

# Anti-bribery Policy – for external use

National Express Group PLC and its subsidiaries (together, the "Group")

Bribery is a criminal offence in all the countries in which the Group carries on business. Bribery also undermines the rule of law, distorts economies, exacerbates social inequality and harms reputations. For all these reasons, the Group prohibits those acting on its behalf from committing bribery in any of its forms and encourages those who have a reasonable suspicion that any other persons are committing bribery to report the same.

It is Group's policy to conduct all of its business in an honest and ethical manner. We are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

To help it deliver on this policy, the Group has established an anti-bribery programme that:

- Has top-level commitment;
- Is founded on, and makes employees and third parties aware of, a clear anti-bribery and corruption policy;
- Assesses the risk of bribery within existing operations and whenever the Group proposes to commence new operations;
- Provides training to all relevant employees who work in areas within any business identified as being particularly high risk so that they can recognise and avoid bribery;
- Encourages employees to be vigilant and to report any suspicion of bribery;
- Rigorously investigates instances of alleged bribery, which may include assisting the police and other appropriate authorities in any resultant prosecution; and
- Takes firm and vigorous action against any individual(s) involved in bribery.

## Dos

- Do declare and obtain permission for giving or receiving any gifts or hospitality in accordance with local gifts and hospitality policies
- Do comply with other anti-bribery procedures the Company has in place
- Do undertake any anti-bribery training you are invited to undertake
- Do look out for any red flags that may indicate improper behaviour
- Do report any knowledge or suspicion of bribery

## Don'ts

- Don't offer or accept cash, cash equivalents or anything of value in return for improper performance of any function
- Don't make facilitation payments to secure or speed up the performance of a function by a government official

## Speaking up – Helpline numbers

We do not believe that it is in anyone's interest for those who have a reasonable suspicion that others who are acting on the Group's behalf are committing bribery to remain silent, not least as those other persons may be causing the National Express Group itself to commit bribery and that could cause significant harm to the Group's business and its reputation and, in turn, prejudice the employment and opportunities of all those who work for the Group.

We therefore encourage anyone who has a reasonable suspicion that someone else who is acting on behalf of the Group is committing bribery to report this. You may call the Whistleblowing Helpline which is toll free and available 24 hours a day, seven days a week. The relevant telephone numbers are as follows:

- Calls from the **United Kingdom** – 0808-234-0137
- Calls from **Spain** – 900-901-427
- Calls from **North America** - 1-877-907-2683
- Calls from **Germany** – dial access code 0-800-225-5288 followed by 877-907-2683
- Calls from **Morocco** – dial access code 002-11-001 followed by 0801-020-304
- Calls from **Bahrain** – 800-81685
- Calls from **France** – 0033428770150
- Calls from **Switzerland** – 0041800321016