

## Modern Slavery and Human trafficking statement 2022

This statement applies to RATP Dev UK Limited, RATP Dev Transit London Limited, London United Busways Limited and London Sovereign Limited (the “**Companies**” or the “**Group**”). Each of the Companies has endorsed, approved and adopted this statement.

This statement relates to actions and activities of the Group during the financial year ended 31 December 2021 (the “**Period**”). During the period we have continued to take steps to promote and improve our commitment to eliminating abuse and exploitation in the organisation and its workplace as described below.

### Organisational structure

RATP Dev Transit London Limited, London United Busways Limited and London Sovereign Limited operate and maintain operates and maintains bus services under the trade name **RATP Dev Transit London since 11 December 2021**. RATP Dev UK Limited is a holding company. It is a subsidiary of RATP Développement SA, a French company. The Group’s business is organised into multiple subsidiaries.

During the Period, the Group’s head office was based in Garrick House, Stamford Brook, 74 Chiswick High Road, London W4 1SY and the Companies had 10 operational garages and approximately 3,700 employees.

The Group as a whole had a turnover in excess of £36 million during the relevant period. The Group also applied the principle of set out in our 2021 Modern Slavery Statement on a voluntary basis to subsidiaries of the Group which operate in the UK and whose turnover is less than £36 million.

On 11 December 2021, RATP Dev UK Limited entered into a joint-venture with Tower Transit Limited through RATP Dev Transit London Limited (JVco), a newly incorporated company. RATP Dev UK Limited holds 87.5% and Tower Transit Limited holds 12.5% of JVco. On 11 December 2021, JVCo acquired certain assets and business of Tower Transit Operations Limited, a subsidiary of Tower Transit Limited by way of a transfer of shares in London Transit Limited. On 11 December 2021, JVCo also acquired the entire issued share capital of London United Busways Limited and London Sovereign Limited.

The Group operates a devolved management structure. However procurement is one of the support functions which is, primarily, provided centrally, affording the Group significant control over the supply chain of its subsidiaries.

The Modern Slavery and Human trafficking statement relating to the business of London Transit Ltd for the Period is available on the website of Tower Transit Limited. <https://www.towertransit.co.uk/modern-slavery-policy>.

All the steps recorded in this statement were taken by the Companies.

### Commitment

Each of the Companies is committed to preventing slavery and human trafficking in its activities and recognises that it has a responsibility to ensure that its supply chains are free from slavery and human trafficking.

Each of the Companies understands that its compliance with the Modern Slavery Act 2015 (the Act), requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Our aims are:

1. that a substantial number of our key suppliers adopt our standards wherever possible, and we work collaboratively with them, clearly setting out our zero-tolerance approach.
2. that we continue our supplier due diligence process on new suppliers, or orders with existing suppliers and regularly review existing suppliers' processes using the questionnaire currently available on the website under Supplier Information.

## Our Supply Chain

Our supply chain is mostly used to source suppliers and consultancy services for various areas of work and materials related to the maintenance of bus operations. It includes manufacturing, primarily of bus vehicles, parts, uniforms, services (such as cleaning of stations, vehicles and depots) and some outsourced services. As procurement is a centralised function, the Group implements the due diligence and contractual processes referred to below to give effect to our anti-slavery and trafficking policy.

The Group does not knowingly enter into business with any other organisation, in the United Kingdom or abroad, which supports slavery, servitude and forced or compulsory labour.

The Group undertakes a due diligence on its suppliers before onboarding them as new or existing suppliers on recurring purchase orders and regularly reviews its existing suppliers. This may include (but is not limited to):

- Using a high-level risk assessment to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on these areas.
- Where appropriate, engage with our suppliers both to convey to them the content of this statement and to gain an understanding of and / or review the measures taken by them to ensure where possible modern slavery and human trafficking is not occurring in their businesses.
- Where appropriate, ensure a pre-screening of suppliers (for example as part of the tender process), organising spot checks on their compliance policies generally and reviewing supplier contracts to include termination powers in the event the supplier is, or is suspected to be, involved in modern slavery.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK. Screening of our UK HR Agencies is carried out when the agencies are onboarded.

We have assessed the functions which are susceptible to modern slavery and trafficking as follows: all third party manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning / security, agency workers.

Part of our commitment to prevent modern slavery and human trafficking from occurring within our business or our supply chain, is to take steps to make sure that we include contractual terms with suppliers which reference their obligations to abide with our anti-slavery and trafficking policy or their own equivalent. This provides us with a way to enforce requirements or cease doing businesses with organisations who are non-compliant.

## Reporting Modern Slavery and Human Trafficking control

The Group's Whistleblowing Guide or other relevant procedures, is intended to provide guidance on how concerns can be communicated to the Group. Concerns about suspected modern slavery and human trafficking associated with the Group or our suppliers may be reported in this manner. The procedures are designed to make it easy for workers to make disclosures, without fear of retaliation.

## Our effectiveness in combating modern slavery and human trafficking

The organisation uses certain key performance indicators (KPIs) to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our business or supply chains:

- Review of the existing supply chain based on risk levels
- Carrying out verification of first tier of our supply chain (where appropriate)
- Regular communication with the supply chain and our HR managers to gauge their understanding of, and compliance with, this statement.
- Regular review of our processes.

## Training, Communication and Awareness of this statement

Our approach to modern slavery and human trafficking is communicated to relevant stakeholders from our website. At induction, we also provide members of staff and agency workers with our policy statement.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide general and specific training to relevant members of staff.

During the period, we carried out an awareness campaign to all our management employees on how to spot a slavery or trafficking issue, understanding different types of slavery and trafficking and how to report a concern.

For the next financial year, RATP Dev Transit London intends to provide additional training to staff and continue running awareness campaigns for its suppliers, employees and agency workers.

## Review of this statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 31 December 2021. This statement will be reviewed on a regular basis (at least annually) and may be amended from time to time. This statement will be made available on the Group's website at [www.ratpdevtransitlondon.com](http://www.ratpdevtransitlondon.com).

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**RATP DEV TRANSIT LONDON**