

Procurement Policy – for external use

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

Our Procurement Policy

The Group's Procurement Policy is to procure supplies in a way that enhances the Group's long-term profitability and sustainable growth. We are committed to conducting all procurement initiatives and activities in an ethical and transparent way and in a way which achieve our goals, as described below.

Our Procurement Goals

Our Group's procurement goals are to:

- Conduct all procurement activity with integrity at all times;
- Make supplier selections based on transparent and objective criteria, free from personal interests, biases or other untoward or political influences;
- Consider a variety of matters when evaluating potential suppliers, including cost, service delivery, risk management, legal and regulatory compliance, innovation, corporate social responsibility and sustainability, environmental and diversity credentials;
- Deliver value for money outcomes for the Group in an ethical and sustainable way;
- Appropriately manage a range of supplier-related risks;
- Build relationships with preferred suppliers who understand the Group and its business needs;
- Ensure supplier diversity and effective supplier and contract management;
- Seek out innovation and collaboration from within the Group's supplier base; and
- Protect the reputation of the Group by complying with all applicable laws and regulations with regard to procurement activity and supplier engagement.

Supplier Code of Conduct

The Supplier Code of Conduct highlights the Group's expectations of suppliers (and their sub-contractors), generally in terms of business practices, and specifically with regard to:

- ethical supply and people practices, including alignment with the Group's procurement goals;
- prevention of financial crime, including bribery and fraud;
- environmental responsibility;
- data protection and information security;
- health and safety;
- prevention on modern slavery; and
- auditability and accountability.

The Group procures goods and services from a large number of suppliers, internationally, and recognises that each supplier may have their own standards and policies for the above. The Group expects all of its suppliers to meet the requirements set out in legislation and regulation affecting both the supply and receipt of goods and services, as well as good industry practice and to ensure that its suppliers and sub-contractors do the same.

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 any contraventions of procurement law or regulation to remain silent.

By raising your concerns, you may assist in putting a stop to that wrongdoing and thereby help to protect the Group's business, people, assets, relationships and reputation.

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