



Modern Slavery Statement - 2025



MODERN SLAVERY ACT STATEMENT 2025

Lothian Buses Limited and its subsidiary companies (“Lothian”) conducts all business in an honest and ethical manner. It is our policy never to enter into a business relationship with another person or business whose practices could involve slavery, forced or child labour.

Lothian takes a zero-tolerance approach to modern slavery and any associated actions, and is committed to acting professionally, fairly and with integrity in all their business dealings and relationships.

Our Organisation and Operations

Lothian is the UK’s largest municipal bus company and proudly owned by the City of Edinburgh, East Lothian, Midlothian and West Lothian councils. We have been based in the city for over 100 years – with 2019 being our centenary - and are one of the region’s largest employers with approximately 2,600 staff, 2,000 of whom are drivers. The group of businesses operates over 90 services through a fleet of approximately 700 vehicles – the main garages in which these services operate from are Central, Longstone, Marine, Musselburgh, Dunbar and Livingston.

Our approach to combatting slavery and human trafficking

During 2026 we will be continuing the work already undertaken to ensure our operational activity and supply chain continue to remain free from modern slavery.

We continually review our business units, which operate throughout the organisation, to determine the supply chain and stakeholders who we have with:

- Vehicle and component suppliers
- Fuel and other consumable suppliers
- General administrative and commercial services
- Technical and IT services
- Consultancy, maintenance and construction
- Catering and cleaning services

Any supplier of goods or services will be expected to provide us with the following legally binding obligations when new material contracts are entered into or renewed:

- To comply with all applicable regulations, laws and guidance on slavery and human trafficking;
- To maintain their own policies and procedures;
- To ensure their own supply chain have the same obligations.

Suppliers with a turnover above the £36m threshold are required to adhere to the obligations of the Modern Slavery Act 2015 and to produce their own statement.

Our Policy

In January 2019, we published Lothian's Modern Slavery Policy which provides employees with details of the rules and responsibilities regarding modern slavery, servitude, forced or compulsory labour, child labour, people trafficking and exploitation of both the company and employees, to ensure a consistent approach aligned to current employment legislation.

It is our policy not to enter into a business relationship with another person or business whose practices could involve slavery, forced or child labour.

Lothian takes a zero tolerance approach to modern slavery and any associated actions, and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

The policy provides further clarification and guidance on areas such as confidentiality, how to raise a concern, training and penalties. All Lothian policies are available on MyLothian.

Reviewing and assessing risk

Lothian will review its processes annually to identify potential improvements and ensure appropriate action is taken. As part of this review, we will assess modern slavery risks across our policies, operations and supply chain, and implement measures to prevent, manage and mitigate those risks.

Due diligence, monitoring and evaluation

During 2026 we will:

- Continue to work with our suppliers and partners to review performance and adherence to the Act;

- Review Lothian's Modern Slavery policy to ensure compliance with the Employment Rights Act 2025.
- Provide specific training as and when required and consider including the subject of modern slavery within other training courses where it would help to raise awareness;
- Monitor any changes in our supply chain and business partners.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our statement for the financial year ending 2025. It was approved by the Lothian Buses Limited Board of Directors on 17 June 2026.



Sarah Boyd
Chief Executive



Lothian