

# 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 blue shape. A horizontal pink line intersects this curved line. To the right of the intersection, a pink triangular shape points to the right.

***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 2018/19 FINANCIAL YEAR**

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

The Go-Ahead Group plc and its subsidiaries (“Go-Ahead”/ “us”/ “we”/ “our”/ the “Group”) is 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 2018/19 Financial Year to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace.

#### **A) ORGANISATION'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 approximately 28,000 employees. Many of our subsidiaries in the UK had a turnover in excess of £36 million during the 2018/19 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 operating subsidiaries in the UK whose turnover is less than £36m and overseas subsidiaries who have no equivalent legislation in their local jurisdiction. In all cases compliance with this Statement is endorsed by the Board of Directors of each operating subsidiary.

All the steps taken in this Statement are taken by The Go-Ahead Group plc. The Statement will be endorsed, approved and adopted by each of The Go-Ahead Group plc’s relevant operating subsidiaries and is made available on their respective websites where there is an obligation to do so.

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

The Group’s business is organised into multiple subsidiaries. The Group operates a devolved management structure, however procurement is one of the support functions which is, primarily, provided centrally, affording the Group’s centre 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 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 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**

Go-Ahead again assessed the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain for the financial year 2018/19. We continue to believe that those areas that 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 to 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 businesses with organisations who are non-compliant.

We are CIPS Corporate Certification Standard certified. We have also been independently assessed and accredited as achieving the ISO 20400 "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 Sustainable Procurement 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 Supply Chain 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**

Due to the biennial nature of the Group's compliance training programme, no on line training took place in this Financial Year. All Go-Ahead colleagues had access to the Modern Slavery Policy and a whistleblowing process which will allowed them to identify and report any concerns that they may have had in a confidential and secure manner. Training will be provided in Financial Year 2019/20.

**H) REPORTING ON FINANCIAL YEAR 2018/19**

- 1) Annex 1 sets out the results of the initiatives that were launched in Go-Ahead's 2018/19 Modern Slavery Statement.
- 2) Annex 2 sets out Plans for the Financial Year 2019/20

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 29 June 2019.



David Brown  
Group Chief Executive  
The Go-Ahead Group plc  
Date: 29 August 2019

## **ANNEX 1: 2018/19 STATEMENT REPORTING**

### ***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 formed part of our continued adherence to CIPS Corporate Certification accreditation 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.

### ***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. The biennial training remains part of the mandatory compliance programme for selected staff and preparations began in this Financial Year for its delivery in the next Financial Year.

## **ANNEX 2: 2019/20 PLANS**

### ***Due Diligence***

We have launched the Sustainable Procurement Supply Chain Charter which all suppliers will be required to indicate their adherence to. Existing clauses in our standard procurement terms will be augmented with requirements from that Charter to enhance the strength of our contractual promises from suppliers in the area of Modern Slavery and Human Trafficking.

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***

Group and Operating Companies will provide computer based training to selected staff and run awareness campaigns for a wider group of staff, so that spotting 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 - operating 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 29<sup>th</sup> June 2019 are noted below (the “Operating Subsidiaries”). The Operating 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