

# FirstGroup plc

## Modern Slavery Statement 2024

### Our commitment to preventing modern slavery

At FirstGroup we are committed to conducting our relationships to the highest ethical and moral standards and acting with integrity and professionalism in all our activities. This is in line with our corporate values and the expectations of our colleagues, customers and other stakeholders. It includes the prevention of modern slavery, child labour and human trafficking in all its forms and extends to all business dealings and transactions in which we are involved, regardless of location or sector.

### Scope and coverage of this statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by FirstGroup plc and relevant subsidiaries during the financial year ending 30 March 2024 (“FY 2024”) to prevent modern slavery and human trafficking in our business and supply chains.

Under the Act, a legal obligation to publish a statement applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36m. This statement has therefore been approved and adopted by the Board of FirstGroup plc, as well as each of the Group’s subsidiaries that meets this requirement under the Act (as set out in the Appendix). This statement also extends to our businesses which are not legally required to make a statement under the Act, regardless of their location, size or turnover.

### Organisation and structure

FirstGroup plc is a market leader in public transport in the UK through our First Bus and First Rail divisions. For more information on our business structure, please see our website at [www.firstgroupplc.com](http://www.firstgroupplc.com).

### Policies in relation to slavery and human trafficking

FirstGroup has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This commitment is made in line with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights and the Childrens Rights and Business Principles.

Our Group-wide Code of Conduct on Anti-Slavery and Human Trafficking Prevention sets out our commitment to the prevention of modern slavery in our business and supply chains. This commitment is also reflected and reiterated in our [Code of Ethics](#).

We also have a Whistleblowing Policy to encourage and protect those who come forward, supported by a reporting hotline, which is run independently of FirstGroup and is completely confidential. There were no reports relating to modern slavery or human trafficking to the hotline during FY 2024.

Our [Supplier Code of Conduct](#) prohibits the use in our supply chain of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Supplier Code of Conduct applies to all suppliers and partners who supply products or services to FirstGroup and its subsidiaries.

## Risk management and due diligence

We assess, monitor and mitigate risks relating to slavery and human trafficking on a Group-wide basis, with individual divisions and operating companies taking specific actions where appropriate to the level of risk. In addition to the policies summarised above, our **Modern Slavery Working Group** meets regularly to review the steps being taken by the Group to detect and remedy modern slavery within our own organisation and our supply chain.

We undertook a review of modern slavery risks across the Group towards the end of FY 2020. While no significant risks were identified, the assessment highlighted two areas for improvement – more regular employee training and raising awareness of the Group’s policies and procedures relating to modern slavery. The “Employee training and policy awareness” section sets out further details of how these have continued to be addressed in FY 2024. An internal audit of our modern slavery supply chain risks is due to be completed in FY 2025.

## Supply chain

We have supplier due diligence processes in place to help identify and address potential risks of modern slavery. These processes are supported by our Group Procurement Policy. We continue to screen strategic suppliers to assess the level of associated social risk, conduct audits and follow up issues identified where necessary.

We continue to implement a toolset requiring higher risk suppliers to provide evidence and assurance on a variety of risk factors including modern slavery. At the end of FY 2024, 217 of the highest risk incumbent suppliers have been fully registered on this system with a further 84 currently in progress. We anticipate this number will continue to grow as the implementation programme progresses and the toolset will be fully embedded into the Supplier Onboarding Process during FY 2025.

Where cases, or allegations, of forced labour are identified within our supply chain, we investigate any concern thoroughly. There have been no such cases or allegations in FY 2024.

Our standard contracting terms continue to incorporate specific obligations on our suppliers to comply with applicable anti-slavery and human trafficking laws, including the Act. Our terms also reference our Supplier Code of Conduct which reiterates these principles.

## Employee protection

To attract and retain the skills we need, we offer a competitive wage reflecting local market demands and conditions. In the First Rail division, Avanti and Tram Operations are accredited Living Wage Employers and pay the Real Living Wage (“RLW”) to employees and to third-party contractors working directly for the company in accordance with the Living Wage Foundation rates of pay. GWR and SWR also pay the RLW to directly employed colleagues. From 1 April 2024, First Bus has also become a RLW employer, immediately impacting around 1,300 colleagues who received a pay increase in line with this new commitment. First Bus will also raise apprentices’ wages to the RLW level over the next eighteen months, which is beyond the requirements of the RLW accreditation.

## Employee training & policy awareness

Raising colleagues’ awareness of trafficking and modern slavery is key to identifying and helping to prevent modern slavery and human trafficking. In FY 2024, all senior managers across the Group and its operating divisions were invited to complete the mandatory, dedicated online training module and to read and attest to the Group Modern Slavery Code of Conduct. This module was updated in FY2024 to ensure continued engagement with the training. These training and policy attestation requirements also apply to other higher risk individuals across the Group, including all members of the procurement teams. All relevant individuals are required to repeat both actions annually.

Rates of compliance with the mandatory training and attestation requirements are reported monthly to the senior management team and to the Board on a periodic basis.

## Board approval

The FirstGroup plc Board recognises the importance of the provisions of the Modern Slavery Act 2015 and the Directors aim to ensure that slavery and human trafficking have no part in the Group’s operations and supply chain. The Group has always been vigilant about the welfare of our colleagues, customers, suppliers and other stakeholders and aims to be transparent in its practices. The Board welcomes the opportunity to state its firm commitment to a zero-tolerance approach to modern slavery and human trafficking.

This statement has been approved by the Board of Directors of FirstGroup plc for the financial year ended 30 March 2024. This statement has also been approved by the Boards of Directors of relevant UK subsidiaries, as set out in the Appendix.



**Graham Sutherland**

CEO

FirstGroup plc

10 June 2024

## Appendix

East Coast Trains Limited

First Beeline Buses Limited

First Cymru Buses Limited

First Essex Buses Limited

First Glasgow (No. 1) Limited

First Glasgow (No. 2) Limited

First Greater Western Limited

First Hampshire & Dorset Limited

First MTR South West Railways Limited (70%)

First Rail Holdings Limited

First South West Limited

First South Yorkshire Limited

First TransPennine Express Limited

First Travel Solutions Limited

First Trenitalia West Coast Rail Limited (70%)

First West of England Limited

First West Yorkshire Limited