



# Arriva Limited Modern Slavery and Human Trafficking Statement

## Introduction

The Modern Slavery Act 2015 (the “**Act**”) came into effect on 29th October 2015. This statement is made pursuant to section 54(1) of the Act and constitutes Arriva’s slavery and human trafficking statement for the financial year ending 31 December 2024. This is Arriva’s eighth annual statement.

As an ethical company, we respect every individual’s human rights. Arriva is committed to the prevention of slavery and human trafficking in all its forms and will not condone it within any part of its business or supply chains. Arriva expects the same high standards from our business partners.

## Organisation and Structure

Arriva is a leading provider of passenger transport in Europe, employing around 35,000 people and, in 2024, delivering around 1.6 billion passenger journeys across 10 European countries. In 2024 Arriva were part of Deutsche Bahn (DB) and in May 2024 Arriva were acquired by I Squared Capital.

With buses, trains, coaches, trams, water buses, car- and bike-sharing systems, and on-demand transport solutions, Arriva offers a wide range of transport services. The activities of Arriva are divided into four lines of business: UK Bus, UK Trains, The Netherlands and Mainland Europe.

The Act and its subsequent reporting requirements are UK legislation, and require any business registered in the UK, which fulfils the Act’s criteria to publish an annual statement detailing the steps it has taken to reduce the risk of modern slavery and human trafficking in its supply chains. The Arriva statement applies to all UK subsidiaries of Arriva International Holdings Limited including the entities below:

Arriva Limited; Arriva Treasury Company Limited; Arriva London North Limited; Arriva London South Limited; Arriva Yorkshire Limited; Arriva Merseyside Limited; Arriva Kent Thameside Limited; The Chiltern Railway Company Limited; XC Trains Limited; Arriva Rail London Limited; and London and North Western Railway Company Limited

## Supply Chains

Arriva’s supply chains comprise goods and services for the provision of passenger transport operations. Procurement activities take place in the UK and suppliers to our UK Businesses are predominantly UK-based. The spend for the year ended 31 December 2024 in Arriva’s UK Bus and UK Trains operating divisions and Group Head Office functions amounted to £1.14 billion across more than 3,300 suppliers.

Our major areas of supplier spend are the procurement of buses (including from UK and Chinese suppliers), bus and train maintenance and spare parts, fuel, facilities management, indirect goods and services, information and communications technology (ICT), professional services, and utilities. A risk assessment has been conducted based on the spend in 2024, and no significant modern slavery risks have been identified.

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Arriva's Group Human Right, Modern Slavery and Human Trafficking Policy reflects its continuing commitment to respect the human rights of those who work on our behalf. Arriva's Whistleblowing Policy ensures that both employees, suppliers and the public can raise concerns about malpractice or wrongdoing, including in respect of slavery and human trafficking.

Arriva's Code of Conduct for Business Partners forms part of Arriva's commitment to ethical, social, economic, and environmental performance. We have reviewed our Code of Conduct for Business Partners and consider that it remains fit for purpose in the context of Arriva's exposure to modern slavery risks.

Our Standards of Business Conduct, which has been distributed to all Arriva employees in various formats and translated into local languages promote our values including our position in respect of human rights including forced labour and modern slavery.

## Due Diligence and Risk Management

Due diligence in assessing modern slavery or human rights risk in operations or supply chains is not a legal requirement of the Act, but it is good business practice and as an ethical company, Arriva is committed to improving its procedures in a manner that is proportionate to the identified risk.

Following the introduction of a new Group Procurement Policy and supplier due diligence process in 2020, the processes and practices around the management of suppliers are now well established and supported by regular refresher training across the procurement teams.

In 2024 Arriva renewed its partnership with Slave Free Alliance and worked with its parent charity Hope for Justice. The relationship provides Arriva access to a range of services and supports our maturity in the area of Modern Slavery, these include:

- Consultancy and advice
- Educational resources
- Skilled investigators
- Crisis response

Slave Free Alliance worked with Arriva in 2024 on an updated health check which measured maturity and approach to modern slavery risk management. The outcome of the health check forms the basis of Arriva's approach to improving maturity in the area of modern slavery.

Key areas of focus for 2024 were:

- Completing more in-depth supplier reviews, building on the factory visits and deeper level of due diligence completed by the supplier base.
  - Providing training for procurement colleagues on modern slavery, risk management and improving our escalation process.
  - Providing bespoke training for Arriva's leaders, on early sign spotting for modern slavery activities by third parties on public transport.
  - Using a third-party database for ongoing screening of suppliers. This means we are alerted in real-time to any new risks related to 'special interest categories' which includes human rights, modern slavery and human trafficking.
  - Working collaboratively across sector to support the sharing of information on supplier practice.
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## Effectiveness

Our standard contracts impose obligations on our supplier to comply with all applicable anti-slavery and human trafficking laws, including the 2015; and to have and maintain policies and procedures to ensure continuing compliance; and to not engage in any activity, practice or conduct that would constitute an offence under the Act if such activity, practice or conduct were carried out in the UK. These obligations have not been amended since Arriva's first statement.

We ensure that all agencies we partner with for recruitment purposes agree to our Standards of Business Conduct, which requires adherence to our Human Right, Modern Slavery and Human Trafficking Policy, or demonstration of an equal or stronger policy position to that of Arriva.

## Training

- In 2024, and continuing into 2025, procurement colleagues received training on the new supplier due diligence process, and the risk-based approach to assessing new suppliers.
- Modern slavery also continues to be covered in Arriva's Standards of Business Conduct training. In 2024 an annual refresher module was completed by ~6,000 colleagues.

## Board Sign-Off

Arriva remains dedicated to strengthening its practices to continuously reduce its exposure to modern slavery and human trafficking risks. This statement has been endorsed and signed off by the Board of Arriva International Holdings Limited.



David Martin  
**Interim Chief Executive**

25 June 2025

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