

# Modern Slavery and Anti-Trafficking Statement

ID 00038

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## Change Details

Issue	1
Date	June 2017

## CONTENTS

1	Introduction	3
2	Structure of the Organisation	3
3	Policies	3
4	Due Diligence	4
5	Risk and Compliance	4
6	Effectiveness and KPIs	4
7	Training	5
8	Closing Statement	5

## MODERN SLAVERY AND ANTI-TRAFFICKING STATEMENT

### Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and human trafficking.

Alexander Dennis Limited ("Alexander Dennis") is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers.

Alexander Dennis promotes ethical business practices that protect workers from being abused or exploited in their own organisations and global supply chains.

Alexander Dennis is committed to mitigating the threat, risk or harm caused by Modern Slavery and has a zero tolerance approach where slavery is identified.

Through the development of policies and procedures we will ensure transparency of our steps to ensure that our suppliers and the organisation internally are aware of the consequences of potential breaches.

Alexander Dennis commit to reviewing this policy on an annual basis and will report on progress made throughout each period.

### Structure of the organisation

Alexander Dennis is the UK's leading bus and coach manufacturer, employing around 2,500 people at facilities in the UK, Asia and North America.

Alexander Dennis has a global annual turnover of circa £601m. To find out more about the nature of our business, please click <http://www.alexander-dennis.com/>

In order to remain as Britain's biggest bus and coach manufacturer, we produce the UK's market leading range of single and double deck bus chassis and bodies. Other key markets for Alexander Dennis include the Asia Pacific region and North America. Across these areas we work with a range of suppliers.

Our supply chain consists of component suppliers, outsource manufacturing and use of labour providers.

### Policies

As part of our commitment to combating modern slavery, we have updated the following internal policies:

- Business Ethics Policy
- Public Interest Disclosure Policy
- Competition Policy
- Anti-Bribery Policy

We also make sure our suppliers are aware of our policies and require them to adhere to the same high standards that we commit to.

These policies have been developed internally within the organisation in conjunction with Human Resources, Legal and Procurement.

### **Due diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures which we are currently working with partners to establish:

- Supplier audits
- Self-assessment tools

All due diligence procedures will be conducted in the form of ethical compliance audits conducted by or on behalf of Alexander Dennis. Our due diligence checks will specifically include assessment on modern slavery risks.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers
- to ensure any instances of modern slavery are identified and remediated through working in collaboration with Hope for Justice (changed the final bullet point to this)

### **Risk and compliance**

Alexander Dennis has a zero tolerance approach to modern slavery. We recognise the risk of modern slavery and we are committed to attaining compliance in this area.

We are increasing our focus on modern slavery within our business operations and supply chain.

To evaluate the nature and extent of our exposure to the risk of modern slavery, Alexander Dennis will map our supply chain activity to assess the particular areas of high risk, geographically and by industry/sector.

Where we identify a potential risk within this process we will ensure that it is fully investigated and bring about viable solutions which are proportionate but effective in dealing with issues of modern slavery. We are working hard to put in place the correct processes, balances and checks to ensure that ultimately where we have concerns that the issue cannot be addressed through collaboration and support from a supplier, we will terminate all further business with them on the basis that the supplier has breached our code of conduct.

We will encourage suppliers to establish their own risk assessment processes and will inform them that we will be periodically checking compliance with our standards.

## Effectiveness and KPIs

Alexander Dennis will introduce certain key performance indicators (KPIs) to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

We are developing our KPIs which will contain the following:

- Training levels
- Supply chain auditing and verification
- Investigations undertaken into reports of Modern Slavery and remedial actions taken in response

We have appointed and engaged an external consultant to conduct an independent review of our businesses and supply chains, and to recommend actions we can take to combat slavery and human trafficking from within.

## Training

We will invest in educating our personnel to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our induction programmes, personnel are made aware of our internal policies and we will ensure our personnel are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.

Through initial and ongoing training we will teach the key individuals within the business of the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

We are working in partnership with Hope for Justice, a charity organisation committed to the abolition of modern slavery to develop a training and awareness programme which will be rolled out to key individuals within the business and our key suppliers.

Hope for Justice will also support the business with providing advice and guidance on the action to be taken if any personnel become aware or has suspicions of modern day slavery. They provide a 24 hour support service 7 days a week which works with the business and compliments local HR support.

A policy supporting our statement is being developed with Hope for Justice which will outline what the procedure should be followed if they suspect or observe modern slavery.

## Closing Statement

This statement affirms our zero tolerance approach to modern slavery and human rights abuses.

We recognise the extremely complex nature of modern slavery and will continue to emphasise the importance of collaboration with others to raise awareness and ensure compliance with the requirements of the Act.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Alexander Dennis' slavery and human trafficking statement for the financial year commencing 01<sup>st</sup> January 2017 and ending 31<sup>st</sup> December 2017.

Signature:



Colin Robertson,  
Chief Executive  
Alexander Dennis Limited