

Political Lobbying and Charitable Donations

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.

We are keen to support good and stable government. The Group seeks to be open about any non-financial lobbying activities it undertakes. While it has strict rules on its approach to political interests, it does not prevent any of its employees from choosing to join political parties in their own right and not connected with the Group or any of its businesses.

While Group is keen to support charities, particularly those in the communities it operates in, donations to charity can be used as a means of paying bribes. As a result, Group makes it clear that donations should only be given to reputable, legitimate and registered charities.

Our Policy

Political Lobbying

We have no allegiance to any particular political party. We do not make political donations and no company within the Group is permitted to make political contributions. Our funds, property and equipment are not used to fund any political party or political candidate.

Under the terms of our Competition and ABC Policy (the “**Policy**”), the Group does prevent any individual from choosing in a personal capacity to join, support or make a donation to a political party provided that it is done in such a way that there is no connection with the Group and any of its businesses and that, in the circumstances, it could not reasonably be perceived by others as being a donation or involvement by any member of the Group or for business advantage.

Go-Ahead, however, considers it is acceptable to express views on particular matters of policy without declaring support for any particular political party. In addition, Go-Ahead will participate in policy debates it considers to be relevant.

Charitable Donations

Any proposed charitable donations made by or in connection with Group (and / or any of its businesses), whether made in cash or by way of contribution to charitable events, publications or fundraising initiatives, should be submitted in writing to the employee’s local managing director for pre-approval, who, in turn, should contact the Group Compliance Officers should such director have any concern.

When considering the making of donations, the Policy provides that the following concerns should be raised with the local managing director immediately:

- the charity refuses to issue a receipt, or suggests that the donation be made anonymously;
- the donation is directed to an account in a third country;
- an officer, director, or employee of the charity has family or other ties to a government official; and
- the donation and intended recipient are suggested by a government official.

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 People Director, the Group Legal Director and the Group Company Secretary). This ensures that every part of our business is clear about the responsibility to ensure that no breaches of the Policy arise.

Any actual or potential violation of this Policy caused or contributed to by our activities or business relationships must be reported as soon as possible in accordance with Policy to the Group Compliance Officers or in accordance with the whistleblowing policy.

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.

Failure to comply with this Policy or applicable laws is classed as serious misconduct for the purposes of our disciplinary procedures.

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

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