

# Stagecoach Group Limited – Modern Slavery and Human Trafficking Statement

## Introduction

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 27 April 2024.

As stated in our Code of Conduct ([Code of Conduct](#)), Stagecoach recognises the fundamental civil, political, economic and social human rights and freedoms of every individual and strives to reflect this in our business.

This statement sets out the steps taken by Stagecoach Group and its relevant subsidiaries (together, the “**Group**”) during the financial year to reduce the risk of modern slavery or human trafficking occurring in our business or supply chains.

## Our business

Stagecoach Group Limited is the parent company of a group of companies providing transport services in the United Kingdom. With approximately 25,500 employees and c.8,300 vehicles, Stagecoach is the UK's biggest bus and coach operator.

Risks relating to slavery and human trafficking are considered within the organisation which recognises the importance of a Group-wide approach to improving transparency and preventing slavery and human trafficking from occurring within any part of our business and supply chains. We expect suppliers to adhere to similar high standards of corporate responsibility as our own business and expect them to be committed to preventing slavery and human trafficking in their supply chains. We will not deal with suppliers who are unable to meet these expectations.

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 Limited 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.

## Risk management and due diligence

We recognise that the Group has a responsibility to manage the risk of slavery/ human trafficking occurring in any of its businesses or within its supply chains (as defined below in the “Our supply chains” section) throughout the world. The Group operates 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 engage in slavery or human trafficking as being relatively low.

Stagecoach recognises the importance of effective due diligence in assessing the risk of modern slavery or human trafficking in our operations or supply chains. This is reflected in Stagecoach's commitment to continually seek to improve our existing processes to appropriately manage these risks. We have a central database of all suppliers, which we continue to assess. During 24/25 we are working to enhance our risk rating process to focus priority suppliers for onboarding and continuous review.

## Our supply chains

Stagecoach has several thousand suppliers and external agencies. We purchase a wide range of goods, including technology, engineering parts, energy, fuel, uniforms and services. Although our suppliers are predominately UK-based, we recognise that their supply chains may be global in nature. We are

regularly reviewing our working practices to identify areas for improvement. These practices include our Supplier Code of Conduct ([Group Policies and Statements | Stagecoach \(stagecoachbus.com\)](https://www.stagecoachbus.com/group-policies-and-statements)), questionnaires issued to all suppliers and follow up communications. We use modern slavery and human trafficking compliance as a metric to assist/drive supplier selection, where appropriate, and have produced a Sustainable Procurement Policy for our suppliers to comply with. We continue to review and update our standard contractual terms for the provision of goods and/or services to ensure we are imposing sufficiently robust modern slavery and audit compliance obligations on our suppliers.

### **Actions taken by the Group**

We have in place a dedicated modern slavery working group, comprised of representatives from our Procurement, Legal, Sustainability and Compliance functions, in order to ensure ongoing compliance and monitoring of the requirements of the Act 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:

- 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, 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 Code of Conduct explains our approach to combatting modern slavery and informs employees of the process to follow where they suspect instances of slavery and human trafficking are occurring.
- the Group has a 'Speak-Up' whistleblowing policy ([Whistleblowing policy](#)) and 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 will be thoroughly investigated and appropriate action taken, if required. No reports were made regarding any suspected instances of modern slavery over the last twelve months. 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'.
- 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. Our Risk & Compliance Committee with representatives from across the business raises awareness throughout the Group, ensures progression and drives improvement against our commitments.

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 Limited and the following subsidiaries:

Busways Travel Services Limited, Cambus Limited, Cheltenham & Gloucester Omnibus Company Limited, East Kent Road Car Company Limited, East London Bus & Coach Company Limited, Fife Scottish Omnibuses Limited, Greater Manchester Buses South Limited; Lea Interchange Bus Company Limited, Lincolnshire Road Car Company Limited, Midland Red (South) Limited, Red & White Services Limited, Ribble Motor Services Limited, South East London & Kent Bus Company Limited, Stagecoach Devon Limited, Stagecoach (North West) Limited, Stagecoach (South) Limited, Thames Transit Limited, Western Buses Limited, and The Yorkshire Traction 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 [3 September 2024](#).

A handwritten signature in black ink, consisting of stylized cursive letters that appear to be 'CM' followed by a horizontal line and a period.

Claire Miles  
Chief Executive  
Stagecoach Group Limited  
3 September 2024