

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the VTG UK Ltd slavery and human trafficking statement for the financial year ending 31 December 2025 and has been approved by the Directors of VTG UK Ltd.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

VTG UK Ltd is the largest rail wagon leasing business in the UK, headquartered in Birmingham and, as of 31 December 2025, employed 28 people. We offer investment in and full-service hire of railway wagons to shippers and freight operating companies across various core sectors including construction, intermodal, oil and petroleum and biomass.

Our supply chain includes suppliers across a range of sectors including rail wagon manufacturers, rail wagon maintainers and rail wagon component and parts manufacturers. The vast majority of these suppliers are located in the UK and EU, where high social, safety and labour standards apply.

OUR POLICIES

VTG Rail UK Ltd is committed to acting ethically and with integrity in all our business dealings and relationships. We have issued a Modern Slavery Policy which stipulates a zero-tolerance approach to slavery and human trafficking. Additionally, we have an Employee Code of Conduct, Recruitment and Selection Policy, Dignity and Respect at Work Policy, and Anti-Corruption Policy. This applies to all officers, directors, and employees of VTG Rail UK Ltd.

OUR DUE DILIGENCE PROCESSES

VTG Rail UK Ltd is committed to ensuring that our suppliers meet the high standards of ethics, quality and performance that underpin our business, and we assess this through our robust supplier management processes. We have included specific Modern Slavery provisions within the standard terms and conditions of our direct supplier contracts and compliance is monitored through our supplier headquarter audits and ongoing assessment of supplier product quality, safety and basic labour standards. Furthermore, new suppliers complete Supplier Qualification Questionnaires which assess adherence to modern slavery legislation.

To properly and transparently address the risks of slavery and human trafficking we have implemented a Public Interest Disclosure Policy that enables employees to report suspected breaches of applicable laws and internal policies (anonymously, if desired).

We are committed to ensuring that all employees are aware of our policies and procedures. As part of our induction process, employees read all policies including our Modern Slavery Policy. Policies are continuously accessible through our online HR platform.

OUR EFFECTIVENESS

We will periodically review our processes in order to determine the extent to which they are effective in identifying and managing the risks of slavery and human trafficking within our business and supply chain.

A handwritten signature in black ink, appearing to read 'M. Hurn'.

Marc Hurn
Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Nigel Day'.

Nigel Day
Business Improvement Director