train Media is undergoing the final audit for accreditation and once gained this will prove that the company's ability to provide consistently services and products that meet the needs of our customers and stakeholders.

Our Suppliers

KBH On Train Media operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence consists of an online search to ensure this company has never been convicted of offenses relating to modern slavery. They are required to complete a Supplier Compliance Form and confirm that no part of their business operations contradicts this policy. In addition, they are required to confirm that (for UK suppliers) they pay their employees at least the national minimum wage or (for International suppliers) they pay their employees any prevailing minimum wage applicable within their country of operations.

Contracts may be terminated at any time should any instances of modern slavery come to light.

Training

A statement about slavery or human trafficking is available to all employees and we conduct regular training for our buying team so they understand the signs of

modern slavery and what to do if they suspect it is taking place within our supply chain.

KBH On Train Media will know the effectiveness of the steps taken if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Responsibility for this policy

The board of Directors of KBH On Train Media have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Jessica Garthwaite, Business Director, has primary day-to-day responsibility for implementing this policy and for monitoring its effectiveness on an ongoing basis.

Signed: _____  _____

Date: _____ 22.09.16 _____

Signed: _____  _____

Date: _____ 01.09.17 _____

Policy Review Date 01.09.18