



# 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 2025. This is Arriva’s seventh 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 2025, delivering around 1.6 billion passenger journeys across 10 European countries and rolling stock leasing services in 1 European country. Since May 2024 Arriva have been owned by I Squared Capital.

With buses, trains, coaches, trams, water buses, car- and bike-sharing systems, Arriva offers a wide range of transport services. In 2025 the activities of Arriva were 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 2025 in Arriva’s UK Bus and UK Trains operating divisions and Group Head Office functions amounted to £1.04 billion across ~ 2400 suppliers.

Our major areas of supplier spend are buses (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 2025, and no significant modern slavery risks have been identified.

Arriva's Group Human Rights, 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 to 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.

In line with the Group Procurement Policy and supplier due diligence process, the processes and practices around the management of suppliers are now well established and supported by periodic supplier visits and regular refresher training across the procurement teams.

In 2025 Arriva continued 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
- Policy and practice advice
- Educational resources
- Skilled investigators
- Crisis response

Slave Free Alliance worked with Arriva in 2025 on an updated escalation process to help colleagues and managers spot early signs of potential slavery and human trafficking behaviour, either in the supply chain or whilst using our services. This will be rolled out in 2026.

Key areas of focus for 2025 were:

- Continuing to complete in-depth supplier reviews, building on the factory visits and deeper level of due diligence completed by the supplier base.
- Providing training for 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.

## Effectiveness

Our standard contracts impose obligations on our suppliers to comply with all applicable anti-slavery and human trafficking laws, including the 2015 Act; 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 Rights, Modern Slavery and Human Trafficking Policy, or demonstration of an equal or stronger policy position to that of Arriva.

## Training

- In 2025, and continuing into 2026, 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 2025 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.

Gianfranco Sgro  
**Chief Executive**

March 2026