

Human Rights, Modern Slavery and Human Trafficking Policy

Policy ownership:

Group Talent & Reward
Director

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Business area of author:

Corporate Affairs

1. Policy statement

We recognise our responsibility to protect and promote the human rights of our employees, and to encourage our customers, suppliers and stakeholders to do the same. Our core values and culture encompass a commitment to ethical business practices and good corporate citizenship.

As an ethical company, Arriva respects every individual's human rights and has a zero-tolerance approach to slavery and human trafficking.

Arriva is committed to the prevention of slavery and human trafficking and strictly condemns and prohibits any form of forced labour or slavery, including human trafficking, in its Standards of Business Conduct and Code of Conduct for Business Partners.

2. Who must comply with this policy?

This policy applies to all Arriva businesses (including majority-owned businesses where Arriva has the controlling interest or is the operator). It applies to all employees whether full-time, part-time, contract or temporary.

Each business unit must either adopt this policy in its entirety or, if local requirements exist, implement its own specific policy based on, and fully compliant with, this policy.

3.1 Our commitments:

Human Rights

We are committed to delivering a healthy and safe working environment for our employees, and upholding the principles of our Environment, Health and Safety, and Diversity and Inclusion policies:

- We fully support the United Nations Universal Declaration of Human Rights and the International Labour Organisation conventions.

- We treat all employees fairly and honestly and we will comply with all appropriate local employment legislation.
- We recognise the skills and contributions of our employees and will ensure they are fairly remunerated, reflecting the local market and conditions.
- We do not tolerate harassment or discrimination in the workplace, and we will promote and embrace diversity in all aspects of our business operations.
- We are committed to open communications with our employees and respect their right to join a trade union.

Modern Slavery and Human Trafficking

- Modern slavery is a crime and a violation of human rights. Arriva does not tolerate slavery and human trafficking in any of its business dealings, and continuously monitors and renews its working practices, working closely with its procurement team, to prevent modern slavery.
- Arriva's Modern Slavery Policy is based on the UK Modern Slavery Act 2015 and all our UK businesses must comply. All Arriva businesses outside the UK are required to comply with this policy, as well as any local legislation.

3.2 We uphold these commitments through:

Working with business partners:

- We continuously review our supplier due diligence and onboarding practices and procedures, so they protect our business and employees from risks of modern slavery.
- Arriva's Human Rights, Modern Slavery, and Human Trafficking Policy and Arriva's Group Procurement Policy require suppliers to comply with the Arriva Code of Conduct for Business Partners.

Our workforce:

- Ethical standards are met while working with external recruitment agencies, especially on cross-border recruitment.
- We always ensure recruitment agencies do not charge directly or indirectly any fees or related costs to workers and that they provide candidates with accurate details of working conditions.
- We will conduct due diligence with recruitment agencies and sub-agencies in relevant countries of operation to ensure compliance.

Our customers:

- Where appropriate to their roles, we offer training to colleagues on how to identify and support vulnerable passengers using our transport network, to ensure that Arriva provides a reliable and safe service to all passengers.

3.2.1 Training and development

- Where appropriate, we will take steps to train our managers, prioritising procurement managers, and other colleagues about their responsibilities under this policy to help spot signs of modern slavery and human rights violations in our supply chain and wider business.

3.2.2 Responding to allegations

- We encourage our colleagues, customers, suppliers, visitors, and the public to speak up when something doesn't feel right. We take reports of suspected modern slavery very seriously, and appropriate action will always be taken when an allegation of modern slavery is made. Anyone found to have been involved in suspected modern slavery will be investigated and, where necessary, local law enforcement will be involved.
- We will terminate our relationship with suppliers and third parties working on our behalf if they are found to be in breach of the UK Modern Slavery Act 2015 or equivalent legislation in Arriva territories outside the UK; the United Nations Universal Declaration of Human Rights and the International Labour Organisation conventions.

3.2.3 Data and measurement

- Consideration of modern slavery risk is built into our procurement processes as part of our vendor due diligence activities. We require an active commitment from suppliers, as part of our tendering process, to the Arriva Code of Conduct for Business Partners and, where applicable, that they have also published a modern slavery statement of their own.
- We record any known or suspected risks of modern slavery and ensure any pursuant risk assessment or mitigation actions are thoroughly documented.
- Annually in the UK, as legislated by the Modern Slavery Act 2015, we review the top 80 per cent of our suppliers against a due diligence matrix to help identify any areas that may present risk and investigate any concerns.
- We monitor potential breaches of human rights or instances of discrimination via our grievance process and ensure that where concerns are raised, they are thoroughly documented and investigated.

3.3 Definitions:

3.3.1 What is modern slavery?

Modern slavery is a crime; it is the exploitation of people for commercial or personal gain. Victims of modern slavery are controlled by various methods including by physical force or abuse, threats made against them or their families, coercion and/or deception.

3.3.2 Types of modern slavery and human trafficking

There are many forms of modern slavery. Below are some of the most frequently encountered, however this is not an exhaustive list:

- a) **Servitude:** A type of slavery where individuals cannot leave of their own free will. In some cases, an individual may have had their passport, visas and other personal documentation and belongings confiscated by their employer. Domestic servitude refers to victims being forced to work in predominantly private households performing childcare duties and domestic chores.
- b) **Forced, coerced or compulsory labour:** A person is held against their will and with the threat of punishment or retaliation if they leave (e.g. violence, restriction of movement, debt bondages, wages being withheld or excessive deductions made, confiscation of passports, visas and documentation, threats that they will be reported to authorities).
- c) **Bonded labour:** Debt bondage or bonded labour occurs when an individual is forced to work to repay a debt. Their employer can add other expenses to their debt too, making repayment impossible and enslavement permanent. This form of labour can be generational, for example where a child is born into a situation where they must work to repay debts incurred by their parents.
- d) **Child Labour:** Any form of modern slavery that involves an individual under 18 years old is known as child labour. More than 25 per cent of people living in modern slavery today are children. The demand for cheap labour and specific physical characteristics makes children particularly vulnerable. Those living in extreme poverty are very vulnerable to this kind of slavery.
- e) **Human Trafficking:** The recruitment, confinement, or transportation of people for the purposes of exploitation.
- f) **People Smuggling:** Many migrants, refugees and asylum seekers may fall victim to people smugglers who offer to help them cross borders to reach their destinations. Smugglers may force individuals to work in inhumane conditions to repay the 'debt' for their illegal border crossings.
- g) **Forced criminal activities trafficking:** Criminal networks use victims to carry out a range of illegal activities which generate income for the network, without the risk of being caught themselves. Types of activities include theft, drug cultivation, selling counterfeit goods, or forced begging.

3.3.3. The warning signs to look out for:

All colleagues should ensure they know some of the common signs that suggest something is wrong and can identify when there is a risk of a breach of human rights, or modern slavery is occurring. This may include:

- Workers who:
 - don't have written contracts of employment
 - had to pay fees to access work

- do not have the required documents to prove they are legally entitled to work in the country
 - show signs of abuse, and/or appear malnourished or unkempt
 - are frightened or reluctant to talk to others
 - are transported to and from work by the same person, often very early in the morning or late at night.
- Agencies who:
 - charge very low rates compared to industry standards
 - request multiple employees are paid via the same bank account
 - provide the same next of kin details for multiple employees.

4. Your responsibilities

Everyone – All Arriva employees must comply with this policy and any communications relating to this policy.

Arriva Group Chief Executive - is responsible for implementing this policy. Performance will be reported regularly to the Arriva Management Board.

Business Leaders - including divisional and functional directors, are responsible for ensuring that business areas under their control implement and maintain arrangements to comply with this policy alongside their procurement colleagues.

5. How to raise a concern

Any Arriva employee, business partner, or stakeholder can raise a concern if they believe this policy is being, or at risk of being, breached. Arriva employees should raise any concern as soon as practically possible with their line manager or local compliance officer.

Alternatively, concerns can be raised confidentially via the Arriva Group whistleblowing facility, Integrity Line. For more information or to make a report please visit [Arriva \(integrityline.com\)](https://integrityline.com).

If you are in the UK and prefer to speak up via phone, you can contact our dedicated hotline on +44 203 885 0064. Please use the following PIN (known as a CAP code): 0267 to access.

If you would like to make a report by phone from a country other than the UK, please refer to the Arriva Group [whistleblowing policy](#) where you will find country specific contact numbers.

6. Breaches of this policy

Breaches of this policy must be managed in accordance with the disciplinary policy applicable to the local business.

Suspected wrongdoing will be investigated to the extent legally permitted and appropriate action taken if evidence of wrongdoing is discovered, which may include termination of employment.

7. Further guidance

This policy should be read in conjunction with your own local policy, training or guidance around modern slavery and human rights along with any guidance on reporting instances of suspected modern slavery or human rights breaches available locally.

Queries regarding interpretation of this policy or its content should be referred to your local Compliance or procurement team or Head of Legal.

Alternatively, this can be referred to Group Compliance via the compliance support mailbox at supportc@arriva.co.uk.

8. Recommended tools

Colleagues implementing this policy in their business may wish to refer to the following tools to help monitor and manage the changing risks of modern slavery:

1. **The Global Slavery Index:** [Heat maps](#) and data sets covering prevalence, vulnerability, and government response to modern slavery around the world. This organisation monitors where products of modern slavery crimes are sold and consumed in response to shifting trends.
2. US Department of Labour, [List of goods produced by Child labour or Forced labour Report, 2020](#): Pages 29-37 of this report detail the most high risk goods by country of origin and product type.