

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT<sup>1</sup> FOR THE 2023 FINANCIAL PERIOD**

### **INTRODUCTION FROM MIGUEL ÁNGEL PARRAS, GROUP CHIEF EXECUTIVE**

The Go-Ahead Group Limited and its subsidiaries (“Go-Ahead”/ “us”/ “we”/ “our”/ the “Group”) are committed to ensuring that all their 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. We are committed to improving our practices to combat slavery and human trafficking and we have continued to take steps during the financial period ended on 31 December 2023 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 Limited are providers of public transport services, predominantly in the UK Bus and Rail sectors. The Go-Ahead Group Limited has its registered office in Newcastle, England, and has over 27,000 employees. Go-Ahead is owned by the Australian transport operator Kinetic and the Spanish transport infrastructure company Globalvia. Many of our subsidiaries in the UK had a turnover in excess of £36 million during the 2023 financial period. 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 has been endorsed, approved, and adopted by The Go-Ahead Group Limited 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, indirect goods and services and outsourced IT hardware and software services. Policy and process is led by the Group centralised function and we

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

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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 Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective due diligence and contractual compliance to prevent slavery and human trafficking in our supply chain. In 2023, we reviewed and refreshed our Modern Slavery Policy and made it available to all our colleagues via the Group's intranet.

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

The Group has assessed the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain. 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 e.g. cleaning, security, building and maintenance works, waste management and clothing.

**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 to 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 Modern Slavery Act as part of our pre-qualification questionnaire and in our tenders for all new suppliers.

Since 2019, we have operated in accordance with our "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](#).

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## **G) TRAINING**

A targeted programme of online training took place during the financial period 2023. Colleagues who commenced their employment with Go-Ahead in this period have taken mandatory modern slavery prevention online training. All colleagues retake the training every two years as a mandatory procedure.

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 2023**

- 1) Annex 1 sets out the steps taken in the financial period 2023.
- 2) Annex 2 sets out plans for the next financial period.

This statement has been approved by The Go-Ahead Group Limited Board of Directors and 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 2023.



Miguel Ángel Parras  
Group Chief Executive  
The Go-Ahead Group Limited  
Date: 18<sup>th</sup> September 2024

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## **ANNEX 1: 2023 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 included an external assessment of our practices. 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 joiners and colleagues retaking the course every two years, 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 is more widely known.

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## **ANNEX 2: PLANS FOR THE NEXT FINANCIAL YEAR**

### ***Due Diligence***

We will continue to undertake the due diligence steps described in Annex 1 in the coming financial year.

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

Training will continue to be part of the mandatory compliance programme and will be provided in the 2024 Financial Year. All new joiners 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. All colleagues will continue to be required to retake the training every two years as a mandatory procedure. We will also look to create and promote awareness campaigns in order to ensure that slavery and human trafficking issues are publicised.

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

The UK subsidiaries of The Go-Ahead Group Limited which had a turnover of £36m, or higher, during the financial period between January to December 2023 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  
Govia Thameslink Railway Limited  
Plymouth Citybus Limited  
Go North West Limited

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