

## **Abellio London Bus (comprising Abellio London Limited and Abellio 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 modern slavery and human trafficking statement of Abellio London Bus (“ALB”) in accordance with section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2020.

ALB 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 ALB in the current financial year ended 31 December 2020 to identify, assess and act in respect of potential slavery and human trafficking risks related to its organisation and supply chains.

ALB 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**

ALB operates passenger bus services in London under contract to Transport for London and rail replacement bus / coach services. It comprises Abellio London Limited (number 03786162) and Abellio West London Limited (number 00689260) which are registered in England with the registered office of 301 Camberwell New Road, London SE5 0TF. Abellio London Limited and Abellio West London Limited are wholly owned subsidiary undertakings of, and are controlled by, Abellio Transport Holdings Limited, a company registered in England and Wales. The ultimate parent company is NV Nederlandse Spoorwegen, a company incorporated in the Netherlands.

### **Our supply chains**

ALB works with 700 suppliers, predominantly in the UK and mainland Europe spending circa. £80m on a range of goods and services. Supplier relationships are managed through a dedicated Procurement Manager. ALB 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 modern slavery, human trafficking and general human rights obligations is as much a responsibility of its suppliers as it is ALB.

## **Governance and Risk Management**

### Risk assessment

ALB aims to have processes in place which:

- identify and assess potential risk areas in its supply chains;
- mitigate the risk of slavery and human trafficking occurring in the supply chains;
- monitor potential risk areas in supply chains; and
- protect whistle-blowers.

The steps set out throughout the rest of this section are aimed at remedying and mitigating identified areas of risk. ALB hopes that the steps it takes will eliminate the risks of modern slavery and human trafficking taking place in its own businesses and its supply chains.

### ALB Code of Conduct

ALB has a Supplier Code of Conduct which applies to all aspects of the supply of goods and services provided to ALB. The Supplier Code of Conduct is provided to potential suppliers as part of the procurement process. The Code of Conduct communicates the high standards expected of all ALB's suppliers and is an integral term of all executed supplier contracts.

Under the Supplier Code of Conduct, a prospective 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 be in compliance with its requirements at all times.

### Internal policies

ALB has internal policies and procedures in place which ensure that slavery and human trafficking are not taking place in its businesses, all of which and are part of the onboarding process for all new employees and available to all employees, contractors, agency workers and business partners. Such internal policies include policies in respect of anti-bribery and corruption, whistleblowing, diversity and recruitment. ALB 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.

### Due diligence

As part of ALB's procurement process, potential suppliers are required to complete a questionnaire to be considered as part of their bid. The questions include a number aimed at ensuring that the potential supplier is aware, at an early stage of the procurement process, of its obligations to act ethically and that ALB will not tolerate human trafficking, modern slavery or any other unethical practices in its supply chains.

ALB aims to use its own standard terms and conditions which include anti-slavery and human trafficking provisions. If a supplier breaches any of these provisions, ALB has the ability to terminate the contract with that supplier.

### Awareness

ALB 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 are able to 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. ALB will provide training to selected staff as appropriate on an ongoing basis.

### **Ongoing Activity**

ALB is proud of its commitment to ethical employment practices and continues to work with suppliers to combat slavery and human trafficking. As part of ongoing actions, ALB intends to:

- Undertake an annual assessment for those suppliers identified as having the highest susceptibility to the risk of employing slave or trafficked labour e.g. overseas manufacturing or other processes where low skilled labour is required;
- Continue to review supplier terms and conditions to ensure best practice and the timely updating of terms to embed any new legislation;
- Further educate appropriate staff, so that spotting a slavery or trafficking issue, understanding different types of slavery and trafficking and how to report a concern are more widely known; and
- Share learning experiences and best practice across the Abellio UK Group.

ALB recognises that modern slavery and human trafficking are evolving issues and will therefore, 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 and may take such further steps as it considers may be appropriate to address any risk of slavery or human trafficking.

ALB will take 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 [procurement@abellio.com](mailto:procurement@abellio.com).



Tony Wilson, Managing Director, on behalf of Abellio London Bus