

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

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT<sup>1</sup> FOR THE 2015/2016 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 taken significant steps in the Financial Year to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace as detailed in this Statement.

#### **A) ORGANISATION'S STRUCTURE**

The subsidiaries of The Go-Ahead Group PLC are, predominantly, providers of public transport services in the UK Bus and Rail sectors. The Go-Ahead Group PLC has its registered office in Newcastle, England and the Group has over 26,000 employees in the UK. Many of our subsidiaries in the UK have a turnover in excess of £36 million in this Financial Year and this Statement applies to all of our UK operating subsidiaries regardless of their turnover, compliance with it having been endorsed by the Board of Directors of each operating subsidiary. In the 2016/17 Financial Year we will commence operation Bus Services in Singapore and, in 2020, Rail Services in Germany each via locally based subsidiaries, these overseas subsidiaries will, when fully operational, be reported on in subsequent statements. All the steps taken in this statement are taken by the Go-Ahead Group for itself and each of its operational subsidiaries referred to in B) below.

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

The Group's business is organised into 12 operating 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 chains of the subsidiary operations.

#### **C) OUR SUPPLY CHAINS**

Our supply chains include manufacturing, primarily of bus and rail vehicles, parts and uniforms, support services of non-core services (such as cleaning of stations, vehicles and depots) and outsourced IT hardware and software services. As procurement is a centralised

---

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

function the Group is able to 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 ensuring that there is no modern slavery or human trafficking in our supply chains 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 ensure slavery and human trafficking is not taking place anywhere in our supply chain and a copy of our Policy can be found here.

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

1) Go-Ahead has identified the following areas of the business and or supply chain as being areas which carry the highest susceptibility to the risk of employing slave or trafficked labour: all manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning / security / gateline staff ("**At Risk Functions**" / "**ARFs**").

2) Suppliers of ARFs were asked to complete Go-Ahead's "Modern Slavery Due Diligence Questionnaire" and where deemed necessary following an analysis of those results, we may choose to exercise contractual rights of audit or require those Suppliers to provide statements attesting to their compliance with the Act. We will also monitor our Supplier's statements made under s54 of the Act to assess their compliance with the requirements of the Act.

3) In order to mitigate the risk of slavery and human trafficking occurring in our supply chains Go-Ahead's Procurement Strategy, Policy and Procedures Manual was updated for year 2015-2016, and the Supplier Code of Conduct and Standard Terms of Purchase for Goods and Services have been updated and to include specific obligations under the Act on our Suppliers.

4) At Group level we have researched available training courses for staff and we will commence the delivery of this training, which will alert staff to ARFs, the risks of slavery and human trafficking occurring and how to be alert to its existence, in the 2016/17 Financial Year.

#### **F) SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors support our values on this subject we require our Suppliers to abide by our Go-Ahead's anti slavery and trafficking policy (or their own equivalent) via our contract terms.

In 2016-2017 KPIs will be created to quantify and capture arrange of Group "Sustainability Objectives", including requirements of the Act.

#### **G) TRAINING**

1) Outsourced ARFs. Where an ARF is outsourced we have identified training resources to suit our business and in the 2016/17 Financial Year will commence the process of training those who procure the ARF and those employees who manage the delivery of the ARF at Op Co Level (contract managers / HR / Depot managers/ Depot Supervisors /Station Managers / Station Supervisors /Relevant Directors). We have also updated our standard contract terms in order that, when signed, Suppliers will be contractually obliged to provide analogous training to their staff who are engaged in the supply of services to Go Ahead.

2) Self Provided ARFs. Where the ARF is provided "in house" we have identified training resources to suit our business and in the 2016/17 Financial Year we shall commence the process of training all those involved in the establishment and delivery of that ARF (HR/Relevant Directors/Managers, supervisors and those persons who perform the ARF).

All staff have access to a whistleblowing processes which will allow them to report any concerns that they may have in a confidential and secure manner.

Given the scope of possible participants we have had to adopt many different modes of delivery for training including computer based training, leaflets, classroom training. Training provided has, as a minimum, dealt with the following areas how to spot a slavery or trafficking issue / why slavery and trafficking wrong / types of slavery and trafficking / how to report a concern.

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 ending 2nd July 2016.



Group Chief Executive  
The Go-Ahead Group PLC.  
Date: 14<sup>th</sup> July 2016

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.



Managing Director  
Brighton & Hove Bus and Coach Company Limited  
Date: 14<sup>th</sup> July 2016