

# Journeo

## Modern Slavery & Human Trafficking Statement

### Our Commitment

Modern Slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It destroys lives, damages communities, and has strong links with organised crime. It is a hidden crime and a complex and multi-faceted problem, as well as being a gross violation of fundamental human rights.

The Modern Slavery Act 2015 requires commercial organisations who carry out business in the UK and have an annual turnover of at least £36 million to publish a modern slavery policy statement.

Journeo plc and its subsidiaries ("the Company") is legally and morally committed to ensuring to the best of our ability that there is no modern slavery or human trafficking in either our own business or our supply chain, and also support and comply with our clients' own efforts to ensure this. We all need to work together to protect and help victims and stop this horrific abuse.

We will not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to prevent slavery and human trafficking during the financial year ending 31 December 2023.

### Our Business

Journeo plc is a public listed company with five operational companies (Journeo Fleet Systems Ltd, Journeo Passenger Systems Ltd, Journeo AB, MultiQ AB and Infotec Ltd), offices in the UK and Scandinavia, and customers based around the world. The Group's head office is in Ashby-de-la-Zouch, Leicestershire, and our main country of operation is England.

Journeo plc currently operates in the UK, Sweden, Denmark, and Ireland – our operations are broadly the same in each – manufacture, maintenance and associated technology systems for the transport industry.

Journeo plc is a market leader in the specialist provision of tailored solutions to the transport community, solving complex operational requirements both on and off the vehicle. We bond closely with our local authority, Passenger Transport Executive and multimodal fleet operator customers to support them in delivering deeply integrated and connected systems to two main market segments, Fleet Transport Operators and Passenger Transport Infrastructure.

Fleet solutions include video surveillance to improve passenger and driver safety, vehicle and driver performance monitoring, passenger Wi-Fi and automatic passenger counting.

Passenger information solutions include the necessary hardware and software for electronic passenger information systems, off-vehicle smart ticketing and wayfinding.

The Journeo plc Board currently comprises of three Non-executive Directors and two Executive Directors who are responsible for the management of the Group. The Board is supported by three committees: audit, remuneration and nomination.

The corporate governance framework which the Group operates, including Board leadership and effectiveness, board remuneration, and internal control is based upon practices which the Board believes are proportional to the size, risks, complexity and operations of the business and is reflective of the Group's values. To this end, we adhere to the Quoted Companies Alliance's (QCA) Corporate Governance Code for small and mid-size quoted companies.

### Our Supply Chain

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Journeo plc works with a global supply chain of market-leading equipment manufacturers and niche specialists, and support this with our own in-house research and development capabilities to deliver safe, secure and scalable solutions.

Journeo plc currently has suppliers of electronic components and transport technology items who are based in the UK, China, France, Lithuania, Denmark, and Sweden.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. All our suppliers and subcontractors are subject to our pre-qualification process, which checks their financial, health, safety, environmental, quality and Corporate Social Governance standards and performance. This process also requires that company to commit to preventing slavery and human trafficking and to comply with our own Policy.

Where suppliers, products or materials are coming from outside the UK, or where the supplier is likely to have an annual turnover of at least £36 million, we require them to provide evidence that they have their own Slavery and Human Trafficking Policy and procedures in place.

To date we have not been aware of any human trafficking or slavery activities within our supply chain, but we have a zero-tolerance approach, and if any instances come to our attention, we will act promptly in accordance with our legal and moral obligations and notify the relevant authorities of any individual's or supplier's contravention of the Modern Slavery Act.

## Our Policies and Procedures

In relation to anti-slavery and human trafficking, Journeo plc has the following documented policies and procedures in place for identifying and preventing slavery and human trafficking in our operations:

**POL011 Ethical & Corporate Social Responsibility Policy Statement.** This detailed document sets out how we act and conduct business in an ethically responsible manner and how we seek to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons and which have the least negative impact on the environment. This is based on the SA8000 standard for Social Accountability.

**POL23 Modern Slavery Policy Statement.** This outlines our commitment to legal compliance, ethical standards, and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles and specifically in relation to modern slavery and human trafficking.

**POL6 Refusal to Work Policy Statement.** We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

**P105 Purchasing and Supplier Approval.** This procedure defines our methods for evaluation, selection, monitoring of performance and re-evaluation of external providers.

**P111 Emergency Preparedness.** This procedure includes a section on Suspicion of Modern Slavery to make all our workers aware of modern slavery red flags (based on common signs of forced labour) and how to report them.

These are supported by our other procedures and policies within our Business Management System, particularly:

- **POL5 Working Hours Policy**
- **POL12 Equality and Diversity Statement**
- **POL20 Anti-Bribery and Anti-Corruption Policy**
- **POL24 Anti-Tax Evasion Policy**
- **W200 Recruitment & Induction Work Instruction**

We are also working to formalise our approach to sustainability and environmental, social and governance (ESG) topics. To date, we have carried out a materiality assessment and baseline review,

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and have defined the categories where we aim to lead within our sector and themes that we will proactively manage and monitor, as well as identified areas for improvement as we expand our business.

## **Our Responsibilities**

Our CEO has ultimate responsibility for preventing modern slavery within the business. He is supported in this by external consultants, and internally by department heads and management, as well as staff who are directly involved in procurement and in working with suppliers and subcontractors.

Our CEO is ultimately responsible for creating, implementing and reviewing our policies, procedures and the process by which they were developed, with support from management and external Consultants.

The Journeo Finance and HR departments work with external consultants to carry out an analysis of human rights and modern slavery risk within Journeo plc and its supply chain. They are also responsible for instigating an investigation should any concerns or issues be raised.

The HR Manager is responsible for coordinating the training of all workers in awareness of anti-slavery and human trafficking as relevant to their roles within Journeo.

Our workers, and those of any supplier or subcontractor, have a duty to report any concerns to us if they suspect any slavery or human trafficking activities. Anyone reporting such concerns, as long as the intent is genuine, whether subsequently proven or unfounded, will not be put at a disadvantage for doing so.

## **Our Due Diligence Processes**

All our recruitment activities are carried out in a fair and transparent manner and comply with relevant legislation and standards, including the Immigration, Asylum and Nationality Act, and we expect suppliers and subcontractors to do the same.

The Journeo Supplier/Subcontractor Approval Process is defined in procedure P105 Purchasing and Supplier Approval.

Our Approved Suppliers Questionnaire currently asks “Is your business committed to preventing slavery and human trafficking?” If not, we expect them to explain why. We also ask suppliers and subcontractors to provide a copy of their Slavery and Human Trafficking Policy and remind them that this is a legal requirement if their turnover is more than £36m.

Our Approved Suppliers Questionnaire includes questions about taking steps to prevent child labour, and about their compliance with the Immigration, Asylum and Nationality Act.

Any new supplier or subcontractor is required to complete the Approved Suppliers Questionnaire before working with us, and existing suppliers are required to complete the Approved Suppliers Questionnaire periodically. Completed questionnaires and evidence are evaluated before the supplier/subcontractor is placed on the Approved List.

Failure to provide satisfactory responses is likely to lead to us not permitting the use of that supplier/subcontractor. In the event of information that later comes to light for existing suppliers/subcontractors, for example, one or more red flags or concerns being raised regarding Modern Slavery, we would investigate and invoke sanctions against that supplier if they failed to improve their performance in line with an action plan or seriously violated our Modern Slavery Policy, and this is likely to include the termination of the business relationship.

Our managers carry out site inspections on our own workers and subcontractors, which would identify any concerns or red flags about subcontract and agency workers.

Should any concerns or issues be raised in relation to modern slavery or human trafficking, the relevant department head would instigate an investigation, which may involve assistance from external advisors if deemed necessary, and a report would be produced in accordance with our Incident Reporting process.

## **Our Risk Assessment and Management**

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To date we have not been aware of any human trafficking or slavery activities within our supply chain. However, we have not yet formally assessed the risks and therefore acknowledge that we could strengthen our due diligence checks and process further. In the coming year (to financial year end 31<sup>st</sup> December 2024), we intend to:

- Map our supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking, using the Global Slavery Index as a basis.
- Areas to consider in relation to assessing and managing risks to workers include Country, Sector, Transaction, and Business Partnerships.
- Better evaluate the modern slavery and human trafficking risks of any new or existing supplier where our supply chain mapping identifies a medium to high risk.
- Consider the need to conduct a supplier audit, which will include their health and safety standards, labour relations and employee contracts, where our supply chain mapping and/or evaluation process identifies a high risk.
- Consider other ways in which identified risks can be investigated, how issues can best be remediated or mitigated through activities such as industry collaboration or improved internal purchasing practices.
- Review our procurement practices to ensure that we are not inadvertently encouraging modern slavery, such as through incentives or insistence on purchasing the lowest cost products that can be delivered in the fastest time, whilst still balancing our business needs.

## Our Awareness and Training Programmes

- All workers are expected to have a basic awareness of what Modern Slavery is, red flags to look for, and how to report any concerns. This is communicated via the issue of the Journeo Emergency Preparedness procedure, P111, and via a separate awareness document on Modern Slavery “TBT 090 Modern Slavery”, which is issued as a Toolbox Talk or briefing periodically as part of Journeo’s schedule of Toolbox Talks.
- The HR Manager is coordinating the training of all workers in awareness of anti-slavery and human trafficking as relevant to their roles within Journeo. A new HR system is planned to be implemented in the coming months, and we are also looking for a suitable Modern Slavery e-learning course that meets our business needs.
- The results of our supply chain assessment of product or geographical modern slavery and human trafficking risks will help us determine if more in-depth training is required.

## Our Performance

Journeo plc has defined a set of objectives and key performance indicators and controls to identify and combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have acknowledged that they have read and understood the toolbox talk TBT 090 Modern Slavery?
- Roll-out an e-learning module on Modern Slavery as a minimum.
- How many suppliers have filled out our Approved Suppliers Questionnaire within the 2 years? Out of those, how many have their own Modern Slavery policies?
- Establish supply chain mapping and assess the risk of modern slavery and human trafficking in our supply chain.
- Review our existing supply chain based on the findings of the mapping and risk assessment process.

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- Review our procurement practices to ensure that we are not inadvertently encouraging modern slavery, such as through incentives or insistence on purchasing the lowest cost products that can be delivered in the fastest time, whilst still balancing our business needs.

This statement has been approved by Russ Singleton, CEO of Journeo plc, who sits on the Board, for the financial year ending 31 December 2023. This statement will be reviewed and updated every year and will be published as soon as possible after our financial year end (within 6 months at most). It can be found on the Journeo plc website with a link in a prominent place on the homepage, along with any previous versions of this Statement.

Legally an organisation is required to complete a statement for each financial year (of that organisation) in which their turnover exceeds the specified threshold



**CEO**

Date: May 2024

*(On behalf of the board of Directors)*

Russ Singleton