HUMAN RIGHTS POLICY

Alexander Dennis Limited and its affiliates **('Alexander Dennis', 'we', 'our' or 'us'**) are committed to respecting the human rights and dignity of individuals within our operations, supply chain, and communities in which we do business, and to promoting and protecting the human rights of our team and communities. We strive to do this by meeting the expectations outlined by our parent company, NFI Group in our Human Rights Statement, Code of Business Conduct and Ethics, and Supplier Code of Conduct.

We endeavour to respect human rights in all our activities and are guided by internationally recognised principles, including these set out in widely accepted human rights frameworks and charters, including:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Organisation for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises
- International Bill of Human Rights; The United Nations Universal Declaration of Human Rights (UDHR)
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

These commitments are subject to and in accordance with rights and obligations under applicable laws.

SCOPE

This policy applies to all Alexander Dennis team members. "Team members" includes employees, temporary and agency workers, contractors, interns, volunteers, and apprentices. We expect that anyone representing us or partnering with us in any part of the business, including in our supply chain, follows the same standard of business conduct.

Alexander Dennis is a UK-headquartered bus manufacturer and a recognised leader in a broad range of bus mobility solutions. Alexander Dennis manufactures double-deck and lightweight buses for markets across the UK, Europe, North America and Asia Pacific regions.

POLICY

Alexander Dennis is committed to conducting our business in ways that, at a minimum, meet fundamental obligations in areas of human rights, labour, environment, anti-corruption, and ethical business practices. The following principles, standards, and qualities describe the expected behaviour from all our team members and agents and the behaviours we expect from all our suppliers and their respective employees:

- Safety: The health and well-being of our team members and the safety of our products are our top priorities.
- Quality: We strive for excellence in our products, services, and all that we do.
- Integrity: We act with honesty, transparency, and integrity, treating each other with respect in a diverse, equitable, and inclusive workplace.
- Accountability: We take responsibility for our actions, seeking to build trust and earn a reputation for excellence and reliability.
- Teamwork: We work with our team members, our supplier partners, and our customers to pursue mutual benefits.
- Sustainability: We seek long-term success for our business, our communities, and the environment through responsible sourcing, lean manufacturing, and sustainable operations.

This policy reflects our company's standards on human rights. Alexander Dennis prohibits any actions that disregard international labour and human rights standards or violate applicable laws and regulations.

UPHOLDING DIGNITY, RESPECT AND PRIVACY

We foster a workplace and business environment where a diverse workforce is valued, and every team member is treated with dignity and respect. We recognise and respect differences in background, culture, identity,

experience, and perspective, and believe these differences strengthen our organization and the communities in which we operate. We do not tolerate discrimination, harassment, or abuse of any kind in connection with employment, whether physical, verbal, sexual, or psychological. Such conduct is prohibited on the basis of race, colour, religion, national origin, sex, age, disability, marital status, sexual orientation, gender identity or expression, or any other status protected by applicable law.

We respect the right to privacy and adopt practices to protect the personal information of our team members, customers, and other stakeholders, in accordance with applicable data protection and privacy laws.

MODERN SLAVERY AND ETHICAL RECRUITMENT

Alexander Dennis strictly prohibits all forms of modern slavery, human trafficking and forced or compulsory labour in our operations and supply chain. We expect our team members, suppliers, and business partners to uphold these standards and comply with all applicable laws and regulations. Our approach aligns with our NFI Group Supplier Code of Conduct, which requires thorough management of risk, due diligence, monitoring, and corrective action to ensure that all individuals are treated with dignity and protected from exploitation.

Recruitment must be conducted ethically, based on the needs of the business and the skills and potential of applicants. Team members shall never be required to pay recruitment fees to Alexander Dennis, its authorized agents, or recruiters to secure employment. The company bears all costs related to the recruitment and hiring of personnel. We require all hiring managers, third-party recruitment partners and suppliers to strictly adhere to this standard. The Company reviews recruitment compliance within its own operations and can trigger a formal remediation process, including reimbursement to the affected individual, if it is discovered or raised that a worker has paid any recruitment fees or costs.

All recruitment processes must be fair, transparent, and free from exploitation including not retaining workers' original personal identification and travel documents, nor restricting their freedom of movement. Workers must be able to leave their employer after reasonable notice (the period of which must be agreed upon engagement) and must receive all owed salary and provide terms of employment in writing to workers with accurate and understandable information regarding their work, compensation, working hours and benefits.

CHILD LABOUR

Alexander Dennis strictly prohibits child labour. No individual may be hired if they are under: (I) the legal minimum working age in the country of employment, (ii) the age for completing compulsory education; or (iii) 15 years old; whichever age is highest. Alexander Dennis and its suppliers may hire young workers (those under 18 years of age) in roles such as apprenticeships or vocational training programmes that support their development and access to decent work. Such employment must not interfere with the individual's education, health, safety, or wellbeing. Where young workers are employed in environments involving potential hazards (e.g. chemicals, noise, dust, machinery), Alexander Dennis and its suppliers must ensure that: risks are properly assessed and controlled, appropriate personal protective equipment (PPE) is provided and used, enhanced supervision and training are in place, and all activities comply with applicable health and safety laws for young workers.

RENUMERATION AND WORKING HOURS

We respect the right of all team members to fair remuneration and reasonable working hours. We ensure pay practices and working time arrangements comply with applicable laws and regulations and support the health, safety, and wellbeing of our workforce. Wages are paid regularly and transparently, and working hours, rest periods, and leave are managed in a manner that respects legal requirements and human rights standards.

HEALTH AND SAFETY

We promote a safe, clean, and healthy working environment in accordance with applicable laws and our Environmental, Health and Safety Policy. We take reasonable steps to prevent workplace hazards and work-related injuries through appropriate safeguards, training, and the provision of necessary protective measures and PPE. We respect workers' health, wellbeing, and safety by providing access to appropriate sanitation, welfare facilities, safe drinking water and hygienic facilities for storage and consumption of food consistent with legal requirements and recognized health and safety standards. This includes providing reasonable allowance for breaks for toilet, rest, lactating mothers and prayer.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of all team members to freedom of association and collective bargaining, in line with applicable laws and internationally recognised human rights standards, including the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Team members are free to form, join, or not join a trade union and to bargain collectively where represented by a legally recognised union. We are committed to establishing constructive dialogue with team members' freely chosen representatives. We do not tolerate interference, pressure, or retaliation against any individual for exercising these rights and expect the same standards to be upheld across our operations.

COMMUNITY AND LAND RIGHTS

We respect the rights of local communities and Indigenous peoples and seek to avoid contributing to adverse impacts linked to land acquisition, resettlement, and the use of natural resources in our value chain. Where relevant to our operations or supply chain, we expect appropriate engagement with affected communities and respect for legitimate land tenure and customary rights, including the process of Free, Prior and Informed Consent (FPIC) for Indigenous peoples, in line with applicable law and internationally recognised standards.

ENVIRONMENTAL RIGHTS

We recognise that a clean, healthy, and sustainable environment supports the protection and fulfilment of human rights. We seek to prevent, mitigate, and remediate adverse environmental impacts associated with our operations. In addition, we expect our suppliers and business partners to operate in compliance with applicable environmental laws and to manage environmental risks associated with their operations. We also seek to protect the health and safety of workers by identifying and managing foreseeable environmental risks that may affect working conditions, health, safety, or wellbeing.

CRITICAL AND CONFLICT MINERALS

We seek to avoid contributing to adverse human rights impacts associated with the extraction, trade, handling, and use of minerals in our supply chain, including minerals that may finance armed groups or involve forced labour, child labour, or other human rights violations. We expect appropriate due diligence and transparency from suppliers, including cooperation with reasonable information requests, supply chain mapping where feasible, and corrective action processes where risks are identified. Where relevant, we align our approach with applicable legal requirements and recognised due diligence frameworks for responsible minerals sourcing. Our commitments and expectations are outlined in our Conflict and Critical Minerals Policy.

IMPLEMENTATION AND REPORTING

We are dedicated to promoting human rights, complying with all relevant laws and regulations, and conducting business with integrity. These principles are reflected in our business values, and with Code of Business Conduct and Ethics. Every team member receives training on this Code upon joining the organisation and completes a review of the policy biennially. We provide standardised training for team members involved in purchasing and sourcing decisions on forced and child labour risks, conflict and critical minerals in the supply chain, applicable legal obligations, and supplier requirements under our Supplier Code of Conduct and Supply Chain Due Diligence Policy. This training aims to support responsible sourcing and ethical business practices.

Alexander Dennis' responsibility for managing modern slavery risks sits with its Commercial and Legal Director, who also leads the human rights working group. Alexander Dennis communicates its supply chain management procedures and due diligence processes in our Supply Chain Due Diligence Policy.

We have developed a Human Rights Remediation Response Protocol to provide appropriate remedy where we identify that we have caused or contributed to adverse human rights impacts through our activities. We operate in a spirit of continuous improvement and are committed to strengthening our ability to identify, assess, and respond to human rights concerns. We provide human rights training and awareness activities for employees and monitor and report on our human rights commitments and related efforts.

HOW TO REPORT CONCERNS

We encourage open communication and provide secure, confidential channels for reporting concerns. All reports are taken seriously, investigated promptly, and addressed appropriately. We do not tolerate retaliation or reprisal against any workers, suppliers, or others for having reported contraventions of the implementation of our human rights approach, this is outlined in our Whistleblower policy.

Anyone can report concerns via phone or online using the following information:

The Reporter may make a Report or Financial Allegations Report, on a confidential (and, if desired, anonymous) basis, by phone or online using an independent third-party reporting service provided by NAVEX Global (the "Ethics and Compliance Hotline"):

Website: www.nfigroup.ethicspoint.com
United Kingdom: 0800 820 3388
North America: 1-800-601-2161
Mexico: 8008801423
Hong Kong: 800-93-3389
Germany: 0800 180 8458
Ireland: 1800849195
Singapore: 800 492 3106
New Zealand: 0800 436 396

CHANGES TO THIS POLICY

This policy was published on 22 September 2026 and last updated on 22 September 2026. Alexander Dennis will periodically review this Policy and update it as necessary to ensure its continued relevance, effectiveness, and alignment with applicable legal requirements and evolving best practices. Any updates will be posted on our website.

APPROVALS

Signed on behalf of Alexander Dennis Limited

Paul Davies
President & Managing Director
Alexander Dennis

22 September 2026