

Introduction

Modern slavery is a serious crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking — all of which involve the exploitation of individuals through coercion or deprivation of liberty for personal or commercial gain.

Wrightbus fully supports the objectives of the Modern Slavery Act 2015 (the “Act”) and is committed to preventing slavery and human trafficking in all aspects of our operations and supply chains in accordance with the [OECD Due Diligence Guidance for Responsible Business Conduct | OECD](#)

Our business

Wrightbus is Europe’s fastest growing zero emission bus manufacturer. Risks relating to slavery and human trafficking are continuously considered within the organisation and we are committed to improving transparency and preventing slavery and human trafficking from occurring within any part of our business and supply chains. We expect suppliers to adhere to similar high standards of corporate responsibility as our own business and expect them to be committed to preventing slavery and human trafficking in their supply chains. We will not deal with suppliers who are unable to meet these expectations.

1. Purpose and Scope

1.1 Objectives of this Policy

This policy is designed to:

- Define the responsibilities of Wrightbus and those acting on our behalf in upholding our stance against modern slavery and human trafficking.
- Provide guidance on identifying and reporting concerns related to modern slavery.

1.2 Who This Policy Applies To

This policy applies to all individuals working for or on behalf of Wrightbus, including:

- Employees
- Agency and seconded workers
- Apprentices
- Contractors, consultants, agents, third-party representatives, suppliers and business partners

1.3 Policy Status

This policy is not contractual and may be amended at any time.

2. Our Commitment

As outlined in our [Code of Conduct](#) and [Bullying and Harassment Policy](#), Wrightbus recognises and respects the civil, political, economic, and social rights of our employees. We strive to reflect these values throughout our business practices and supply chain.

3. Training and Communication

3.1 Employee Communication and Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary through our internal platforms and communication channels.

3.2 Supplier Communication

Our zero-tolerance approach is communicated to all suppliers, contractors, and business partners at the outset of our relationship and reinforced regularly.

4. Reporting and Enforcement

4.1 Internal Breaches

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, they are encouraged to inform the Group General Counsel immediately. If the matter is not remedied, employees should raise it formally using our Grievance Procedure.

Our Whistleblowing policy is regularly communicated to all our employees. The purpose of the policy is to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. [Whistleblowing policy -Bamford Bus Company- September 2023.docx](#)

Any employee found to be in breach of this policy may face disciplinary action, up to and including dismissal for gross misconduct. We encourage reporting of concerns through our Whistleblowing Policy, available via our Corporate Governance and Compliance framework. [Corporate Governance and Compliance | WrightBus](#)

5. Supply Chain Standards

We are committed to transparency and ethical conduct across our supply chains. All contractors, suppliers, and business partners are expected to uphold the same high standards, including:

- Prohibiting forced, trafficked, or child labour
- Ensuring their own suppliers adhere to these principles

Wrightbus has hundreds of suppliers, and we purchase a wide range of goods, including technology, engineering parts, energy, fuel and services.

Although nearly half of our suppliers are UK-based, we recognise that their supply chains may be global in nature. We are regularly reviewing our working practices to identify areas for improvement. These practices include our Supplier Code of Conduct [Supplier Code of Conduct \(003\).doc](#), questionnaires issued to all suppliers and follow up communications. We also embed human rights related due diligence in broader in our procurement team's in person supplier audits.

We use modern slavery and human trafficking compliance as a metric to assist/drive supplier selection, where appropriate, we are continuously striving to impose sufficiently robust modern slavery and audit compliance obligations on our suppliers.

Supplier Onboarding Process

New suppliers must sign our Supplier Code of Conduct. [Supplier Code of Conduct \(003\).doc](#)
Following submission, the Purchasing Manager and Quality Manager will meet with the supplier to review their responses, including their policies on modern slavery. Based on this review, suppliers may be approved or rejected.

6. Risk Management and Due Diligence

Wrightbus is committed to continuously improving our due diligence processes to identify and mitigate potential risks effectively.

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

We have in place a dedicated ESG Committee, comprised of representatives from our Procurement, Legal, Sustainability, Sales and Human Rights functions, to ensure ongoing compliance and monitor the requirements of the Act within our supply chain

The ESG Committee has the following responsibilities:

- formalising our risk-assessment process which will be applied to all suppliers, complementing the supplier due diligence questionnaire we issue (which includes confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking).
- following up on responses to questionnaires where appropriate, such as requesting further evidence on specific matters.
- conducting an annual audit of a sample of suppliers identified as posing a medium to high risk.
- actively measuring and monitoring through a central database supplier status and risk levels.
- continuously reviewing and updating our policies and procedures as appropriate in order to raise awareness and profile of the issue within our organisation.