

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT AS REQUIRED UNDER S54 OF THE MODERN SLAVERY ACT<sup>1</sup> FOR THE 2025 FINANCIAL PERIOD**

### **INTRODUCTION FROM MATT CARNEY, CEO – GO AHEAD BUS**

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 2025 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 35,000 employees.

Many of our subsidiaries in the UK had a turnover in excess of £36 million during the 2025 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. In the rail operation, we have local procurement teams who are supported by the Group Procurement. They use management systems and processes established by Group, but have a level of autonomy to deliver specific requirements for their operations.

Nonetheless, all operating companies have autonomy to purchase goods and services where needed, but following the Group established policies and procedures (known as

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

the Go-Ahead Way – more information ahead in item D), or utilising Group let contracts and frameworks.

## **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
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- 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**

The Go-Ahead Group Limited works in accordance to the Go-Ahead Way, a management system based hundreds of documents that formalise and standardise 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.

As part of the Go-Ahead Way, we have a 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, as well as our commitment to conducting our business in a manner that respects and upholds the human rights of all people with whom we engage and who are affected by our operation.

In addition, we have our Modern Slavery Plan, which states 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.

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

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

### **Sustainable Procurement Charter**

Since 2019, Go-Ahead's suppliers have been aligning to our Sustainable Procurement

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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, and states 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 and the performance metrics we would like to see from our strategic suppliers both through the tendering process and ongoing contract.

In late 2025, we started the work to refresh this document and to ensure it includes up-to-date sustainable procurement best practices as well as it reflects Go-Ahead's current business, values and supply chain. The work will be finished in 2026 and will be available on the company's website.

## **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. vehicle and vehicle parts manufacturing, 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**

In the reporting period, Go-Ahead has also commissioned an independent audit to assess its procurement practices against the International Organisation for Standardisation (ISO) 20400:2017, a guidance standard that supports organisations to

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integrate sustainability into their procurement processes. This independent assessment highlighted our strong focus on sustainability procurement tools and guidance, as well as sustainability risks and opportunities. The evaluation reported classified Go-Ahead as 'mature' company in regard to its sustainability practices towards the supply chain, which reflects our strong drive to progress and evolve our sustainable procurement.

## **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 by commissioning a London-based independent organisation with expertise in business and human rights to conduct due diligence on 47 Go-Ahead suppliers, selected with criteria that included categories of higher risk and volume of spend.

The assessment included:

- Categorisation of products/ services into high-level product/service categories;
- Use of technology and analytics to assess the modern slavery risk profiles of each supplier, within its product category.
- Opportunity to all suppliers to present the mitigations for modern slavery that they have in place
- Supplemented analysis through with desktop research
- Human rights adverse media checks against all suppliers using human rights bad actors' database and additional open-source research
- Analysis of each supplier into a risk ranking, based on geographic, industry, product/service and employment mode risks (after application of assessed mitigations in place)

Based on the analysis, this independent due diligence pointed out:

- The highest risk product categories in Go-Ahead's supply chain.
- The highest risk geography that the Company is exposed to, via its suppliers.
- Inexistence of suppliers categorised in the highest tier of employment mode risk.
- Risk treatments to will reduce modern slavery risk to Go-Ahead.

Go-Ahead is taking in the findings and risks identified through this independent assessment and will act on its recommendations to further reduce its exposure to modern slavery risks in its supply chain.

## **G) TRAINING**

A targeted programme of online training took place during the financial period 2025. Team members who commenced their employment in administrative and managerial positions with Go-Ahead in this period have taken mandatory modern slavery prevention online training and will retake the training every two years as a mandatory procedure.

All Go-Ahead team members also have access to the Human Rights Plan, the Modern

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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 will act on its recommendations to further reduce its exposure to modern slavery risks in its supply chain .

#### **I) REPORTING ON FINANCIAL YEAR 2025**

- 1) Annex 1 sets out the steps taken in the financial period 2025.
- 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 2025.



Matt Carney  
CEO – Go Ahead Bus  
The Go-Ahead Group Limited  
Date: 31 March 2026

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## **ANNEX 1: 2025 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. We continued to adhere to ISO 20400 “Sustainable Procurement” guidelines, in which was independently assessed in the latest financial year and pointed out Go-Ahead as a ‘mature’ company in this regard. We work with clauses in our standard procurement terms are augmented with requirements from our sustainable procurement supply chain charter to enhance the strength of our contractual promises from suppliers in the area of modern slavery and human trafficking. The sustainable procurement charter is being refreshed and an updated version will be published on our website in 2026.

### ***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 47 suppliers, selected with criteria that included categories of higher risk and volume of spend.

The independent assessment and mitigation report was delivered to Go-Ahead in December 2025, and the company is taking in the findings and risks identified through this independent assessment and will act on its recommendations to further reduce its exposure to modern slavery risks in its supply chain.

### ***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 team members who commenced their employment in administrative and managerial positions, as well as the ones who took the course more than two years ago.

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## **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 ISO 20400:2017 “Sustainable Procurement”, and publish a refreshed version of our supply chain charter to ensure it is up to date and accurately reflects our values and practices.

### ***Due diligence***

We will take in the findings and risks identified through the independent modern slavery supply chain due diligence conducted in 2025, and will act on its recommendations to further reduce its exposure to modern slavery risks in its supply chain. We will also use this assessment as a base for similar and more in-depth exercises that we plan to carry out in the future.

### ***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 in administrative and managerial positions 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. These team members 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.

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### **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 2025 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

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