

Keolis (UK) Limited

Keolis (UK) Limited Modern slavery statement for the financial year ending 31 December 2024

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Keolis (UK) Limited's slavery and human trafficking statement for the financial year ending 31 December 2024. It sets out the steps that Keolis (UK) Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Keolis (UK) Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

During the financial year ending 31 December 2024, the principal activities of Keolis (UK) Limited were those of a holding company. These are inclusive of but not limited to: managing the designated regional investments of its parent company Keolis S.A. which in the UK includes railway, light rail and tram systems in London, Nottingham and Manchester; providing support services to subsidiary undertakings and group undertakings; and responding to invitations to tender issued by public transport authorities to operate public transport networks, notably heavy and light railway systems in the United Kingdom and Republic of Ireland. This statement relates to the activities of Keolis (UK) Limited only.

Our supply chains

Our supply chains include the provision of goods and services that are required in the ordinary course of business (such as IT, employee payroll and PR) as well as in connection with our bids for new franchises or concessions to operate new franchises. Keolis (UK) Limited expects the highest standards from all of its suppliers and has put in place various measures to reduce the risk of slavery or human trafficking taking place in its supply chains or in any part of its business.

Our policies

Keolis (UK) Limited operates a number of internal policies to ensure that it is conducting business in an ethical and transparent manner. These include:

1. **Modern Slavery Policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Whistleblowing Policy.** We operate a whistleblowing policy, including the ability to make anonymous online disclosures, so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **Guide for Ethical Business Conduct.** This Keolis Group guide provides a framework for the principles that underpin the actions of Group employees (including those of Keolis (UK) Limited). This guide calls upon all Group employees to adhere to and promote professional ethics in conducting business.
4. **Anti-Corruption and Influence Peddling Code of Conduct.** The Keolis Group code of conduct covers the expectations of employees in relation to anti-bribery and corruption and provides guidance on managing potentially at-risk situations.

Contracting with Third Parties

As part of its approach to risk management and organisational responses to modern slavery, Keolis (UK) Limited conducts due diligence checks on third parties prior to entering into contractual relationships. Regardless of whether Keolis (UK) Limited has previously contracted with a particular third party, a due diligence check will be conducted when entering into a new contract to ensure that the information Keolis (UK) Limited has on the

company is up to date. The due diligence procedure includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery. In addition, Keolis (UK) Limited uses contractual provisions to confirm its commercial counterparties' adherence to the Modern Slavery Act 2015 and to Keolis (UK) Limited's Modern Slavery Policy. Keolis (UK) Limited only allows subcontracting (if applicable) with companies which confirm their adherence to equivalent obligations.

Keolis (UK) Limited retains its own Compliance Officer responsible for third-party due diligence procedures for suppliers and business partners.

Training, Communications and Awareness of Modern Slavery

All Employees are required to read the Modern Slavery Policy and to follow Keolis (UK) Limited's requirements.

Keolis (UK) Limited will provide interactive training to all relevant stakeholders, including its employees and management, to enhance awareness and understanding of modern slavery risks. This training is further supported by tailored one-to-one coaching sessions available from Keolis (UK) Limited's Compliance Officer.

Financing Procedures

Keolis (UK) Limited has in place effective internal financial controls. These include controls to: (i) ensure that payments are directed to third parties in respect of which due diligence checks have been conducted; (ii) prevent payments being made to third parties other than those with whom Keolis (UK) Limited has a contractual relationship; and (iii) ensure employee salaries are paid accurately and promptly.

Monitoring and Evaluation

The Compliance Officer maintains oversight of modern slavery-related matters throughout the year, including monitoring relevant developments and practices across the organisation. An annual review of Keolis (UK) Limited's Modern Slavery Policy and this statutory statement is undertaken to ensure they remain appropriate and reflect current expectations. As part of this process, consideration may be given to internal performance indicators and feedback from relevant stakeholders to help inform future enhancements to the company's approach.

Approval for this statement

This statement was approved by the Board of Directors on 23 June 2025.



Chief Executive Officer
Keolis (UK) Limited
Date: 23 June 2025