

# Whistleblowing Policy – for external use

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

Whistleblowing is telling someone in the organisation about something you reasonably believe is going on in the organisation that involves some form of wrongdoing and where you reasonably believe you are acting in the public interest by doing so.

It is the process via which you can report suspected or actual wrongdoings, in confidence and anonymously (if you wish), particularly when you feel unsafe or unable to report such behaviour to your manager or if you have done so before and no action has been taken.

## Why it is important for

It is National Express 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 unethical conduct.

A culture of openness and accountability is essential which is why we encourage employees, contractors, suppliers, customers, agents and any other third parties with whom we do business to raise any genuine concerns they may have about wrongdoing by, or within, the National Express Group.

We do not believe that it is in anyone's interest for people with a reasonable belief of wrongdoing to remain silent, not least as by raising their concerns they may assist in putting a stop to that wrongdoing and thereby help to protect the Group's business, people, assets, relationships and reputation.

We therefore encourage you to raise any genuine concerns you have about wrongdoings which affect the Group.

A non-exhaustive list of wrongdoings can be found below under "what concerns to raise", alongside an explanation of what matters should be dealt with in a different way and what you should not do.

## What concerns to raise

- Fraud
- Theft
- Bribery and Corruption
- Breaches of competition laws and rules
- Bullying, harassment or discrimination
- Inadequate non/financial recordkeeping/ malpractice
- Improper use of company resources
- Breach of confidentiality
- Breaches of our gifts, entertainment and hospitality policy
- Insider trading
- Conflicts of interest
- Abuse of authority
- Modern slavery, forced labour or human trafficking
- Environmental, health & safety and security issues
- Disclosure of confidential information

## What matters should be dealt with in a different way (e.g. via your line manager or with HR)

- Bringing grievances you may have in relation to your employment
- Settling personal disputes

## What you should not do

- Make accusations which you know to be false
- Make accusations to achieve an ulterior motive

## How to report – Helpline numbers to use

- 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

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## What happens after you have raised a concern

We will take all cases of genuine whistleblowing seriously.

If you raise a concern through the Whistleblowing Helpline, a report will be prepared and sent to the appropriate manager(s) who is/are not connected with the concern for review and careful consideration of what action should be taken.

Depending on the nature of your concern, this may lead to an internal inquiry or a more formal investigation, and/or referral to an appropriate external person, such as independent investigators or the police. Please be aware that inquiries and investigations can take time and their outcome will often depend on the evidence that is identified.

If we need further information from you, we will contact you directly if you have given your name and contact details or, if you have chosen to remain anonymous, we will ask you to provide this information through the Whistleblowing Helpline when you call the Helpline number back on the contact date given to you. We may ask you how you think your concern should best be dealt with. If you have a personal interest in the matter, we would ask that you tell us at the outset. Whilst we will try to give you as much feedback as possible, we may not be able to give you specific details as this could infringe upon the privacy of another individual or it could compromise an ongoing investigation. We cannot guarantee that we will respond to all concerns in the way that you might wish, but we will handle the matter fairly, proportionately and consistently.

Depending on the nature of your concern, closure of your concern can be expected, on average, within 1 to 3 months. When the investigation is lengthy, the investigator will provide regular updates.

## Our commitment to you for speaking up

### Confidentiality

- All concerns raised will be treated in confidence.
- Your identity will not be disclosed – whether you have chosen to use the anonymous service or not.
- To help us keep confidentiality, please do not discuss your concern with anyone else.

### Protection from retaliation

We will support people who raise any genuine concerns in accordance with this policy, even if they turn out to be mistaken. We do not support people who maliciously raise concerns (i.e. about matters which they know to be untrue) or which they raise for ulterior motives (i.e. motives other than acting in the public interest or the interests of National Express Group).

