

## Whistleblowing Policy

National Express Group PLC and its group companies (together, the “Group”) are committed to the highest standards of honesty, integrity, openness and accountability. This is why we encourage whistleblowing in appropriate circumstances.

**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. Wrongdoing may include:**

- actions which endanger the health or safety of any of our passengers, members of the public or members of our workforce;
- actions which cause unlawful damage or danger to the environment;
- criminal offences, including fraud, bribery and slavery;
- failure to comply with legal obligations;
- harassment or victimisation;
- financial or asset mismanagement;
- breach of our internal policies or procedures;
- unauthorised disclosure or use of confidential information or personal data;
- actions likely to damage our reputation; and
- actions which are intended to conceal any of the above.

National Express does 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 people, assets, relationships and reputation. We therefore encourage you to raise any concerns you have about wrongdoing within the Group with your line manager or, alternatively, with your local HR representative. Alternatively, if you do not feel able or comfortable to do so, you can report your concerns to a more senior manager, a member of the Legal team by calling the Whistleblowing Helpline. This Helpline is run by an independent third party provider who specialises in this kind of service and who mans the Helpline with qualified advisers who can discuss your concerns with you. If you call the Helpline, you may, if you wish, remain anonymous.

The Helpline is toll free and is available 24 hours a day, seven days a week.

The relevant telephone numbers for the Whistleblowing Helpline are as follows:

Calls from the United Kingdom - 0808-234-0137 (English)

Calls from Spain – 900-98-1221 (Spanish)

Calls from North America - 1-877-907-2683 (English)

Calls from Germany – dial access code 0-800-225-5288 followed by 877-907-2683 (German)

Calls from Morocco – dial access code 002-11-001 followed by 0801-020-304 (Arabic)

Calls from Bahrain – 800-81685 (English and Arabic)



We take all cases of genuine whistleblowing seriously and we will seek to deal with all cases fairly, proportionately and consistently. You are referred to your local Whistleblowing Policy for further information about how your concerns will be handled and the protection and support we offer to those who raise genuine concerns. The Board of Directors of National Express Group PLC routinely reviews the Group's whistleblowing arrangements and the reports arising from them to seek to ensure they are effective and being dealt with appropriately.