



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

FEBRUARY 2023

SOUTHAMPTON FOOTBALL CLUB LTD

Modern Slavery & Human Trafficking Statement



INTRODUCTION

This statement has been published in accordance with the Modern Slavery Act 2015, and demonstrates our commitment made in relation to the prevention of modern slavery. The statement sets out the steps taken by Southampton Football Club Limited, Southampton Girls and Women's Football Club Limited and Saints Foundation, our club's affiliated charity, to prevent and address modern slavery and human trafficking. This sets out the steps that we have taken during the 21/22 Season and has been approved by the boards of each organisation.

Since the publication of our last statement on modern slavery and human trafficking, we have completed a further review of the risks faced in relation to these issues by our sporting, commercial and other business practices. This has included consideration of how those risks occurring in our business activities and supply chains may have changed over that time and confirmation that no incidents have arisen. This updated statement has been produced as the result of that review.

We remain committed to guarding against both modern slavery and human trafficking risks internally, in the communities around us and in our wider national and global activities. We are increasingly aware of the need for us to assess the potential impact that we can have through our activities on everyone we work with. This commitment is aligned and reflected in the club's Halo Effect strategy which launched in 2021. One of the core pillars of the Halo Effect strategy is that of corporate responsibility which puts ethical practices and fair treatment of everyone at the forefront.

Over the period of time since our last statement, we have continued to improve our due diligence procedures and to increase the awareness of modern slavery and human trafficking risks throughout our operations. This has been achieved by training key staff and addressing the risks that we face in our everyday business operations. We continue our work to enhance the procedures as set out in this statement and make our staff, as well as those we work with externally, aware of our commitment to helping eliminate modern slavery and human trafficking.





1. WHAT IS MODERN SLAVERY

Modern slavery is a violation of fundamental human rights. It can take many forms which include:

- Forced and compulsory labour
- slavery
- servitude
- human trafficking

These types of offences were consolidated into one piece of legislation when the Modern Slavery Act 2015 was passed. This Act specifically makes it a crime to exploit or traffic any person for the benefit of another person or organisation.

2. ABOUT US

Southampton Football Club Limited is an established Premier League football club with business interests and operations in the UK and across the rest of the world. We employ approximately 430 permanent members of staff and also have a number of casual workers who perform match day and events roles for us. The majority of our staff are employed and based in the UK.

Our business is split into three principal divisions:

- Football
- Commercial
- Business support services

This means that we have a significant number of local, national and global sporting and commercial partners as well as a range of suppliers who operate in different parts of the world.

We also have strong links to the following:

- **Saints Foundation:** a charity that is affiliated to the club, Saints Foundation, which is responsible for developing and running programmes to help the vulnerable and those in need in the communities around us;
- **NG Bailey:** an engineering and services business to which the club outsources its facilities management; and
- **Gather & Gather:** a catering and events company within the CH&Co Catering Limited group to which the club outsources its catering and events operation.

We choose to assess our risks in relation to modern slavery and human trafficking on an ongoing basis through the club's organisational and safeguarding risk registers.

1. WHY DO WE PRODUCE A MODERN SLAVERY STATEMENT?

We believe that the implementation of policies and working procedures to eliminate modern slavery and human trafficking is important to ensure that we:

- properly understand the risks that we face in relation to modern slavery and human trafficking as the result of our sporting, commercial and other business activities;
- ensure that we apply the same standards of ethical working to all areas of the club, including the operations of our men's and women's senior teams and our boys' and girls' Academy or development teams so that





everyone understands our expectations and commitment to eliminating modern slavery and human trafficking;

- are able to properly respond to the growing expectations inside and outside of the club. This includes regulators, our fans, partners and other businesses who increasingly expect us to engage effectively on all issues that relate to sustainability and ethical business operations;
- properly safeguard our players who make up our senior teams, Academy teams and Girls & Women's programmes. To be able to fully protect everyone appropriately we must understand how the recruitment of players internationally, particularly young players, can potentially lead to their exploitation and human trafficking;
- continue to meet our legal obligations. We are required by the Modern Slavery Act to publicly disclose the steps we are taking to mitigate modern slavery risk through the club. It is important for us to always comply with any regulations that apply to us. This will reduce our risk of legal liability but, more importantly, also means that everyone can continue to have confidence that we are working in an ethical way that treats people fairly;
- can clearly show our commitment and positive response to the increasing scrutiny and level of expectation placed on us as a Premier League Club with regards to labour exploitation in the operation of major sporting events;
- can show our alignment to FIFA, the Premier League and other governing bodies who have also started to take a stronger stance on modern slavery. By doing this we will be able to influence other clubs and the communities around us by raising awareness and tackling the key issues collaboratively.

3. OUR COMMITMENT TO ELIMINATING MODERN SLAVERY & HUMAN TRAFFICKING

As set out in our previous statements, we do not tolerate any form of modern slavery or human trafficking in any part of our organisation or anywhere in our supply chain.

This statement sets out the steps that we have taken to pro-actively prevent modern slavery and human trafficking in our organisation. It also provides an outline of our current plans to make sure that we continue to use ethical working practices, and to ensure that the partners and external parties that we work with remain fully compliant with the Modern Slavery Act.

We are committed to operating our business in an ethical, transparent and legally compliant way. We expect all of our staff and anyone else working for or with us, including those in our supply chain, to comply with the laws and regulations that apply to us.

1. OUR BUSINESS AND OUR SUPPLY CHAIN

We are aware of the need to be conscious of the working conditions and practices within our supply chain, and so continue to regularly risk assess all our existing business partners and refresh due diligence on them. Alongside this, any new partner or business must complete robust due diligence checks completed by our procurement and legal teams before any engagement of services takes place.

Our organisation is extremely diverse meaning that we have suppliers that work across a broad range of industries including suppliers of IT and office equipment, playing and replica kit, retail, digital media services, food and drinks and labour.





One area that we continue to be mindful of is the risk of human trafficking of minors, which can include agents and other parties moving young players across borders. This remains a key priority for our organisation.

2. OUR CONTINUED PROGRESS SO FAR

Since our last modern slavery statement, we have taken the following steps to improve our performance:

- Completed further training for the legal and procurement teams on due diligence best practices.
- We continue to have a board champion to lead the implementation of our policies and management systems related to modern slavery and human trafficking.
- Established a clearer, more mature governance framework in which modern slavery and human trafficking compliance sits. This allows proper evaluation and reporting of concerns, trends and new or emerging risks. This includes coverage and evaluation of risk in relation to modern slavery at our Risk & Governance Committee and Safeguarding Board.
- Working with the Boys' and Girls' Academies and all other relevant teams within our Football Division to evaluate and ensure that we prevent the potential of human trafficking as much as we possibly can.
- Established our Halo Effect Strategy where one of its pillars revolves around corporate responsibility and ethical practices.
- Continued to include modern slavery provisions in our standard terms and conditions of business and commercial contracts to ensure that our suppliers adhere to our policies.
- Engage with and have a membership with the Hampshire Modern Slavery Network.
- Continued to conduct a full annual review of our own payment policies, processes and rates to all staff and contractors, and suppliers.
- Updated our supplier/partner general due diligence questionnaire and introduced a modern slavery specific questionnaire to be provided to suppliers or partners where relevant to services/engagement.
- Established a multidisciplinary working group including members of the Legal, Finance and Procurement teams to continually review and improve our procurement and purchasing processes to reduce the risks that we face in relation to modern slavery.
- Maintained our accreditation from the Living Wage Foundation. This means that we voluntarily agree to pay every member of staff over the age of 18 a fair wage – in line with the cost of living and significantly above the current national minimum wage. We also impose this obligation on third party organisations who supply us with staff to work at our sites.

3. OUR NEXT STEPS

While we have made good progress internally on the steps that we have in place to prevent modern slavery and human trafficking, we remain committed to improving our work in relation to these issues. Over the next twelve months we will:

- further extend external training to all of our board and senior leadership team;





- ensure that increased awareness around modern slavery is embedded in our safeguarding approaches;
- implement a clear supplier code of conduct and ethics to work alongside our annual modern slavery and anti-trafficking statement;
- work closely with our Football and Academy departments (this will include teams that work on both our male and female programmes) to establish clearly documented policies and frameworks that relate to the prevention of modern slavery and human trafficking. This will include building a full action plan to bring certainty to our work in these areas. This is a key area of work for us as we believe that this work may, in time, help to influence the work of other clubs and governing bodies;
- Continue to embed the Halo Effect Strategy in our day to day operations and ensure that the Steering Committee completes regular KPI reviews of the Strategy, so that we can continue to evaluate our performance on preventing modern slavery and human trafficking;
- Begin work on obtaining a B Corporation certification, and it is expected that we will achieve full certification by the end of the 2023/24 season;
- continue to build on the relationships we have with key local and national external partners (e.g. local police forces and enforcement bodies). This allows us to understand and get advice on emerging threats, risks and intelligence;
- update our internal Code of Conduct/Ethics and launch out by mid 2023;
- complete our usual annual review of partners and suppliers to allow contracts, terms and due diligence on each to be updated/refreshed; and
- complete the onboarding of a new procurement platform which allows us to run effective tenders on new products/services, complete due diligence, and onboard new and refresh existing suppliers.

4. NON-COMPLIANCE

There are no current issues of non-compliance with modern slavery or human trafficking laws that we have been made aware of.

Should any potential non-compliance be reported to us, we will work to remedy any areas in which we or our suppliers do not meet the appropriate standards that we expect to work to. In the event of any external party not meeting those standards, this may include ultimately ceasing to trade with partners who do not continue to meet our requirements or breach relevant regulations.

5. ROLES & RESPONSIBILITIES

This policy is owned by our Legal and Safeguarding teams. Any issues may be reported to:

- Tim Greenwell, board member with responsibility for overseeing our approach to preventing modern slavery and human trafficking.
- Zoe O'Sullivan, our Director of Legal.
- Kim Mundy, our Head of Safeguarding & Governance.

In order to assess the effectiveness of the measures that we have taken as a collective group of companies, we will continue to continually review and update the policies and procedures that we have adopted in relation to preventing



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modern slavery and human trafficking. This review will be led by the individuals named above. Any actions or improvements that we make to our policies or working practices will be included in our future statements.

1. MANAGEMENT ENDORSEMENT

This statement has been approved by our board of directors and was reviewed in January 2023.

A handwritten signature in black ink that reads "Toby Steele". The signature is written over a horizontal dotted line.

Toby Steele
Managing Director
Southampton Football Club Limited

A handwritten signature in black ink that reads "Tim Greenwell". The signature is written over a horizontal dotted line.

Tim Greenwell
Chief Governance & Operations Officer
Southampton Football Club

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