Pro:Direct Sport Group of Companies Limited and its subsidiary companies (Pro:Direct)

Pro:Direct Slavery and Human Trafficking Statement for the financial year ended 31 March 2023 made pursuant to the Modern Slavery Act 2015

Introduction

Modern Slavery includes slavery, servitude, human trafficking and forced labour. The Modern Slavery Act ("the Act") came into force in October 2015. This Act requires Pro:Direct Sport Limited (Pro:Direct) to state publically the steps that have been taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its business or any of its supply chains. The statement must be approved by the Pro:Direct Board, signed by a Director and published on the company website.

Our Business

Pro:Direct is a leading player in online sports retail. Established as a business in 1981, we founded the world's largest online football store in 1999, which is now global, shipping out of the UK, Europe and the US to over 200 countries. Pro:Direct has established, long-standing relationships with the world's leading sports brands including Nike, adidas and Puma, as well as many more.

Pro:Direct Policy on Modern Slavery & Human Trafficking

Pro:Direct is committed to conducting business fairly, transparently, honestly and openly. We seek to operate responsibly wherever we work in the world and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate.

It is the policy of Pro:Direct that each company within the Pro:Direct Group and each director and employee of any Group company will comply in all respects with all applicable UK laws, and (in addition and where relevant) local laws if overseas countries, standards and principles relating to Modern Slavery (as defined in the Act). Companies with the Group will establish and enforce effective compliance procedures including their supply chains. We also have a company Code of Conduct which is embedded into the daily operations of the business as well as incorporated into the company induction.

Due Diligence in Supply Chains

Procurement for the multi-brand online store is achieved via an international portfolio of suppliers of thousands of products with different levels of involvement. We have various direct suppliers around the globe, from which we buy our stock and materials for sale. Pro:Direct engages with its suppliers through its procurement functions to ensure that an appropriate approach is taken to management of modern slavery and human trafficking risk within its supply chains.

Supplier Risk Assessment

Supplier risks are assessed based on appropriate factors including geographical location, business sector, type of product or service, supply chain structure, business model, business ethics and labour practices. Where risks are considered to be elevated the level of due diligence and auditing is increased appropriately and maintained to ensure compliance with policy.

Training

Pro:Direct recognises the need for employees in Business, Procurement and Human Resources functions to be trained on the signs and risks of modern slavery and human trafficking, and how to manage compliance with Pro:Direct's policy throughout its supply chain. All employees are made aware of the Code of Conduct and Pro:Direct encourages all employees to report any concerns they may have regarding modern slavery and human trafficking either to their line manager or the People Team.

Recruitment Practices

Pro:Direct is committed to respecting fundamental human rights in all its activities. Recruitment processes for direct employees are designed to ensure that no employees are at risk of modern slavery or human trafficking. Companies that provide agency staff to Pro:Direct are subject to contractual terms and conditions that require them to have appropriate processes in place to protect the human rights of those staff and comply with Pro:Direct policy. Agency suppliers are subject to regular compliance audits which include a review of the steps taken to avoid modern slavery and human trafficking.

Peter Hammond

Director – Finance & Operations
Pro:Direct Sport Limited

April 2023