# **Human Rights Policy**

The Go-Ahead Group plc (the "Group") is one of the UK's leading public transport companies and we are committed to conducting our business in a manner that respects and upholds the rights of all of those people with whom we engage and who are affected by our actions.

We believe that everyone is entitled to basic rights and freedoms, whoever they are and wherever they live. We expect our colleagues, and those with whom we undertake business, to incorporate a general commitment to respect those rights and freedoms in all of their day-to-day activities.

Our values are embedded throughout the organisation with respect for human rights and ethical behaviour underpinning them all.

### **Our Aim**

This Human Rights Policy (the "**Policy**"), and our associated policies and systems, reflect our support of the principles contained within the United Nations' Universal Declaration on Human Rights (the "**Declaration**"), the UN Guiding Principles on Business and Human Rights (the "**Principles**") and the International Bill of Human Rights (the "**Bill**").

We strive to avoid causing or contributing to adverse human rights impacts on our people or in the running of our businesses.

As a responsible international business, we look to support and respect all internationally recognised human rights. We aim to ensure that, where local laws differ from our own policies, we will, so far as possible, follow the higher standard. Where there is conflict, we will adhere to the local laws while seeking ways to respect international human rights to the greatest extent possible.

### **Our People and Our Policies**

In line with the Declaration, the Principles and the Bill, we look to our people to respect the human rights of their colleagues including non-discrimination and the freedom of association and the right to engage in collective bargaining. This is embedded within the Group's policies and procedures manual. Local senior management are tasked with ensuring compliance and confirming this as part of their biannual risk reporting to the Group executive directors.

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

- Anti-Bribery;
- Code of Conduct;
- Whistleblowing;
- Equal Opportunities, Diversity and Inclusion;
- · Health and Wellbeing; and
- Health and Safety.

Compliance with these policies is mandatory and is incorporated within all new joiners' inductions. All of our colleagues must be aware of, and adhere to, this Policy and the additional policies set out above: failure to comply could result in such offending colleague being liable to disciplinary action.

#### **Our Business Partners**

We are committed to ensuring that all of our 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, child labour, forced labour and human trafficking and continually work to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace.

We strive to evaluate and select all of our suppliers and contractors taking into account this Policy. Local management is required to monitor performance of their suppliers where appropriate.

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

- Modern Slavery Policy;
- Ethical Procurement Policy; and
- Sustainable Suppliers' Policy

Further, our terms and conditions of goods and services purchase arrangements provide that our suppliers are required to:

- not employ child labour nor engage in forced labour;
- comply with all local employment laws (including those laws on equality of rights on disability and sex);
- conduct themselves in accordance with the highest level of ethical standards; and
- comply with our visions, attitudes and beliefs which support our approach to protecting human rights.

### **Local Communities**

We are constantly striving to respect those human rights of local communities in which we operate. By undertaking open dialogue with all of our stakeholders, and participating in community engagement activities, we strive to uphold local customs, cultures and values of the people in such communities. By doing so, we look to support the highest standards in business ethics and integrity and play a positive role in furthering human rights within those communities.

## **Ensuring Compliance**

To ensure compliance with this Policy, we assess human rights impacts and monitor labour conditions both internally and across our supply chain. This involves ensuring this policy and those policies which derive from it are communicated effectively to all colleagues, contractors, suppliers and any other third party.

This Board of The Go-Ahead Group plc has overall responsibility for ensuring our commitment to respect human rights is put into practice and for the implementation of this Policy. The Board is supported by certain members of the Group Leadership Executive (in particular, support is provided by the Group Corporate Services Director, the Group Legal Director, the Group Company Secretary and the Group People Director). This ensures that every part of our business is clear about the responsibility to respect human rights.

Where we identify that we have caused or directly contributed to adverse impacts on the human rights of others, we will work to remedy those impacts through legitimate and proportionate processes. Any actual or potential violation of human rights caused or contributed to by our activities or business relationships must be reported as soon as possible in accordance with our whistleblowing policy.

The Policy will be reviewed annually and training on any changes will be undertaken.

April 2021