

# Modern slavery statement

A decorative graphic on the right side of the page. It features a thin, curved pink line that starts at the top right and curves downwards and to the left. A horizontal pink line intersects this curve. Below the horizontal line, there is a large blue shape that tapers to the right, and a smaller pink shape that tapers to the right, positioned above the blue shape.

***Go Ahead***

## **THE GO-AHEAD GROUP PLC**

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT<sup>1</sup> FOR THE 2019/20 FINANCIAL YEAR**

#### **INTRODUCTION FROM DAVID BROWN, GROUP CHIEF EXECUTIVE**

The Go-Ahead Group plc and its subsidiaries (“Go-Ahead”/ “us”/ “we”/ “our”/ the “Group”) are committed to ensuring that all of its business dealings are carried out in full compliance with relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited both within Go-Ahead and its supply chains. Go-Ahead are committed to improving our practices to combat slavery and human trafficking and we have continued to take steps during the 2019/20 Financial Year to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace.

#### **A) GO-AHEAD'S STRUCTURE**

The subsidiaries of The Go-Ahead Group plc are providers of public transport services, predominantly in the UK Bus and Rail sectors. The Go-Ahead Group plc has its registered office in Newcastle, England, and the Group has over 30,000 employees. Many of our subsidiaries in the UK had a turnover in excess of £36 million during the 2019/20 Financial Year and this Statement applies to them and they are listed in Annex 3. We also apply its principles on a voluntary basis to other subsidiaries in the UK whose turnover is less than £36m and overseas subsidiaries which have no equivalent legislation in their local jurisdiction. Compliance with this Statement is endorsed by the board of directors of each subsidiary listed in Annex 3.

The Statement will be endorsed, approved and adopted by The Go-Ahead Group plc and each of the relevant Group subsidiaries and it is made available on their respective websites where there is an obligation to do so.

#### **B) OUR BUSINESS**

The Group operates a devolved operating structure, with multiple subsidiaries. However, procurement is one of the support functions which is, primarily, provided centrally, affording the Group’s significant control over the supply chain of its subsidiaries.

#### **C) OUR SUPPLY CHAIN**

Our supply chain includes manufacturing, primarily of bus and rail vehicles, parts, uniforms, services (such as cleaning of stations, vehicles and depots) and outsourced IT hardware and software services. As procurement is a centralised function, the Group

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<sup>1</sup> References in this Statement to the “Act” are references to the “Modern Slavery Act 2015”.

can implement the due diligence and contractual processes to which are referred below to give effect to Go-Ahead's anti-slavery and trafficking policy.

**D) OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to preventing acts of modern slavery or human trafficking in our supply chain and/or in any part of our business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective due diligence and contractual compliance to prevent slavery and human trafficking in our supply chain.

**E) DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

Each year the Group assesses the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain, with the most recent assessment undertaken for the Financial Year 2019/20. We continue to believe that those areas, which carry the highest susceptibility to the risk of employing slave or trafficked labour, are all manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning / security / gate line colleagues ("**At Risk Functions**" / "**ARFs**").

**F) SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance for slavery and human trafficking. Part of our commitment to prevent modern slavery and human trafficking from occurring within our business or our supply chain is to take steps to make sure that we include contractual terms with suppliers which reference their obligation to abide with our anti-slavery and trafficking policy or their own equivalent. This provides to us a way to enforce requirements or cease doing businesses with organisations which are non-compliant.

We have been independently assessed and accredited as working in compliance with ISO 20400 the "Sustainable Procurement" standard. We include questions relating to compliance with the Act as part of our pre-qualification questionnaire and in our tenders for all new suppliers and these are monitored as part of our sustainability KPIs.

To further promote best practice, we have established the "Go-Ahead Supplier Sustainability Award" to promote socially responsible business practices, including adherence to our standards in the area of modern slavery and human trafficking.

We have also launched a "Sustainable Procurement Charter" (the "**Charter**") following a heat mapping exercise with our key high-risk suppliers. The Charter covers many areas of sustainability in our supply chain including modern slavery and sets out the steps we are taking to reduce its occurrence in our supply chain. The Charter is published on our website.

**G) TRAINING**

On-line training took place during the Financial Year 2019/20. An awareness campaign was also launched, during the week of Anti-Slavery Day in October 2019, and again in the first Quarter of 2020 to ensure that all relevant staff were trained and the issues surrounding slavery and human trafficking were publicised. All Go-Ahead colleagues also have access to the Modern Slavery Policy and the Group Whistleblowing Policy which allows them to identify and report any legitimate concerns that they may have had without recrimination and in a confidential and secure manner.

**H) REPORTING ON FINANCIAL YEAR 2019/20**

- 1) Annex 1 sets out the steps taken in the Financial Year 2019/20
- 2) Annex 2 sets out plans for the Financial Year 2020/21

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the Financial Year 2019/20.



David Brown  
Group Chief Executive  
The Go-Ahead Group plc  
Date: 4 September 2020

The Board of Brighton & Hove Bus and Coach Company Limited, a subsidiary of The Go-Ahead Group plc, have endorsed approved and adopted this Modern Slavery Act statement for and on behalf of Brighton & Hove Bus and Coach Company Limited



Martin Harris  
Managing Director  
Brighton & Hove Bus and Coach Company Limited  
Date: 17 September 2020

## **ANNEX 1: 2019/20 STEPS TAKEN**

### ***Due Diligence.***

We have continued to include pre-qualifying questions for tenders and terms and conditions in our contracts with suppliers which require compliance with the Act. Compliance with the Act forms part of our continued adherence to and our achievement of International Organisation for Standardisation (ISO) 20400 “Sustainable Procurement”, in which we were independently assessed. This includes an external assessment of our sustainability. Existing clauses in our standard procurement terms were augmented with requirements from our supply chain Charter to enhance the strength of our contractual promises from suppliers in the area of modern slavery and human trafficking.

### ***Training and awareness***

Our Modern Slavery Policy is available on our intranet along with information about how to report issues, so that guidance is available to staff who may have concerns. Training remains part of the mandatory compliance programme for selected staff and an updated training course was delivered in the first quarter of 2020. An awareness campaign was also launched during the week of Anti-Slavery Day in October 2019 and again in the first Quarter of 2020. This ensured that slavery and trafficking issues were publicised. All relevant staff were trained and equipped with the knowledge to spot slavery & human trafficking, to understand different types of slavery and trafficking and how to report a concern.

## **ANNEX 2: 2020/21 PLANS**

### ***Due Diligence***

We will continue to undertake the due diligence steps outlined for 2019/20 in the coming financial year.

Strategic suppliers will be required to sign up to the “Supply Chain School” and assess themselves against a number of sustainability criteria resulting in “personal” action points against which Go-Ahead will perform their own assessment.

### ***Training and awareness***

We will have a facility to provide computer based training to selected new staff and are able to run awareness campaigns, where required, so that recognising a slavery or trafficking issue, understanding different types of slavery and trafficking and how to report a concern are more widely known.

### **ANNEX 3: Group Statement - subsidiaries for whom the Group is legally obliged to report**

The UK subsidiaries of The Go-Ahead Group plc which had a turnover of £36m, or higher, during the financial year ended 27 June 2020 are noted below (the “Relevant Subsidiaries”). The Relevant Subsidiaries have each endorsed, approved and adopted the Group Statement, copies of which can be found on their dedicated websites.

Go North East Limited  
London General Transport Limited  
Brighton & Hove Bus & Coach Company Limited  
The City of Oxford Motor Services Limited  
Go South Coast Limited  
London & South Eastern Railway Limited  
Govia Thameslink Railway Limited