

## Charitable Donation and Sponsorship Policy

Charitable donations by companies in the Stagecoach Group of companies (herein, “Stagecoach Group”, “Stagecoach” or “Group”), whether in the form of money or donations in-kind (such as time, resource, money and sponsorship), are an important part of our commitment to social responsibility.

The Stagecoach Group Charitable Donations and Sponsorship Policy sets out rules to ensure that Stagecoach is supporting reputable charities and organisations.

### 1. Policy objectives

In line with the Group Sustainability Strategy, the Policy’s objective is to continue to make a significant contribution towards the communities Stagecoach serves through time, resource, money and sponsorship, both centrally and within its local operating companies.

### 2. Stagecoach Charitable Giving

2.1 The aim of the Stagecoach Charitable Giving policy is to foster community development through the Group’s charitable activities.

The Stagecoach Giving for Good Charity Committee, which has representation from key areas across the business, has overall responsibility for approving charitable donations and sponsorship contributions being made through as part of the Group’s target, which is to allocate 0.5% of profit before tax to charities and other good causes.

Stagecoach’s operating companies have responsibility for agreeing and securing the relevant approvals for any charitable spend in their local areas.

2.2 Stagecoach directs its charitable giving towards the following areas of interest, which are closely aligned with the company’s key purpose and objectives:

- health and wellbeing;
- young people, skills and employment;
- loneliness and social isolation;
- accessibility and opportunity.

2.3 Stagecoach and its companies make the following distinction between charitable donation and sponsorship contribution:

- a charitable donation entails a voluntary contribution of certain value to support non-profit objectives without seeking any benefits in exchange;
- a sponsorship contribution is associated with pursuing business interests and/or achieving goals through supporting an event, activity or organisation financially or through the provision of products or services.

Charitable donations and associated partnering activity is the preferred form of support.

### 3. Contributions policy

3.1 Beneficiaries of contributions donated by Stagecoach and its companies are non-profit charitable organisations, individual and legal entities.

- 3.2 Stagecoach and its companies can only make charitable donations where:
- the donation is made in compliance with applicable laws, as well as the principles and requirements of this Policy, the Code of Conduct and the Group's anti-bribery and corruption guidelines.
  - the donation is meant to achieve social good;
  - the donation is not meant to secure an improper business advantage; and
  - there is a valid charitable purpose for the donation with all charities having to either be registered charities or community interest companies.
- 3.3 Stagecoach and its companies can only make sponsorship where:
- the contribution is made in compliance with applicable laws, as well as the principles and requirements of this Policy, the Code of Conduct and the Group's anti-bribery and corruption guidelines.
  - the contribution is not meant to secure an improper business advantage.

#### **4. Limitations**

4.1 Stagecoach and its companies do not make charitable donations and sponsorship contributions if the recipients of such contributions, including ultimate beneficiaries, are any of the following:

- serving public officials;
- government authorities;
- political parties, movements and political players or their representatives;
- military organisations and projects;
- organisations that discriminate by race, gender, ethnicity, sexual orientation, disability, marital status, age or any other basis prohibited by law;
- organisations whose policies or activities are not in line with Stagecoach values.

In line with the Stagecoach Group Code of Conduct, the Group's funds, or resources (e.g. property or equipment), must not be used, either directly or indirectly, to fund any political party, political campaign, political candidates or anyone associated with them. Stagecoach funds must also not be used to make political payments under the guise of charitable donations.

#### **4.2 Conflict of interest**

A Conflict of Interest is a personal connection that interferes with an employees' ability to perform their duties in a fair and impartial manner. It occurs when an employee's private interests interfere with the interests of Stagecoach, or where the family members or friends of a Stagecoach employee receives improper benefits because of that relationship.

If any member of the Charity Committee has any family or friendship relationships with those charitable organisations being awarded money or donations from Stagecoach (whether at Group or local levels), then they must declare this to the Charity Committee before the award is made. This should be done by recording it on the Conflicts of Interest form. Irrespective of whether that conflict of interest is actual, potentially or perceived, they must not take part in making a decision that could be perceived to be affected by that conflict.

#### **5. Planning of charitable and sponsorship activities**

5.1 An annual charity budget is set each year stating that a minimum of 0.5% of pre-tax profits will be donated to charitable causes each year.

5.2 Stagecoach will ordinarily work with four main partner charities each financial year, as determined through the charity committee and voted for by employees from across the group. In addition, a set monthly budget will be allocated to support smaller charities and good causes.

5.3 Stagecoach operating companies will agree local charitable support in line with this policy.

## **6. Authorisation of charitable and sponsorship activities**

6.1 All Stagecoach Group expenditure relating to the agreed annual target of donating 0.5% of pre-tax profits will be agreed and authorised by the Stagecoach Charity Committee. Spend by operating companies locally will be approved by the relevant operating company, with company Managing Directors able to authorise up to £1k for Operating Company only charitable donations.

6.2 In accordance with the Stagecoach Group Delegated Authority Policy, the Chair of the Charity Committee and his/her deputy have the authority to approve up to £75k per charitable transaction.

## **7. Accounting and recordkeeping**

7.1 All charitable donations will be recorded each month as part of the Stagecoach Charity Committee. Details of the spend, including beneficiary and purpose, will be recorded in a special register by the Chair of the Charity Committee or designated person.

7.2 Stagecoach will accurately record total charitable spend in its annual report and accounts.

7.3 Stagecoach will ensure that information about its charitable donations and policy is publicly available by:

- Posting information on the [stagecoachgroup.com](http://stagecoachgroup.com) website
- Disclosing information in its annual reports
- Reporting information in its Sustainability updates
- Publishing information in the media and other outlets
- Posting information on its employee channel, Blink, and other internal communications channels.

## **8. Review**

The Stagecoach Charity Committee and Stagecoach Compliance team will review this policy at least annually and if needed, may amend it at any time to reflect business developments or changes to international or national laws and regulations.

## **9. Reporting concerns**

If you are aware of any issues and you wish to raise your concerns regarding any part of this policy, then you can do so, anonymously, via any of the channels noted below:

1. Email: [whistleblower@stagecoachgroup.com](mailto:whistleblower@stagecoachgroup.com)
2. File a concern at: [report.whistleb.com/stagecoach](http://report.whistleb.com/stagecoach)
3. Call the Stagecoach dedicated whistleblowing line: +44 (0)203 808 3920 and enter code 7384

For further information on Stagecoach's Speak-up/Whistleblowing policy, you can access it via the following link: [Stagecoach Whistleblowing policy](#)