



Supplier Code of Conduct

May 2018

Introduction

This Supplier Code of Conduct sets out the standards our suppliers are expected to adopt in relation to managing working conditions and their environmental impacts. It is FirstGroup plc's policy to conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties as set out in our Code of Business Ethics.

We value the business relationships we have with you and have established our Supplier Code of Conduct in line with our beliefs and values. Our Supplier Code of Conduct also reflects our strategic imperative to embed sustainability into every decision we make.

We expect our suppliers to act in accordance with the highest ethical standards and to comply with all relevant laws, regulations and licences when working for First Travel Solutions. We believe that you are an important and central part of helping create a more socially and environmentally responsible supply chain.

The purpose of this document is to share our expectations and fundamental principles which should extend into your own supply chain principles. This means that we expect you to carry out your business in line with our values and aspirations.

Andrew Scholey

Managing Director



Our requirements for supplier business conduct are set out below

Labour Practices

Employment to be Freely Chosen

Forced, bonded or compulsory labour must not be used. Employees should be free to leave employment at any time after reasonable notice. Employees should not be required to lodge identity papers or other valuable items with their employer, on an indefinite basis.

Freedom of Association

In line with local laws employers must recognise the rights of employees to choose whether or not to be represented by a trade union and to organise and engage in union activities. Where workers' representation and collective bargaining are restricted by law, employers should facilitate open communication and direct engagement between workers and management to ensure that workers' rights, needs and views can be considered and acted upon.

Child Labour Avoidance

No person shall be employed who is under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the greatest. Young people under the age of 18 shall not be employed in hazardous conditions or work that could affect their personal development.

Working Hours

Working hours should not exceed the standards set in local law and should not be excessive. Workers should be allowed at least one day off per seven-day week.

Wages and Benefits

Employees' employment conditions should be clearly communicated to them. Employees should be fairly and reasonably paid in line with applicable wage laws relating to minimum wages, overtime hours and legally mandated benefits. Workers should be paid in a timely manner documented via pay slips or similar.

Labour Exploitation

Whilst it may be unlikely your company are directly employing trafficked people, contractors and sub-contractors (or the agencies supplying labour) could find themselves targeted by unscrupulous gang masters who may be offering a ready supply of labour at rates much lower than minimum wages.

Appropriate Risk assessment policies and procedures should be in place and be proportionate to the organisation's size, structure, location of activities and supply chain(s), and nature of business. The policies should Identify relevant information from both internal and external sources and be clearly defined and communicated to all employees.

Please note that suppliers and subcontractors to First Travel Solutions are required to notify us as soon as it becomes aware of any instance of Modern Slavery or Labour Exploitation taking place in supply chains or in any part of its business.

Non-Discrimination

There shall be no discrimination in hiring and employment practices such as promotions, rewards or access to training. Employees should not be discriminated against on the basis of race, caste, national origin, religion, age, gender, marital status, sexual orientation, union membership or political affiliation.

Humane Treatment

There shall be no harsh or inhumane treatment of workers such as verbal or physical abuse. Disciplinary procedures should be clearly defined and communicated to workers.

Modern Slavery

There shall be no Modern slavery of workers such as being treated as commodities and/or exploited for criminal gain. Policies should be clearly defined and communicated to all employees They should provide information about the first steps when modern slavery is identified and broadly how and with whom to contact.



Health and Safety

Occupational Safety

Workers should be provided with safe and hygienic working conditions. Appropriate steps shall be taken to prevent accidents and injury to health through control of hazards in the workplace. Where hazards cannot be controlled appropriate, well maintained personal protective equipment shall be provided. Workers shall receive regular, recorded health and safety training. Workers shall be encouraged to raise safety concerns with their employer.

Emergency Preparedness

Emergency and response procedures should be in place setting out clearly the action to be taken in the event of an emergency. Appropriate fire detection equipment, suppression equipment and adequate exit facilities and recovery plans should be in place.

Occupational Injury and Illness

Procedures should be in place for preventing, managing, tracking and reporting occupational injury and illness.

Housing

Where worker's accommodation is provided, it must be maintained in a clean and safe condition with appropriate facilities to meet the basic needs of the workers such as adequate water, heat and ventilation and reasonable personal space.

Environment

Environmental Permits and Reporting

Operations must maintain all the appropriate environmental permits and approval.

Environmental Management

Appropriate management, operational and process controls should be in place to minimise the release of harmful emissions to the environment. Operations should maintain and test appropriate spill response procedures.