

Anti-Slavery and Human Trafficking Statement



The Football Association Premier League Limited (“we” or “our”) is committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do and to contributing to the wellbeing of communities around the world.

This is our ninth statement on the anti-slavery and human trafficking measures implemented across our business and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Our Organisation

We are the organising body of the competition currently known as the Premier League (the “Competition”), with responsibility for its Rule Book and the centralised broadcast and other commercial rights. The Competition is the leading professional football league competition in England. It was formed on 20 February 1992 and has been the top division of the professional football league in England since Season 1992/93.

We are structured as a private company that is wholly owned by its 20 member clubs who make up the Competition at any one time (“Clubs”). Each Club holds one share, as well as one special share which is held by the Football Association. Each Club is independent, working within the rules of football, as defined by the Rule Book, The Football Association, UEFA and FIFA, as well as being subject to English and European law.

We work proactively and constructively with the Clubs and other football authorities to improve the quality of football, both in England and across the world. Our core values see us aim to be ambitious, inspiring, connected and fair. Our values influence the way we think, communicate, and behave as an organisation and govern the interaction we have with the world around us. Our commitment to conduct our business in an ethical and lawful manner is set out in our Statement of Principles which is available on our website via the following link: <https://www.premierleague.com/about/statement-of-principles>

Our Supply Chains

Our supply chains consist primarily of service providers whose employees have qualifications and skills that are unlikely to be exploited through forced labour. We assess the risk of modern slavery and human trafficking occurring in our business to be low, but we recognise that no organisation can consider itself immune or afford to be complacent. In the last year, we have continued to expand internationally – establishing operations in China, as well as commencing the process to incorporate an entity in India. Whilst we assess that the risk in our business remains low, we are implementing further diligence steps to ensure that we manage our modern slavery risk these new territories – see Looking to the Future.

Our supply chains include third party suppliers of products and services for our commercial, broadcasting, youth development and football administration operations. These include, amongst others, suppliers of the following products and services:

- Audio-visual equipment/service
- Broadcasting services
- Catering products and services
- Consultancy services
- Couriers
- Educational services
- Financial services
- Food and beverages
- Football operations
- Insurance services
- IT equipment/software/hardware services
- Maintenance services
- Marketing/advertising/design services
- Photography
- Professional services
- Property management services
- Recruitment services
- Security services
- Supplies for our offices and other sundries
- Training services
- Travel and accommodation services
- Utilities

Anti-Slavery and Human Trafficking Policy

We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain. We comply with all applicable labour laws relating to working terms and conditions, including pay, and we place great emphasis on the fair and equal treatment of all our staff. All our staff (including agency workers) are paid at least the London Living Wage.

Our Anti-Slavery and Human Trafficking Policy (the "Policy") makes clear our zero-tolerance approach to modern slavery and human trafficking. It shows our commitment 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 and human trafficking is not taking place anywhere in our own business or in any of our supply chains. The Board of Directors has overall responsibility for ensuring the Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

We provide mandatory training to staff on the Policy and on the risk that the business faces from modern slavery and human trafficking in its supply chains. Our staff are required to periodically complete an interactive online learning module which provides context as to how the crimes of modern slavery and human trafficking may be committed. This year, that module has been refreshed and was completed by all staff in August 2024. This module also highlights potential warning signs for individuals to be aware of. This module forms part of our induction process for all new employees.

In order to support and bolster the effectiveness of the Policy and the accompanying training, we have in place a whistleblowing hotline and web-based reporting service ("Whistleblowing Service"). The Whistleblowing Service is accompanied by a bespoke Whistleblowing Policy which was reviewed and refreshed in January 2024. This year we have provided mandatory training to staff on the Whistleblowing Policy and together with our Whistleblowing Champion at Board level – further augments the importance of whistleblowing within our business and increase the visibility of whistleblowing throughout the business. The Whistleblowing Policy incorporates the roles and responsibilities of our Board Whistleblowing Champion. While we actively encourage a culture of openness within our business, the Whistleblowing Service provides staff with a secure means of communicating concerns and protected disclosures, with the option to do so anonymously. There were no instances of modern slavery reported in the financial year ended 31 July 2024.

Safeguarding Policy

We aim to adopt the highest possible standards and take all reasonable steps to safeguard the children and adults at risk ("Vulnerable Groups") we engage with. We recognise our duty to promote the welfare and well-being of Vulnerable Groups, to protect them from harm and to respond to abuse, exploitation and safeguarding concerns when they arise. We are committed to providing a safe environment where Vulnerable Groups feel safe, valued and respected.

We have a well-established safeguarding team and we have appointed a designated Board level Safeguarding Champion. We have procedures and guidance in place underpinned by education to ensure that staff recognise what constitutes poor practice and abuse, and their responsibilities to respond appropriately. Our Safeguarding Policy, which is refreshed annually, is available via the following link: <https://www.premierleague.com/safeguarding/safeguarding-governance-in-football>.

Supplier Due Diligence

We expect all our consultants, contractors, suppliers and other business partners (together "Suppliers") to adopt the same high standards that we adhere to. As part of our contracting process, where appropriate, 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.

This year, to further bolster our contracting process, we have appointed a Head of Procurement who is tasked with (amongst other things) identifying and managing risks, including modern slavery risks,

in new procurements. A newly appointed Senior Risk and Performance Manager also provides further support in this process.

Our standard terms and conditions for Suppliers include an express obligation that they comply with the Modern Slavery Act 2015. We also take steps to ensure that there is a provision in our agreements with Suppliers that if a Supplier is found to be in breach of its obligations to comply with the Modern Slavery Act 2015, then we are entitled to terminate that agreement immediately.

As part of the process of identifying and assessing any actual or potential involvement in modern slavery or human trafficking in our supply chain we require those employees responsible for procuring services to consider the risk of potential issues relating to modern slavery and human trafficking through our supplier onboarding process. We encourage openness and will support anyone who raises genuine concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or supply chains and actions (including enhanced due diligence) would be taken to address such concerns. The appointment of a Head of Procurement will further embed this process within our business.

We use due diligence software to risk assess Suppliers prior to contracting with them for their services. This software, provided by a market leading third party, rigorously screens suppliers before delivering a report exposing any adverse media or other relevant information associated with that supplier. This allows us to make an informed assessment, obtain further information and introduce additional safeguards where necessary. Once screened, suppliers are subject to continuous monitoring, with any changes to risk status notified to us.

Assessment of Effectiveness

This statement constitutes our anti-slavery and human trafficking statement for the financial year ending 31 July 2024. We will continue to assess the effectiveness of the measures we take and we will regularly review and refine our policies and procedures, and the mandatory training provided to staff, in relation to modern slavery and human trafficking and will include updates on any actions we take in future statements.

Looking to the Future

Over the next year, as the business continues to expand including into the new territories identified above, we shall continue to closely review and update, where appropriate, our Supplier due diligence and contracting processes to ensure that modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

We will offer enhanced localised modern slavery and human trafficking training to staff in our China and India offices. We will also review the supply chains of those offices to identify any Suppliers who represent a high risk of modern slavery and human trafficking in order to conduct enhanced due diligence on those Suppliers.

This statement has been approved by The Football Association Premier League's Board of Directors on 17 December 2024. A revised statement, detailing the steps taken and improvements made, will be published on the Premier League's website each year at www.premierleague.com.

ALISON BRITTAIN
Chair

