

Introduction

This statement is made pursuant to the Modern Slavery Act 2015. It sets out the steps taken by National Express Group PLC and its relevant subsidiaries (together, the "Group") during their financial year ended 31 December 2021 to ensure, to the extent possible, that no modern slavery or human trafficking takes place in any part of their businesses or supply chains.

Our business

The National Express Group is a leading public transport provider, with bus, coach and rail services in the UK, Continental Europe, North Africa, North America and the Middle East.

The Group is organised into a number of divisions: UK Coach & Bus (providing coach and bus services in the UK); North America Bus (providing student transportation, transit services and shuttle services in 34 US states and 3 Canadian provinces); ALSA (providing coach and bus services in Spain, Morocco, Switzerland and Puerto Rico); German Rail; and International (the Bahrain bus operation which the Group operates jointly with Ahmed Mansoor Al A'Ali through a joint venture).

The Group's revenue for the year ended 31 December 2021 was £2.17bn and its normalised operating profit for the same period was £87m. During 2021, 792 million passenger journeys were made on the Group's services and, as of 31 December 2021, the Group employed close to 51,000 people, the majority of whom are drivers.

For more information about the Group's businesses, please visit our website at <http://www.nationalexpressgroup.com/about-us/>.

The Modern Slavery Act is relevant to all commercial organisations in any sector that supplies goods or services, and which carry on a business or subsidiary in the UK. It is the Group's policy to conduct its business in an ethical manner and with integrity. Accordingly, the Group has a zero-tolerance approach to slavery and human trafficking and is committed to taking steps to enforce such approach, as detailed in this statement.

Our supply chains

The Group procures goods and services from suppliers around the world, which total several thousand in number and operate from multiple countries. Our vendors supply everything from vehicles, fuel and utilities to uniforms, catering, cleaning, contract and agency employees and security. The Group aims to ensure that its suppliers meet high standards with respect to both the conduct of their business and their management of social and ethical issues. To this end, the Group has in place Ethical Sourcing Standards which we expect our suppliers to comply with. We include in our supplier contracts the right to audit such compliance and take other remedial action against suppliers should we find non-compliance.

Our policies

As reported in our first Modern Slavery statement, the Group has adopted a Modern Slavery Policy. The Group also has a number of other policies in place which support ethical behaviour and assist in deterring and detecting unethical behaviour, including modern slavery, as explained below.

The Group has in place a Workplace Rights Policy and a Human Rights Policy. The Group also has in place a Whistleblowing Policy and operates a confidential whistleblowing hotline in each division.

There were no reports made to the whistle-blowing hotline regarding any suspected instances of modern slavery during 2021. Had there been any such reports, they would have been investigated fully and acted upon as necessary.

The Group is very proud to have been the first private transport group to commit to becoming a voluntary Living Wage employer. UK Bus secured Living Wage Foundation accreditation in January 2016, followed by UK Coach obtaining the same accreditation in October 2018. For any other country in which the Group operates, the Group has committed to pay at least 10% above the national minimum wage in that country. The Group is also committed to providing a workplace that values diversity, champions inclusion and respects the rights of all employees. These are examples of the Group's commitment to conducting its business in an ethical manner and with integrity.

Steps taken by the Group

In 2021, the Group focused on ensuring its Modern Slavery governance and controls across its supply chain were robust and adhered to. This included the following: specialised training for procurement and other relevant employees; continuing category assessment and supplier audits; and updating supplier contracts with additional ethical clauses.

The Group's procurement employees across all divisions annually undertake the Ethical Procurement and Supply course provided by the Chartered Institute of Procurement & Supply. The Group also conducted a review of training non-procurement employees across each division. All new employees receive training, and the frequency of refresher training for other employees is currently under review.

Additional communication and awareness initiatives were launched in the year to further raise awareness of, and provide opportunities to learn more about, Modern Slavery.

The divisions continue to work within the Group's Modern Slavery four-step process: Assess, Analyse, Action and Audit. All new suppliers are subject to the assessment stage and, if they fall within a high-risk category, the analysis and action stages must be completed before a purchase order is placed.

During the year, the divisions conducted a refresh questionnaire programme with existing suppliers in high-risk categories. The supplier questionnaires gathered

information and evidence in relation to the mitigation of the risk of Modern Slavery within the Group's supply chains through: policies, procedures, staff training, whistleblowing hotlines, sub-contractor due diligence, supply agreements, auditing and any external memberships such as the ETI and SEDEX.

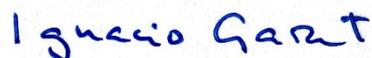
The Group governed its progress through quarterly steering group meetings consisting of representatives from each of the Group's divisions as well as from the Group's procurement, compliance, HR and legal teams. The steering committee will continue to engage in 2022 to ensure each division is focused on robust supply chain risk assessment utilising questionnaires, supporting audits across high-risk supply categories and to further enhance and expand our Modern Slavery training.

Approval of this Statement

The Audit Committee of the Board of Directors of National Express Group PLC has concluded that the Group's policies, together with the steps taken and expected to continue to be taken by the Group, provide reasonable assurance that the Group is acting in a way which reduces the risk of slavery and human trafficking in both its own business and in its supply chains.

This statement has been approved by the Board of Directors of National Express Group PLC. This statement has also been approved by the Boards of Directors of relevant UK subsidiaries of National Express Group PLC to which it also relates, being National Express Limited and West Midlands Travel Limited.

For and on behalf of National Express Group PLC and each of its relevant subsidiaries



Ignacio Garat
Group Chief Executive officer
11 May 2022