

## Modern Slavery Policy

### 1 Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking (“**modern slavery**”), all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Go-Ahead Group PLC and its operating companies (“**we**”) have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (“**MSA**”). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.5 Elliot Laurie (elliot.laurie@go-ahead.com), in his capacity as Group Legal Director, is responsible for this policy. Where reference is made to contacting the Group Legal Director in this policy, the appropriate address for contact is [elliot.laurie@go-ahead.com](mailto:elliot.laurie@go-ahead.com).

### 2 What is slavery?

- 2.1 The MSA, and this Policy, covers four activities:

Term	Meaning
Slavery	Exercising powers of ownership over a person.

Servitude	The obligation to provide services which is imposed using coercion.
Forced compulsory labour or	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

**3 How is it relevant to us?**

- 3.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. It is relevant to our business and the society that we operate in. As a good corporate citizen preventing modern slavery in our organisation is the right thing to do for many reasons.
- 3.2 The MSA recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

*Supply Chain*

- 3.3 With this in mind, we need to pay particularly close attention to:
  - 3.3.1 our own supply chain, in the context of our businesses this means we need to be alert to the practices of our suppliers of cleaning and security services, and vehicle parts and garment manufacturers; and
  - 3.3.2 the supply chains of those supplier mentioned in 3.3.1; and
  - 3.3.3 any outsourced activities where the relevant supply chains involve jurisdictions that may not have adequate safeguards.

*Recruitment*

*Agency Staff*

- 3.4 It is policy that we only use specified reputable recruitment agencies.
- 3.5 To ensure the potential for slavery and human trafficking is reduced as far as possible, we check recruitment agencies before adding them to our list of approved suppliers.

*General Recruitment*

- 3.6 We always ensure all staff have a written contract of employment.
- 3.7 We always ensure staff are legally able to work in the UK.

- 3.8 We check the names and addresses of our staff.
- 3.9 We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

#### **4 Responsibility for the policy**

- 4.1 The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The Group Legal Director, is responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Each operating company has its own compliance officer, who shall be responsible for ensuring delivery of and adherence to this Policy within the relevant operating company.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given computer-based training on modern slavery.
- 4.4 You are invited to comment on this policy and suggest ways in which it might be improved or if you think there is more that we can do to prevent people from being exploited. Comments, suggestions, and queries are encouraged and should be addressed to the Group Legal Director.

#### **5 Identifying and reporting modern slavery, and compliance with the policy**

- 5.1 You must ensure that you read, understand, and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of **all** those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. All colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- 5.3 In the battle against modern slavery all colleagues should keep their eyes and ears open. Part 1 of Annex 1 contains a non-exhaustive list of factors which may indicate that a person is subject to a form of modern slavery.
- 5.4 Colleagues in managerial positions should listen and be approachable and respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation. Managers should use their experience and professional judgement to gauge situations and where possible raise the awareness of the issues, particularly managers who supervise cleaning or security services.

- 5.5 If you suspect someone is the victim of modern slavery, or that it may occur in the future, then you must follow the reporting procedures set out in Part 2 of Annex 1.
- 5.6 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.7 If you believe or suspect a breach of *this policy* has occurred or that it may occur you must contact the Group Legal Director or, if given the circumstances of the suspected breach you believe it is inappropriate to report it to the Group Legal Director then it should be reported in accordance with our whistleblowing policy as soon as possible.
- 5.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your company's HR Team, or the Group Legal Director.
- 5.9 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Legal Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **6 Organisation responsibilities**

- 6.1 We will:
  - 6.1.1 maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
  - 6.1.2 manage our recruitment (as mentioned in section 3 above);
  - 6.1.3 check our supply chains (as mentioned in section 3 above);
  - 6.1.4 ensure we have in place an open and transparent grievance process for all colleagues;
  - 6.1.5 seek to raise awareness so that our colleagues know what we are doing to promote their welfare by way of training and awareness programmes;

- 6.1.6 make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our customers seriously.

## **7 Training**

- 7.1 We provide training to those staff members who are involved in managing recruitment and our supply chains and those whose job roles may lead them to encounter victims of modern slavery .
- 7.2 More general awareness training is provided to all staff by way of at least an annual awareness programme.

## **8 Breaches of this policy**

- 8.1 Any colleague who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **9 Monitoring our procedures**

- 9.1 We will review our modern slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

## **Annex 1 - Identifying Slavery and Reporting Slavery**

### **1 Identifying slavery**

1.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

1.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:

1.2.1 the person is not in possession of their own passport, identification, or travel documents;

1.2.2 the person is acting as though they are being instructed or coached by someone else;

1.2.3 they allow others to speak for them when spoken to directly;

1.2.4 they are dropped off at and collected from work;

1.2.5 the person is withdrawn or they appear frightened;

1.2.6 the person does not seem to be able to contact friends or family freely;

1.2.7 the person has limited social interaction or contact with people outside their immediate environment.

1.3 This list is not exhaustive.

1.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

1.5 If you have a suspicion, report it.

### **2 Reporting slavery**

2.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

2.2 If you think that someone is in immediate danger, call the Modern Slavery Helpline (08000 121 700) or dial 999.

- 2.3 Otherwise, you should discuss your concerns with your company's HR Team, or the Group Legal Director who will decide a course of action and provide any further advice. If you feel it is necessary you may report the concern via our accordance with our whistleblowing policy.
- 2.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you do not approach the individual and that you discuss your concerns first with your company's HR Team or the Group Legal Director before any further action is taken.