Modern Slavery Act

Statement of Compliance

Wellglade Holdings Limited and the Wellglade Group

This statement is made on behalf of Wellglade Holdings Limited and the following companies within the Wellglade Group:

- Trent Motor Traction Company Limited, trading as trentbarton
- Barton Buses Limited, trading as trentbarton
- Wellglade Limited
- TM Travel Limited
- Kleanline Limited
- Nottinghamshire & Derbyshire Traction Company Limited
- Midland General Omnibus Company Limited
- Kinchbus Limited
- Little Transport Limited

Our Commitment

One of our fundamental beliefs is that everyone has the right to work in a safe, respectful and professional environment, free from exploitation, abuse and any form of modern slavery.

We recognise that this responsibility extends beyond our own employees and operations to the organisations and individuals within our supply chains. We are committed to taking appropriate and proportionate steps to prevent modern slavery, forced labour, human trafficking and exploitation from occurring within our business and supply chains.

The Wellglade Group has a zero-tolerance approach to modern slavery and human trafficking and will not knowingly support or do business with any organisation involved in such practices.

Organisational Structure and Operations

The Wellglade Group is a UK-based group of companies whose principal activities are the provision of passenger transport and associated services. Our operations are based in England and our businesses are supported by a workforce of employees and a range of suppliers and service providers.

Whilst our operations are predominantly based in England and we consider the direct risk of modern slavery within our own workforce to be low, we recognise that modern slavery risks can exist within supply chains regardless of where an organisation's operations are based.

Accordingly, we do not rely solely on our geographical location when assessing modern slavery risk. We continue to consider the nature of our operations, workforce, procurement activities and supplier relationships when identifying and managing potential risks.

Employment Practices

Our employees are one of the Group's most important resources. We are committed to ensuring that our employment practices comply with applicable UK legislation and Government guidance.

As part of our recruitment and employment processes:

- We undertake appropriate checks to confirm that employees have the legal right to work in the UK.
- We ensure that employees receive at least the applicable statutory National Minimum Wage or National Living Wage, as appropriate.
- We maintain appropriate employment policies and procedures designed to support fair, respectful and professional treatment of employees.
- We do not tolerate forced labour, bonded labour, servitude, human trafficking or any other form of exploitation.
- Employees are provided with appropriate channels through which concerns can be raised.

Worker Rights and Labour Standards

The Wellglade Group is committed to protecting the fundamental rights of all workers and to ensuring that employment is freely chosen and conducted without coercion, exploitation or discrimination.

In support of this commitment, the Group and its suppliers are expected to uphold the following principles:

- Freedom to terminate employment: Workers must be free to leave their employment in accordance with applicable contractual and legal requirements and must not be subjected to forced labour or unreasonable restrictions preventing them from leaving employment.
- Freedom of movement: Workers must be free to move freely and must not be subjected to restrictions on their movement as a means of controlling or coercing them.
- Freedom of association: Workers' lawful rights to freedom of association and representation will be respected, in accordance with applicable UK legislation.
- Violence, harassment and intimidation: Violence, threats of violence, harassment, bullying, intimidation and other abusive or degrading treatment are prohibited.
- Child labour: The Group prohibits the use of child labour and expects all suppliers and business partners to comply with applicable minimum age and child employment requirements.
- Discrimination: Discrimination in recruitment, employment or the workplace on the basis of protected or other legally recognised characteristics is prohibited. Workers must be treated fairly, with dignity and respect.
- Retention of identification documents: Workers must retain possession and control of their original identification documents and other personal documents. The Group prohibits the confiscation or inappropriate retention of workers' original passports, identity documents or other personal documentation as a means of restricting their freedom.

- Access to remedy: Where modern slavery, forced labour, human trafficking or other exploitation is identified or suspected, the Group will take appropriate action to protect affected individuals and investigate the circumstances. Where appropriate, we will seek to ensure that affected workers have access to appropriate remedy, support and relevant reporting or justice mechanisms, in accordance with applicable law.

These principles apply to the Group's own employment practices and form part of the standards we expect from organisations within our supply chain.

Supply Chain and Supplier Expectations

We recognise that modern slavery risks may arise within our wider supply chain, including through contractors, suppliers and other third parties.

We therefore expect our suppliers and business partners to operate in accordance with applicable legislation and to maintain appropriate standards relating to employment, human rights and the prevention of modern slavery.

Where appropriate, our procurement and supplier-management processes take account of modern slavery considerations. We expect suppliers to identify and manage risks within their own operations and supply chains and to cooperate with us where concerns are identified.

We will not knowingly engage with organisations that are involved in modern slavery or human trafficking. Where a concern is identified, we will consider appropriate action, which may include investigation, engagement with the supplier, the implementation of corrective measures and, where appropriate, termination of the business relationship.

Risk Assessment and Management

The Group recognises that modern slavery is an ongoing risk that requires continued monitoring rather than a one-off assessment.

Our current assessment is that the overall risk of modern slavery within the Group's direct operations is low. This assessment takes into consideration the nature and location of our operations, our employment practices and the controls we have in place.

We nevertheless recognise that risks may arise within particular sectors, services, labour arrangements or supply chains. We therefore continue to review our modern slavery risks and the effectiveness of our controls as part of our wider governance and supplier-management processes.

Policies and Procedures

The Group maintains policies and procedures which support our commitment to preventing modern slavery and protecting employees from exploitation.

These policies and procedures are reviewed periodically to ensure that they remain appropriate and continue to reflect applicable legislation and relevant UK Government guidance.

We recognise the importance of ensuring that relevant employees understand the risks associated with modern slavery and know how to raise concerns.

Reporting Concerns

Any concerns raised will be taken seriously and investigated appropriately. Where an incident or potential incident is identified, the Group will seek to respond appropriately, with consideration given to the protection and welfare of any potentially affected individuals.

Monitoring and Continuous Improvement

The Wellglade Group recognises that effective management of modern slavery risks requires ongoing monitoring and continuous improvement.

We will continue to:

- review our modern slavery risks and controls;
- consider modern slavery within relevant supplier and procurement processes;
- review our employment practices;
- maintain appropriate policies and procedures;
- raise awareness of modern slavery risks amongst relevant employees;
- monitor concerns or incidents that are brought to our attention;
- engage with suppliers where concerns or risks are identified; and
- review our approach against relevant UK legislation and Government guidance.

We will use the findings from these activities to identify areas where our approach can be strengthened.

Compliance with Government Guidance

The Wellglade Group is committed to complying with the Modern Slavery Act 2015 and to following relevant UK Government and Home Office guidance concerning the prevention of modern slavery and transparency in supply chains.

We recognise that compliance is an ongoing responsibility. We will continue to review developments in legislation, statutory guidance and recognised good practice and will update our policies, procedures and controls where necessary.

Our approach is intended to reflect the Government's recommended principles for identifying and managing modern slavery risks, including organisational policies, risk assessment, due diligence, appropriate action where risks are identified and monitoring the effectiveness of the measures we have in place.

Annual Review

The statement will be reviewed annually and updated as necessary to reflect changes in our business, supply chain, risk profile, legislation and relevant Government guidance.

Next review due, August 2027