Modern Slavery and Human trafficking statement 2025

This statement applies to **First Bus London Limited** (formerly RATP Dev Transit London Ltd), London United Busways Limited, London Sovereign Limited and London Transit Limited (the "**Companies**" or the "**Group**"). Each of the Companies has endorsed and adopted this statement.

This statement relates to actions and activities of the Group during the financial year ended 31 December 2024 and the period from 1 January 2025 to 28 February 2025 while the Group remained under the indirect control of RATP Développement SA (the **"Period**").

Organisational structure

On 28 February 2025, First Bus Holdings Limited, part of FirstGroup plc, acquired First Bus London Limited (formerly RATP Dev Transit London Ltd) and its subsidiaries: London United Busways Limited, London Sovereign Limited, and London Transit Limited.

During the Period, these subsidiaries operated as RATP Dev Transit London. Since 28 February 2025, they have been trading as **First Bus London**. Before this date, the Group was ultimately owned by RATP Développement SA.

During the Period, the Group's head office was at Garrick House, Stamford Brook, 74 Chiswick High Road, London W4 ISY. The Companies had 10 operational garages and about 3,789 employees.

The Group's turnover exceeded £36 million during the relevant period. The Group voluntarily extended the principles outlined in this Modern Slavery Statement to those Companies with turnovers below £36 million.

During the Period, the Group operated a devolved management structure. Procurement and Purchasing were support functions provided centrally, affording the Group control over its supply chain.

Commitment

Each of the Companies is committed to preventing slavery and human trafficking in its activities and recognises that it has a responsibility to ensure that its supply chains are free from slavery and human trafficking.

Each of the Companies understands that its compliance with the Modern Slavery Act 2015 (the "Act"), requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Our aims are that:

- 1. wherever possible our key suppliers adopt our standards, and we work collaboratively with them, clearly setting out our zero-tolerance approach.
- 2. we continue our supplier due diligence process on new suppliers, or orders with existing suppliers and regularly review existing suppliers' processes using the questionnaire currently available on the Group's website under Supplier Information.

Our Supply Chain

Our supply chain is mostly used to source supply of goods and services for various areas of work and materials related to the maintenance of bus operations. It includes primarily the supply of bus vehicles, parts, uniforms, services (such as cleaning of vehicles and depots) and some outsourced services. As procurement is a centralised function, the Group implements the due diligence and contractual processes referred to below to give effect to our anti-slavery and trafficking policy.

The Group does not knowingly enter into business with any other organisation, in the United Kingdom or abroad, which supports slavery, servitude and forced or compulsory labour.

The Group conducts regular due diligence on suppliers prior to onboarding, whether as new or recurring partners, and regularly reviews existing supplier relationships. This may include (but is not limited to):

- Using a high-level risk assessment to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on these areas.
- Where appropriate or possible, engage with our suppliers both to convey to them the content of this statement and to gain an understanding of and / or review the measures taken by them to ensure where possible modern slavery and human trafficking is not occurring in their businesses.
- Where appropriate or possible, ensure a pre-screening of suppliers (for example as part of a tender process), organise spot checks on their compliance policies generally and review supplier contracts to include whenever possible, termination powers in the event the supplier is, or is suspected to be, involved in modern slavery. This provides us with a way to enforce requirements or cease doing businesses with organisations who are non-compliant.

We have assessed the functions which are susceptible to modern slavery and trafficking as follows: all third-party manufacturing processes or other processes where low skilled labour is required or managed. e.g. bus manufacturing, supply of spare parts, cleaning / security services, supply of uniforms, supply agency workers.

Employee protection

During the Period, we believe that no labour directly engaged by the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in the UK. Screening of our UK recruitment agencies is carried out when the agencies are onboarded.

As a London bus operator, the Group adheres to the London Bus Driver Professional Wage and is a member of the Licence for London scheme. The Group also ensures that all personnel have the legal right to work in the UK, in compliance with immigration and employment laws.

Employee protection

During the Period, RATP Dev's Whistleblowing Guide and related procedures assisted the reporting of concerns, including those related to modern slavery. The procedures were designed to make it easy for workers to make disclosures. There were no reports relating to modern slavery or human trafficking in any of the Companies through this whistleblowing procedure during the Period.

Our effectiveness in combating modern slavery and human trafficking

During the Period, the Group had a dedicated compliance team, comprised of representatives from our Procurement, Legal and Compliance functions, in order to ensure ongoing compliance and monitoring of the requirements of the Modern Slavery Act 2015.

The Group has established specific objectives to assess the effectiveness of its efforts to prevent modern slavery and human trafficking within its operations and supply chains under the control of its board of directors. The measures include a review our processes, internal and external communication, contractual undertakings, suppliers' questionnaires and policies of the first tier of the Group supply chain and certain key suppliers, using certain risk levels.

Training, Communication and Awareness of this statement

During the Period, the Group's approach to modern slavery and human trafficking was communicated to relevant stakeholders from the website **www.ratpdevtransitlondon.com**, and internally through our compliance e-bulletins and through our compliance boards in our local garages.

Overtime, the Group raised awareness among staff and agency worker about the risk of modern slavery in our industry during our staff induction process and provide ongoing general and specific training for our managers and relevant members of staff to reinforce this knowledge.

For the next financial year, the Group intends to continue providing training to staff and continue running awareness campaigns for its relevant employees and agency workers.

Review of this statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors of First Bus London Limited for itself and its subsidiaries for the financial year ended 31 December 2024 and for the period from 1 January 2025 to 28 February 2025.

This statement will be reviewed on a regular basis (at least annually) and may be amended from time to time.

This statement is available on the Group's website at <u>www.firstbuslondon.co.uk</u>

Fiona Guthrie HR Director FIRST BUS LONDON (formerly RATP DEV TRANSIT LONDON)