West Bromwich Albion Football Club Anti-Slavery Statement – 2025

West Bromwich Albion Group Limited plus its subsidiaries, West Bromwich Albion Football Club Limited, West Bromwich Albion Heritage Limited and WBA Football Development Limited are committed to eliminating the existence or prospect of modern-day slavery and human trafficking within its own business and that of its supply chain, and imposes the same high standards on its contractors, suppliers and all of its other various business partners.

The Club fully supports the Modern Slavery Act 2015 (the "Act").

This statement is made pursuant to section 54(1) of the Act and constitutes West Bromwich Albion Football Club Limited's anti-slavery and human trafficking statement for the financial year ending 30 June 2025.

The Club's structure, business and supply chains

West Bromwich Albion Football Club is an English professional football club which was established in 1878 playing under the rules and regulations of various governing bodies including (but not limited to) FIFA, UEFA, The English FA, the English Premier League, the English Football League, the Women's Super League, the Women's Championship and the Women's National League. It is a registered limited company (with the registered company number 03295063). For details of the Club's ownership please see the Club's website at www.wba.co.uk/club/controlling-shareholder-management

The Club's supply chain is comprised of external suppliers that provide the products and services the Club purchases, including (but not limited to) providers of:

- food and beverages;
- cleaning services;
- merchandise for re-sale;
- playing kit;
- security / stewarding personnel;
- catering, events and hospitality personnel;
- financial services;
- entertainment services;
- audio / visual;
- IT outsourcing;
- photography;
- travel and accommodation;
- maintenance services;
- recruitment; and
- office supplies.

Policies in relation to Slavery and Human Trafficking

The Club does not support or knowingly deal with any business involved in slavery or human trafficking.

The Club has internal policies in place and ensures that such policies are reviewed on a regular basis, including a specific Modern Slavery Policy, Whistleblowing Policy, Equality & Diversity Policy and Safer Recruitment & Selection Policy which reflects its commitment to acting ethically and with integrity in all of its business relationships and in implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place within the Club or its supply chains.

Due Diligence

As part of the Club's due diligence processes into modern slavery and human trafficking, the supplier approval process is key to ensure that slavery is not present within the Club's business or its supply chain. Specifically:

- We endeavour to establish and build long-standing relationships with our suppliers and are clear on our expectations of business behaviour;
- We have zero tolerance to slavery and human trafficking. We expect all suppliers to comply with our values to demonstrate this commitment; and
- We expect all suppliers to comply with all applicable anti-slavery and human trafficking legislation.

High Risk Areas

Imported products, particularly merchandise and training/playing kit, from third parties based outside the UK are potentially more at risk of modern slavery issues. We expect non-UK based suppliers to have suitable anti-slavery policies and processes.

Additionally, by the very nature of professional football, another high-risk area is that of "third-party ownership" where the ownership of a player's economic rights is held by third-party sources, such as football agents, sports-management agencies, or other investors.

The level of management control required for these high-risk areas, along with all others, will be continually monitored by the Club and individually by its suppliers.

Safeguarding

The Club has an extensive safeguarding team that works across the Club and The Albion Foundation. The Club recognises its responsibilities in safeguarding the welfare of adults and children of all ages. Specific safeguarding policies are in place at the Club and the Club's safeguarding team works in accordance with relevant League rules and with national legislation.

The Club's Head of Safeguarding is a direct link for all staff (including all players (this also includes academy players)) and consumers / customers to raise any concerns and/or issues they may have in this area.

The team work in conjunction with various public bodies across Greater Birmingham and the Black Country and regular safeguarding training is provided to staff who work directly with adults and children in regulated activity.

Specifically in relation to match days, the Club's stewards have received specific training on the identification of potential safeguarding issues and how and to whom to report these. A number of stewards have been designated as "Safeguarding Stewards" and members of the Club's safeguarding team are also represented at all appropriate matches.

Going forward

The Club is committed to improving practices to combat slavery and human trafficking.

In accordance with the requirements of the Act, this statement can be found on our website and will be reviewed annually.

Andrew Nestor – President & Sporting Director
22 November 2025