

SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT¹ FOR THE 2024 FINANCIAL PERIOD

INTRODUCTION FROM MIGUEL ÁNGEL PARRAS, GROUP CHIEF EXECUTIVE

The Go-Ahead Group Limited and its subsidiaries (“Go-Ahead”/ “us”/ “we”/ “our”/ the “Group”) are committed to ensuring that all their 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 and human trafficking and we have continued to take steps during the financial period ended on 31 December 2024 to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace.

A) GO-AHEAD'S BUSINESS

The subsidiaries of the Go-Ahead Group Limited are providers of public transport services. They operate bus and/or rail in the UK, Ireland, Sweden, Singapore, Australia, and Norway.

Owned by the Australian transport operator Kinetic and the Spanish transport infrastructure company Globalvia, the Go-Ahead Group Limited has its registered office in Newcastle, England, and has over 29,000 employees.

Many of our subsidiaries in the UK had a turnover in excess of £36 million during the 2024 financial period, and this Statement applies to them. They are listed in Annex 3. In addition, we apply the principles contained in this Statement on a voluntary basis to other subsidiaries in the UK whose turnover is less than £36m and overseas subsidiaries which have no equivalent legislation in their local jurisdiction.

The Statement has been endorsed, approved, and adopted by The Go-Ahead Group Limited and each of the relevant Group subsidiaries listed in Annex 3. This Statement is made available on their respective websites where there is an obligation to do so.

B) OUR PROCUREMENT STRUCTURE

The Group delivers its transport services through multiple subsidiaries, however, for our UK bus operation the strategic procurement is mostly centralised, affording the Group significant control over that supply chain. Nonetheless, the operating companies have autonomy to purchase goods and services where needed, but following the Group established policies and procedures (known as the Go-Ahead Way – more information ahead in item D), or utilising Group let contracts and frameworks.

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

C) OUR SUPPLY CHAIN

Our supply chain includes more than two thousand companies that provide a range of goods and services for Go-Ahead. The main categories of spend can be found below.

Rail categories of spend:

- Traction and rolling stock
 - Parts and spares
 - Traction and rolling stock services
- Buildings
 - Building maintenance
 - Building works
- Ticket issuing systems
- Marketing
 - Advertising agents
- Recruitment services
 - Temp and contract staff
- Cleaning
 - On train cleaning
- Utilities
 - Electricity
- Rail replacement
 - Bus replacement services / taxis
- Business services
 - Customer relations services
- Security
 - Depot/garage/station patrolling
- Office / premises services
 - Waste disposal (hazardous)
 - Waste disposal (non-hazardous)
- Clothing
 - Staff clothing and protective equipment

Bus categories of spend

- Fuel, oils and lubricants
 - Diesel fuel
 - Oils and lubricants
 - Bus and coach vehicles
 - New vehicles / Manufacture
 - Parts and spares
 - Tyres
 - Maintenance
 - Cleaning
 - Bus and coach cleaning
 - Utilities
 - Electricity
 - Natural gas
 - Water
-

- Buildings
 - Building maintenance
 - Building works
 - Hazardous waste management
- IT retail
 - Mobile ticket issuing system
- Recruitment services
 - Permanent and temporary
- Clothing
 - Staff clothing / uniforms
- Office / premises services
 - Waste disposal (non-hazardous)

D) OUR POLICIES

In the period covered by this statement, the Go-Ahead Group Limited has been rolling out the Go-Ahead Way, a project that involves the draft/update of over 300 documents at formalising and standardising the most relevant policies and procedures for our business. The Go-Ahead way works with five levels of documentation, starting with a high-level policy and drilling down into plans, procedures, work instructions and training materials.

In light of the new Go-Ahead Way, we have recently reviewed our Environmental, Social, Governance (ESG) Strategy, which states our endeavour to ensure human rights are protected and respected in our value chain, as well as our Modern Slavery Plan, which state Go-Ahead's support and compliance with the UK Modern Slavery Act 2015 ("MSA"), our zero-tolerance approach to modern slavery, and 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.

Go-Ahead Human Rights Plan, which states our support of the United Nations' Universal Declaration on Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Bill of Human Rights, was also reviewed as part of the roll-out of the Go-Ahead Way.

In addition to these, we have other documents that support our commitment to the UK's MSA:

- Code of Conduct;
- Whistleblowing Policy;
- Procurement Policy; and
- Tender Procedure.

Sustainable Procurement Charter

Since 2019, Go-Ahead's suppliers have been aligning to our Sustainable Procurement Supply Chain Charter, which outlines our procurement sustainability priorities, and the

areas where we mandate minimum standards from suppliers, alongside those areas where we aspire to work with our suppliers to deliver more complex sustainability goals.

The Charter is aligned with the United Nations Sustainable Development Goals, including Decent Economic Growth (SDG8) and Good Health and Wellbeing (SDG3), and state our commitment to ethical standards towards our stakeholders and sustainable procurement. It also includes a heat map with our sustainability priorities versus our categories of spend.

E) ASSESSING AND MANAGING MODERN SLAVERY RISKS

The Go-Ahead Group's robust risk management and internal controls system involves the assessment of risks at the strategic, operational, and tactical levels. Risks are assigned to the relevant owners within the business and recorded in specific risk registers appropriate to the organisational structure and functional responsibilities.

Risk assessment involves the evaluation of the nature and magnitude of the respective risks to the Go-Ahead Group's objectives and planned activities based upon known vulnerabilities and threats. It considers the likelihood of the threats being realised, their impact on the business and an assessment of the controls and/or mitigation for the respective risks.

The Group has assessed the risk of its susceptibility to modern slavery and trafficking in its business and its supply chain. Our understanding is that the areas which carry the highest susceptibility to the risk of employing slave or trafficked labour are manufacturing processes or other processes where low-skilled labour is required e.g. cleaning, security, building and maintenance works, waste management and clothing.

Supplier questionnaires

We have zero tolerance for 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 suppliers which reference their obligation to abide by our anti-slavery and trafficking policy or their own equivalent. This provides us with a way to enforce requirements or to cease doing business with organisations which are non-compliant.

In addition to contractual terms, in our tender process we include questions relating to compliance with the Modern Slavery Act as part of our pre-qualification questionnaire for all new suppliers.

ISO 20400 – Sustainable Procurement

Go-Ahead operates in accordance with the international standard on sustainable procurement (ISO20400:2017), and this alignment has been independently verified. This reflects our ambition to deliver best-in-class sustainable procurement in collaboration with our suppliers and contributes to mitigate modern slavery risks.

F) DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

During the period covered by this statement, Go-Ahead made another step to prevent risks related to modern slavery in its supply chain. We commissioned a London-based independent organisation with expertise in business and human rights to conduct due

diligence on 50 Go-Ahead suppliers, selected with criteria that included categories of higher risk and volume of spend.

The work will be carried out in the financial year 2025, and its main findings and recommendations will be reported in Go-Ahead's modern slavery statement for that period.

G) TRAINING

A targeted programme of online training took place during the financial period 2024. Colleagues who commenced their employment with Go-Ahead in this period have taken mandatory modern slavery prevention online training. All colleagues retake the training every two years as a mandatory procedure.

All Go-Ahead colleagues also have access to the Modern Slavery Plan and the Group Whistleblowing Policy, which allows them to identify and report any legitimate concerns that they may have without recrimination and in a confidential and secure manner.

H) MONITORING PERFORMANCE

Go-Ahead's work to prevent modern slavery in its value chain focuses on its supply chain. The company has a number of measures in place to mitigate risks and promote human rights. As mentioned, the company has commissioned an independent organisation to conduct a due diligence on selected suppliers and is planning to use the outcome of this work, which is a report with findings and recommendations, as a basis to establish performance indicators to enhance the way we monitor human rights-related risks.

I) REPORTING ON FINANCIAL YEAR 2024

- 1) Annex 1 sets out the steps taken in the financial period 2024.
- 2) Annex 2 sets out plans for the next financial period.

This statement has been approved by The Go-Ahead Group Limited Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes the Group's slavery and human trafficking statement for the Financial Year 2024.



Miguel Ángel Parras
Group Chief Executive
The Go-Ahead Group Limited
Date: 27 June 2025

ANNEX 1: 2024 STEPS TAKEN

Sustainable procurement

We have continued to include pre-qualifying questions for tenders and terms and conditions in our contracts with suppliers which require compliance with the Act. Compliance with the UK Modern Slavery Act forms part of our continued adherence to and our achievement of International Organisation for Standardisation (ISO) 20400 “Sustainable Procurement”, in which we were independently assessed. This included an external assessment of our practices. Existing clauses in our standard procurement terms were augmented with requirements from our Charter to enhance the strength of our contractual promises from suppliers in the area of modern slavery and human trafficking.

Due diligence

During the period covered by this statement, Go-Ahead commissioned a London-based independent organisation with expertise in business and human rights to conduct due diligence on 50 high-risk our suppliers. The due diligence will be carried out in the financial year 2025, and its main findings and recommendations will be reported in Go-Ahead’s modern slavery statement for that period.

Training and awareness

Our Modern Slavery Policy is available on our intranet along with information about how to report issues, so that guidance is available to staff who may have concerns. In addition, we trained all new office-based joiners, as well as colleagues who took the course more than two years ago.

ANNEX 2: PLANS FOR THE NEXT FINANCIAL YEAR

Sustainable procurement

We will continue to include pre-qualifying questions for tenders and terms and conditions in our contracts with suppliers, which require compliance with the UK Modern Slavery Act. We will continue to be aligned with the International Organisation for Standardisation (ISO) 20400 “Sustainable Procurement”, and will refresh our supply chain charter to ensure it is up to date and accurately reflects our values and practices.

Due diligence

We will finish the due diligence we started in late 2024 and will report its main findings and recommendations in the statement covering the financial year 2025. We will also use this report as a basis to establish performance indicators to enhance the monitoring of our human rights-related risks.

Training and awareness

Training will continue to be part of the mandatory compliance programme and will be provided in the 2025 Financial Year. All new joiners will be trained and equipped with the knowledge to identify slavery and human trafficking, to understand different types of slavery and trafficking and how to report a concern. All colleagues will continue to be required to retake the training every two years as a mandatory procedure. We will also look to create and promote awareness campaigns in order to ensure that slavery and human trafficking issues are publicised.

ANNEX 3: Group Statement - subsidiaries for whom the Group is legally obliged to report

The UK subsidiaries of The Go-Ahead Group Limited which had a turnover of £36m, or higher, during the financial period between January to December 2024 are noted below (the “**Relevant Subsidiaries**”). The relevant subsidiaries, as well as their associated subsidiaries have each endorsed, approved and adopted this Group Statement, copies of which can be found on their dedicated websites.

Go North East Limited
London General Transport Limited
Brighton & Hove Bus & Coach Company Limited
The City of Oxford Motor Services Limited
Go South Coast Limited
Govia Thameslink Railway Limited
Plymouth Citybus Limited
Go North West Limited
East Yorkshire Motor Services Limited