

Modern Slavery Act Statement

Our Business

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.

EFC are committed to conducting business in a lawful and ethical manner, and this statement sets out our zero-tolerance approach to modern slavery and human trafficking, demonstrating our compliance with the Modern Slavery Act 2015 (MSA).

EFC is at the top of the Everton Family group structure and 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 and is currently engaged in the development and construction of a world-class stadium.

Our Training and Policies

Modern slavery remains an important part of our society, and includes slavery, forced labour and servitude, all of which are the deprivation of human rights for exploitation, and commercial gain.

EFC have clear policies which touch upon modern slavery and human trafficking, which set out how we expect our employees to behave and conduct themselves, these are periodically updated and communicated to employees. All new starters, and current staff are provided with online training material where necessary or where there are law changes.

Our colleagues have a responsibility to be aware of risks around modern slavery and human trafficking and are required to report any concerns regarding modern slavery, regardless of how small, to allow management to investigate, and act upon them.

EFC respects the right to work freely and with equal opportunity, and operate with policies, which apply to those who work at our place of business on our behalf, including contractors, suppliers, and those on temporary/ad hoc employment.

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
- Confidential Reporting Policy

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

EFC deliver training to all staff on its expectations in respect of their compliance with the MSA and we include the MSA as a standard topic for our 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 Supply Chain

Our supply chain includes third party suppliers of products/services required for the overall operation of the Everton Family.

We ensure that the onboarding processes for new suppliers are robust, including the requirement for all third parties to agree to our third-party handbook.

EFC have processes 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.

Processes include:

- 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 will undertake analysis on all parties to each contract we are entering into and undertake enhanced due diligence exercises where specific circumstances lead us to consider there to be a high-risk of modern slavery.

Our Due Diligence

The Everton Family sits in the heart of a community and prides itself on its family ethos and being a values-based organisation. Our aim to go beyond legal compliance; taking meaningful, sustainable, and ethical steps to help ensure modern slavery or human trafficking does not take place within our supply chain. Over the last 12 months we have been undertaking the following:

- Reviewing our assessment of MSA compliance of our top suppliers
- Undertaking due diligence checks for all new suppliers and commercial partners
- Providing modern slavery risk assessment questionnaires for completion to our top suppliers
- Providing training to our staff

In addition to this we:

- Are an accredited Living Wage Foundation (LWF) employer and principal partner of the LWF helping to influence policy in this area
- Include MSA training in the Everton Family's induction
- Have a 'Confidential Reporting Policy' to empower staff members to 'blow the whistle'

Our Aim

We intend to improve our MSA compliance year on year, making the right decisions to become a best practice organisation for 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 30 June 2024 and was approved by the Board of Directors for and on behalf of the Everton Family on 20 November 2024.

Signed by



Colin Chong

Chief Executive Officer

Everton Football Club Company Limited