

Modern Slavery Act Statement in respect of financial year 2022/2023

Introduction

Everton Football Club Company, Limited (EFC) on behalf of itself and its subsidiaries (together the Everton Family) are committed to having a zero-tolerance approach to any modern slavery or human trafficking practices within the Everton Family and our supply chains. In this statement we explain our current policies and the work we have undertaken to ensure compliance with the Modern Slavery Act 2015 (MSA) for the previous twelve months.

Our Business

EFC is at the top of the Everton Family group structure. EFC is a privately owned company limited by shares. The remainder of the group companies are also private companies registered in England and Wales which are either limited by shares or guarantee.

EFC is one of the world's leading and most historic football clubs. We are a multinational business which, through the Everton Family, has a broad range of domestic and international commercial partners, sponsors, and suppliers. We also benefit from the distribution and broadcasting of live football content; such revenue is derived from the domestic and international television and radio rights to the Premier League, UEFA, and other competitions. Through its subsidiaries, EFC operates a charitable foundation, an alternative educational provider and is currently engaged in the development and construction of a world-class stadium.

Our 2022/2023 Policies and Procedures

EFC respects the right to work freely and with equal opportunity. We have clear policies which set out how we expect our employees to behave and conduct themselves. These policies also apply to those who work at our place of business on our behalf, including contractors, suppliers, and those on temporary/ad hoc employment.

All of the Everton Family's written policies and procedures for employees which touch upon modern slavery or human trafficking risks and behaviours are periodically updated and presented to staff. All new starters were provided with training in these areas and current staff are provided with ongoing training where necessary or where the law changes.

The policies which govern how we treat fellow employees and conduct our operations include:

- Anti-Bribery Policy
- Anti-Harassment and Bullying Policy
- Equal Opportunities Policy
- Grievance Policy
- Pay Policy
- Confidential Reporting Policy

These policies ensure the protection of human rights and compliance with employment legislation, with a view to the elimination of discrimination in the workplace. They encourage an atmosphere of openness and provide an effective remedy for anyone who may feel they are suffering from behaviour indicative of modern slavery.

The Everton Family deliver training to all staff on its expectations in respect of their compliance with the MSA and we have added the MSA as a standard topic for the Everton Family's induction which is delivered to all new starters. We have also developed a Compliance Handbook, applicable to all staff, which contains a section on MSA compliance, as a result we determined that a stand-alone MSA policy was unnecessary.

Our 2022/2023 Suppliers

Our supply chains for 2022/2023 included third party suppliers of products/services required for the overall operation of the Everton Family. These include, amongst others, suppliers of the following products/services:

- Football operations
- Audio-visual equipment/service
- Broadcasting (including production and editing) services
- Catering products and services
- Charitable programmes
- Construction services
- Consultancy services
- Couriers
- Education and training services
- Financial services (including grant funding)
- Food & beverages
- Insurance services
- IT equipment/software/hardware
- Kit and equipment
- Maintenance services
- Marketing/advertising/design services
- Medical Treatment/Supplies
- Merchandise
- Pitches-related products and services
- Professional services
- Property management services
- Recruitment services
- Security services
- Supplies for our offices and other sundries
- Travel & accommodation services
- Utilities

To ensure that our supply chain and contractors comply with our zero-tolerance approach to any modern slavery or human trafficking practices, our commercial and supply agreements, wherever possible, are subject to third party contractors complying with all applicable legislation, including the MSA.

Due Diligence and Compliance Processes for Slavery and Human Trafficking

As part of our MSA strategy to identify and mitigate risk we have systems in place to identify and assess potential risk areas in our supply chain in turn minimising the risk of slavery and human trafficking occurring in the Everton Family or our supply chains. Such systems include:

- A dedicated due diligence team carrying out specific checks and using a questionnaire regarding MSA compliance which must be completed by key suppliers as part of the due diligence process.
- A dedicated Safeguarding team that are committed to protecting children and young people who are at risk of being exploited by parents, carers, family members or bogus agents.
- Robust policies that must be complied with by all employees, contractors, suppliers and those on temporary/ad hoc employment.
- Whenever we undertake a tender activity, we issue our modern slavery policy and ask suppliers to sign their agreement to our policy or provide us with a copy of their own modern slavery policy.

- We have undertaken analysis on all parties to each contract we have entered into and undertaken enhanced due diligence exercises where specific circumstances have led us to consider there to be a high-risk of modern slavery.

Our MSA Aims

The Everton Family sits in the heart of a community and prides itself on its family ethos and being a values-based organisation. Over the past six years we have been working through our “Modern Slavery Act Strategy”, the aim of which was to go beyond mere legal compliance; taking meaningful, sustainable, and ethical steps to help ensure modern slavery or human trafficking does not take place within its supply chain.

The Modern Slavery Act Strategy included a further review of our operations to identify any areas susceptible to a risk of modern slavery and human trafficking. To achieve this goal, we worked with business ethics specialists to assist with the review of our existing MSA stance and develop a strategy for the Everton Family in this area.

Ways that we have demonstrated our compliance with the MSA over the past twelve months are:

- Reviewed ways to assess MSA compliance of our top suppliers
- Undertook due diligence checks for all new suppliers and commercial partners
- Provided modern slavery risk assessment questionnaires for completion to our top suppliers
- Delivered training to managers
- We are an accredited Living Wage Foundation (LWF) employer and principal partner of the LWF helping to influence policy in this area
- Including MSA training in the Everton Family’s induction
- Having a ‘Confidential Reporting Policy’ to empower staff members to ‘blow the whistle’

Effectiveness in combating modern slavery and human trafficking

To assess the effectiveness of the MSA strategy and the measures taken by the Everton Family, we continuously monitor the results of the MSA Strategy to update our policies as required and to prevent any exploitation of people involved in our supply chains and in the Everton Family. We intend to improve our MSA compliance year on year and make the right decisions to become a best practice organisation for MSA compliance in the Premier League.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Everton Family’s modern slavery and human trafficking statement covering the financial year ending 31 June 2023 and was approved by the Board of Directors for and on behalf of the Everton Family on 25 January 2024.

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Signed by Colin Chong

Director and Chief Executive Officer of Everton Football Club Company, Limited