

Stagecoach Group Limited

Modern Slavery & Human Trafficking Statement FY26



CEO Introduction

At Stagecoach, our purpose is to serve our customers and the communities that rely on us every day. And I know that building a sustainable business means acting responsibly, working with trusted partners to build long term relationships and collectively hold ourselves to the highest standards.

Every day, we rely on a wide range of goods and services from our supply chain to help deliver more than a million journeys safely and reliably. To build a resilient and sustainable business, I recognise that this reliance depends on strong, trusted partnerships, with collaboration and shared responsibility at their heart.

This Modern Slavery Statement is built on our core value, Stronger Together. We believe that no organisation can tackle modern slavery alone. By working in partnership, challenging ourselves and others to do better, and taking collective action, we can create lasting change and help protect the rights and dignity of all people. This belief underpins our commitment to working collaboratively with colleagues, suppliers and stakeholders to address human rights risks, modern slavery and labour exploitation across our operations and supply chain. It also reflects our continued commitment to the Ten Principles of the United Nations Global Compact, of which we have been a participant since 2023, and our determination to uphold the highest standards of responsible and ethical business conduct.

Since 2025, we have been proud to partner with Slave-Free Alliance (SFA), part of Hope for Justice. This partnership strengthens our ability to identify and support individuals affected by modern slavery and exploitation, protect those at risk, and help prevent these practices across our wider value chain. It also enhances our oversight, due diligence and governance of business operations and third-party relationships.

Through our work with SFA, we benchmark our approach against recognised good practice and continually strengthen our programme in line with internationally recognised frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance.

This statement outlines our ambition to strengthen the identification, prevention and remediation of modern slavery risks by formalising our risk assessment processes, reviewing suppliers, monitoring supplier risk profiles, providing targeted training, and continually reviewing and enhancing our policies, controls and procedures.

The action we take against modern slavery supports the ambitions of our Climate Transition Plan. By recognising the systemic approach required to tackle the wider impacts of climate change, we play our part to making a real difference for the people and places we serve.

Sam Greer
Chief Executive Officer



Our business and operations

Our business provides bus and coach transport services in the United Kingdom. With approximately 25,000 employees and 8,253 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 action and activity rests with a cross-functional working group which is outlined in the governance section of this 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 2026.

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.

Actions taken by the Group

We noted above that we have established a dedicated modern slavery working group made up of representatives from our Procurement, Legal, Sustainability, People, and Risk & Assurance functions. The group is responsible for ensuring ongoing compliance with, and monitoring of, the requirements of the Act across our organisation and supply chain. As part of the working group's commitment to assessing and addressing modern slavery risks, we undertake the following activities:

- Formalise our risk-assessment process which will be applied to all suppliers, complementing the supplier due diligence questionnaire we issue. This includes confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.
- Follow up on responses to questionnaires where appropriate, such as requesting further evidence on specific matters.
- Coordinate audit requirements of depots and suppliers as appropriate, identified as posing a medium to high risk.
- Actively measuring and monitoring through a central database supplier status and risk levels.
- Support the organisations provision of 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.
- Review 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.
- Work with external third-party partner, Slave-Free Alliance, to continuously evolve and improve our risk assessment methodology, policy review, and training.

Three priority areas and risks we have focussed on over the last year

1. Advanced our partnership with Slave Free Alliance by completing a baseline gap analysis, which covered internal and external aspects of modern slavery.
2. Completed second consecutive year of the Sustainable Supplier Training programme, hosted in collaboration with the United Nations Global Compact (UNGC) UK Network.
3. Designed and implemented a bespoke audit process, enhancing tender due diligence for supply chain partners operating in high-risk commodities and services.



Governance

The Board of Stagecoach Group Limited is made up of executive and non-executive directors with a wide range of skills, knowledge and experience, to provide effective leadership through independent thinking and consensual decision-making in delivering the company’s strategy.

The Board of Directors has oversight of anti-slavery activity, action and potential risk impacting the Group, including the approval of our Modern Slavery Statement.

Board



Sam Greer
CEO



Ray O'Toole
Non-Executive Chairman



Bruce Dingwall
Executive Director



Graeme Charnock
Non-Executive Director



Lynne Weedall
Non-Executive Director



Hamish Mackenzie
Non-Executive Director



Scott Auty
Non-Executive Director



Florian Hubel
Non-Executive Director

The Group Risk & Compliance Committee, chaired by the Group Financial Officer, has representation from across the business, including our Chief Executive Officer and the Executive Leadership Team and Operating Companies. The Risk & Compliance Committee typically meets every two months and reports to the Audit Committee, which reports to the Board.

Our executive team is united behind our vision: to deliver sustainable transport solutions that support connected, inclusive communities and a vibrant, growing economy.

This Executive Team is supported further by the Group Senior Leadership Team (SLT). SLT members are accountable for various functions within the business, such as Health, Safety and Environment, Information Technology, People, Legal, Communications, Marketing, etc



Executive team



Sam Greer
CEO



Bruce Dingwall
CFO



Debra Goodwin
CPO & CCO



Dr Kate Jones
CIO



Sharon Vye-Parminter
HSE Director



Tony Cockroft
Asset Management Director



Sarah Bradley
General Counsel & Company
Secretary



Rob Jones
Regional Managing Director,
England and Wales



Fiona Doherty
Regional Managing Director,
Scotland

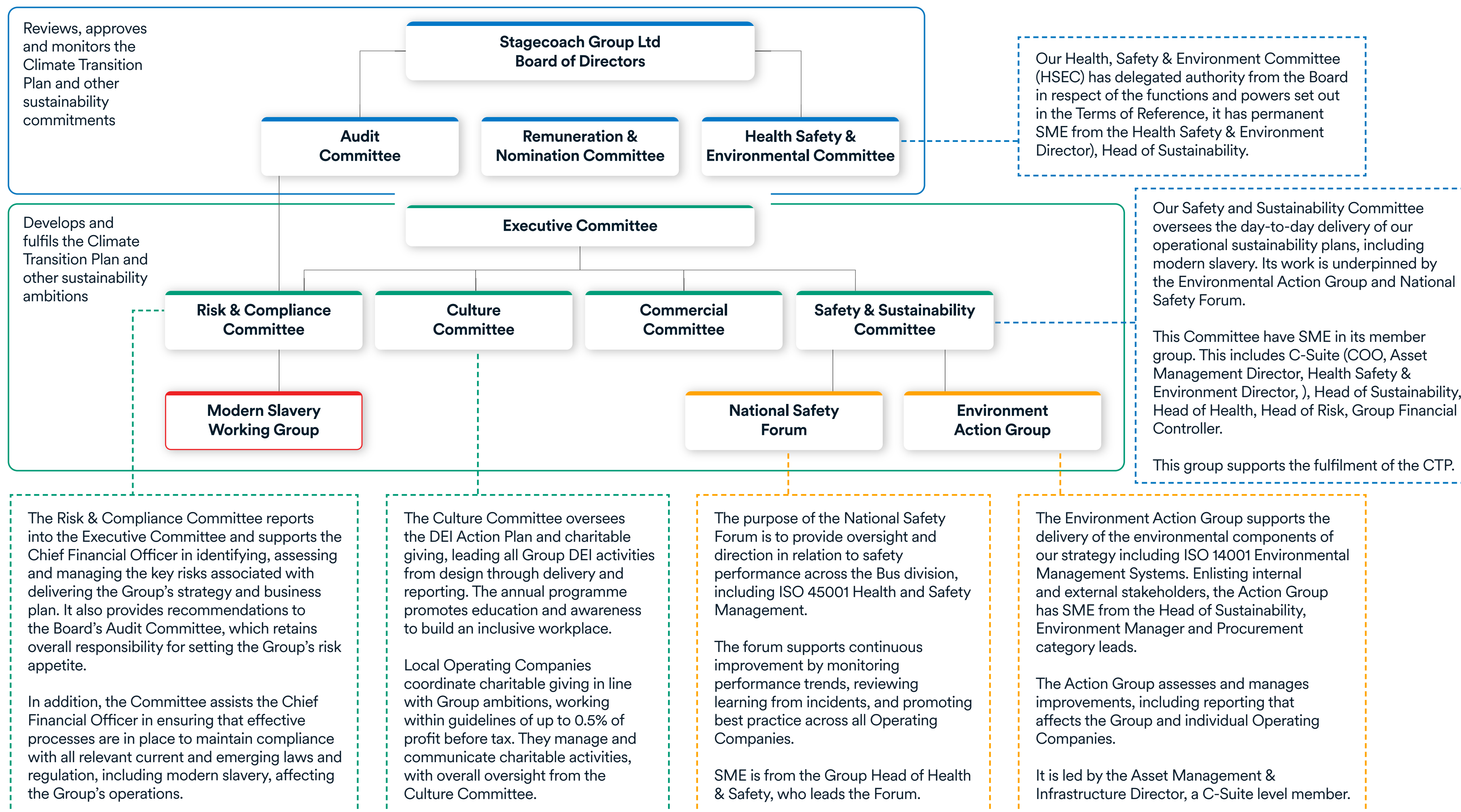
As Chair of the Group Risk & Compliance Committee, the Chief Financial Officer has directional responsibility for anti-slavery action. The Committee is supported by the Modern Slavery Working Group which comprises of members from Risk, Legal, Procurement, Sustainability and Human Resources and is led by the Group General Counsel and Company Secretary.

In recognition of the importance of anti-slavery activity, the Modern Slavery Working Group, Risk & Compliance Committee and Safety & Sustainability Committee work together collectively to:

- Steer the Groups initiatives to raise awareness with internal stakeholders
- Support activities to manage value chain partners
- Provide subject matter expertise and guidance
- Provide oversight and sign off of annual Modern Slavery Statement

The Safety and Sustainability Committee also has oversight of anti-slavery action and considers matters in detail and as appropriate during its regular meetings.





Our policies

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 at the appropriate level of governance and communicated internally and externally. With this Group-wide approach we are improving transparency and helping to prevent slavery and human trafficking from occurring, within any part of our business and supply chains. Our policies outline the best practices to be taken by our employees who are involved in the procurement of goods from third parties, what we expect from our partners and who we all should raise concerns and speak up.

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, supplier questionnaires 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 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 operating responsibly 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.



Risk management and due diligence

We recognise our responsibility to manage the risk of modern slavery and or human trafficking occurring in any of our businesses or within our supply chains (as defined in the section “Our supply chains”) 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 recognise that pockets of high risk are present and as such we are conscious of the need to remain vigilant and 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.

The framework around our “Speak Up” whistleblowing policy forms an important part of our risk management and due diligence processes. Available through our website, it provides employees, suppliers and other stakeholders with access to a dedicated platform and a range of confidential channels through which concerns can be raised.

The framework supports the identification and management of potential modern slavery, human trafficking and wider ethical compliance risks across our operations and supply chain. Reports relating to suspected breaches of the Modern Slavery Act, violations of applicable laws and regulations, or other unethical conduct are reviewed by the Speak Up Panel and escalated to senior leadership where appropriate to ensure thorough investigation and effective remediation.

As part of our supplier due diligence approach, suppliers are made aware of the availability of these reporting channels through our Supplier Code of Conduct. The Code also sets out our expectation that suppliers maintain their own mechanisms for reporting concerns and protecting whistleblowers. Information received through these channels helps us identify emerging risks, investigate potential issues and take appropriate action to mitigate adverse impacts within our supply chain.

In 2025/26 we entered our second year of partnership with the Slave Free Alliance. The partnership helps us continuously improve action to combat and assess the 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 are proud to be working with Slave Free Alliance and fortunate to have them as our critical friend.

“As modern slavery continues to affect millions of people globally, organisations have a critical role to play in identifying risks and driving meaningful change. Stagecoach’s commitment to this agenda reflects a clear understanding that protecting human rights extends beyond compliance. By taking proactive steps to prevent exploitation and enhance awareness, Stagecoach is helping to create safer communities and setting a powerful example of responsible business leadership.”
Marc Stanton – Director – Slave Free Alliance



Myths and facts

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.

Myths and Facts provided by Slave Free Alliance.

Conclusions

At Stagecoach, we recognise that modern slavery remains a significant global challenge and that businesses have an important role to play in preventing exploitation and protecting human rights. During FY26, we continued to strengthen our approach through enhanced governance, improved supplier due diligence, targeted training, and our ongoing partnership with Slave Free Alliance. These actions have helped us build a stronger foundation for identifying, assessing and addressing modern slavery risks across our operations and supply chains.

We remain committed to continuous improvement and understand that vigilance is essential. We will continue to develop our risk assessment processes, increase supplier engagement and oversight, and raise awareness among our colleagues and stakeholders. By working collaboratively with our employees, suppliers, industry partners and communities, we aim to help create a culture where exploitation is not tolerated and where respect for human rights is embedded throughout our value chain.



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.

Board approval

Approved by the Board of Stagecoach Group Limited on 22nd September 2026

Sam Greer
Chief Executive
Stagecoach Group Limited