



STAGECOACH GROUP
greener smarter travel

SPEAKING UP



Our policy on how
employees can raise
concerns about serious
misconduct at work



Introduction

Stagecoach Group is committed to a culture of openness across all its businesses and ensuring the highest standards of probity and accountability. We actively encourage employees with serious concerns about the interests of others or the company to come forward. That is why we have a specific policy, called “Speaking up”, which is designed to ensure you can raise serious concerns constructively and without fear of victimisation, subsequent discrimination or disadvantage.

Normally, any concern about a workplace situation should be raised with your immediate manager. However, it may be that the seriousness or sensitivity of certain issues makes this difficult. As a result, the “Speaking up” policy covers issues such as financial malpractice, safety concerns or practices that could be a danger to the public or the environment.

As an employee, you are well positioned to know when there is something seriously wrong within your company. However, you may feel raising these concerns would be disloyal to the company or your colleagues, or you may worry about the consequences for yourself. In these circumstances, you may find it easier to ignore the concern rather than report what may be just a suspicion of wrongdoing.

Stagecoach wants all employees to feel confident that they can raise matters at an early stage when they are just a concern rather than waiting for proof. The “Speaking up” policy means you can do so in good faith and without fear of reprisals.

“We actively encourage employees with serious concerns to come forward.”

Scope

This procedure applies to all Stagecoach employees and, in addition, covers other workers, trainees, agency staff, and home workers.

Protection

This policy is designed to offer protection to employees who disclose concerns about malpractice provided they relate to one or more of the following:

- > A criminal offence has been, is being, or is likely to be committed.
- > A breach of the Group’s Anti-Bribery policy, or other malpractice has been, is being, or is likely to be committed.
- > A person is failing, has failed, or is likely to fail to comply with any legal obligation under which they operate.
- > The health and safety of any individual has been, or is being endangered.
- > A miscarriage of justice has occurred, is occurring, or is likely to occur.
- > The environment has been, is being, or is likely to be degraded.

Information tending to show any of the above matters has been, or is being, or is likely to be deliberately concealed.

If you are unsure whether something is within the scope of this policy you should seek advice from the contacts set out on the final page of this policy.

How to raise a concern

If you have a concern about malpractice, Stagecoach hopes you will feel able to first raise it with your line manager. This may be done orally or in writing.

If you feel unable to raise the matter with your immediate line manager, for whatever reason, you can raise the issue through the contacts set out on the final page of this policy.

How will it be handled?

Once you tell Stagecoach about your concerns, we will investigate initially what action should be taken. This may involve an internal inquiry or we may appoint external investigators. Stagecoach will inform you:

- > Who is handling the matter.
- > How they can be contacted.
- > Whether further assistance may be needed.

If requested, Stagecoach will write to you summarising your concern and detailing how we propose to handle it. If your concern is covered by other company procedures, we will let you know.

“Stagecoach will not tolerate the harassment or victimisation of anyone raising a concern.”

Confidentiality

Stagecoach will not tolerate the harassment or victimisation of anyone raising a concern. The manager and those carrying out the investigation are responsible for ensuring that confidentiality is maintained. It should be noted that it might not always be possible to maintain employee confidentiality, for example, if there is a requirement to be a witness at a criminal investigation. However, employees will be given support in these circumstances.

Your responsibility

- > Ensure that you have a ‘reasonable suspicion of malpractice’ before raising your concerns.
- > Raise your concerns in good faith. Malicious, unsubstantiated complaints will not be acceptable and may, in some cases, lead to disciplinary action, particularly if they are made for personal gain.
- > In cases where you have requested confidentiality, you are also responsible for ensuring that this confidentiality is maintained. You should not, for example, discuss the case in detail with colleagues, or threaten colleagues with disclosure when you discover alleged malpractice, as this could lead to disciplinary problems later in the process.

Our responsibility

To ensure that the confidentiality of those who “speak up” is not compromised if at all possible.

- > To receive and act proportionately upon a complaint about malpractice without bias and to act towards both the complainant and any other persons with whom we might come into contact in the course of this case with fairness and consistency. The process should happen as quickly as possible; normal acknowledgements should be made within 14 days of receipt.
- > To investigate fully the alleged malpractice.
- > To respond to the individual in writing about the outcome.



Questions & Answers

Q: Will this procedure affect my career within Stagecoach?

A: No, we have introduced this procedure to enable you to raise concerns about malpractice, and we will take this very seriously.

Q: Can I withdraw my concern?

A: Once an employee raises a concern about malpractice, we will continue to ensure that the matter is looked into thoroughly. Once raised, a matter cannot be ignored.

Q: Do I need to put my name on it?

A: It is the responsibility of the manager and those carrying out the investigation to ensure that confidentiality is maintained. If you feel uncomfortable with placing your name on a document, you can talk in confidence with the relevant manager who will explain the process.

Q: What do I do if I feel I am being victimised or harassed?

A: We will not tolerate the harassment or victimisation of anyone raising a concern. If as an employee you feel that you are being victimised or harassed in any way, you should contact your manager.

Q: Who within Stagecoach can give me further advice and guidance on raising issues of concern?

A: For further advice, or to raise a concern, please:

- > Contact your manager in the first instance
- > Email in confidence to whistleblower@stagecoachgroup.com, or
- > Contact one of the following:

Andrew Levy
Stagecoach Group
Legal Director

+44(0)20 7620 5976
andrew.levy@stagecoachgroup.com

Stagecoach Group plc
Friars Bridge Court
41-45 Blackfriars Road
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Michael Vaux
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Company Secretary

+44(0)1738 642 043
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Senior Group
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Manager

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Coach USA
160 South Route 17N
Paramus NJ 07652

Q: Who can I talk to aside from Stagecoach?

A: In the UK, Public Concern at Work provides confidential advice.

Website: www.pcaw.org.uk

Telephone: 020 7404 6609

Email: whistle@pcaw.co.uk