

# FirstGroup plc

## Modern Slavery Statement 2023

### 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 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 25 March 2023 (“FY 2023”) 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

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 2023.

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 2023.

### 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.

In FY 2023, we have embedded a new toolset requiring higher risk suppliers to provide evidence and assurance on a variety of risk factors including modern slavery. At the end of FY 2023, 162 suppliers had been fully registered on this system – we anticipate that this will be at least doubled in the current financial year.

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 2023.

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. No breaches of our Supplier Code of Conduct relating to modern slavery were identified in FY 2023.

### Employee protection

We pay a fair wage reflecting local market demands and conditions. Within First Rail, Avanti West Coast and Tram Operations are both accredited Living Wage Employers, and pay the Real Living Wage (“RLW”) to employees and to third-party contractors working directly for them in accordance with the Living Wage Foundation rates of pay.

---

GWR and SWR also pay the RLW to directly employed staff. Almost 98% of employees in First Bus are paid at or over the RLW.

## 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 2023, all senior managers across the Group and its operating divisions were required to complete a mandatory, dedicated online training module and to read and attest to the Group Modern Slavery Code of Conduct. 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 25 March 2023. This statement has also been approved by the Boards of Directors of relevant UK subsidiaries, as set out in the Appendix.



**Graham Sutherland**  
Chief Executive Officer  
FirstGroup plc  
8 June 2023

## Appendix

East Coast Trains Limited  
First Beelines 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 Yorkshire Limited  
First South West 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