Brentford FC Limited – Modern Slavery Statement

December 2023

Financial Year-End: 30th June 2023
Modern Slavery Act Statement Publication: 24th December 2023

"*At Brentford Football Club our unwavering commitment to the highest standards of governance, integrity and respect for human rights is deeply rooted in our core values: togetherness, respectful and progressive. We recognise we have a crucial role in combating modern slavery in all its forms. By fostering a culture of transparency and accountability, we not only adhere to our legal obligations but also uphold our moral responsibility. As a club we pledge to be a force for positive change not just in football but as a leader in our global community.*"

Jon Varney, Chief Executive Officer, Brentford FC

Introduction

Modern slavery, including criminal exploitation, domestic servitude, forced labour, human trafficking, and sexual exploitation, is a profound global issue, affecting an estimated 49.6 million people around the world.

Brentford Football Club Limited (the "club") is committed to identifying, assessing, addressing, and preventing modern slavery and protecting people from exploitation. At Brentford FC, we place inclusivity and safeguarding at the heart of everything we do, and we will not tolerate modern slavery or human trafficking in our organisation, among our partners or in our supply chain.

The club's values of togetherness, respectfulness, and progressiveness, underpin how we address the risks of modern slavery. In accordance with these values, we are committed to acting professionally and conducting our business in an honest and ethical manner. It is of particular concern for our industry as every club has significant relationships with suppliers and partners with global supply chains.

We employ young people, and many people are employed by the club directly or indirectly on a match-by-match basis and it is important that they are treated fairly by us or our suppliers and partners.

In accordance with Section 54 of the Modern Slavery Act 2015, companies with a turnover of £36 million or above must publish an annual statement regarding modern slavery within six months after the end of their financial year. Pursuant to that requirement, the club is publishing our second Modern Slavery Act statement in respect of its financial year ending 30th June 2023.

This statement will be updated every year to:

- act transparently and disclose information about any modern slavery risks we have identified and what actions we have taken in response to them;
- target our actions where they can have the most impact by prioritising our risks;
- make year-on-year progress to address those risks and improve outcomes for workers in our business and supply chains.

Modern Slavery Act

About Brentford FC

Brentford FC is a professional Premier League football club based in the London Borough of Hounslow, which plays its home matches at the Gtech Community Stadium. The club was founded in 1889 and is now in its third season in the Premier League.

In 2020, we moved to a new, 17,250-seater stadium with outstanding facilities for fans, broadcasters, corporate guests, and the community, having previously played at their historic Griffin Park home for 116 years. At the end of the first season in the new stadium, Brentford won promotion to the Premier League. The club's first season in the topflight of English football since 1947 started in August 2021. Promotion and a move to a new stadium are parts of a longer-term vision that aims to see the club sustain top level football on the field and ensure that the club is sustainably run.

Situated next to the M4, the new stadium is at the centre of the Brentford East redevelopment scheme, which includes the construction of more than 900 new homes, a new purpose-built location for Brentford FC Community Sports Trust.

The Brentford FC Community Sports Trust (the "BFC CST") is the club's official charity. With community work spanning more than three decades, the BFC CST has established itself as a pioneering organisation for the local community using the power of sport to educate, motivate and inspire people from all backgrounds.

The BFC CST and the club work together to take a very active role in the local community. The club and the trust have worked together to win the EFL Community Club of the Year Award four times and the Club has also been awarded a Business in the Community and Community Mark Award. In total, since opening its new stadium in 2020, the BFC CST impacts in the local area have been valued at [£143] million in that three year period.

The club operates through Brentford FC Limited and its subsidiary Lionel Road Developments Limited ("LRD"). The club and LRD together with other (dormant companies) make up the "Group". References to the club in this statement cover the Group. This statement is not made on behalf of the BFC CST which is a separate legal entity and the BFC CST is not subject to the reporting requirements of the Modern Slavery Act. However, the BFC CST is a key supplier to the club and is subject to compliance with key policies and risk assessment along with other suppliers.

The club operates in the UK and to the extent that it has any overseas business that consists of very short trips abroad for training and friendly games and servicing a small number of fans based globally with retail and memberships. The club has a global profile through its participation in the Premier League. Apart from its primary business of competing in professional football competitions, and the broadcast opportunities which arise out of those, the club promotes third parties through sponsorship, advertising and partnerships, it sells club-branded goods and services through its retail store and online channels, and it operates an event and hospitality business for its fans and corporate customers.

Our Commitment to Tackling Modern Slavery

We are committed to taking steps to ensure that modern slavery does not exist across the club's operations or supply chains. This statement sets out the club's top-level commitment to addressing the risk of modern slavery and is recognised as being part of the development of an overall approach to address modern slavery risk as an integral part of the overall objectives of the club.

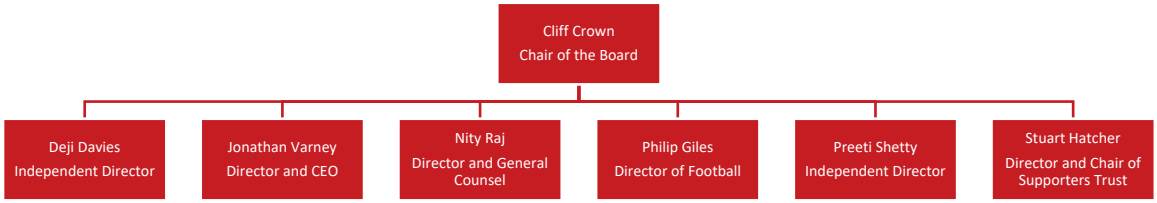
Following the Home Office's statutory guidance, we cover the following 6 areas below:

1. **Organisation structure and supply chains**
2. **Policies in relation to slavery and human trafficking**
3. **Due diligence processes**
4. **Risk assessment and management**
5. **Key performance indicators to measure effectiveness of steps being taken**

6. **Training on modern slavery and trafficking**

Organisational structure and supply chains

Board of Directors of Brentford FC Limited:



The Board of Directors of Brentford FC Limited is accountable to its shareholder, the Football Association, Premier League, fans, sponsors and its community for compliance with the club's legal obligations. The Board delegates responsibility for the club's operations to the club's executive staff, led by the club's Chief Executive Officer.

In common with many other sports clubs, we have a relatively small full-time staff and then engage a large number of staff as employees, through agencies, or sub-contractors, to work on match days, in catering, stewarding and other match day roles. All of these roles are important to providing the best experience for our fans but the nature of those match day roles mean they are often staffed by young people, with comparatively fewer qualifications than full time staff and a significant proportion of them earn relatively low wages. We are an accredited London Living Wage Employer and we voluntarily agree to pay every member of staff over the age of 18 at least the London Living Wage – which is set in line with the cost of living and is significantly above the current national minimum wage. The club also imposes this obligation on key third party organisations who supply us with staff to work at our sites.

The club has recently restarted its academy operation which means we must consider the welfare of young people in our care. We have some experience in this area already because we already operated a B Team and we take particular care to ensure that the welfare of our youngest and most vulnerable players is a high priority for our staff. We employ a full-time specialist Head of Safeguarding whose responsibilities include overseeing the care of vulnerable people across the club. Consideration is given to the ongoing education and welfare of players in the academy and the B team to ensure the risk of them being exploited is minimised as far as possible. Safeguarding is at the heart of everything we do and we operate within the Football Association's and Premier League's safeguarding framework which include a requirement to submit to an annual audit of the club's safeguarding practices.

Our supply chains include suppliers of goods and services which support our participation in football competitions, including the accompanying broadcast commitments, our commercial operations, including advertising partners and sponsors, our retail operations – in particular sports apparel, entertainment and events. Key suppliers identified as part of our risk assessment in 2023 were the club's primary apparel, hospitality, food and beverage partners. All the foregoing have Modern Slavery statements on their websites and we make compliance a condition of our contracts with them. As part of our relationships with those companies we have the ability to interrogate them about their procedures to ensure that we and they remain in compliance with our policies.

The club selects new suppliers against pre-agreed criteria to mitigate risks to the Club. The club also has an onboarding process for new suppliers that ensures they meet the club's minimum standards and includes due diligence checks to identify risks, including slavery and trafficking. We carry out periodic risk assessments to consider the areas of the business where modern slavery and exploitation may be a risk and give the most attention to these areas.

Modern Slavery Act

The club is committed to creating and ensuring a non-discriminatory working environment for its staff and non-discrimination policies apply to all employees. The club obtained the preliminary level of the Premier League's Equality, Diversity & Inclusion Standard this year, and we are now working towards the intermediate level.

Our contracts include terms requiring our counterparties to comply with all applicable laws including relating to anti-slavery and human trafficking.

The club has a zero-tolerance approach to slavery, in all its forms, within its supply chain and in its partners. It is committed to running its business in an ethical and lawful manner and, as such, all persons working for us, and all persons in our supply chain, must comply with the law and help the club to ensure that modern slavery is not taking place anywhere in our business or in our supply chain or that of our partners.

Policies in relation to slavery and human trafficking

At the club, policies are developed collaboratively with the People & Compliance Team based on our values, best practice and feasibility and are shared with all staff on our internal HR system. They are reviewed periodically, either at one, two or three year intervals or sooner if required.

We have a policy to review our suppliers and partners for a range of reputational and compliance issues, including relating to anti-slavery. Where risk assessments require particular focus on certain suppliers and partners, we review the specifics of their own policies with those suppliers and partners to ensure they meet our standards. If we did not believe that a supplier or partner was working to the required standards we would take appropriate action, including up to seeking termination of our relationship with them.

In the next 12 months, we plan to launch a Procurement Policy and Supplier Code of Conduct, which will encompass Modern Slavery, Equity, Diversity & Inclusion and Sustainability.

Recruitment Policy

The club Recruitment Policy and Procedure was last updated in September 2023 and provides a clear framework for safely recruiting and selecting appropriately experienced and qualified workers fairly and transparently.

All staff need to have characteristics and values that make them safe and suitable to work at Brentford. Some actions we have taken to ensure this include:

- Ensuring all prospective staff are subject to criminal record checks (Disclosure Barring Service) and a Self-Declaration Form
- Completing a risk assessment of any information contained in a DBS. If there is disagreement about the outcome of a risk assessment, a DBS panel will be convened. This would be chaired by the Head of Safeguarding
- Interviewing applicants and recording recruitment decisions
- Obtaining two references, including from the most recent employer
- Verifying and recording applicant's qualifications and experience on a single central record
- Providing staff with an induction to their role, including safeguarding policies and procedures and accredited safeguarding training
- Ensuring all staff complete a probationary period

The recruitment process is led by the Human Resources department at Brentford who will ensure that any recruitment completed by the Club, in partnership with the Safeguarding Team when needed, is done safely.

Code of Conduct

The club Code of Conduct was last updated in August 2023, and exists to clarify the standards of conduct expected from all staff, players, Board members, Trustees, volunteers, temporary staff and agency

workers (staff) at Brentford FC and BFC CST, promote consistency, ensure that all staff are aware of their responsibilities whilst engaged in their employment and to set out the implications of non-compliance.

Whistleblowing
We have a Whistleblowing Policy in place set out in the company's employee policies portal which allows employees to help us tackle corruption and crime, including modern slavery.

Employees, and anybody connected with us, are encouraged to speak up if they have concerns about slavery in our business or within our supply chain and concerns can also be raised to the club directly at enquiries@brentfordfc.com or alternatively, a complaint can be addressed to the club's adjudicator who is the Chair of the Board of Brentford Football Community Society Limited "Bees United" and also a director of the club.

If any complainant wishes to whistleblow to an organisation that is completely independent of the club they may do so by contacting Protect, an independent charity which supports whistleblowers and lobbies for protection for whistleblowers. The club is a member of Protect, and they may be contacted on +44 20 3117 2520 or whistle@protect-advice.org.uk.

Due diligence process
We expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated. The club acknowledges the importance of a strong due diligence framework supporting its policies. We've initiated efforts to enhance our existing due diligence systems, aligning them with our approach to effectively mitigate risks related to modern slavery. Any revisions to our current policies and procedures will be communicated to our suppliers accordingly.

Due diligence procedures will be proportionate to the identified modern slavery risk, the severity of the risk, and level of influence a business may have. This will be informed by the broader risk assessments which have been conducted.

Risk assessment and management
The club has in place a risk assessment process for all aspects of its business by implementation of a Risk Register which identifies the areas of the business which are most at risk and includes an assessment of the risks resulting from slavery and human trafficking. The club reviews its Risk Register periodically, and has a dedicated Risk Committee, which is chaired by a Board Non-Executive Director, in order to identify any new or changing risks and ensure that safeguards are being put in place in our own operations, in suppliers, and lower down the supply chain to minimise the risk of exploitation and trafficking.

Key performance indicators to measure effectiveness of steps being taken
In order to assess the effectiveness of the measures taken by the club we will continue to regularly review and refine our policies and procedures in relation to modern slavery and human trafficking and will include updates on any actions we take in future statements.

Training on modern slavery and trafficking
This year, all staff received mandatory training on Safeguarding and Psychological Safety. Due to staff turnover in relevant roles, we are now looking to update the compulsory training that employees receive next year on equality, diversity, inclusion and safeguarding to ensure it includes anti-slavery training which is appropriate to each role, and in this respect those areas of compliance overlap.

We are working on ensuring that care is taken to ensure that key individuals involved in procurement, compliance and legal, commercial sales and operations are aware of how to reduce risk in their areas both for our own operations and that of key suppliers and partners. The club operates a strict policy for the recruitment of staff, which includes mandatory, pre-recruitment right to work checks.

Annual Review

The club commits to take the following steps in the next 12 months:

1. Develop and implement a formalised Procurement Policy
2. Develop and implement a Supplier Code of Conduct
3. Increase monitoring on the approach towards preventing modern slavery in our supply chain.
4. Develop and deliver modern slavery training programme across the club.

The club will review and publish this statement annually.

Approval

This statement was approved by the Board of Brentford FC Limited on 14 December 2023. It will be available from the club's home page at https://www.brentfordfc.com/en/modern-slavery from 29 December 2023 and on the Government's Modern Slavery Statement Registry here: https://modern-slavery-statement-registry.service.gov.uk/ on or before 14 January 2024.

Signed on the Board's behalf for and on behalf of Brentford Football Club Limited:



Nity Raj
Director & General Counsel
Brentford FC Limited
24 December 2023