

Company Policy on "Speaking up"

Introduction

Stagecoach Group is committed to developing 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.

Scope

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

The UK Public Interest Disclosure Act 1998, the New Zealand Protected Disclosures Act 2000 and similar statutes in the United States of America and Canada offer protection against dismissal and ill treatment to employees who "speak up" on malpractice within their companies.

Application of Procedure

Protection

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

- * A criminal offence 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
- * 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

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 following channels:

- * A Director of the Company, such as Group Chief Executive Brian Souter
- * Stagecoach Group Deputy Company Secretary Mike Vaux, tel +44 (0)1738 642043 or email michael.vaux@stagecoachgroup.com
- * Email in confidence to whistleblower@stagecoachgroup.com

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 a more formal investigation. 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.

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. However, you personally should also take steps to ensure you do not jeopardise this

confidentiality by discussing your actions with others. 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.

Roles and Responsibilities

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. You should note, for example, that the Public Interest Disclosure Act 1998 in the UK does not protect those who make public disclosures 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. (NB: it might not always be possible to maintain absolute confidentiality, for example, if a criminal investigation has to be undertaken).
- * 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.