

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Reviewed August 2024

At Nottingham City Transport Limited ('NCT') we recognise that slavery and human trafficking are significant human rights issues. This statement reflects our commitment to acting ethically and with integrity in all our business relationships. We are committed to taking appropriate and proportionate steps to mitigate the risk of these occurring within our business and our supply chain

Our Business

Nottingham City Transport is a multi-award winning bus company. We have over 1,100 employees and we are the biggest public transport operator in Nottingham providing a comprehensive network of services across the city. Our mission is to provide those we serve with a safe, reliable, value for money, integrated, public transport network which has the least impact on our environment.

The Board of Directors have examined the risk of modern slavery within its business operations and considers the risks to be low. This assessment is based on the current procedures we have in place and the nature of our business, which is providing a bus service to the public.

Our Supply Chains

Our supply chains predominately provide vehicles, fuel, materials and equipment for NCT's own use, including:

- Buses
- Parts and components
- EV charging equipment
- Uniforms
- Office equipment & stationery
- Legal, accounting and professional services
- Cleaning materials

With the exception of an online e-learning services provider, we procure all our directly sourced supplies from UK based organisations that are required to comply with UK laws on modern slavery and forced labour.

Due diligence processes and Risk Assessment

As a business we ensure that we identify and assess potential risk areas in our operation and supply chains. The key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractors working on our premises, and the workforce of our supply chain who supply to our business.

The steps that we take to mitigate risks in relation to each of these areas are as follows:

Employees

As a service provider, NCT's largest resource is its employees. We verify that all employees have the right to work in the UK before commencement of their employment. We pay at or above the appropriate National Minimum Wage and/or Living Wage rates. We make all employees aware of their working hours, leave and absence entitlements and other employment benefits upon joining the business and as part of their induction.

We prohibit the use of forced labour. As a business we ensure that whistleblowers are protected and the Company's whistleblowing policy is designed to create a secure and confidential channel to report concerns or suspicions of modern slavery.

Agency workers

NCT may only occasionally engage agency workers. In this event, all suppliers of agency workers would be required to:

- 1) Ensure their agency workers have the right to work in the UK;
- 2) Confirm that they do not charge workers a work finding fee and;
- 3) Ensure they have procedures in place to minimise the risk of recruiting forced or bonded labour.

Subcontractors

We require subcontractors to ensure their employees have the right to work in the UK.

We expect all sub-contractors that purchase materials for use in our business to consider the risks of modern slavery in their supply chain and to prohibit any form of modern slavery, forced labor, and human trafficking in their business.

Suppliers

We procure our directly sourced supplies from UK based organisations that are required to comply with UK laws on forced labour.

All suppliers and subcontractors are required to ensure that they comply with the statutory requirements in respect of the Modern Slavery Act 2015, which in turn, confirms to us that the risk of slavery in our supply chain has been mitigated.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

Number of Reported Incidents

The number of reports or allegations of modern slavery or human trafficking received through internal channels, including via our whistleblowing policy

Time Taken to Resolve Reported Incidents

The average time taken to investigate and resolve reported incidents of modern slavery or human trafficking.

Frequency of Policy Reviews

How often the company reviews and updates its modern slavery and human trafficking policies and procedures

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, additional training to our staff, especially for those engaged in procurement, human resources and management will be arranged.

Supplier Code of Conduct

Implementing a new supplier code of conduct that suppliers are expected to adhere to as a condition of doing business with NCT.

This statement will be reviewed annually and is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement constitutes our slavery and human trafficking statement for the financial year ending 31st March 2024.

Signed for, and on behalf of, the Executive Board:

A handwritten signature in black ink, appearing to read 'David Astill', written over a horizontal line.

David Astill
Managing Director
Nottingham City Transport Limited