Transport for London Modern Slavery Statement 2025/26

Period covered by this statement
Transport for London's (TfL) financial year-end occurs on 31 March. This statement covers the financial year 1 April 2025 – 31 March 2026.

Organisations covered by this statement

This statement covers TfL, its subsidiary company Transport Trading Limited (TTL), and the following subsidiary companies of TTL:

Transport for London Finance Limited
Crossrail Limited
London Transport Museum Limited
London Transport Museum (Trading) Limited
London Underground Limited
Tube Lines Limited
London Buses Limited
London Bus Services Limited
Rail for London (Infrastructure) Limited
Rail for London Limited
Tramtrack Croydon Limited
Docklands Light Railway Limited
London River Services Limited
Victoria Coach Station Limited
Places for London Limited (previously known as TTL Properties Limited)
TTL Blackhorse Road Properties Limited
TTL Build to Rent Limited
TTL Earl's Court Properties Limited
TTL Electric Vehicle Charging Limited
TTL Ickenham Properties Limited
TTL Kidbrooke Properties Limited
TTL Landmark Court Properties Limited
TTL Office Properties Limited
TTL South Kensington Properties Limited
TTL Student Properties Limited
TTL Wembley Park Properties Limited
TTL West London Properties Limited

Dormant subsidiaries are not included in the above list. More information on TfL and its subsidiaries can be found on our website: TfL Subsidiary Companies Structure.

For any questions about information in this statement, please contact TfL's Responsible Procurement (RP) team at responsibleprocurement@tfl.gov.uk.

Introduction

This Statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and outlines TfL's approach to identify, prevent and mitigate the risks of modern slavery, human trafficking, forced and bonded labour, and human and labour rights violations in its supply chains. This is TfL's eleventh annual statement, covering the period 1 April 2025 to 31 March 2026.

A record of all of our statements can be found in the TfL Board papers:

- from 2022 onwards on the TfL Board website; and
- from 2016 to 2021 inclusive in the Publications and Reports section of the TfL website.

The statement is organised as follows:

1. Organisation and supply chain structure
2. Policies in relation to modern slavery
3. Due diligence
4. Training
5. Goals and Key Performance Indicators (KPIs)

1. Organisation and supply chain structure

Created by the Greater London Authority Act 1999, TfL is the integrated transport authority responsible for delivering and managing London's public transport network and key road infrastructure. With a total workforce above 29,000 employees, TfL is responsible for delivering the Mayor of London's strategy and commitments on transport.

The Greater London Authority (GLA) is the main governing body for London, responsible for the strategic planning and social and economic development of the city. The GLA Group is made up of its functional bodies, including TfL and four other key organisations overseeing policing, fire and rescue, and planning. More information can be found on the GLA Website.

1.1 Products, sectors, and services

TfL's core services include the operation and oversight of multiple transport modes—such as the London Underground, buses, Docklands Light Railway, London Overground, Elizabeth line, trams, river services, and cycling and walking provision—as well as the management of London's principal road network, traffic systems, and taxi and private hire services.

TfL operates primarily within the transport and infrastructure sector, and procures extensively across related sectors, including construction and engineering, information and communications technology, professional services, facilities management, and other specialist services.

As the largest procurement authority within the GLA Group, TfL also provides a core function for the procurement of goods and services for the GLA, Old Oak Park Royal Development Corporation (OPDC) and London Legacy Development Corporation

(LLDC). During 2025/26, TfL spent in excess of £9.4bn on goods, works and services on behalf of TfL, the GLA, OPDC and LLDC.

1.2 Supply chain mapping

TfL has over 5,000 direct suppliers and has commissioned goods, works and/or services from 3,295 of them in 2025/26. Our contracts vary in length from a few months to over 20 years.

52 are currently classified as key suppliers, defined as TfL's most important suppliers which are critical to business operations or projects and programmes. Criticality is based on a wide range of factors including spend, continuity of service and substitutability. In 2025/26, we spent around £2.2bn with key suppliers, representing 30% of total addressable spend. They span a range of sectors, including engineering, construction, facilities management, IT, and professional services.

We have started work to map our global supply chains, beyond our direct suppliers, commencing with our supply chains for zero emission buses, electronic hardware and garments. This is an important precondition to effective human rights due diligence.

Our work to map our zero emission bus and electronics hardware supply chains is through our partnership with Electronics Watch, an independent, not-for-profit organisation which helps public buyers to work together to promote and protect the rights of workers in global supply chains. We also started mapping our garment supply chain in 2024, as outlined below.

Zero emission buses
In 2025/26, we streamlined the collection of supply chain data from our zero emission bus manufacturers. Although TfL contracts with bus operators rather than manufacturing directly, we can request this information from the latter through our updated Bus Specifications.

Currently we have three bus manufacturers producing buses under these new requirements: Alexander Dennis, BYD, and Wrightbus. All three manufacturers provided us with the supply chain data when requested in February 2026, which will be reflected in the next modern slavery statement to allow for processing times.

As of December 2025:

- There are 23 specific production sites in our zero emission buses supply chains. 17 were disclosed by our manufacturers, 4 were identified by Electronics Watch through analysis, and 2 through companies' own public supplier lists;
- These production sites are located in 11 countries: Bolivia, China, Denmark, the DRC, Germany, Hungary, Italy, Malaysia, the Netherlands, Poland, and the United Kingdom;
- 20 sites are factories and 3 are mines. 75% of the factories (15 sites) perform component manufacturing; 15% (3 sites) final assembly; and 10% (2 sites) both.

Each manufacturer was invited for a follow-up call to discuss the data collection process. In March 2026, we held an in-depth, open conversation with Alexander Dennis. The manufacturer demonstrated extensive efforts in mapping low tiers of the supply chain, including smelters, being the first to provide this level of detail. This clearly demonstrates what is possible when the work is prioritised and resourced. While challenges remain in verifying lower tier supply chain data, transparency regarding uncertainties is key to improving mapping over time. Our structured data collection template also helped Alexander Dennis refine their approach to supply chain mapping and supplier engagement, which they have since expanded beyond TfL bus models. We welcome this constructive engagement and look forward to similar discussions with the other manufacturers.

Electronic hardware
We mainly buy electronic hardware through our Reseller framework, and Mobile services contracts. Our Oyster cards, procured through a dedicated framework, also include chips and are therefore relevant to electronics supply chain mapping.

Both our Reseller Framework, let at the end of 2024, and Oyster Cards Framework, let in summer 2025, include the Electronics Watch Contract Conditions.[1] These require our suppliers to disclose the names and locations of production sites in the supply chain of the goods we buy. We are planning to follow up on supply chain mapping requirements in 2026/27, prioritising the most purchased products, in accordance with the principle of proportionality.

Most TfL phones are bought through suppliers on our Mobile Services contract, Vodafone and O2, and are manufactured by Apple. Mobile phone production carries high risk of human and labour rights abuses, similarly to other electronic hardware, and is covered under our affiliation to Electronics Watch. In 2025/26, we continued in our efforts to gather information about the factories where our phones and their components are produced. We issued two separate transparency requests to Apple, and met with O2 to reiterate the ask, as with Vodafone in the previous financial year. We also continued to collaborate with other Apple customers under a public buyer Working Group facilitated by Electronics Watch. Through this group, we supported the writing of a status report on this issue of lack of transparency, outlining our collective efforts since 2023. We plan to share this report with internal and external stakeholders in 2026/27.

Outside of our proactive efforts to map our supply chains, Electronics Watch receives information about production sites linked to our products via information disclosed to other public buyers purchasing the same product models, as well as through publicly available information. Based on this, as of December 2025:

- There are 449 specific production sites in our ICT supply chains. 110 were disclosed by suppliers, 8 via analysis, and 333 through public supplier lists.
- These production sites are located in 26 countries: Austria, Brazil, Canada, China, Czechia, the Democratic Republic of Congo, France, Germany, Hungary, India, Ireland, Israel, Japan, Laos, Malaysia, Mexico, Philippines, Poland, Romania, Singapore, South Korea, Taiwan, Thailand, the UK, the

[1] Please note that our frameworks include Version 2.0 of the Electronics Watch Contract Conditions, which have been since updated to Version 3.0, available online. The underlining ask has remained the same.

US, and Vietnam.
- 84% of these (379 sites) perform component manufacturing; 11% (47 sites) perform final assembly; and 2% (7 sites) perform both. There was one site of mineral extraction. The specific supply chain operations were unknown for 3% (15 sites) of locations.
- An additional 1,012 production sites have been identified as potentially linked to our supply chains.

Garments
At the end of 2024, we mapped our tier 2 garment manufacturers under the Uniforms contract. All TfL uniforms are procured from a UK-based supplier, Cooneen at Work. Our tier 2 suppliers, who manufacture our uniforms, are located in China and Bangladesh, and can be found on our account on the Open Supply Hub, a free, open and accessible global supply chain map. We recognise the importance of transparency and are committed to making our supply chain mapping available on the platform where possible. Although we aim to refresh this data on a yearly basis, we have paused this work to re-develop our ask and templates. We expect to resume in 2026/27.

1.3 Modern slavery risk management governance
Responsibility for managing TfL's supply chain sits with our Procurement and Commercial (P&C) function, reporting to the Chief Finance Officer, who in turn reports to the Commissioner of TfL. TfL's Director of Procurement is also accountable to the GLA Group Collaborative Procurement Board (CPB) for the implementation of responsible procurement. For more information on the CPB, please see: Collaborative Procurement Board | London City Hall.

The TfL Responsible Procurement Manager, supported by the Assistant RP Manager, is responsible for planning, developing and delivering ethical sourcing commitments and requirements across the P&C function, following the due diligence process described below.

TfL also hosts the GLA Group's Central Responsible Procurement Team (CRPT) within its P&C function. The CRPT works with TfL, along with the wider GLA Group, to prioritise and deliver the commitments of the RP Policy, including how we plan to promote ethical sourcing practices and address risks of modern slavery.

1.4 Information gathering
The information in this Modern Slavery Statement was gathered by TfL's Responsible Procurement Manager and the ethical sourcing lead from the CRPT. Information about specific procurement exercises and contracts was confirmed by the relevant commercial managers. TfL subsidiaries mentioned in this statement contributed to relevant parts of this statement. Electronics Watch provided us with information on our electronics and zero emission vehicle supply chains, and the Ethical Trading Initiative (ETI) was also consulted.

The information has been structured to align with the UK Home Office's Transparency in Supply Chains (TISC) Statutory guidance and International Reporting on Modern Slavery, Forged Labour and Child Labour where possible, and to enable us to report under the ETI's Corporate Transparency Framework.

2. Policies in relation to modern slavery

TfL is committed to respecting human and labour rights in its operations and supply chains. This includes respecting, and holding our suppliers accountable to, the rights defined by the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work and related Conventions, and implementing human rights due diligence (HRDD) according to the UN Guiding Principles on Business and Human Rights.

2.1 GLA Group

Our commitment is enshrined at GLA Group level through the Responsible Procurement and Social Value Policy, and the Responsible Procurement Delivery Plan (RPDP), under the themes of Good Work and Ethical sourcing.

The Responsible Procurement and Social Value Policy is a high-level strategic document setting out the GLA Group's ambitions and commitments to use responsible procurement and deliver social value in London and beyond. The RPDP sets out how the GLA and its functional bodies (including TfL) will deliver the goals of the Policy and includes metrics for quarterly and annual reporting to the Group. From 2026-27, in addition to reporting quarterly and annual quantitative metrics, each functional body will also need to report on a quarterly basis on how they meet each action included in the RPDP to the GLA Group CPB.

The two documents can be found on this page. The specific provisions contained in the Policy and the RPDP relevant for this Statement are summarised in Table 1.

Table 1. GLA Group Responsible Procurement and Social Value Policy and Delivery Plan

The RP Policy and Delivery Plan commit us to promote good work and ethical sourcing by:

- Respecting, and holding our suppliers accountable to, international human and labour rights;
- Developing a process for effective HRDD;
- Exercising HRDD to identify, address and remedy human and labour rights risks in our supply chains;
- Mapping our supply chains, focusing on medium and high-risk suppliers;
- Collaborating with external parties, including Electronics Watch, the ETI, relevant civil society organisations and trade unions, as well as other public bodies, to address any risks identified;
- Integrating the Mayor's Good Work Standard* (GWS) in relevant procurements;
- Requiring that all suppliers pay the London Living Wage; and
- Seeking to contract with suppliers that recognise and respect the rights of freedom of association and collective bargaining.

*The GWS is a free accreditation programme developed by the GLA in collaboration with London's employers, trade unions, professional bodies and experts. It is organised into four Pillars, which set the benchmark for good work. These are:

1. Fair pay and conditions
2. Engagement, voice and wellbeing
3. Skills and progression
4. Diversity and inclusive recruitment

Businesses can achieve three different levels of accreditation: Foundation, Achievement and Excellence. Recognising that good pay is the foundation of good work, all levels require accreditation to the Living Wage Foundation. More information about the GWS can be found here.

In 2026, the GLA Group published a collection of Responsible Procurement case studies showcasing examples of how our Policy and Delivery Plan are implemented in practice. The document can be found on this page.

2.2 TfL

TfL's Supplier Guide, updated in August 2025, clearly sets out our commitment to upholding human and labour rights across our UK and global supply chains and that we expect the same from our suppliers. The guide highlights that TfL works collaboratively with suppliers to address potential issues, improve transparency, and support effective human rights due diligence.

Purchasing policy

We recognise that delays in paying our suppliers can result in workers not being paid for their work, potentially leading to debt, and, in worst cases, modern slavery. We are legally required to pay all undisputed sums to our suppliers within 30 days of payment becoming due, and, in 2025-26, did so for 98.5% of our invoices. The GLA Group Responsible Procurement and Social Value Policy also provides for our payment of undisputed sums to small and medium-sized enterprises (SMEs) within 10 working days of payment becoming due. In 2025-26, we achieved this for 89.4% of SME invoices.

Suppliers' policies

TfL asks potential suppliers for their own policies to identify and address human and labour rights risks and abuses as part of its procurement activity. Since early 2026, we specifically ask bidders, where relevant to the to the goods, services or works being procured, for information about their policies or processes concerning their:

- Selection of prospective suppliers
- Assessment of current suppliers
- Assessment of their supply chains (tiers 2 and beyond)
- Response to identified risks or allegations
- Provisions to remedy human or labour rights abuses which are found.

Responses are scored based on whether evidence has been provided to substantiate each answer. The tender process is further described in Section 3.2 below.

2.3 Continuous improvement

The Responsible Procurement and Social Value Policy, and the Responsible Procurement Delivery Plan were updated in summer 2025, bringing us in line with best practice in the field by introducing a HRDD framing, and requiring respect for relevant international standards named above, beyond the Ethical Trading Initiative's Base Code. During the update, all GLA Group functional bodies and relevant GLA

policy leads were consulted. Electronics Watch also provided feedback on the Ethical sourcing section.

The documents will be next updated in the 2028/29 financial year.

The GLA Group is also working on developing a Supplier Charter, which will adapt the Responsible Procurement and Social Value Policy, aimed at GLA Group functional bodies, into a document outlining our expectations from our suppliers. The document will be published in 2026-27, and it will be included in relevant tenders moving forwards. It will have a section dedicated to ethical sourcing.

3. Due diligence

To address the human and labour rights risks in our supply chains, we follow a HRDD approach, as defined by the UN Guiding Principles on Business and Human Rights. We have two separate processes for assessing and mitigating risk as part of the procurement process and for existing contracts, detailed separately below. Overall, the RP team was involved in 40 tenders and existing contracts at medium and high risk of human and labour rights abuses. The risk categories in Table 2 below are used to identify at risk procurements and contracts, which should be prioritised for ethical sourcing action. Key sources underpinning these categories include the Business and Human Rights Resource Centre; UK Government guidance, the US Bureau of International Labor Affairs (ILAB)'s List of Goods Produced by Child Labor or Forced Labor, GLAA Industry Profiles, and the Global Slavery Index, among others.

Table 2. Risk categories

- Construction
- Garment / textiles, including footwear
- FM: hospitality, catering, security, cleaning, waste
- Logistics, including warehousing, transport, courier services
- Mining
- Electronics
- Manufacturing
- Food and food related, including fishing, agriculture, food processing
- Healthcare, social care
- Green transition, including renewables e.g. solar panels, zero emission vehicles, etc

3.1. Risk identification, prioritisation and mitigation for procurements

a. Process

While human and labour rights risks and violations are often identified during contract delivery, it is essential that the foundations to address them effectively are established at the procurement stage. Here, we can set clear expectations for the market on what will be expected of them if they become our suppliers.

When working on procurements, our risk prioritisation and mitigation are shaped by our procurement process, timelines, and contract value. Our approach is the following:

- For all contracts above the Procurement Act 2023 value threshold, procurement managers are required to fill in an initial form via Microsoft Forms, which includes questions about the contract type and value. The information provided enables the RP team to triage the procurement in one of two ways depending on if the contract is valued below, at or above £25m.

- **Contracts below £25m:** TfL utilises the Social Value Portal at tender stage, requiring bidders to register and submit Social Value Delivery Plans against the London Themes, Outcomes and Measures framework. Bidders are required to choose among different commitments relating to Economy, Planet, Work and Community, which they will be required to implement if they win the bid. Some of these relate to modern slavery, such as the undertaking of social audits and the allocation of resources to identify and address risks in a bidder's supply chains. Currently, we do not mandate specific categories for bidders to commit to. This means that they may not choose measures related to modern slavery. We will keep this under review.

- **Contracts above £25m:** A standardised process is used to identify and mitigate risks, as shown in Table 3.

Table 3. Standardised risk identification and mitigation at tender stage for contracts above £25m

1. Procurement planning

- Procurement managers complete a social value Microsoft Form detailing core contract information which is used to identify risks of human and labour rights abuses related to the contract(s) in question. Where the procurement value is noted as above £25m, the RP team meet with them to determine any resulting bespoke requirements for the Invitation To Tender (ITT) stage.
- For large procurements, the planning stage may include market engagement sessions organised by procurement managers. Where these take place, the Responsible Procurement Manager attends to provide an overview of TfL's responsible procurement approach, including supplier expectations and requirements on ethical sourcing.

2. Tender stage

- The Procurement Specific Questionnaire for all above public procurement threshold contracts includes a pass/fail question to ensure bidders are compliant with the Modern Slavery Act 2015.
- The RP team provides tailored award questions for the ITT stage. TfL allocates a minimum of 10 per cent of the award scoring to RP, of which ethical sourcing is a part. Specific weighting is decided on a case-by-case basis by the RP team, depending on risk.

- Where relevant to the specific procurement process, the RP team may lead a dialogue session on human and labour rights risks in supply chains, depending on the context and need.
- All contracts include a requirement to pay the London Living Wage. In addition, RP requirements include clauses for Equality Diversity and Inclusion (EDI) – to include an EDI statement or action plan depending on the value of the contract – and to complete the self-assessment for the GWS.
- Medium and high-risk contracts include specific ethical sourcing contract schedules. These require suppliers to respect international human and labour rights, exercise HRDD and alert us when any risks are identified. They also include different ways for TfL to monitor compliance and to manage non-compliance using contractual remedies.
- In-scope contracts include Electronics Watch Contract Conditions, requiring suppliers to disclose where our products and their key components are made. This is crucial to ensure that working conditions in our specific supply chains can be monitored.

b. 2025-26 activities

In 2025/26, TfL conducted 2,105 procurement exercises, including a number of high-value contracts above £25m. The risk of human and labour rights abuses in them was identified and addressed through our approach described in Table 3. The following are some notable examples demonstrating our actions related to tenders procuring contracts with a medium to high risk of human and labour rights risks.

Rail Tracks Framework – Manufacture and Supply

In 2025/26, TfL began to re-procure a framework for the manufacture, maintenance and supply of rail tracks across the network, including the Elizabeth line. A bespoke ethical sourcing ITT question was developed to address human and labour risks, predominantly in steel supply chains. Bidders were asked to provide a risk assessment of the materials provided through the contract, and detail risk management procedures.

Catering

TfL undertook a procurement for catering and food and beverage services across 29 sites. During the tender, bidders were required to demonstrate robust human rights due diligence across food supply chains (including tier 2+), traceability of high-risk commodities (e.g. coffee, cocoa and seafood), use of recognised risk assessment tools, and evidence of remediation and continuous improvement processes. In parallel, a Good Work question was included to assess fair employment practices within the workforce.

Physical Security

In 2025/26, TfL began the re-procurement of physical security services, a labour-intensive category with heightened human rights risks linked to recruitment practices and third-party labour providers. To address these risks, the contract will introduce a requirement to achieve GWS accreditation within 18 months of contract commencement, and work towards ‘Excellent’ level of accreditation during contract delivery. The contract will be awarded in 2026/27.

E-scooter trial phase 3
In 2026, TfL re-tendered their e-scooter contract, which will select two operators to manage e-scooter trials in London. This procurement will result in two concession contracts, with the operators owning and maintaining the e-scooters. The production of e-scooters carries similar human and labour rights risks to those of e-bikes, tendered in the previous financial year, related to their batteries. This was one of the first tenders in which we used the new ITT approach for ethical sourcing, described above. Bidders were required to provide us with evidence of their risk assessment as well as risk management procedures, and to demonstrate implementation of the Employer Pays Principle. The submissions will form part of the contract requirements for the winning bidders.

3.2. Risk assessment and mitigation for existing contracts

a. Process

To manage risk in our existing contracts, we risk assess our key suppliers on an annual basis and identify other non-key suppliers falling in risk categories. The risk assessment currently comprises two elements:

1. If the contract falls into the identified risk categories listed in Table 2 above, it is classified as a risk contract;
2. If the supplier appears in the Violation Tracker (either Global or UK) for human or labour issues in the past three years, or they have any reports on the Business and Human Rights Centre (BHRC) companies profile, they are classified as high risk.

The process for following up on medium and high-risk contracts currently includes a Modern Slavery Assessment Tool (MSAT) campaign for all medium and high-risk suppliers. The MSAT is a UK Cabinet Office self-assessment questionnaire used to evaluate supplier practices in addressing modern slavery in their supply chains. Some contracts also have a requirement to produce an annual ethical sourcing action plan. This is a historical requirement that has been replaced by our high-risk contract conditions. These include the possibility of requesting such a plan where necessary.

A separate process is in place to mitigate risks and address violations in electronics and zero emission buses supply chains, found in Table 4.

b. 2025-26 activities

TfL's Responsible Procurement Manager undertook the risk assessment outlined above in autumn 2025, with the help of the CRPT. The risk assessment covered a total of 96 suppliers and contracts[2] for TfL and 19 for Places for London. The TfL list included:

- 64 key suppliers[3]
- 18 contracts above 25m that fell into risk categories
- 14 contracts that we were aware of because they were identified as at-risk during tendering, which have since been signed

[2] Our exercise included our key suppliers, who may have multiple contracts with us, as well as individual contracts above threshold.
[3] As stated in our Supply chain mapping section, at the time of publication of this statement, TfL counts 52 key suppliers. However, when the risk assessment was conducted, the key supplier list included 64 suppliers.

The risk assessment identified 78 suppliers at risk:
- 43 key suppliers and 35 additional suppliers
- 28 high risk and 50 medium risk suppliers

The risk categories identified were: construction (18 TfL suppliers, 12 Places for London), FM (17 TfL suppliers), electronics (15 TfL suppliers, 1 Places for London), logistics and transport (11 TfL suppliers), manufacturing (2 TfL suppliers), garment and textiles (1 TfL supplier), and green transition (1 TfL supplier).

The London Transport Museum (LTM) conducted a separate risk assessment led by the Retail Buying Manager. LTM sources TfL brand merchandise from a significantly smaller supplier base than TfL (124 suppliers in total) that consists of a broad range of suppliers and licensees, including some micro and small, diverse owned businesses. LTM identified the top 25 suppliers by order value as at-risk suppliers, accounting for 77% of LTM's total order spend, and of which nine are TfL licensees.

We will update our risk assessment during 2026/27, adjusting our list of key suppliers, and accounting for new and expired contracts.

As a first step to manage our risks, we invited the suppliers identified through the risk assessments to complete the UK Government's MSAT. Overall, we invited a total of 101 suppliers: 65 TfL suppliers, 7 Places for London suppliers and 25 LTM suppliers.[4]

The RPDP requires us to work with our suppliers to ensure that they achieve an MSAT score of at least 70 per cent, including 70 per cent in key categories (Assessing and managing risk, Due Diligence, KPIs). Of the 33 suppliers who completed the MSAT following our request, 18 achieved a score of 70 per cent or above, and 6 a score of 70 and above in key categories.

Since only 30% of the suppliers invited completed the MSAT, we will reopen the campaign for the beginning of 2026/27, and engage with relevant contract managers to drive higher supplier engagement. Afterwards, we plan to request suppliers scoring under 70% overall to undertake training to improve their practices. More information can be found in Section 4.

As noted above, some contracts also have a historical requirement to produce an annual ethical sourcing action plan. In 2025/26, we reviewed plans for the following contracts:
- *Corporate Purchase Power Agreement ('PPA Comet')*
  This covers 20% of the output of a new 400-hectare solar farm to provide green energy to the Tube. It is a 15-year contract, which was awarded in summer 2025 to Longfield Solar Energy Farm Limited. Solar panels production carries high human rights risks, which we will address through the duration of the contract.
- *PLU HV Power Batch C*

[4] The total number of at-risk suppliers and suppliers invited to the MSAT are different due to our inability to find contact details for all, and because some suppliers are shared across organisations.

This contract is part of the Piccadilly Line Upgrade project, and aims to provide a power upgrade to meet the increased power demand for new and more frequent trains. It includes the sourcing of cables and other electrical components, transformers and switchgear. It was awarded in 2023 to Balfour Beatty and will be in place until April 2028.

- *London Overground Concession*
  The London Overground is operated under a concession agreement between TfL (who specifies the requirements and service levels) and a private sector operator (who operate the services on TfL's behalf). The operator has responsibility for cleaning and security services, which carry human rights risks due to the nature of the labour force. The contract was re-tendered in 2025, and was awarded to First Rail London Limited (FRL). It will last for 8 years, with an option to extend it by an additional 2 years. A preliminary ethical sourcing action plan was required as part of the tender submissions, with a requirement for this to be agreed and finalised following contract award. The RP team met with FRL as part of contract mobilisation in March, to discuss the plan and contract management moving forwards.

London Transport Museum
In addition to participating in TfL's MSAT campaign in 2025-26, the London Transport Museum LTM also began an assessment process for retail suppliers and manufacturers against its updated Supplier Code of Best Practice (the Code). The Code includes a section on human and labour rights in the supply chain, which sets out LTM's desire for its suppliers to establish and maintain a human rights due diligence process.

The assessment provides a detailed information matrix covering material usage, environmental impact, and labour and working condition audits. The matrix helps identify areas of concern, which are then raised with the supplier for corrective action. Suppliers are further required to provide factory data to LTM - including physical addresses and legal names of factories for key and high-risk component manufacturing.

The rollout of the Code and the assessment is an extensive, ongoing process that will take time to conduct with full participation required from suppliers and manufacturers to provide good quality data.

Good Work Standard
In line with the GLA Group RP Policy, TfL continues to promote the GWS with its suppliers, to advance good employment practices across London. More information can be found in Table 1 above, or on their website. On contracts above £25m in value, TfL suppliers are required to complete the GWS initial assessment during contract mobilisation. Suppliers are then encouraged to join the GWS via communication campaigns, supplier engagement events and drop-in sessions. Between April 2025 and March 2026, the GLA team responsible for the GWS delivered nine drop-in sessions and 14 events.

Over 2024-2025, eight of our suppliers became accredited to the GWS, bringing it to a total of 52 since 2021, and covering over 86,500 workers.

Tables 4 and 5 describe our efforts to identify and address actual human and labour rights risks in our supply chains, as well as to promote the rights to freedom of association and collective bargaining.

Table 4. Identified risks and violations in our supply chains, and how we are addressing them

The main way in which we find out about concrete risks and violations in our supply chains comes through our affiliation with Electronics Watch, thanks to evidence they collect through worker-driven investigations in the supply chains. We receive quarterly Monitoring Status Reports on factories in our supply chain currently monitored, including actions to remedy any found violation.

In 2025, Electronics Watch reported on 5 active cases concerning 4 factories and 1 mine that they have investigated in our **zero emission bus** supply chains. These sites are located in 4 countries: China (2), the DRC (1), Hungary (1), Malaysia (1). Across its investigations, the following human rights violations and risks were identified: legal wages (4 production sites), occupational health and safety (4 production sites), recruitment and employment conditions (4 production sites), abusive termination of employment (3 production sites), freedom of association and the right to collective bargaining (3 production sites), excessive working hours (2 production sites) and discrimination in hiring and occupation (2 production sites). No risks or confirmed forced labour or child labour cases were identified.

They also reported on 27 active cases concerning 26 factories and 1 mine that they have investigated in our **electronics** supply chains. These sites are located in 6 countries [China (15), the DRC (1), India (2), Malaysia (4), Taiwan (1) and Thailand (4)]. When the violations and risks of violations are taken collectively, the most prevalent issues in TfL's ICT supply chains were: legal wages (18 production sites), occupational health and safety (18 production sites), excessive working hours (16 production sites), recruitment and employment conditions (15 production sites), forced labour (15 production sites), and discrimination in hiring and occupation (13 production sites).

When risks or actual violations are identified, Electronics Watch supports us to enforce our contract obligations and facilitates remediation for workers on behalf of ourselves and other affiliates. In 2025:

- Four cases were resolved. You can read about the impact of three of them here: Elna, Allied Malaysia, Tripod.
- At a component supplier in Thailand, 158 Burmese migrant workers were refunded for recruitment fees paid to secure their jobs. One brand also registered this site in its independent grievance mechanism to ensure that workers have a secure channel to report grievances and access to local resources and emergency services.
- A final assembly facility in Hungary implemented an improved management system to monitor working hours and put in place ensure emergency preparedness measures.
- At a final assembly facility in India, subsequent monitoring showed that previous issues regarding late payment of bonuses did not recur after corrective actions were implemented.

We intervene and use our leverage when there are indications that our suppliers are not using their own leverage to the extent they can and should to mitigate risks and provide access to remedy, or when we need information to verify they are in fact doing so. Since 2025-26, we have been following up with one business concerning issues found by Electronics Watch monitoring partners in one of their factories. While work is ongoing, we hope to be able to report the outcomes of such engagement in our next statement.

In May 2025, we were also contacted by a journalist in relation to **buses and trains** we procure, and their potential link to Uyghur forced labour. Thanks to our supply chain mapping work, we were able to confirm that none of the factories investigated were in our supply chains at the time. The full report can be read following this link. We remain open to receiving similar information on a confidential basis to complement our own efforts to identify risks and will do our part in investigating and addressing any potential issues brought to our attention.

In 2026-27, are focusing on how to report on the specific risks and violations identified through the Violations Tracker and Business and Human Rights Centre, in addition to Electronics Watch data.

Table 5. Rights to freedom of association and collective bargaining
We recognise that these rights are crucial for workers to organise and advocate for better working conditions but are routinely violated.

At the policy level, both rights are explicitly covered by the GLA Group Responsible Procurement and Social Value Policy, as well as the Responsible Procurement Delivery Plan. Their protection is also integrated in our contracts, which require suppliers to respect internationally recognised human rights, which include the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), and the principles set out in the ILO Declaration on Fundamental Principles and Rights at Work and related Conventions.

In addition, the Good Work Standard, which is promoted with relevant suppliers (see below), also covers these rights. The Engagement, voice and wellbeing pillar includes 8 criteria relating to trade union engagement and collective bargaining. These criteria ensure that workers are informed of their rights, supported to join and engage with trade unions, benefit from accessible facilities and paid time for union activity, and are represented through structured, transparent consultation and collective bargaining arrangements embedded across the organisation. Staff responsible for the GWS accreditation also regularly engage with trade unions to make sure prospective and current accredited businesses are engaging proactively and constructively in dialogue with their employees. When there are outstanding industrial disputes or issues concerning workers' rights, accreditation may be put on hold until they are resolved.

We recognise the importance of proactively promoting freedom of association and collective bargaining with our suppliers and broader supply chain. We are currently

developing an engagement approach on this issue. In July 2025, we tested our approach by holding a meeting our tier 2 Oyster card chip supplier, NXP Semiconductors, who were open to having a conversation on the matter.
Violations of these rights are widespread in electronics supply chains. For example, Know The Chain's 2025 ICT benchmark report found that 93 per cent of companies scored zero on their efforts to support and enable freedom of association in their supply chains. Against this backdrop, we welcomed the opportunity to begin dialogue with a company operating in this sector.
Our discussion covered the unionisation and collective bargaining status at the NXP site in our supply chains, their auditing practices, grievance mechanisms and engagement with wider stakeholders, such as global unions and NGOs.
NXP were also transparent about the challenges they face, including how unionisation conditions differ depending on location and country, and acknowledged areas where their own practices could improve. As a result of this conversation, we now have a stronger understanding of the issues involved, which we intend to build on in future engagements.
In the long-term, we plan to have similar meetings with all our high-risk suppliers. We will also include questions on them in the new ethical sourcing action plan currently being developed by the RP Manager and CRPT.

The CRPT ethical sourcing lead is also part of the Working Group on Freedom of Association and Collective Bargaining, facilitated by Electronics Watch. In 2025-26, the group worked on identifying a case where these rights are violated, so that public procurement leverage could be used to facilitate access to remedy. The group explored several cases where we could collaborate with significant appetite by workers to receive external support. However, no case met our criteria. We will continue this work in 2026-27.

3.3. Collaboration and stakeholder engagement

Addressing the human and labour rights risks in our supply chains is not something we can do on our own. It is a long-term process, which requires collaboration between several different stakeholders, including us, our suppliers, other public buyers, governments, workers, trade unions, and civil society organisations. While we engage with a variety of different stakeholders, these are the most relevant:

Electronics Watch
Electronics Watch is a key partner for us in exercising HRDD. In addition to the activities described so far, in 2025-26, we also continued to participate in the Low Emission Vehicles Programme meetings on a quarterly basis.

International Working Group on Ethical Public Procurement (IWGEPP)
TfL is represented by the CRPT at the IWGEPP, a group that brings together different stakeholders working on ethical public procurement, including practitioners, policymakers, researchers and NGOs. In 2025-26, we:

- Attended the quarterly meetings of the Practice sub-working group, to share and discuss the different approaches to HRDD among participants;
- Organised quarterly 'clinic' sessions, creating a forum to discuss practical challenges on upcoming tenders, including on risks related to specific industries, and best approaches to contract management;

- Organised a special clinic session on public procurement and businesses operating in occupied territories.

In 2025-26, the CRPT ethical sourcing lead also became Vice Chair of the group.

Solar PV Working Group - Action Sustainability

In 2026, the CRPT ethical sourcing lead joined Action Sustainability's Solar PV Working Group, to deepen our knowledge about how to address human and labour rights risks in solar PV supply chains. The group meets on a quarterly basis and is attended by business representatives, public buyers and experts in the field.

3.4. Continuous improvement

Our due diligence process underwent significant changes in 2025-26, including:

- A review of our risk categories, as detailed in Table 2;
- A new threshold for risk assessing procurements, from £15m to £25m, due to resourcing;
- A new set of ethical sourcing ITT questions. We moved away from open ended questions, and introduced specific, evidence-based questions on the bidders' risk assessment and management processes and supply chain mapping. For contracts involving labour, we also introduced questions on the use of third-party labour and on bidders' compliance with the Employer Pays Principle;
- A reviewed set of ethical sourcing contract conditions to be used in all non-high risk contracts, as part of TfL's baseline contract conditions. These are a shorter, streamlined version of our high-risk ones, but which keep the same requirements described in Table 3;
- A new process and template for risk assessing our existing contracts, as detailed in Section 3.2.a.

Our risk assessment for existing contracts primarily considers industry risks, rather than individual practices of our suppliers and their supply chains. A significant reason for this is the lack of transparency and traceability of our supply chains. Further, because we recognise that self-reported supplier information only represents part of the picture and is not objective, we continue to take steps to obtain information from other credible sources and methodologies to corroborate what we have. We have started to move into this direction by incorporating information from the Violations Tracker and the BHRC into our risk assessment, although this only covers our direct suppliers.

Our continuous work towards traceability and transparency in electronics and zero emission buses supply chains have allowed us to obtain much more concrete information on risks and violations for them, thanks to our affiliation to Electronics Watch and their worker-driven methodology (Table 4).

In the long term, we plan to develop a process to gather worker-driven information for other sectors too. We also plan to take other factors into consideration to inform our risk assessment, such as information gathered from supply chain mapping, information about labour type and supply chains, and MSAT scores, among others.

Our approach to following up on medium and high-risk suppliers is also currently being re-developed by the CRPT lead and TfL's RP Manager. We are currently developing an ethical sourcing action plan template, to request more information from high-risk suppliers on their practices, as well as a supply chain mapping plan.

4. Training

In 2025-26, TfL's RP manager attended the GLA Group Modern Slavery Delivery Group quarterly meetings, where the CRPT ethical sourcing lead shared best practice and emerging risks that the Group needs to take into consideration when procuring.
The CRPT ethical sourcing lead also worked to co-develop a training on modern slavery, in partnership with NHS Commercial Solutions, Newcastle University, Brighton and Sussex Medical School, Electronics Watch, and IOSH. The training is the first of its kind, specifically addressing modern slavery in the supply chains of public buyers, and covering roles and responsibilities of both public procurers as well as their suppliers. Launched in May 2026, it will be used in 2026-27 to upskill relevant staff as well as suppliers found lacking, for example scoring under 70% in the MSAT.

5. Goals and Key Performance Indicators

We will improve our HRDD process by:

1. Developing our ability to respond to potential risks on the ground by establishing different levels of responsibility and escalation measures;
2. Developing a new ethical sourcing action plan template;
3. Addressing gaps identified through the Electronics Watch HRDD Maturity Matrix; and
4. Deepening our supply chain mapping, and expanding the list of suppliers on the Open Supply Hub.

We will exercise HRDD by:

1. Re-assessing our existing key suppliers for human and labour rights risks, and identifying our salient risks;
2. Rolling out another MSAT campaign;
3. Requiring low scoring MSAT suppliers to attend a modern slavery training, and following up to identify where gaps remain in their approaches
4. Taking substantive action to address risks to freedom of association and collective bargaining in our supply chains, in collaboration with Electronics Watch and Freedom of Association Working Group.

The following KPIs will be used to track our actions:

- % suppliers responding to MSAT campaign
- % suppliers providing ethical sourcing action plan when asked
- % suppliers providing supply chain data when asked
- % suppliers responding to our ask for engagement and supply chain action

This Statement has been approved and published by the TfL Board and will continue to be reviewed at least once annually.

Andrea Clarke, General Counsel **24 September 2026**

On 23 September 2026, the TfL Board approved the TfL Modern Slavery Statement 2025/26 and authorised the General Counsel to agree the final form of the Statement. The Statement has also been agreed by Transport Trading Limited and each of its subsidiary companies covered by this Statement.