

Information Security and Data Protection

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 full compliance with the relevant laws and regulations. This extends to our information security and data protection policies (together, the “**Policies**”) which are in place to ensure that the processing of personal data by the Group is fair and lawful, to protect our commercial and customer information, and to facilitate business continuity by preventing the occurrence, and minimising the impact, of information security incidents.

Our Aim

Adherence to the Policies will limit:

- accidental or deliberate breaches of confidentiality, and the interference with the integrity and/or accessibility of our data;
- breaches of our legislative, regulatory and/or contractual requirements including the Data Protection Act 2018 and PCI DSS compliance; and
- reputational and financial damage.

The Group, its operating companies and all suppliers and contractors with whom it or they engage are committed to:

- adherence to their obligations under Data Protection legislation;
- treating information security as a critical business issue;
- supporting the implementation, operation and maintenance of the Policies; and
- creating an information security-aware work environment.

Our Policies

The Policies set out our commitment to protect and process all personal data of employees, contractors, suppliers and customers in a fair and lawful manner. Under the Policies, all personal data are:

- processed fairly and lawfully and in a transparent manner;
- processed for limited purposes and in an appropriate way;
- adequate, relevant and not excessive for the purpose;
- accurate and up to date;
- not kept longer than is necessary for the purpose for which it was collected;
- processed in line with data subjects' rights;
- secure;
- subject to appropriate governance and record keeping; and
- not transferred to people or organisations situated in countries without adequate protection.

All of the Group's businesses have nominated data protection managers and the Group has a Data Protection Officer to ensure the data protection principles are followed and legal obligations are met.

Ensuring Compliance

This Board of The Go-Ahead Group plc has overall responsibility for the implementation and monitoring of this Policy. The Board is supported by certain members of the Group Leadership Executive (in particular, support is provided by the Group Data Protection Officer Director, the Group Legal Director and the Group IT Director). This ensures that every part of our business is clear about the responsibility to ensure that no breaches of the Policy arise.

Within the businesses, the responsibility for ensuring compliance with the Policies rests with the operating company managing directors and Directors who are responsible and accountable for the Personal Data processing activities within their Directorate. Adherence to the Policies is audited internally and, in certain departments, externally.

Any actual or potential violation of either of the Policies caused or contributed to by our activities or business relationships must be reported as soon as possible in accordance with the relevant Policy to the Data Protection Officer (data.protection@go-ahead.com) in the case of a data protection issue and/or in the case of an Information Security issue.

We take all reported concerns seriously and investigate all reports appropriately. We will take steps to ensure that any person raising a concern or making a report in good faith suffers no detriment having done so and other protective measures are in place to support this person.

These Policies will be reviewed annually and training on any changes will be undertaken.

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