



Modern Slavery and Human Trafficking Statement 2025



Stagecoach Group Limited – Modern Slavery and Human Trafficking Statement.

About our Modern Slavery Statement

At Stagecoach Group we support the objectives of the Modern Slavery Act 2015 (the “Act”) to eliminate slavery and human trafficking and make this statement pursuant to section 54(1) of the Act for the financial year ended 03 May 2025.

The Act requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This obligation applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36 million. Our statement is, therefore, made by Stagecoach Group Limited and each of its subsidiaries (together, the” Group”) that are required to make such a statement in accordance with the Act. Our statement is also made on behalf of certain other subsidiaries of the Group that, while not subject to the requirements of the Act, recognise the importance of a Group-wide approach to improving transparency and preventing slavery and human trafficking occurring within the supply chain. The companies making this statement are listed below.

We are committed to respecting the rights and dignity of all workers, both within our operations and across our supply chains, and to preventing risks of modern slavery, forced labour, and human trafficking. We recognise the fundamental civil, political, economic and social human & labour rights and freedoms of every individual and strive to reflect this in our business.

Our statement sets out the steps taken by the Group during the financial year to prevent and address the risk of modern slavery or human trafficking occurring in our business and supply chains.



Message from our CEO



“There is no space for modern slavery or the organised crime that underpins it.”

We exist as Stagecoach to serve our customers and their communities.

For our business to be sustainable, we need to hold ourselves and our partners to the highest standards. In our business, we rely on goods and services from our supply chain to ensure that we deliver over a million journeys every day, taking people safely to where they need to go.

We believe this dependency on goods and services requires strong partnerships, and by supporting these, we build a more resilient Stagecoach.

Central to our Modern Slavery Statement is one of our core business values, Stronger Together. This value drives our commitment to collaborative action on human rights, modern slavery, and labour exploitation; both within our operations and throughout our supply chain. These partnerships reinforce our dedication to the Ten Principles of the United Nations Global Compact.

Our collaboration with Slave-Free Alliance (SFA), part of the charity Hope for Justice, enhances our ability to identify individuals affected by modern slavery and exploitation, protect those at risk, and prevent such practices throughout our broader value chain. It will also help us strengthen oversight across all business units and third-party relationships.

Guiding effective identification, protection and prevention of modern slavery, this statement sets out our ambition; to formalise our risk-assessment process, audit suppliers and actively measure and monitor supplier status risk levels, provide appropriate training and continuously review and update our policies and procedures.

We are proud to be partnering with SFA. There is no space for modern slavery or the organised crime that underpins it.

**We are
stronger together**



Actions taken by the Group

We have in place a dedicated modern slavery working group comprising of representatives from our Procurement, Legal, Sustainability, People and Risk & Assurance functions, and aims to ensure ongoing compliance and monitoring of the requirements of the Act within our organisation and supply chain. As part of the working group's mission to assess and address the risk of modern slavery, we are undertaking the following activities:



Formalising our risk-assessment process which will be applied to all suppliers, complementing the supplier due diligence questionnaire we issue (which includes confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking).



Following up on responses to questionnaires where appropriate, such as requesting further evidence on specific matters.



Conducting an annual audit of a sample of suppliers identified as posing a medium to high risk.



Actively measuring and monitoring through a central database supplier status and risk levels.



Providing mandatory modern slavery and human trafficking training to new and existing senior employees in relevant roles.



Continuously reviewing and updating our policies and procedures as appropriate to raise awareness and profile of the issue within our organisation.



Reviewing current practices for sharing and analysing information about suppliers' compliance with the Act across our organisation, with a view to identifying any efficiencies or improvements that could be made. Our Risk & Compliance Committee with representatives from across the business raises awareness throughout the Group, ensures progression and drives improvement against our commitments.



We have engaged with Slave-Free Alliance to support the development of our risk assessment methodology, policy review, and training. This external partnership helps us benchmark our approach against good practice and improve future alignment with international frameworks such as the United Nations Guiding Principles (UNGPs) on business and human rights and Organisation for Economic Corporation & Development (OECD) Guidance.

Our business

Our business provides bus and coach transport services in the United Kingdom. With approximately 25,500 employees and c.8,400 vehicles, we are the UK's biggest bus and coach operator.

We recognise that the nature and scale of our operations, including a large, decentralised workforce, significant use of contracted services, and multiple tiers of suppliers, presents potential exposure to labour exploitation and modern slavery risks. Responsibility for identifying and managing these risks rests with a cross-functional working group that reports into senior leadership. This includes representatives from legal, procurement, operations, people, and sustainability teams.

Our policies relevant to modern slavery include our Code of Conduct, Supplier Code of Conduct, and Speak Up (whistleblowing) policy, which apply across the Group. These are periodically reviewed and communicated internally and externally. With this Group-wide approach we are improving transparency and preventing slavery and human trafficking from occurring, within any part of our business and supply chains.



Risk management and due diligence

We recognise our responsibility to manage the risk of slavery/ human trafficking occurring in any of our businesses or within our supply chains (as defined below in the “Our supply chains” section) throughout the world. We operate primarily in the United Kingdom, which has a developed culture of ethical business practice and strong labour regulation.

We have assessed the overall risk of the Group contracting with organisations that might engage in slavery or human trafficking as being relatively low, but we are conscious that we need to remain vigilant and continue to assess the risk on an ongoing basis. We also recognise the importance of effective due diligence in this regard. This is reflected in our commitment to continually seek to improve our existing processes and knowledge base to appropriately manage these risks.

Our ‘Speak-Up’ whistleblowing policy, which can be found on our website, provides a dedicated whistleblowing platform along with other confidential reporting channels. Reporting of possible breaches of the Act is included in the list of example concerns

which can be raised under this ‘Speak-Up’ whistleblowing policy. Any such reports are initially reviewed by the Speak Up panel and escalated to our senior leaders where required for thorough investigation. The availability of this mechanism for suppliers to make a report and the need for suppliers to have in place their own process for reporting concerns, is set out in the ‘Supplier Code of Conduct’. Should suppliers have potential integrity concerns, including but not limited to violation of local laws or regulations or witness unethical behavior, they can use our dedicated whistleblower channels to raise for our internal review.

In 2025, to help us strengthen further our approach to assessing challenges of human rights, modern slavery and labour exploitation, including the risk rating process and due diligence checks in our supply chain and organisation, we have partnered with Slave Free Alliance. Slave-Free Alliance act as our critical friend supporting us to protect people and our operations from modern slavery and labour exploitation.



SLAVE-FREE
ALLIANCE

Working Towards a
Slave-free Supply Chain

“With an estimated 49.6 million people in modern slavery, and 77% of companies believing it may exist in their supply chain, Stagecoach’s proactive approach sends a clear message: exploitation has no place in the systems and services people rely on every day. Together, we’re working to ensure public transport brings communities closer, without leaving anyone behind.”

- Marc Stanton, Director of Slave-Free Alliance



Our supply chains

As could be expected, we work with several thousand suppliers and external agencies. We purchase a wide range of goods and services in a range of categories including technology, engineering parts, energy, fuel, uniforms and facilities management. Goods and services are procured through a hybrid structure encompassing both group and locally managed contracts, with all new supplier requests processed by our central procurement team.

Although our suppliers are predominately UK-based, we recognise that their supply chains may be global in nature. We regularly review our processes and procedures to identify areas for improvement. These practices include our Supplier Code of Conduct, questionnaires issued to all suppliers and follow-up communications. Modern slavery and human trafficking supplier questionnaire scores are used, where appropriate, as a metric to assist with supplier selection.

We have produced a Sustainable Procurement Policy for our suppliers to comply with. This policy outlines the best practices to be taken by our employees who are involved in the procurement of goods from third parties, and what we expect from our partners.

We continue to review and update our standard contractual terms for the provision of goods and/or services to ensure we are contracting with sufficiently robust modern slavery and audit compliance obligations.

We expect suppliers to adhere to similar high standards of corporate social responsibility as our own business and expect them to be committed to preventing slavery and human trafficking in their supply chains. We work with our suppliers to meet these expectations and manage misalignment to our Supplier Code of Conduct expectations on a case-by-case basis.

✘ Myth Victims self-identify.

✔ Fact It is exceedingly rare for a victim to contact someone for help while being trafficked, even when given specific opportunities to do so.

✘ Myth Human trafficking is the same as people smuggling.

✔ Fact Unlike people smuggling, human trafficking involves coercion and exploitation, and is a crime against an individual. People smuggling is voluntary and is a crime against a state.

✘ Myth If they are receiving payment, they are not victims.

✔ Fact If a victim is given money for the work they are forced to do, it is often pittance and subjected to deductions. Others are 'paid' in tobacco or alcohol.

In scope entities

Our Modern Slavery Statement is made on behalf of Stagecoach Group Limited and the following subsidiaries:

Lincolnshire Road Car Company Limited, Busways Travel Services Limited, Cambus Limited, Stagecoach Devon Limited, East Kent Road Car Company Limited, Manchester Buses South Limited, Stagecoach (North West) Limited, Thames Transit Limited, Stagecoach (South) Limited,, Fife Scottish Omnibuses Limited, Western Buses Limited, Bluebird buses Limited, Red & White Services Limited, Cheltenham & Gloucester Omnibus Company Limited, Midland Red (South) Limited, The Yorkshire Traction Company Limited, Ribble Motor Services Limited, East London Bus & Coach Company Limited, South East London & Kent Bus Company Limited, Lea Interchange Bus Company Limited

Where any of these companies, or any other company within Stagecoach group of companies which meets the criteria for publishing a statement under the Modern Slavery Act 2015, does not have its own dedicated website, a written copy of this statement will be provided upon request.

Approved by the Board of
Stagecoach Group Limited on 11 September 2025



Claire Miles
Chief Executive
Stagecoach Group Limited





For queries about Stagecoachs Modern Slavery and Human
Trafficking statement 2025, please contact:
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