

# Braddell Limited

Policy Statement January 2021

# Slavery and Human Trafficking

A member of  
**COMFORTDELGRO**



We are committed to improving our practices to combat slavery and human trafficking.

## ORGANISATION'S STRUCTURE

We are a passenger transport company. We are a part of the ComfortDelGro Group ("Group"), and our ultimate parent company is the ComfortDelGro Corporation which has its head office in Singapore. The Group has over 23,500 employees worldwide and operates in seven countries. The Group has a global annual turnover of S\$3.228 billion in a year marked by COVID-19, border closures and economic lockdowns.

## OUR BUSINESS

This statement covers all of the activities of Braddell Limited. Metroline Limited is the most substantial part of our business operating and is responsible for almost 20% of the London bus market through our subsidiaries, Metroline Travel Limited and Metroline West Limited. Our parent company itself is responsible for operating a bus refurbishment centre. Braddell also has an interest in operating express coach services in the Republic of Ireland through a wholly owned subsidiary, ComfortDelGro Irish Citylink, a joint venture with Stagecoach in Scotland, Scottish Citylink and a bus and coach operation in South Wales, New Adventure Travel Limited.

## PROCUREMENT AND SUPPLY CHAINS

Our UK business has in excess of 1,000 suppliers who provide a range of products and services including capital equipment, professional services, facilities, maintenance repair & operating and support services totalling nearly £200 million per year in spend. Whilst all the Tier 1 suppliers are based in the UK there are a handful whose operations and Tier 2 supply chains are also performed outside the UK.

Our procurement activities include a Pre-Qualification Questionnaire (PQQ) which includes a mandatory question regarding the Modern Slavery Act 2015. Any suppliers who declare that they do not comply with the legislation will be excluded or disqualified from the procurement process. Additionally, when procuring goods and services, we apply Terms and Conditions which requires suppliers to comply with legislation.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Procurement Policy, Supplier Code of Conduct and Whistleblowing Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective 'systems and controls to ensure slavery and human

trafficking is not taking place anywhere in our supply chains.

The Procurement Policy, has been built around and adopts elements of the of Ethical Trade Initiative (ETI) Base Code as a means of evaluating suppliers and contractors who may be considered high risk in terms of modern day slavery and selected sections of the Ten principles of the United Nations Global Compact.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have established an industry based risk matrix, developed an assessment tool, mapped our first tier supply chain, identified those suppliers who accounted for 90% of our total spend along with those identified as operating in High Risk Industries. This exercise will be carried out annually to identify changes in our top suppliers.

We believe the areas of the supply chain most at risk are: products produced in countries listed on the Global Slavery Index, Labour Cycle (recruitment) and low skilled labour roles (cleaning, security) and clothing manufacturing (uniforms and workwear)

This process identified a number of suppliers who have been or will be over the next 12 months assessed against the Procurement Policy criteria to ensure that these principles are upheld.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a Compliance team, which consists of from the following departments who will be responsible for developing and

implementing policies, assessments and remediation with non-conforming suppliers.

The compliance team will be led by the Head of Purchasing & Contracts and Human Resources.

### **TRAINING**

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 training to our staff with key procurement personnel undertaking an independent and certified (Chartered Institute of Purchasing) yearly assessment on Ethical Procurement.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of Supplier Assessments completed
- Number of Assessment Non Compliance Notices issued
- Number of Ethical Procurement certificates obtained in the year

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to extend the scope of the assessment to those suppliers outside the top 90% and those who are in the second tier of our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2020.

Sean O'Shea



**DIRECTOR**

**Date:** March 2021