Modern Slavery Policy

15/10/2024

1 Purpose

The purpose of this policy is to state Go-Ahead's support and compliance with the UK Modern Slavery Act 2015 ("MSA") and our zero-tolerance approach to modern slavery.
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2 Policy Sponsor

Glyn Watts, Head of Business Services, Go-Ahead Group.

3 Sponsor's introduction

Modern slavery is a crime and a violation of fundamental human rights. Go-Ahead and its operating companies have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, which is consistent with our disclosure obligations under the MSA.

4 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

5 Definitions and interpretations

The following definitions and interpretations are applicable to this policy document:

Term	Meaning
Go-Ahead or Company	The Go-Ahead Group Limited
Group	The Go-Ahead Group Limited and its subsidiaries (whether directly or indirectly owned)
Board	The Company's board of directors
Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services which are imposed using coercion.
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

6 Abbreviations and acronyms

The following abbreviation and acronym are applicable to this policy document:

Abbreviation/acronym	Meaning
MSA	UK Modern Slavery Act 2015

7 Policy statement

Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking ("modern slavery"), all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Go-Ahead and its operating companies have a zero-tolerance approach to modern slavery and we expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. It is relevant to our business and the society that we operate in. As a good corporate citizen preventing modern slavery in our organisation is the right thing to do for many reasons.

The MSA recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

Supply Chain

With this in mind, we need to pay particularly close attention to:

- Our own supply chain, in the context of our businesses this means we need to be alert to the practices of our suppliers of cleaning and security services, and vehicle parts and garment manufacturers;
- The supply chains of our suppliers; and
- Any outsourced activities where the relevant supply chains involve jurisdictions that may not have adequate safeguards.

Recruitment

Agency Staff:

- It is policy that we only use specified reputable recruitment agencies; and
- To ensure the potential for slavery and human trafficking is reduced as far as possible, we check recruitment agencies before adding them to our list of approved suppliers.

General Recruitment:

- We always ensure all staff have a written contract of employment;
- We always ensure staff are legally able to work in the UK;
- We check the names and addresses of our staff; and
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

Responsibility for the policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

At Group level, Elliot Laurie (elliot.laurie@go-ahead.com), in his capacity under the whistleblowing policy, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Each operating company has its own compliance officer, who shall be responsible for ensuring delivery of and adherence to this Policy within the relevant operating company.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given computer-based training on modern slavery.

You are invited to comment on this policy and suggest ways in which it might be improved or if you think there is more that we can do to prevent people from being exploited. Comments, suggestions, and queries are encouraged and should be addressed to the Group Compliance Officer or sent to grouplegal@go-ahead.com.

Identifying and reporting modern slavery, and compliance with the policy

You must ensure that you read, understand, and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. All colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

In the battle against modern slavery, all colleagues should keep their eyes and ears open. The Appendix contains a non-exhaustive list of factors which may indicate that a person is subject to a form of modern slavery.

Colleagues in managerial positions should listen, be approachable and respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation. Managers should use their experience and professional judgement to gauge situations and, where possible, raise awareness of the issues, particularly managers who supervise cleaning or security services.

If you suspect someone is the victim of modern slavery, or that it may occur in the future, then you must follow the reporting procedures set out in the Appendix.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must contact the Group Compliance Officer OR report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Group.

Compliance Officer in person or through the whistleblowing helpline.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Group Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Organisation responsibilities

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- Manage our recruitment as mentioned above;
- Check our supply chains as mentioned above;
- Ensure we have in place an open and transparent grievance process for all colleagues;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare by way of training and awareness programmes;
- Make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking are not taking place in our supply chains, and to demonstrate that we take our responsibilities to our employees and our customers seriously.

Breaches of this policy

Any colleague who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Monitoring our procedures

We will review our Modern Slavery Policy regularly, at least annually. We will provide information and/or training on any changes we make.

8 Communication

This policy will be uploaded to the Group intranet, The Junction, and made accessible to the statutory directors of all operating companies. It will also be uploaded to the company's website and made publicly available to all stakeholders.

Go-Ahead also provides awareness campaigns to all staff at least on an annual basis.

9 Training

All colleagues who commence their employment with Go-Ahead have to complete a modern slavery prevention online training which highlights our commitment to respect human rights.

We provide dedicated training to staff members who are involved in managing recruitment and our supply chains and those whose job roles may lead them to encounter victims of modern slavery.

10 Further guidance

Please contact Elliot Laurie, Group Legal Director, if you need further guidance or have any questions regarding this policy.

11 Related policies

The following Group policies apply specifically to all of our colleagues in the workplace:

- Human Rights;
- Code of Conduct;
- Whistleblowing;
- Colleague Health, Safety and Well-being; and
- Operational Health and Safety.

Compliance with these policies is mandatory and is incorporated within all new joiners' inductions.

Supporting this Policy, the following Group policies apply to how we engage with our business partners and suppliers:

- Procurement; and
- Sustainable Business Policy

12 Review and approval

This policy was approved on 15 October 2024 and is reviewed annually.

Appendix

Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off at and collected from work;
- The person is withdrawn or they appear frightened;
- The person does not seem to be able to contact friends or family freely; and
- The person has limited social interaction or contact with people outside their immediate environment.

Please note this list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

Reporting slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, call the Modern Slavery Helpline (08000 121 700) or dial 999.

Otherwise, you should discuss your concerns with your immediate manager or Elliot Laurie (elliot.laurie@go-ahead.com) who will decide on a course of action and provide any further advice. If you feel it is necessary, you may report the concern in accordance with our whistleblowing policy.