

# Mobico Group PLC - Modern Slavery & Human Trafficking Statement 2024

## Introduction

This statement is made pursuant to the Modern Slavery Act 2015. It sets out the steps taken by Mobico Group PLC and its relevant subsidiaries (together, the "**Group**") during their financial year ending 31 December 2024 to ensure, as far as reasonably possible, that no modern slavery or human trafficking takes place in any part of their business or supply chain.

## Our business

The Mobico Group is a leading public transport provider with bus, coach and rail services in the UK, Continental Europe, North Africa, North America and the Middle East.

The Group is organised into a number of divisions: UK (providing coach and bus services in the UK and Ireland); North America School Bus (providing student transportation), North America WeDriveU (providing transit services and shuttle services); ALSA (providing coach and bus services in Spain, Switzerland, France, Morocco, Portugal, and Kingdom of Saudi Arabia); German Rail; and International (the Bahrain bus operation which the Group operates jointly with Ahmed Mansoor Al A'Ali through a joint venture).

The Group's revenue from its continuing businesses for the year ended 31 December 2024 was £3.4billion and its normalised operating profit from those businesses for the same period was £187.7m. The Group employed close to 46,200 people, the majority of which are drivers.

For more information about the Group's businesses, please visit our website at <https://www.mobicogroup.com/about-us/>.

The Modern Slavery Act is relevant to all commercial organisations in any sector that supplies goods or services, and conduct business in the UK. It is the Group's policy to conduct its business in an ethical manner and with integrity. Accordingly, the Group has a zero-tolerance approach to slavery and human trafficking and is committed to taking steps to enforce such approach as detailed in this statement.

## Our supply chains

The Group procures goods and services from suppliers around the world, which total several thousand in number and operate from multiple countries. Our vendors supply a variety of categories from rolling stock, road vehicles, fuel and utilities to uniforms, catering, cleaning, contract employees (including drivers) and security.

The Group aims to ensure that its suppliers meet high standards with respect to both the conduct of their business and their management of social and ethical issues. To this end, the Group has in place Ethical Sourcing Standards which we expect our suppliers to comply with. We have a practice of including in our supplier contracts the

right to audit such compliance and take other remedial action against suppliers should we find non-compliance.

## **Our policies**

As reported in our 2018 statement, the Group has adopted a Modern Slavery Policy that is regularly updated and has recently been revised. The new updated policy will be reported in the 2025 Statement. The Group also has a number of other policies in place which support ethical behaviour and assist in deterring and detecting unethical behaviour, including modern slavery.

The Group has a Workplace Rights Policy and a Human Rights Policy. The Group also has in place a Whistleblowing Policy and operates a confidential whistleblowing hotline in the UK, North America, Spain, Morocco, Portugal, France, Germany, Switzerland and Bahrain.

The Group was the first private transport provider to commit to becoming a voluntary Living Wage employer. UK Bus secured Living Wage Foundation accreditation in January 2016, followed by UK Coach obtaining the same accreditation in October 2018. For any other country in which the Group operates, we are committed to pay at least 10% above the national minimum wage in that country. The Group is also committed to providing a workplace that values diversity, champions inclusion and respects the rights of all employees. These are examples of commitment to conducting business in an ethical manner and with integrity.

## **Steps taken by the Group**

During 2024, the Group continued to ensure its Modern Slavery governance and controls across the supply chain were robust. This included specialised training for Procurement; continuing category assessment and supplier audits; updating supplier contracts with additional ethical clauses.

The Group's dedicated Procurement employees across all divisions attend the Ethical Procurement and Supply course provided by the Chartered Institute of Procurement & Supply. This training is a mandatory requirement for all Procurement employees to undertake on an annual basis.

All Procurement employees also have access to the group's supplier due diligence system. The system enables our teams to check suppliers and associated people for sanctions, PEPs (Politically Exposed People), adverse media, ESG, company structures and credit / financial information.

The Group Implemented a new check process to ensure new suppliers are assessed. All divisions are now required to report all new high-risk suppliers onboarded to the steering group on a quarterly basis through an agreed register. The Group continued to utilise a new spend analysis tool with the UK and North America live and steps being put in place to add the rest of the Group. The Spend tool now provides the Group Procurement team with transparency of supplier spend categorisation on a monthly basis so we can identify any new suppliers added to high-risk categories that have not been reported through the mandated process.

The Bahrain division ensured all its suppliers in high-risk categories completed the questionnaire and supporting evidence. These responses were evaluated and found one global supplier met our expectations and five local suppliers scored below our expectations. Corrective action plans have been established with suppliers being required to agree to a code of conduct which will then be followed with knowledge sharing and together their policies and procedures or alternative suppliers sourced.

The UK, North America, Bahrain and Alsa divisions continue to work within the Group's Modern Slavery four-step process: Assess, Analyse, Action, and Audit. New suppliers are subject to the assessment stage. If they fall within a high-risk category, the analysis and action stages must be completed before a purchase order is placed. Existing suppliers are re-assessed across a 3-to-5-year cycle.

The Alsa Division also completed a supply chain mapping exercise of its key uniform supplier including a review of independent third-party audits for suppliers in the chain.

The Group continued to govern its progress through quarterly steering group meetings consisting of representatives from the divisions in Procurement and Compliance. The steering committee will continue to engage in 2025 to ensure each division is focused on robust supply chain assessment utilising questionnaires, supporting audits, supply chain mapping and to continue employee training across the organisation.

### **Approval of this Statement**

The Audit Committee of the Board of Directors of Mobico Group PLC has concluded that the policies, together with the steps taken and to be taken, provide reasonable assurance that the Group is acting in a way which reduces the risk of slavery and human trafficking in both its own business and in its supply chains.

This statement has been approved by the Board of Directors of Mobico Group PLC. This statement has also been approved by the Boards of Directors of relevant subsidiaries of Mobico Group PLC to which it also relates.

Signed for and on behalf of Mobico Group PLC and each of its relevant subsidiaries



Phil White

Executive Chair

10 June 2025