

# Modern Slavery & Anti-Trafficking Statement

For financial year ending 31<sup>st</sup> December 2024



## Introduction

This is Alexander Dennis' Modern Slavery Statement (the "Statement"), in accordance with the UK Modern Slavery Act 2015. This Statement covers the structure, operations, and supply chain of the Alexander Dennis ("AD") business and the steps we have taken to identify, cease, prevent, mitigate, and remedy human rights and modern slavery risks including forced labour and child labour for the period ending on 31 December 2024.

During 2024, Alexander Dennis, working alongside its parent company NFI Group ("NFI"), has made efforts to prevent and reduce the risk of modern slavery and this statement provides details on the steps we have taken.

Alexander Dennis is committed to respecting the human rights and dignity of individuals within our operations, supply chain, and communities in which we do business. We align our approach with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises to identify, cease, prevent, mitigate and remediate human rights risk and impacts. Alexander Dennis acknowledges that the global nature of our supply chain poses potential heightened risks of modern slavery. We are committed to risk-based due diligence and taking proactive actions to reduce risk, and if identified, remove or otherwise address labour exploitation in any form in our own operations and supply chains.

This statement has been approved by the Senior Leadership Team of Alexander Dennis and NFI Group.

Signed by



**Paul Davies**  
President & Managing Director  
Alexander Dennis

30 June 2025

## Organisation and Locations

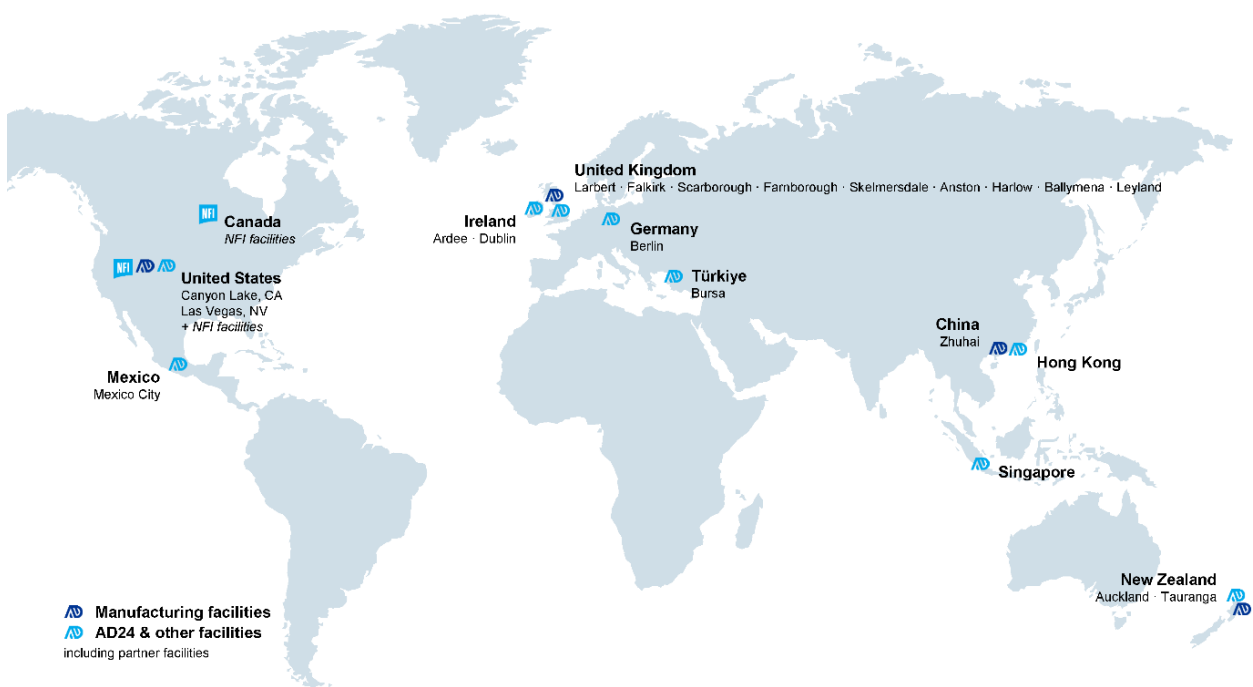
Alexander Dennis is a recognised leader in propulsion-agnostic bus mobility solutions.

Alexander Dennis manufactures double-deck and lightweight buses for markets across the UK, Europe, North America and the Asia Pacific region. In addition to battery-electric, Alexander Dennis offers low-emission buses that use advanced load management to deliver competitive total cost of ownership for customers.

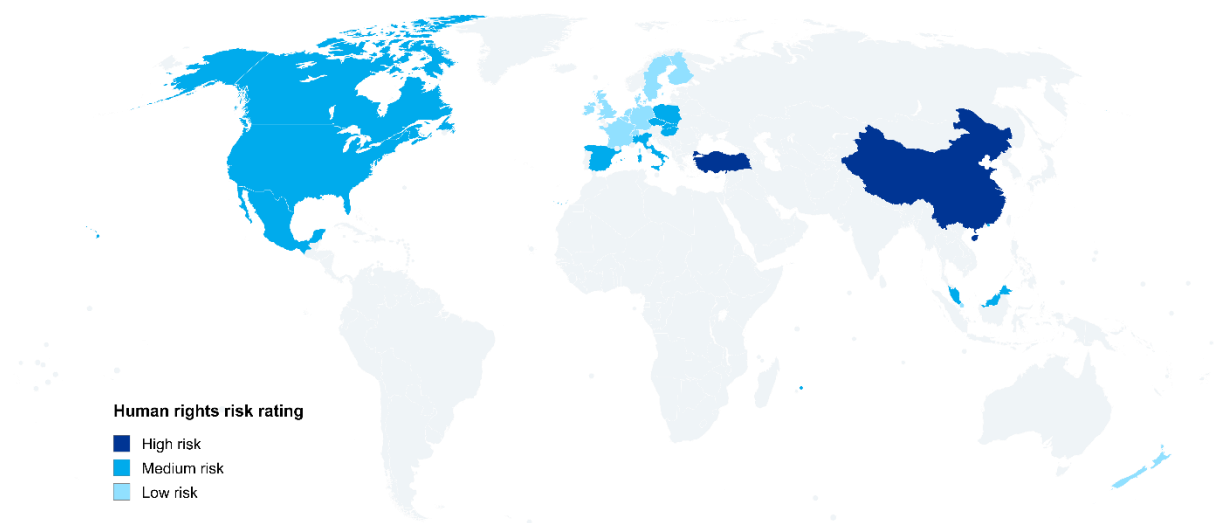
Alexander Dennis products are backed up by comprehensive AD24 aftermarket support including parts, field service, workshops, technical publications, training and the AD Connect telematics suite.

Alexander Dennis builds on 130 years of heritage and today has team members at 16 facilities in nine countries as well as partner locations.

Further information is available at [www.alexander-dennis.com](http://www.alexander-dennis.com) and [www.nfigroup.com](http://www.nfigroup.com).



## Supply Chain



Our supply chain is tiered, with 1996 active tier 1 suppliers across Manufacturing and Aftermarket, in the following regions:

UK & Europe	1,736
North America	133
Asia-Pacific	76
SEEMA (South East Europe)	51

## Policies and Governance

### Policies and Commitments

As part of Alexander Dennis' commitment to taking steps to reduce the risk of modern slavery in our supply chain, we have in place the following policies, commitments and documents to communicate our expectations to our employees and suppliers.

#### [Human Rights Statement](#)

NFI's Human Rights Statement outlines our commitment and approach on human rights, including modern slavery. Our Human Rights Statement, informed by international principles such as the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, outlines expectations respecting the human rights and dignity of individuals within our operations, supply chain, and the communities in which we do business.

#### [Code of Business Conduct and Ethics](#)

We use NFI Group's Code of Business Conduct and Ethics which prescribes the minimum moral and ethical standards of conduct required of all employees, consultants and agents.

This code is the foundation for subsequent policies and procedures associated with responsible sourcing. The NFI Group Code of Business Conduct and Ethics mandates that all activities are conducted with the highest standards of fairness, honesty, and integrity.

### [Supplier Code of Conduct](#)

We use NFI Group's Supplier Code of Conduct which includes sections on Human Rights, Forced Labour, and Child Labour. The Supplier Code of Conduct is communicated to our suppliers with the requirement that they sign the document, agreeing to conduct their business within the requirements of the Code.

### [Conflict and Critical Minerals Policy](#)

NFI Group and Alexander Dennis have identified high-voltage batteries and other electrical components used in our zero emission vehicles as a potential heightened risk of Forced Labour and/or Child Labour. This policy aims to identify and address the risks in the mining and production of these minerals. In signing our Supplier Code of Conduct, suppliers also agree to act in accordance with NFI's Conflict and Critical Minerals Policy.

### [Supply Chain Due Diligence Policy](#)

NFI Group's Supply Chain Due Diligence Policy which applies to all Alexander Dennis suppliers. It outlines our supply chain management procedures and due diligence processes.

### [Whistleblower Policy](#)

NFI Group's Whistleblower Policy, which applies to Alexander Dennis, establishes the process for reporting internally any breaches or suspected breaches of the law, the Code of Business Conduct and Ethics, and/or corporate policies and procedures by employees. The requirements of this Policy are extended to our suppliers through the Supplier Code of Conduct.

All policies are reviewed annually.

## **Governance**

Alexander Dennis' day to day responsibility for managing modern slavery risks sits with Alexander Dennis' Legal, ESG and Compliance Director who leads the human rights working group.

Alexander Dennis' human rights working group meets on a monthly basis to monitor the progress against our human rights action plan, discuss supply chain due diligence and ensure the continuous improvement of our efforts.

The human rights working group and colleagues from Alexander Dennis' sustainability and procurement teams liaise with the Alexander Dennis Executive Team as well as NFI's sourcing and sustainability teams to share insights and work together on key projects.

## Risk assessment and due diligence processes

During 2024, Alexander Dennis worked with NFI Group to develop a comprehensive Supply Chain Due Diligence Policy, Supplier Assessment Questionnaire (SAQ) and risk assessment tool to help us identify and assess suppliers on human rights and sustainable sourcing risks, including the risk of modern slavery, forced labour and child labour. The Supply Chain Due Diligence Policy outlines our expectations for suppliers regarding human rights, labour standards, and environmental stewardship, with a focus on conflict and critical minerals. By implementing these measures, we aim to enhance transparency, mitigate risks, and promote responsible business practices across our supply chain.

The risk tool, developed by an independent consultant, uses publicly available and reputable indices to assess country-level risks, along with in-depth research to evaluate the sourcing of various components, including those containing conflict and critical minerals across different geographies.

The SAQ serves as a structured template to assess suppliers on geographical and component risks as well as for those who supply critical and conflict minerals. The SAQ also assesses the policies and processes a supplier has in place to identify, prevent, mitigate and remediate human rights violations, and is aligned with the OECD Guidelines for Multinational Enterprises. We embedded the open-source templates from the Responsible Minerals Initiative (RMI) to help collect information from our suppliers including mapping suppliers of critical and conflict minerals. The templates include the Additional Mineral Reporting Template (AMRT), formerly known as the Extended Minerals Reporting Template (EMRT), as well as the Conflict Minerals Reporting Template (CMRT). Once our suppliers fill in the questionnaire and supply relevant documentation to verify their responses, our human rights and sustainability team members assess the supplier's responses, provide a risk assessment and score, and then in collaboration with the supplier, develop an action plan to improve practices.

During 2025, we will continue to roll out the SAQ and develop action plans with our suppliers to support our efforts towards continuous improvement.

In accordance with the Supply Chain Due Diligence Policy, we follow the steps outlined below to conduct due diligence and assess the risk associated with our suppliers:

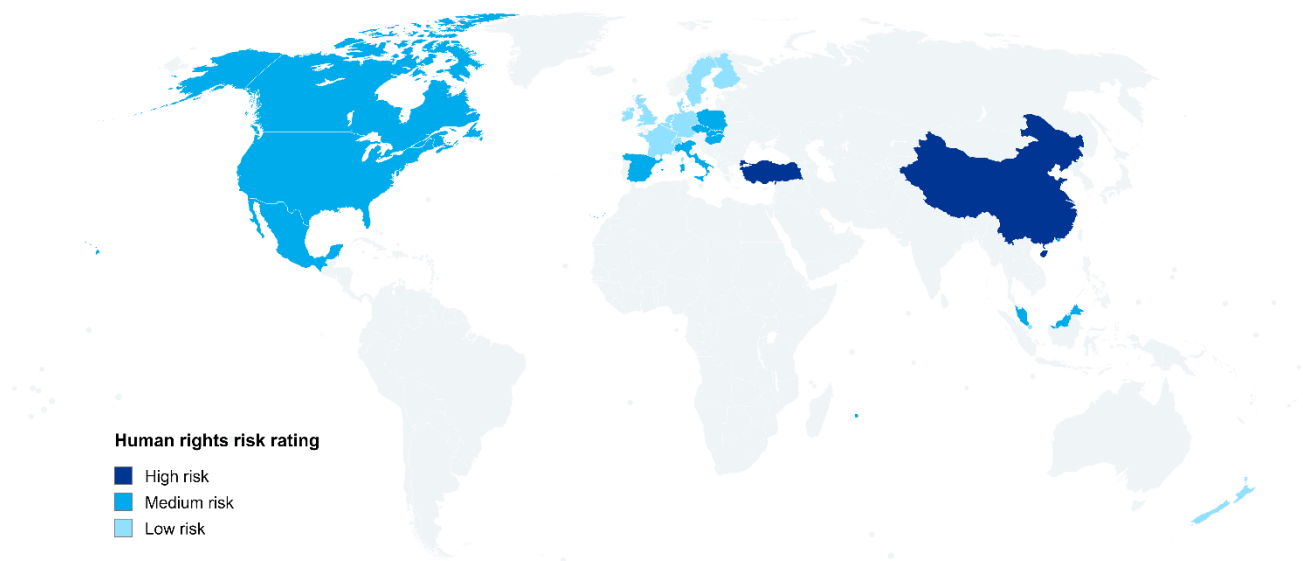
- a. **Identify Risks:** The SAQ and inherent risk assessment are completed to identify any associated risks. This assessment identifies whether the supplier deals with critical or conflict minerals or operates in high-risk countries. The assessment determines the supplier's risk level as high, medium, or low.
- b. **Take Action:** If the supplier is deemed high-risk, our human rights team will issue additional due diligence questionnaires which address the use of critical and conflict minerals, ask for more information on the list of smelters used within their supply chain, and which of their suppliers have operations in high-risk countries. The completed questionnaires will then be reviewed by our human rights team.
- c. **Mitigate Risk:** The team will conduct further checks based on external resources and public data and may request additional information from the supplier to ensure thorough risk assessment.
- d. **Remediation Process:** The team is responsible for creating an action plan to address any risks found during the assessment of a supplier. This plan will outline the

necessary actions and improvements the supplier must implement to avoid potential suspension by Alexander Dennis.

- e. **Assess Again for High-Risk Suppliers:** The team will ensure the supplier provides regular updates on progress against the action plan. Warning notices may be issued for insufficient progress, potentially leading to termination of the relationship. The diligence steps are repeated based on the supplier's risk level – annually for high-risk, every two years for medium-risk, and every three years for low-risk suppliers.

## Actions taken to prevent and mitigate modern slavery, forced labour and child labour

In 2024, Alexander Dennis, supported by an independent consultant, conducted risk assessments of 626 suppliers for environmental and social risks, including modern slavery, based on their country of operation and the nature of their business activities (i.e., supplier category). We will embed this tool into our ongoing due diligence processes during 2025.



We have identified China and Turkey as key high-risk countries. Suppliers of batteries, electrical components, and metal fabrication were considered the highest risk categories, due to the frequent presence of critical and conflict minerals in the supply chains for batteries and electrical components.

During 2025, we will be implementing our new supply chain due diligence tool and programme to ensure we work with our suppliers to undertake appropriate due diligence to prevent and mitigate human rights violations, including the risk of modern slavery.

## Supply chain mapping

In 2024, we completed a Battery Supply Chain Mapping and Risk Identification Program with one of our battery suppliers, tracing battery components through each tier of the supply chain down to raw materials and critical mineral sources, with the aim of identifying potential human rights and environmental risks. This programme focused on three main work packages:

- **Supply chain mapping:** understanding the full extent of the supply chain tracing products from source to end-product, and analysing commodity flows to understand actual or potential sourcing pathways.
- **Risk Identification/Assessment:** evaluation of social, environmental, and human rights risks along the entire supply chain (sourcing, processing, transportation and manufacturing).
- **Risk Comparison and Risk Prioritisation:** undertaking a risk normalisation exercise to assess performance against indicators material to the battery supply chain in each geography, with the aim of identifying the top ten risks.

## Remediation

NFI Group and Alexander Dennis provide access to remedy via our ethics and compliance hotline. Our [Whistleblower Policy](#) outlines the process and provides guidance to employees, and they are encouraged to use the toll-free lines to report any concerns or report via website here: [EthicsPoint - NFI Group, Inc.](#)

Any reporter who wishes to remain anonymous may create a password and will receive an identification number to identify their Report or Financial Allegations Report (the “Report Key”). The Report Key and password permits the Reporter to track the status of the Report or Financial Allegations Report and to submit further details, if required, on a confidential basis.

Our policy also states that any person reporting a concern submitted in good faith will be protected from retaliation or harassment of any kind.

## Training

Alexander Dennis and NFI Group provide training related to regulatory and legal requirements, internal policies and codes, and requirements of employees in support of responsible sourcing.

In 2024, an internally developed training program was introduced, becoming a mandatory requirement for all employees involved in purchasing or sourcing decisions and being successfully delivered to over 250 NFI team members, including key Alexander Dennis functions such as procurement and supply chain. The training program is comprised of three separate modules and encompasses an in-depth exploration of forced and child labour, how critical and conflict minerals are used within our supply chain, NFI’s obligations under various legislations, such as the Canadian Forced Labour Act in Supply Chains and the UK Modern Slavery Act, and the obligations which exist under the NFI Code of Conduct and Supply Chain

Due Diligence policies. The first of these training modules was released in late 2024, the remaining two to be released in early 2025. Each module takes roughly 30-40 minutes to complete and concludes with a multiple-choice assessment designed to evaluate and validate the trainees' comprehension of the key concepts. 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 policies. 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 training for UK on-site personnel. In addition, we undertake specific bespoke training for supply chain and procurement team members.

## Measuring effectiveness

During 2024, an independent consultancy supported Alexander Dennis to undertake a human rights gap assessment to assess and measure the effectiveness of our existing human rights programme and support the development of our new action plan for 2025.

The gap assessment framework reviewed Alexander Dennis against the OECD Guidelines for Multi-national Enterprises, UN Guiding Principles on Business and Human Rights (UNGPs) and the UK Modern Slavery Act. The aim of this assessment was to identify key areas of improvement and opportunities for Alexander Dennis to better identify, address, prevent, and mitigate human rights risks.

Key actions we will be implementing in 2025, as identified by the gap assessment, are:

- Supporting our highest risk suppliers with development of action plans for continuous improvement.
- Developing supplier guidance on providing effective remedy.
- Continuing our due diligence efforts in high-risk supply chains such as our battery supply chain.