

Transport UK London Bus (comprising Transport UK London Limited and Transport UK West London Limited) Anti-Slavery and Human Trafficking Statement

#### Introduction

This statement is published pursuant to section 54 of the Modern Slavery Act 2015 and is the Anti-Slavery and Human Trafficking Statement of Transport UK London Bus "TUK London Bus" in accordance with section 54 of the Modern Slavery Act 2015 for the financial year ending March 2025.

TUK London Bus adopts a zero-tolerance approach to slavery and human trafficking. It is committed to taking all reasonably practicable steps to ensure that slavery and human trafficking is not present in its business, supply chains or amongst third-party representatives working on our behalf.

This Anti-Slavery and Human Trafficking Statement sets out the actions taken by TUK London Bus in the current financial year ending March 2026 to identify, assess and act in respect of potential slavery and human trafficking risks related to its organisation and supply chains.

TUK London Bus expects the same standards from all those it works with, including business partners, consultants, contractors, suppliers, and third-party representatives working on its behalf. It is further committed to working with its suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

### Our organisation

TUK London Bus operates passenger bus services in London under contract to Transport for London and rail replacement bus / coach services. It comprises Transport UK London Bus Limited (number 03786162) and Transport UK West London Bus (number 00689260) which are registered in England with the registered office of 301 Camberwell New Road, London SE5 0TF. Transport UK London Bus and Transport UK West London Bus are wholly owned subsidiary undertakings of, and are controlled by, Transport UK (Operations) Ltd, a company registered in England and Wales.

# Our supply chains

TUK London Bus works with circa. 1,028 suppliers predominantly registered and trading in the UK and mainland Europe spending circa. £183m on a range of goods and services. Supplier relationships are managed through a dedicated Head of Procurement. TUK London Bus recognises there could be a number of levels of suppliers between itself and the raw materials at the start of the supply chain and as such respecting and complying with anti-slavery, human trafficking and general human rights obligations is as much a responsibility of its suppliers as it is TUK London Bus.



#### Risk assessment

TUK London Bus conducts an ongoing risk assessment of its supply chain through the supplier onboarding process which considers:

- The risk profile of the supply chain based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups

This assessment informs TUK London Bus's response and the risk controls that are implemented.

#### **Policies**

TUK London Bus operates the following policies for ensuring a safe and healthy workforce and identifying and preventing slavery and human trafficking in its operations:

- TUK London Bus promotes equal opportunities across all its business activities including (but not limited to) recruitment and selection, employment, training, and promotions. We do not discriminate against its workers and encourage diversity, equality, and inclusion
- TUK London Bus encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers
- TUK London Bus protects its employees' rights to a working environment free from harassment and intimidation. Our People Policies, such as:- Equality Diversity and Inclusion, Whistleblowing Policy and Prevention of Sexual Harassment in the Workplace Policies are designed to prevent any intimidating behaviour at work and to provide protection for employees who consider that they are being harassed or bullied
- TUK London Bus carries out right to work checks on all direct employees prior to them commencing their roles in the business. This includes checking that the employee has a valid visa and is of an appropriate age to work
- TUK London Bus enforces a Supplier Code of Conduct that contains the high standards expected of all our suppliers and is part of the due diligence when onboarding new suppliers.
  It is an integral term of contracts executed with legacy contracts under review to ensure compliance.

Under the Supplier Code of Conduct, a supplier must, amongst other requirements:

- comply with all the applicable laws, statutes, regulations, and codes of the countries it is present or operates in
- maintain a safe and civilised work environment
- uphold the human rights of all employees and adhere with all laws, regulations, codes, and government guidelines on human rights
- take all reasonable steps to ensure there is no slavery, human trafficking or child labour taking place in its supply chains or elsewhere in its business, and keep up to date with its understanding of the Modern Slavery Act 2015 and comply with its requirements at all times



### Supplier due diligence

TUK London Bus conducts due diligence on all new suppliers during the procurement process and subsequent onboarding, this includes:

- Assessing risks in the provision of high-risk services such as cleaning
- Ensuring suppliers are aware of their obligations to act ethically and contractually obligated to do so.
- Taking a zero-tolerance position on human trafficking, modern slavery, and any other unethical practices in the supply chain
- Requiring improvements to any substandard practices
- Sanctioning suppliers that fail to adhere to anti-slavery and human trafficking provisions and reporting such failure as appropriate

### **Awareness**

TUK London Bus recognises the importance of its staff being aware of and understanding the risks of slavery and human trafficking. It seeks to ensure that appropriate staff can identify the signs of slavery and human trafficking and that such staff are aware of what action to take if such activities are identified or suspected. We will continue to raise awareness of modern slavery issues and will send internal communications to all staff focused specifically on modern slavery, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

TUK London Bus will continue to share experiences and best practice across the Transport UK Limited Group.

# **Training**

In addition to the awareness programme, we mandate compliance training which includes Preventing Bribery in Business and provides training material which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to its organisation
- How employees can identify the signs of slavery and human trafficking
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What steps TUK London bus will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by TUK London Bus anti-slavery policy



# Measuring how we're performing

TUK London Bus is defining a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These will be reported annually and include:

- How many employees have completed mandatory training?
- How many suppliers have completed the ethics questionnaire and Supplier Code of Conduct?
- How many high-risk suppliers have been audited with respective results?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

TUK London Bus recognises that modern slavery and human trafficking are evolving issues and will continue to consider the effectiveness of the steps it is taking to eradicate modern slavery and human trafficking from its businesses and its supply chains.

TUK London Bus will take all appropriate steps to address any instances of slavery and human trafficking and publish an updated Anti-Slavery and Human Trafficking Statement each year. Any queries in relation to this statement should be addressed to:-bus.procurement@transportukbus.com

David Cutts Managing Director Transport UK

London Bus