

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

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT<sup>1</sup> FOR THE 2016/2017 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. This year our subsidiary in Singapore is included in the reporting. In 2020, Rail Services in Germany will be provided by a local subsidiary and this subsidiary 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 14 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.

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

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

Our supply chains include 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 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 chains 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 continues to monitor those areas of the business and or supply chain which we believe carry the highest susceptibility to the risk of employing slave or trafficked labour. These remain: all manufacturing processes or other processes where low skilled labour is required or managed e.g. cleaning / security / gateline 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 any suppliers which reference their obligation to abide with our antislavery and trafficking policy or their own equivalent. This provides us with a way to enforce requirements or cease doing businesses with organisations who are not complying.

We have been assessed as reaching the CIPS Corporate Certification Standard and are committed to continue to reach this standard. The assessment regime includes an audit process which takes into account a wide-ranging view of our approach to supplier management including how we manage sustainability and one of the performance indicators is our suppliers' compliance with the Modern Slavery Act. We introduced a question relating to compliance with the Modern Slavery Act for as part of our pre-qualification questionnaire for all new suppliers which is monitored as part of our sustainability KPIs.

### **G) TRAINING**

The training provided to staff covers ARF, risks of slavery and human trafficking occurring and how to be alert to its existence. All Go-Ahead colleagues continue to have access to a

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

#### **H) REPORTING ON FINANCIAL YEAR 2016/17**

1) Annex 1 sets out the results of the initiatives that were launched in Go-Ahead's 2016/17 Modern Slavery Statement.

2) Annex 2 sets out Plans for Financial Year 2017/18

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 1 July 2017.



Group Chief Executive  
The Go-Ahead Group plc  
Date: 31 August 2017

The Board of On Track Retail Limited, a subsidiary of The Go-Ahead Group plc, have endorsed, approved and adopted this Modern Slavery Act statement for and on behalf of On Track Retail Limited.



Director  
On Track Retail Limited  
Date: 19 September 2017

## **Annex 1 – 2016/17 Statement Reporting**

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

In the 2015/16 Statement Go-Ahead committed to undertake due diligence on Suppliers in the next financial year. Suppliers of ARFs. were asked to complete Go-Ahead's "Modern Slavery Due Diligence Questionnaire" which asked for confirmation that their own organisation and supply chain complied with all areas of the Modern Slavery Act. Of the responses that we received 100% indicated compliance with the Act.

Central Procurement has revised the Group's tendering process, so that suppliers are now asked to indicate their compliance with the Act as part of the pre-qualifying process of all tenders.

### ***Training***

We commenced delivery of training during this financial year to key members of staff, for example those active in procurement or managing at risk contracts, directors and HR managers. The training covers ARF, risks of slavery and human trafficking occurring and how to be alert to its existence.

Operating Companies commenced planning of an awareness programme for the coming year for their organisations.

## **Annex 2 – 2017-18 plans**

### ***Due Diligence***

We plan to continue to focus on the "at risk" suppliers and in particular suppliers of ARFs from whom we are awaiting a response to the questionnaire. The procurement process has been updated to include a checklist for anti-slavery terms for new suppliers and we plan to roll out a process to vary existing contracts, so that anti-slavery terms are incorporated.

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

The training will be continued in the next financial year and is intended to be included as one of mandatory training requirements in a compliance programme. In the financial year 2017/2018 we are planning to deliver the awareness programme so that issues surrounding Modern Slavery are more widely known. The aim is to raise awareness amongst a wider group of staff about how to spot a slavery or trafficking issue / why slavery and trafficking is wrong / types of slavery and trafficking and how to report a concern.

Looking forward, Modern Slavery training will become part of our catalogue of compliance training and priority colleagues will be asked to refresh their knowledge and understanding

every two years. We will offer the awareness training to selected new starters within our businesses so that they are familiar with our commitments to the Act from the outset of their careers with Go-Ahead.

We will provide on-line reference resources to colleagues so that guidance is available along with information about to report concerns.

