

Stagecoach Group plc – Slavery and Human Trafficking Statement

Stagecoach Group supports the objectives of the Modern Slavery Act 2015 (“the Act”) of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act for the financial year ended 2 May 2020.

Stagecoach Group plc is the ultimate parent company of a group of companies providing transport services. That group of companies is hereafter referred to as “the Group”. Risks relating to slavery and human trafficking are considered across the Group. 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. This statement is therefore made by Stagecoach Group plc and each of its subsidiaries that are required to make such a statement in accordance with the Act. The 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 its supply chain. The companies making this statement are listed below.

We recognise that the Group has a responsibility to manage the risk that slavery and/or human trafficking may be taking place in any of its businesses or within its supply chains throughout the world. The United Kingdom, in which the Group operates, 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 engage in slavery or human trafficking as being relatively low.

We have in place a dedicated modern slavery working group - assembled from across our bus and tram businesses and comprised of representatives from our procurement, IT, legal and compliance functions - in order to ensure ongoing monitoring of, and compliance within, our 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:

- continuing to risk assess prospective suppliers and requiring for higher risk suppliers, at the outset of the procurement process, the completion of a modern slavery due diligence questionnaire (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 existing suppliers identified as posing a medium to high risk, based on the level of spend by the Group and in respect of those suppliers that manufacture goods or provide services in countries and/or sectors where instances of modern slavery are more likely to be prevalent.



- providing mandatory modern slavery and human trafficking training to new and existing senior employees, as well as those within relevant roles (including procurement, legal and compliance).
- continuously reviewing and updating our policies and procedures as appropriate in order to raise awareness and profile of the issue within our organisation. Our revised code of conduct explains our approach to combatting modern slavery and informs employees of the process to follow where instances of slavery and human trafficking are suspected.
- reviewing current practices for sharing and analysing information about suppliers' compliance with the Act across the Group, with a view to identifying any efficiencies or improvements that could be made.

Following a review of the effectiveness of the steps we have taken this year we intend to take the following additional steps in order to identify any issues and ensure continued compliance with the Act:

- rolling out a revised and updated modern slavery online training course. Relevant employees will be identified based on a 'Target Audience' criterion designed by our compliance team with input from our modern slavery working group. Senior leaders will also be asked to confirm that all relevant staff from their part of the business have been selected.
- reporting of possible breaches of the Act will be added to the list of example concerns which can be raised under the Group's 'Speak Up' whistleblowing policy.
- following a successful pilot implementation, continuing the rollout across the Group's various business divisions of a central database for sharing information about suppliers' compliance with the Act.

We will continue to monitor the Group's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in the Group's supply chain and/or businesses.

This statement is made on behalf of Stagecoach Group plc and the following subsidiaries: Stagecoach Transport Holdings Limited, Scoto Limited, Scusi Limited, Stagecoach Bus Holdings Limited, Stagecoach Rail Holdings Limited, Stagecoach (South) Limited, Stagecoach (North West) Limited, East Kent Road Car Company Limited, Busways Travel Services Limited, Cambus Limited, Greater Manchester Buses South Limited, Glenvale Transport Limited, Stagecoach Devon Limited, Thames Transit Limited, The Yorkshire Traction Company Limited, PSV Claims Bureau Limited, Red & White Services Limited, Cheltenham And Gloucester Omnibus Company Limited, Midland Red (South) Limited, Fife Scottish Omnibuses Limited, Bluebird Buses Limited, Western Buses Limited, East London Bus & Coach Company Limited, South East London & Kent Bus Company Limited, East Midlands Trains Limited, Lincolnshire Road Car Company Limited, Stagecoach Supertram Maintenance Limited, South Yorkshire Supertram 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 plc on 28 August 2020.

A handwritten signature in black ink, appearing to read "Ray O'Toole", written over a horizontal line.

Raymond O'Toole
Chairman
Stagecoach Group plc

3 September 2020

