

Modern slavery statement

A decorative graphic on the right side of the page. It features a large blue shape on the left that tapers to a point on the right. A thin pink curved line starts at the top right, curves down and left, then curves down and right, passing through the tip of the blue shape. A horizontal pink line extends from the left edge of the page to the tip of the blue shape. From this tip, a pink triangle extends to the right edge of the page.

Go Ahead

THE GO-AHEAD GROUP PLC

SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT¹ FOR THE 2020/21 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 2020/21 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 2020/21 Financial Year, this Statement applies to them and they are listed in Annex 3. We also apply the principles contained in this Statement 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.

The Statement will be endorsed, approved and adopted by The Go-Ahead Group plc and each of the relevant Group subsidiaries listed in Annex 3 to this Statement 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

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

can implement the due diligence and contractual processes which are referred to 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 2020/21. We continue to believe that those areas, which carry the highest susceptibility to the risk of employing slave or trafficked labour, are manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning / security / gate line colleagues.

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 us with a way to enforce requirements or cease doing business 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.

We also operate 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 compliance 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

A targeted programme of on-line training took place during the Financial Year 2019/20 and an updated programme will be launched in 2021/22. Colleagues who commence their employment with Go-Ahead in between those periods will have access to the on-line training. Awareness campaigns have and will continue to form part of our efforts to highlight the slavery and human trafficking issues amongst our colleagues. 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 without recrimination and in a confidential and secure manner.

H) REPORTING ON FINANCIAL YEAR 2020/21

- 1) Annex 1 sets out the steps taken in the Financial Year 2020/21
- 2) Annex 2 sets out plans for the Financial Year 2021/22

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 2020/21.



David Brown
Group Chief Executive
The Go-Ahead Group plc
Date: 3 September 2021

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:

ANNEX 1: 2020/21 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 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. We have a facility to provide computer based training to new colleagues and are able to run awareness campaigns, where required, so that recognising a slavery or human trafficking issue, understanding different types of slavery and human trafficking and how to report a concern are more widely known.

ANNEX 2: 2021/22 PLANS

Due Diligence

We will continue to undertake the due diligence steps outlined for 2020/21 in the coming financial year.

Training and awareness

Training will be part of the mandatory compliance programme and an updated training course is to be provided in the 2021/22 Financial Year. We will look to create and publicise awareness campaigns in order to ensure that slavery and human trafficking issues are publicised. All relevant staff will be trained and equipped with the knowledge to identify slavery and human trafficking, to understand different types of slavery and trafficking and how to report a concern.

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 3 July 2021 are noted below (the “**Relevant Subsidiaries**”). The Relevant Subsidiaries have each endorsed, approved and adopted this 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
Plymouth Citybus Limited.
