

Modern Slavery & Anti-Trafficking Statement

For financial year ending 31st December 2025



Introduction

This is Alexander Dennis' Modern Slavery Statement (the "Statement"), in accordance with the UK Modern Slavery Act 2015. This Statement covers the structure, operations, and supply chain of Alexander Dennis Limited ("Alexander Dennis" or "AD") and the steps we have taken to identify, cease, prevent, mitigate, and remedy human rights and modern slavery risks including forced labour and child labour for the period ending on 31 December 2025.

During 2025, Alexander Dennis, working alongside its parent company NFI Group Inc. ("NFI"), has made efforts to prevent and reduce the risk of modern slavery and this statement provides details on the steps we have taken.

Alexander Dennis is committed to respecting the human rights and dignity of individuals within our operations, supply chain, and communities in which we do business. We align our approach with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises to identify, cease, prevent, mitigate and remediate human rights risk and impacts. Alexander Dennis acknowledges that the global nature of our supply chain poses potential heightened risks of modern slavery. We are committed to risk-based due diligence and taking proactive actions to reduce risk, and if identified, remove or otherwise address labour exploitation in any form in our own operations and supply chains.

This statement has been approved by the Senior Leadership Team of Alexander Dennis and NFI Group.

Signed by



Paul Davies
President & Managing Director
Alexander Dennis

24th June 2026

Our business and supply chain

Organisational structure

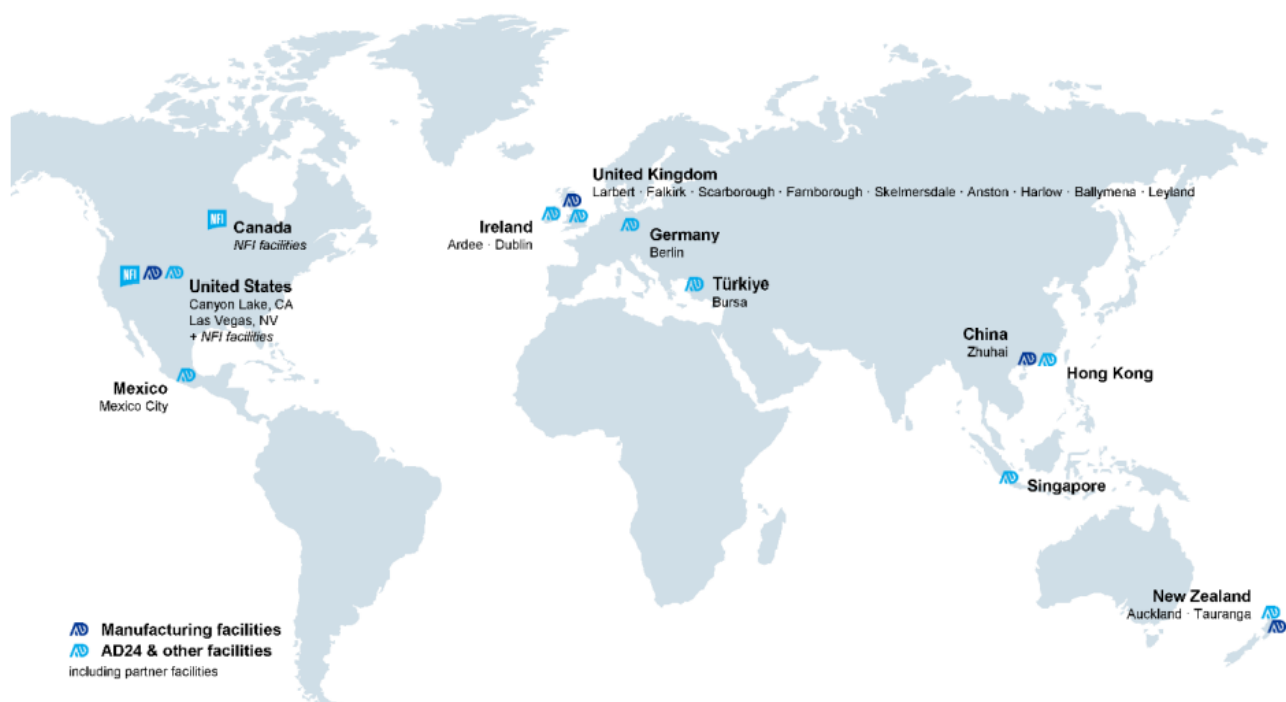
Alexander Dennis is a recognised leader in propulsion-agnostic bus mobility solutions.

Alexander Dennis manufactures double-deck and lightweight buses for markets across the UK, Europe, North America and the Asia Pacific region. In addition to battery-electric, Alexander Dennis offers low-emission buses that use advanced load management to deliver competitive total cost of ownership for customers.

Alexander Dennis products are backed by its comprehensive AD24 aftermarket support including parts, field service, workshops, technical publications, training and the AD Connect telematics suite.

Alexander Dennis builds on 130 years of heritage and today has over 1,810 team members at 16 facilities in nine countries as well as partner locations, as shown in the map below. All companies operating under Alexander Dennis can be found in Appendix 1.

Further information is available at www.alexander-dennis.com and www.nfigroup.com.



Supply chain

Our supply chain is tiered, with 2,119 active tier 1 suppliers in the following regions:

Region	Number of suppliers	Spend portion
UK & Europe	1,626	83%
North & South America	235	8%
Asia-Pacific	255	9%

Our tier 1 suppliers (direct suppliers with whom we contract) include:

- Battery suppliers
- Manufacturing and component suppliers
- Aftermarket suppliers
- Non-production suppliers (e.g., facilities management, professional services, logistics and other indirect procurement)

Policies and governance

Governance

Alexander Dennis' responsibility for managing modern slavery risks sits with its Commercial and Legal Director, who also leads the human rights working group.

Alexander Dennis' human rights working group meets on a monthly basis to monitor the progress against our human rights action plan, discuss supply chain due diligence and monitor the continuous improvement of our efforts. The human rights working group and colleagues from Alexander Dennis' sustainability and procurement teams liaise with the Alexander Dennis Executive Team as well as NFI's Sourcing and Sustainability teams to share insights and work together on key projects.

Policies and commitments

As part of Alexander Dennis' commitment to taking steps to reduce the risk of modern slavery in our supply chain, we have in place the following policies, commitments and documents to communicate our expectations to our employees and suppliers. All policies are reviewed annually.

Policy	Description and relevance to modern slavery	Communication
Human Rights Statement	NFI's Human Rights Statement outlines our commitment and approach on human rights, including modern slavery. Our Human Rights Statement, informed by international principles such as the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, outlines expectations respecting the human rights and dignity of individuals within our operations, supply chain, and the communities in which we do business.	We encourage employees to read our statement and report any abuses. It is also referenced in our Supplier Code of Conduct and shared with all suppliers.
Code of Business Conduct and Ethics	NFI Group's Code of Business Conduct and Ethics applies to Alexander Dennis and prescribes the minimum moral and ethical standards of conduct required of all employees, consultants and agents. This code is the foundation for subsequent policies and procedures associated with responsible sourcing. The NFI Group Code of Business Conduct and Ethics mandates that all activities are conducted with the highest standards of fairness, honesty, and integrity.	All employees are required to read the Code and this forms part of induction training. Team members also complete online training at required intervals and the content of which is reviewed every year and refreshed if required.
Supplier Code of Conduct	NFI Group's Supplier Code of Conduct applies to Alexander Dennis and includes sections on Human Rights, Forced Labour, and Child Labour.	The Supplier Code of Conduct is communicated to our suppliers with the requirement that they sign the document, agreeing to conduct their business within the requirements of the Code.
Conflict and Critical Minerals Policy	NFI Group and Alexander Dennis have identified high-voltage batteries and other electrical components used in our zero emission vehicles as a potential heightened risk of Forced Labour and/or Child Labour. This policy aims to identify and address the risks in the mining and production of these minerals.	In signing our Supplier Code of Conduct, suppliers also agree to act in accordance with NFI's Conflict and Critical Minerals Policy.

<u>Supply Chain Due Diligence Policy</u>	NFI Group's Supply Chain Due Diligence Policy applies to all Alexander Dennis suppliers. It outlines our supply chain management procedures and due diligence processes.	In signing our Supplier Code of Conduct, suppliers also agree to act in accordance with NFI's Supply Chain Due Diligence Policy.
<u>Whistleblower Policy</u>	NFI Group's Whistleblower Policy, applies to Alexander Dennis and establishes the process for reporting internally any breaches or suspected breaches of the law, the Code of Business Conduct and Ethics, and/or corporate policies and procedures by employees. The requirements of this Policy are extended to our suppliers through the Supplier Code of Conduct.	All employees are provided access to this policy and this forms part of induction training. Team members complete online training and the content of which is reviewed every year and refreshed if required.

Assessing and managing risks of modern slavery in our business and supply chain

Our Supply Chain Due Diligence Policy, Supplier Assessment Questionnaire (SAQ) and risk assessment tool help us identify and assess suppliers on human rights and sustainable sourcing risks, including the risk of modern slavery, forced labour and child labour. The Supply Chain Due Diligence Policy outlines our expectations for suppliers regarding human rights, labour standards, and environmental stewardship, with a focus on conflict and critical minerals. By implementing these measures, we aim to enhance transparency, mitigate risks, and promote responsible business practices across our supply chain.

The risk assessment tool uses publicly available and reputable indices to assess country-level risks, along with in-depth research to evaluate the sourcing of various components, including those containing conflict and critical minerals across different geographies.

The SAQ serves as a structured template to assess suppliers on geographical and component risks as well as for those who supply critical and conflict minerals. The SAQ also assesses the policies and processes a supplier has in place to identify, prevent, mitigate and remediate human rights violations, and is aligned with the OECD Guidelines for Multinational Enterprises. We embedded the open-source templates from the Responsible Minerals Initiative (RMI) to help collect information from our suppliers including mapping suppliers of critical and conflict minerals. The templates include the Additional Mineral Reporting Template (AMRT), formerly known as the Extended Minerals Reporting Template (EMRT), as well as the Conflict Minerals Reporting Template (CMRT). Once our selected suppliers fill in the questionnaire and supply relevant documentation to verify their responses, our human rights and sustainability team members assess the supplier's responses, provide a risk assessment and score, and then in collaboration with the supplier, develop an action plan to improve practices.

In accordance with the Supply Chain Due Diligence Policy, we follow the steps outlined below to conduct due diligence and assess the risk associated with our suppliers:

- a. **Identify Risks:** The SAQ and inherent risk assessment are completed to identify any associated risks. This assessment identifies whether the supplier deals with critical or conflict minerals or operates in high-risk countries. The assessment determines the supplier's risk level as high, medium, or low.
- b. **Take Action:** If the supplier is deemed high-risk, our human rights team will issue additional due diligence questionnaires which address the use of critical and conflict minerals, ask for more information on the list of smelters used within their supply chain, and which of their suppliers have operations in high-risk countries. The completed questionnaires will then be reviewed by our human rights team.
- c. **Mitigate Risk:** The team will conduct further checks based on external resources and public data and may request additional information from the supplier to ensure thorough risk assessment.
- d. **Remediation Process:** The team is responsible for creating an action plan to address any risks found during the assessment of a supplier. This plan will outline the necessary actions and improvements the supplier must implement to avoid potential suspension by Alexander Dennis.
- e. **Assess Again for High-Risk Suppliers:** The team will ensure the supplier provides regular updates on progress against the action plan. Warning notices may be issued for insufficient progress, potentially leading to termination of the relationship. The diligence steps are repeated based on the supplier's risk level – annually for high-risk, every two years for medium-risk, and every three years for low-risk suppliers.

Actions taken to understand, prevent, and mitigate modern slavery, forced labour and child labour

Assessing modern slavery risks in our supply chain

We have a multi-dimensional approach to assessing human rights and modern slavery risks in our supply chain. This is based on assessing inherent risks associated with the sectors and countries our suppliers operate in, and on an evaluation of a supplier's actual risk profile to assess how well they are managing the risks that they are exposed to.

As set out in our Supplier Code of Conduct, we reserve the right to suspend or terminate business relationships with suppliers that demonstrate a persistent disregard for the standards set out in our policy, or where there is a significant breach. Before terminating a relationship, we seek to consider the potential impact on workers and communities affected with the aim of disengagement being carried out in a responsible manner and reducing the likelihood of any increased risks to people.

Inherent risk assessment

Our inherent risk assessment allows for identification of our highest risk suppliers for human rights and modern slavery risks and the prioritisation of suppliers and supplier categories to support action. The risk assessment tool uses publicly available indices such as Global Slavery Index and UNICEF and ILO Child Labour Reports to identify a risk level for each country of operation. For category (supplier business activity), we use publicly available information, industry reports and NGO reports as well as the UNGP methodology to determine

a risk level associated with the suppliers' activities. Together these provide an overall inherent risk score of each supplier to support prioritisation and further action.

Risk is influenced by (i) the sector (manufacturing, electronics, metals, logistics), (ii) geography (including countries identified through our inherent risk assessment), (iii) depth of supply chain (tiers beyond Tier 1), and (iv) worker vulnerability (migrant labour, agency workers, low-paid workers, and workers in informal or unregulated settings).

China and Turkey continue to be identified as key high-risk countries based on external indices used in our inherent risk assessment as Figure 1 shows.

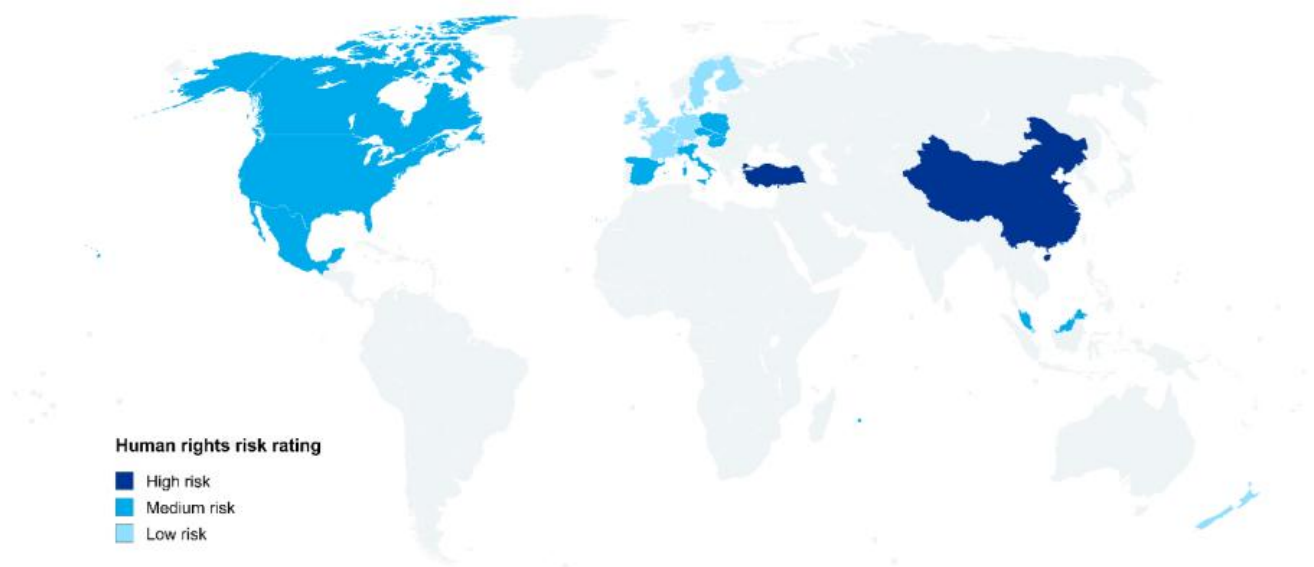


Figure 1: Inherent Country Risk based on risk assessment

Suppliers of batteries, electrical components, power electronics, wiring harnesses and related sub-components, as well as metal fabrication, are associated with heightened inherent modern slavery risk due to the complexity of these supply chains and the frequent use of critical and conflict minerals.

These risks are often concentrated beyond Tier 1, including at the level of smelters, refiners and raw material extraction, where visibility and leverage are more limited. Risk exposure may also increase where minerals are mined or processed, or where components are manufactured in higher-risk jurisdictions identified through external indices used in our inherent risk assessment process.

Based on the nature of these supply chains and publicly available research, workers may be more vulnerable in contexts where suppliers rely on migrant, agency or temporary labour, or where labour protections and access to grievance mechanisms are more limited.

These types of risks commonly associated with these supply chains can include forced labour and child labour, deceptive recruitment practices (such as recruitment fees, contract substitution, retention of identity documents), excessive overtime and wage-related issues.

We are aware that these risks do exist in complex battery supply chains and we are working with our suppliers and customers to continually improve our approach to identifying and address these risks.

The highest-priority modern slavery risks for Alexander Dennis arise primarily in upstream, multi-tier supply chains for manufactured components and raw materials. Through FY25, 497 production suppliers were assessed. These suppliers were prioritised based on their relevance to core manufacturing activities and alignment with our risk-based prioritization approach. We identified 32 suppliers as inherently high risk for modern slavery based on the country of operation and category of supply and determined 13 are considered to be priority suppliers for focus of further due diligence, including enhanced assessment and engagement by the Human Rights Working Group and Sustainability team.

Actual risk assessment

Using our Supplier Assessment Questionnaire and additional assessments, suppliers can share further documentation e.g. ISO certification, SEDEX SMETA audits and Responsible Minerals Initiative (RMI) certification. Using this documentation, we assess their ability to identify and manage risks, as well as obtain further information on key high-risk suppliers. We aim to work closely with our high-risk suppliers to address and help remediate any issues that are identified. In 2025, we assessed 13 high-risk suppliers identified in our inherent risk assessment. All 13 suppliers completed our SAQ and 100% had action plans provided to them which have been agreed in collaboration with the supplier. During 2025, we worked on our battery supply chain as a key focus area with high inherent risk.

Battery supply chain due diligence

During FY25, we have continued to strengthen our understanding of risks within our battery supply chain through collaboration with key Tier 1 suppliers and our stakeholder, Transport for London. This included mapping battery supply chains beyond Tier 1, with visibility extending, where possible, to Tier 3 and smelter and refinery levels. As part of this process, we have gathered and reviewed information on identified smelters and refiners, including assessing their alignment with responsible sourcing standards such as those of the Responsible Minerals Initiative (RMI), and reviewing available due diligence and audit reports. Through this collaboration, Transport for London is engaging Electronics Watch to support independent assessment of selected facilities. We recognise the complexity and evolving nature of battery supply chains and will continue to work collaboratively with suppliers, customers and partners to strengthen traceability and implement proportionate, risk-based due diligence measures.

Grievance mechanisms and providing access to remedy

NFI Group and Alexander Dennis provide access to remedy via our ethics and compliance hotline. Our [Whistleblower Policy](#) outlines the process and provides guidance to employees,

and they are encouraged to use the toll-free lines to report any concerns or report via website here: [EthicsPoint - NFI Group, Inc.](#)

Any reporter who wishes to remain anonymous may create a password and will receive an identification number to identify their Report or Financial Allegations Report (the “Report Key”). The Report Key and password permit the Reporter to track the status of the Report or Financial Allegations Report and to submit further details, if required, on a confidential basis.

Our policy also states that any person reporting a concern submitted in good faith will be protected from retaliation or harassment of any kind.

During 2024, as part of our continual improvement programme, we identified a gap in our own management system relating to guidance regarding remediation and as such developed an internal remediation process in 2025 to support our business and colleagues in the case of any potential issues arising. During 2026, we aim to provide training to relevant employees on this guidance.

In 2025, during our supply chain due diligence process, we identified that several of our suppliers did not have appropriate processes in place to provide remediation. To support their continuous improvement, we developed a Supplier Remediation Guidance Document and communicated this to all suppliers with the identified gap. We ask these suppliers to translate this into their own policy and process to embed within their own business operations. In 2026, we aim to review our supplier remediation efforts to confirm they have completed these actions and to identify if more support is required.

In 2025, we have had no reported or substantiated cases of modern slavery, forced labour and/or child labour.

Training

Alexander Dennis and NFI Group provide training related to regulatory and legal requirements, internal policies and codes, and requirements of employees in support of responsible sourcing.

In 2024, an internally developed training program was introduced, becoming a mandatory requirement for all employees involved in purchasing or sourcing decisions and being successfully delivered to over 250 NFI team members, including key Alexander Dennis functions such as procurement, sustainability and supply chain. This training continued to be available during 2025. The training program is comprised of three separate modules and encompasses an in-depth exploration of forced and child labour, how critical and conflict minerals are used within our supply chain, NFI’s obligations under various legislations, such as the Canadian Forced Labour Act in Supply Chains and the UK Modern Slavery Act, and the obligations which exist under the NFI Code of Conduct and Supply Chain Due Diligence policies.

The first of these training modules was released in late 2024, and two were released in 2025. Each module takes roughly 30-40 minutes to complete and concludes with a multiple-choice assessment designed to evaluate and validate the trainees’ comprehension of the key concepts. Alexander Dennis will continue to invest in educating our team members to

recognise the risks of modern slavery and human trafficking in our business and supply chains. Through induction programmes, team members are made aware of internal policies and are encouraged to identify and report any potential breaches of our policies. We recognise the importance of raising awareness about the risk of modern slavery and ensuring that people connected to our business know what actions they are expected to take. Alexander Dennis has a specific modern slavery online training programme available to all employees which we aim to review in 2026 and provide wider training and awareness support to all Alexander Dennis employees during 2026.

We also provide specific 'spot and report' the signs of modern slavery training for UK on-site team members. In addition, we provided specific bespoke training for supply chain and procurement team members, which was delivered in a virtual live session with the support of external expertise.

Measuring effectiveness

We are committed to continuous improvement. During 2025, Alexander Dennis continued to strengthen its human rights programme with support from external experts. We also developed a new action plan for 2026 following on from our work in 2025 and building on the human rights gap assessment completed in 2024.

We have started monitoring our performance to track and improve our ability to identify human rights and modern slavery risks using the following KPIs:

KPI	Performance FY25
Percentage of in-scope tier 1 suppliers assessed for inherent risk	100% of production suppliers
Percentage of inherently high-risk Tier 1 suppliers completing SAQ (actual risk assessment)	100% of production suppliers
Percentage of inherently high-risk Tier 1 suppliers with a current independent on-site assessment (or completed in FY25) ¹	61.54% of production suppliers
Percentage of suppliers with identified actual risks where a corrective action plan is agreed and tracked.	100% ²
Number of tier 3 suppliers (smelter and refineries with on-site assessment ³).	33 ⁴

¹ At present we accept ISO 45001 and SEDEX SMETA.

² 13 suppliers assessed all have agreed action plans in place during FY25.

³ We are currently using the Responsible Minerals Initiative (RMI) certification which are publicly available.

⁴ We have identified 46 smelters and refiners in our battery supply chain to date; however, we are still working with our suppliers to further improve upstream traceability, so we are reporting this as a number rather than a percentage at this stage.

Next steps

Looking ahead, we remain committed to continually strengthening our human rights due diligence and building on the progress we have made this year. Key actions we will be implementing in 2026, are:

- Continue supporting our highest risk suppliers with development of action plans for continuous improvement.
- Continue communicating the supplier guidance on providing effective remedy that we developed in 2025.
- Updating our training and improving our internal capacity to understand and identify human rights and modern slavery risks for Alexander Dennis employees.
- Continuing our due diligence efforts in high-risk supply chains such as our battery supply chain.

Appendix 1

Companies operating under Alexander Dennis are:

- Australia – Alexander Dennis (Australia) Pty Ltd.
- Canada – Alexander Dennis (Canada) Inc.
- Germany – Alexander Dennis Germany GmbH
- Hong Kong - Alexander Dennis (Asia Pacific) Limited
- Ireland – Alexander Dennis Limited (branch office)
- Malaysia - Alexander Dennis Malaysia Sdn Bhd
- Mexico - Alexander Dennis Mexico SA de CV
- Mexico - Servicios ADL Mexico, SA de CV
- New Zealand – Alexander Dennis (New Zealand) Limited
- Singapore – Alexander Dennis (Singapore) Services Pte Ltd
- USA – Alexander Dennis Inc.