



ALEXANDER  
DENNIS

**MODERN  
SLAVERY &  
ANTI-TRAFFICKING  
STATEMENT  
2023**



# STATEMENT

**Alexander Dennis understands that modern slavery and human trafficking is a crime which results in abhorrent abuse of human rights; constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and human trafficking.**

**With business operations and supply chains across the globe, we are aware of our responsibilities to respect and protect the rights of employees, individuals and communities affected by its activities. We remain committed to working to prevent modern slavery and human trafficking from occurring within our business operations and supply chains. We fully recognise the importance of collaborating with our wide range of stakeholders and actors to eradicate modern slavery in all of its forms.**

Alexander Dennis is absolutely committed to ethical and responsible business practices which seek to protect workers from being abused or exploited in both its own organisation and its global supply chains.

Alexander Dennis has a Human Rights Working Group which feeds into the ESG Steering Committee. In 2023 the Human Rights Working Group will focus upon the following:

- Refreshing and revising our modern slavery risk analysis by geography.
- Ensuring that 100% of our employees have access to training regarding modern slavery and human trafficking, to help them spot the signs and report.
- Providing enhanced training to 100% of our key individuals with specific responsibilities for supply chain engagement, regarding modern slavery in a global context and within high-risk supply chains.
- Enhancing our human rights due diligence processes for both our business operations and global supply chains.
- Continuing our programme of enhanced human rights due diligence checks specifically for our supply chain in China, as a result of the focus upon Uyghur forced labour.
- Engaging with the Global Battery Alliance, and work with key suppliers to undertake specific supply chain mapping for critical minerals.

We look forward to continuing this journey, building our understanding, working with closely with suppliers and collaborating with other stakeholders both in our sector and beyond throughout 2023.



A handwritten signature in black ink, appearing to read 'Paul Davies'.

**Paul Davies**  
President & Managing Director

# STRUCTURE OF THE ORGANISATION

**Alexander Dennis is part of leading independent global bus manufacturer  
NFI Group - [About NFI](#) | [NFI Group](#)**

Alexander Dennis is a global leader in the design and manufacture of double deck buses and is also the UK's largest bus and coach manufacturer. Alexander Dennis offers single and double deck buses under the Alexander Dennis brand as well as Plaxton coaches, with vehicles in service in the UK, Ireland, Europe, Hong Kong, Singapore, New Zealand, Mexico, Canada and the United States. We employ over 2,200 people worldwide.

Alexander Dennis' history and heritage of design, engineering and manufacturing excellence spans more than a century. As a pioneer in embracing the latest technology, Alexander Dennis has brought the widest range of zero emissions and clean diesel buses to market.

To find out more about the nature of our business, please visit [www.alexander-dennis.com](http://www.alexander-dennis.com)

## ALEXANDER DENNIS' LOCATIONS



**We're the world's largest manufacturer of double-deck and lightweight buses.**  
**We're leading the transition to zero-emission mobility.**  
**We're investing in our people and our communities.**  
**We're passionate about doing things right.**

## In numbers

**31,000**

Alexander Dennis buses and Plaxton coaches in service around the world

**2,000**

zero-emission buses sold to date

**10**

countries with Alexander Dennis facilities

**25,000**

passengers carried by Alexander Dennis buses every minute of each day

**2,100**

team members

**128**

years in business

## POLICIES IN RELATION TO SLAVERY & HUMAN TRAFFICKING

As part of Alexander Dennis' commitment to combating modern slavery, we have in place the following policies:

- Code of Business Conduct & Ethics
- Alexander Dennis' Human Rights Policy
- Business Partner Due Diligence Policy
- Supplier Code of Conduct
- Anti-Corruption
- Gifts & Hospitality
- Whistleblowing

These policies will be made available to all suppliers (where appropriate). All policies are reviewed annually by Alexander Dennis and NFI's Audit Risk Committee.

# SUPPLY CHAINS & IDENTIFICATION OF RISK

Alexander Dennis has global supply chains which consist of component suppliers, outsourced manufacturing and use of labour providers.

We have analysed our business operations and supply chains by country. This assessment includes the best publicly available information in relation to public sector corruption and the rule of law; labour rights; government efforts to combat human trafficking; gender inequality; the measures in place to eliminate child labour; education, health & standards of living, and access to banking. By continuing to analyse this information alongside financial data, Alexander Dennis has been able to prioritise its efforts for 2023. The UK, China, Turkey and Poland are our focus areas, however Alexander Dennis is working with a range of key suppliers in many different geographies as a result of its ongoing programme of slavery & trafficking risk analysis. (Please find below examples of our risk mapping for the UK, China, Poland and Turkey.)



## STEPS TAKEN TO PREVENT AND MANAGE RISK

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Alexander Dennis will continue to increase its focus on identifying the risks associated with modern slavery within our business operations and supply chains. We acknowledge the complexities involved and are committed to actively working and collaborating with a wide range of stakeholders, including employees, suppliers, law enforcement, anti-slavery partners and UN agencies and others, to uphold, support and promote human rights.

To evaluate the nature and extent of our exposure to the risk of modern slavery, during 2023 Alexander Dennis will continue to enhance our human rights due diligence processes and procedures overall. Our focus is to understand where risks may lie, and to take appropriate action to prevent and remediate. We will continue to focus upon suppliers in high-risk geographies where Alexander Dennis' spend is significant and where we can utilise any leverage as a result.

Where a potential risk is identified Alexander Dennis will ensure that it is fully investigated, a corrective action plan is implemented in collaboration with suppliers, and that monitoring is put in place to bring about viable and sustainable solutions which are proportionate but effective in dealing with issues of modern slavery and human trafficking.

Where Alexander Dennis has concerns that issues identified cannot be addressed through collaboration with and support from a supplier, the organisation will terminate all further business on the basis that the supplier has breached Alexander Dennis' code of conduct.

Alexander Dennis will continue to increase communications with suppliers regarding modern slavery and will encourage suppliers to establish their own risk assessment processes.

## HUMAN RIGHTS DUE DILIGENCE PROCESSES

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The Human Rights Working Group will review the organisations human rights due diligence processes and procedures. During 2023 we will review and enhance our human rights due diligence measures and controls.

We will continue to engage with suppliers in those particular geographies identified as high risk for Alexander Dennis in order to better understand any issues and to work with suppliers to bring about appropriate changes.

# RESPONSIBLE PROCUREMENT AND SUPPLY CHAIN DUE DILIGENCE

Alexander Dennis has continued to make significant strides in developing our understanding of potential risks within our operations and supply chains and the organisation is working towards a comprehensive programme of human rights due diligence.

Alexander Dennis chose to use the global open source 'Slavery & Trafficking Risk Template' which has been developed by the Social Responsibility Alliance and its global development committee - <https://www.socialresponsibilityalliance.org>

The Slavery & Trafficking Risk Template (STRT) is an extremely robust, open-source industry standard template used to assist companies in their efforts to comply with human trafficking and modern slavery legislation and improve their supply chain-related public disclosures. The STRT helps companies and their suppliers work together to build socially responsible supply chains by facilitating accurate data collection.

The STRT facilitates human trafficking and modern slavery related data collection and analysis, helping companies and their supply chains work together to engage in more ethical operations. The data collected gives companies visibility into their supply chain operations and prioritize due diligence and risk mitigation actions. The STRT is designed to meet the need for a universally-accepted template among global supply chains. The template was developed with support and input from a consortium of stakeholders involved in the STRT Development Committee.

2021 was the UN International Year for the Elimination of Child Labour. Newly published data from the ILO and UNICEF indicates an increase in child labour globally, the first rise for two decades. As a result, the Social Responsibility Alliance has further developing the STRT to ensure that it specifically allows companies to understand whether and where they may have a risk of child labour in their supply chains. Alexander Dennis has incorporated this tool within its due diligence and supplier engagement programme.

Alexander Dennis' own operations continue to be assessed through programme of Independent Modern Slavery Threat Assessments.

## EFFECTIVENESS AND OBJECTIVES

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Alexander Dennis will focus upon the following key areas for the financial year starting 1 January 2023 and ending 31 December 2023, to further drive activity and demonstrate its commitment to preventing modern slavery and human trafficking.

- Engage with the Global Battery Alliance regarding the electric vehicle battery supply chain.
- Engage with the Global Battery Alliance working group focusing upon the supply chain for critical minerals.
- Engage in cross sectoral human rights working group activity.
- Undertake supply chain mapping, in partnership with our suppliers, for cobalt.
- Review and enhance our procurement processes to better reflect human rights due diligence processes.
- Ensure that 100% of our personnel have access to modern slavery training.

## TRAINING AND CAPACITY BUILDING

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Alexander Dennis will continue to invest in educating our personnel to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through induction programmes, team members are made aware of internal policies and are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Alexander Dennis has a specific modern slavery online training programme available to all employees.

We also provide specific 'spot and report' the signs of modern slavery for UK on-site personnel. In addition, we undertake specific bespoke training for supply chain and procurement team members.



# CLOSING STATEMENT

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This statement, which is approved by Alexander Dennis' board, reaffirms the organisation's absolute commitment to implement the Modern Slavery Act. We recognise the severe and long term impact of the global pandemic upon many already vulnerable individuals across the globe, and therefore the importance of the work of the private sector in understanding where risks lie and working to eradicate modern slavery. We commit to upholding our Human Rights Policy and working diligently in all respects to support and uphold the United Nations Guiding Principles on Business & Human Rights.

Alexander Dennis recognises the extremely complex nature of modern slavery and human trafficking 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 1 January 2023 and ending 31 December 2023.

