The Welsh Rugby Union Limited

Modern Slavery Act 2015 Slavery and Human Trafficking Statement

We have prepared this statement for the purposes of section 54(1) of the Modern Slavery Act 2015. This statement constitutes The Welsh Rugby Union Limited's (the "WRU") slavery and human trafficking statement for the financial year 2021 - 2022. It provides a brief explanation of the WRU's structure and business; supply chains; the approach taken to assessing and managing risk; steps taken in relation to suppliers and the supply chain; due diligence practices undertaken relevant to the issue of modern slavery and human trafficking; and training of relevant staff and reporting.

The WRU is the national governing body for rugby union in Wales. Our purpose and principal activity is to promote all rugby union in Wales and encourage more people to engage with the game, more often, with more enjoyment and more success. Our mission is to define Wales and to unite communities. We are committed to ensuring that we operate ethically, source services responsibly and continue to work to protect our organisation and supply chain from modern slavery and human trafficking.

The WRU falls within the ambit of the Modern Slavery Act 2015, given its global annual turnover.

References in this statement to "forced labour" or "modern slavery" mean any conduct which is an offence under Part I of the Modern Slavery Act 2015 including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Structure and Business

The WRU is the main operating company of the WRU Group, and has a number of direct and indirect subsidiaries. The WRU derives its revenues largely from the sale of tickets to attend international rugby union matches held at Principality Stadium in Cardiff, broadcasting, commercial sponsorships and payments from international bodies of which it is a member. The WRU Group has approximately 320 employees.

The WRU's direct subsidiaries include WRU National Centre of Excellence Limited, WRU Properties Limited, WRU Six Nations Limited and WRU Supporters Club Limited. The WRU also majority owns Millennium Stadium plc; owns 83.5% of Millennium Stadium Experience Limited; owns 80% of WRU Gwent Region Limited (and owns 80% of each of that entity's two subsidiary companies, WRU Gwent Rugby Limited and WRU Gwent Stadium Limited); and (through WRU Properties Limited) owns 75% of Parkgate Hotel Cardiff Limited.

Our work is underpinned by our strong values of Courage, Family, Humour, Integrity, Excellence and Success and our continued commitment to equality, diversity and inclusion.

We remain committed to having systems in place to safeguard against forced labour in any part of our business or our supply chains and we do not tolerate forced labour or modern slavery either within our business itself or within our supply chains. We expect our suppliers (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

We will continue to review our business and our supply chains to fully understand the risks that we face in relation to forced labour and modern slavery.

Further information about the WRU, its organisational and governance structure and operations can be found in the WRU's Annual Report for 2022, which is available here: https://community.wru.wales/the-wru/reports/

Supply Chains

Our supply chains are diverse and we take a risk-based approach to assess the risk of modern slavery taking place. We remain vigilant for any suspected instance of forced labour across our business and

we expect our suppliers to operate fair and equitable practices whereby forced labour and modern slavery is not tolerated and to act ethically and with integrity.

Due Diligence

We continue to take the following steps to assess and manage any risk that our supply chains may use forced labour:

- we expect our suppliers to comply with their obligations under the Modern Slavery Act 2015 and to place similar expectations on their respective suppliers;
- when entering into arrangements with suppliers, we may ask our suppliers to complete a self-assessment questionnaire which allows us to assess their business, so that we are alert for any indicators of forced labour or modern slavery;
- considering how we can visit facilities at which clothing and rugby balls are manufactured by or on behalf of our commercial partners to undertake audits;
- we maintain communication and personal contact with our suppliers to ensure they understand our expectations;
- we incorporate relevant contractual obligations into our supplier contracts, such that our suppliers will:
    - undertake to comply with the Modern Slavery Act 2015;
    - warrant that their business and, to the best of their knowledge, their own supply chain do not use forced labour;
    - agree to permit us and third parties acting for us to inspect their facilities, records and practices to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of forced labour; and
    - impose equivalent obligations on their own suppliers,

    such that a failure to adhere with such terms may ultimately result in termination of the contract entered into with that supplier;
- the contractual terms we enter into with our suppliers are regularly reviewed; and
- we shall review statements published by our suppliers on the use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps.

Reporting and Training

We have robust procedures for recruiting employees, with a permanent full-time People Department that manages recruitment and our employee processes. Employment vacancies are subject to internal approvals of terms and conditions and pay. Most recruitment of non-playing people is through direct application to the WRU; recruitment consultants and agencies are used as necessary. Applicants for any employment vacancies are encouraged to complete equality and diversity questionnaires as part of WRU recruitment processes and references are checked with previous employers. We will continue to ensure that relevant employees are aware of the obligations contained in the Modern Slavery Act 2015 and will provide training to relevant employees to ensure a high level of understanding of the risks of forced labour in our business and supply chains.

We have contracted SeeHearSpeakUp, an independent third-party supplier, to provide all employees with an independent whistleblowing hotline where employees can anonymously raise concerns. We also have in place an employee '*Whistleblowing Policy'*, that encourages employees to report any

concerns in relation to behaviours that may be contrary to the WRU's statutory obligations and organisational values. This policy encourages our employees to report their concerns and aims to provide an environment where our employees feel able and safe to raise such concerns. The WRU will take the appropriate measures to address those concerns wherever possible.

The WRU has a designated Audit and Risk Committee which is responsible for assisting the WRU Board to discharge its responsibilities in a number of areas, including internal controls and risk management.

The WRU recognises the importance of maintaining constant vigilance to identify and address any impacts associated with forced labour and modern slavery throughout its supply chains. We will continue to assess the effectiveness of the measures we implement and will also review and refine our policies in relation to forced labour and modern slavery as necessary.

This statement was approved by the Board of Directors on 18 December 2022.



Ieuan Evans MBE
Chair of the Board of Directors