

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 Anti-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 2021.

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 2021 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 circa. 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 anti-slavery, human trafficking and general human rights obligations is as much a responsibility of its suppliers as it is ALB.

Risk assessment

ALB 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 ALB's response and the risk controls that are implemented.

Policies

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

- ALB promotes equal opportunities across all its business activities including (but not limited to) recruitment and selection, employment, training, and promotions. ALB does not discriminate against its workers and encourages diversity, equality, and inclusion
- ALB encourages all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. ALB provide a confidential helpline to protect the identity of whistle-blowers
- ALB protects its employees' rights to a working environment free from harassment and intimidation. ALB's anti-harassment and bullying policy is designed to prevent any intimidating behaviour at work and to provide protection for employees who consider that they are being harassed or bullied
- 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
- ALB enforces a Supplier Code of Conduct that contains the high standards expected of all ALB's 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

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

- Assessing risks in the provision of particular services
- Ensuring potential suppliers are aware of their obligations to act ethically
- Taking a zero-tolerance position in regard to human trafficking, modern slavery, any other unethical practices in supply chains
- 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

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 continue to raise awareness of modern slavery issues and will send internal communications to all staff focused specifically on modern slavery, which explains:

- ALB's 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

ALB will continue to share experiences and best practice across the Abellio UK Group.

Training

In addition to the awareness programme, ALB mandates 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 ALB will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by ALB's anti-slavery policy

Measuring how we're performing

ALB 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 on 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?

ALB 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.

ALB 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@abellio.co.uk.

A handwritten signature in black ink, appearing to be "Jon Eardley".

Jon Eardley
Managing Director
Abellio London Bus