Modern Slavery Statement

PGA European Tour and its subsidiaries, which include (among others) PGA European Tour Productions Limited, (together the "**European Tour group**") are committed to upholding integrity and sportsmanship as we showcase our diverse global talent. We recognise that modern slavery is a growing problem worldwide and we are committed to taking all reasonable actions to ensure that there are no acts of modern slavery and human trafficking within our supply chain or in any part of our business. We seek to impose those same high standards on our consultants, contractors, suppliers and other business partners (together "**Suppliers**"). In accordance with section 54 of the Modern Slavery Act 2015, we set out below the steps that have been taken by the European Tour group during the financial year ending 31 December 2022 to seek to prevent slavery and human trafficking in our business and supply chain.

This Statement covers the six areas recommended in the Home Office's statutory guidance:

1. Organisation structure and supply chains;
2. Policies in relation to slavery and human trafficking;
3. Due diligence processes;
4. Risk assessment and management;
5. Key performance indicators to measure the effectiveness of steps being taken; and
6. Training on modern slavery and trafficking.

About the European Tour group

PGA European Tour is the corporate entity which administers three competition brands: the DP World Tour, the Challenge Tour and, in its capacity as Managing Partner of Ryder Cup Europe LLP, The Ryder Cup in association with the PGA of America. PGA European Tour also holds a stake in and provides some services to tournaments on the Legends Tour.

The European Tour group is committed to 'Driving Golf Further' through our guiding principles of being innovative, inclusive and global.

Innovative: We are driving innovation in golf through the creation of award-winning content, pioneering tournament formats and the use of the latest technology and inventive fan engagement. We are committed to attracting new audiences whilst respecting the tradition of our sport.

Inclusive: We are committed to include all who share a love for the game of golf. We are passionate about a closer collaboration with the women's game, golf for the disabled and promoting the many physical and mental health benefits of playing golf.

Global: Since 1972, players from 38 different countries have won tournaments on our main tour, while our live broadcast reaches more than 490 million homes in more than 150 countries every week, generating in excess of 2,200 global broadcast hours for each tournament. We also enjoy the support of many of the world's leading business brands.

The European Tour group seeks to ensure that it has a positive long-term impact on the courses, countries and the communities we visit through 'Golf for Good', the umbrella name for the European Tour group's commitment to 'Driving Golf Further' in an environmentally and socially sustainable way.

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Organisation Structure and Supply Chain

PGA European Tour is a unique business which generates profits for the benefit of its members – the tournament players – who receive their returns by way of competing for and winning prize money. The European Tour group comprises a number of subsidiaries and joint venture entities engaged in the promotion, management and administration of the business, all of which are managed and controlled as a single entity to achieve its objectives.

The 2022 tournament schedules spanned Europe, Africa and the Middle East with the European Tour group itself responsible for staging 18 tournaments across the DP World Tour and the Challenge Tour, where, when necessary, we employed local temporary staff and volunteers through bona fide recruitment agencies. Tournaments are either sanctioned by PGA European Tour alone or co-sanctioned alongside other international tours, with such tournaments either being staged and promoted by the European Tour group or by another international tour or by third party promoters or with the assistance of local delivery partners.

The business is run by a professional staff of around 315 employees within its registered office in Virginia Water, England, and its representative offices and international branches. Our supply chains can be cross-border and include Suppliers of products and services required for our commercial, broadcasting and tournament operations. These include, amongst others, Suppliers of the following products/services:

- Audio-visual equipment and services
- Broadcasting
- Catering products and services
- Consultancy services
- Education and training services
- Financial services
- Health and Safety consultancy
- IT equipment / software / hardware
- Marketing / advertising / design services
- Medical treatment / supplies
- Professional services
- TV Production
- Property management services
- Recruitment services
- Security services and police
- Ticketing and accreditation services
- Travel and accommodation services
- Utilities
- Merchandise
- Photography

To find out more about our business please view here:
www.europeantour.com/en/europeantour/corporate-news/

Policies in relation to Slavery and Human Trafficking

We strive to ensure we have robust commercial agreements, employment contracts, employment and recruitment-related policies and procedures in place which are updated regularly. No form of slavery will be tolerated within our business.

The European Tour group's Procurement Policy sets out our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. It outlines our activity in relation to social, environmental and ethical impacts of our supply chain and governs how we manage relationships with Suppliers and what we expect of them in relation to modern slavery and otherwise.

Our Whistleblowing Policy details how to report any suspected breach securely and anonymously if required. All reports are reviewed and investigated and escalated if necessary. The Audit and Risk Committee receive quarterly reports. No reports relating to modern slavery were made via our whistleblowing hotline in the 2022 financial year.

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We have a Modern Slavery Guidance Note to ensure any report of modern slavery or human trafficking is dealt with effectively and efficiently by a working group set up for this purpose.

Our standard terms of business require our Suppliers to comply with all applicable laws and include specific obligations upon our Suppliers to:

- comply with all applicable laws including the Modern Slavery Act 2015; and
- implement due diligence procedures in relation to their own suppliers, subcontractors and other participants in its supply chains, to ensure there is no slavery or human trafficking in their supply chains.

In addition to these terms, which we endeavour to incorporate in all relevant contracts, we continue to review our purchasing procedures as set out in the section below.

A copy of our policies may be requested from the Company Secretary.

Risk Assessment and Management and Due Diligence Processes

As part of the European Tour group's efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we understand that we need to adopt robust risk assessment and due diligence procedures and we continue to work towards this goal. We recognise that there may be markets in which our Suppliers operate which are more vulnerable to adverse practices than others and we take seriously the need for greater scrutiny regarding such Suppliers.

Two further employees have been added to the Procurement team. The team of 5 now has a key focus on Supplier database management and ensuring relevant due diligence is completed.

This year, to supplement existing due diligence processes, we are in the process of implementing a source-to-contract software, which gives us the opportunity to standardise and transform our Supplier onboarding and ongoing Supplier data management for our critical Suppliers. We have identified our top 400 spend/risk Suppliers who will undergo an annual audit of documentation across diversity, inclusion and modern slavery. Policies will be requested, reviewed and held centrally in our new software.

Any concerns that are raised by our procurement and due diligence processes are reviewed to ascertain the risk involved and the actions to take in the given situation. We conduct further investigation if required, including asking the Supplier to make a positive written affirmation that (i) they do not; and (ii) their direct supply chain does not, endorse, enable or facilitate human trafficking or slavery within their business. If a Supplier cannot provide the relevant documentation or affirmations to satisfy the Procurement team, they will be marked as a high-risk Supplier, and all efforts will be made to review and onboard alternate Suppliers that do have the relevant policies and procedures in place.

The European Tour group continues to work towards integrating our whole Supplier database into the above processes and to build in more robust practices with a view to establishing a firm plan before the end of 2023.

All new potential vendors as part of the RFP process will be required to submit CSR policy/documentation. Failure to provide sufficient documentation will result in the potential vendor's bid not being considered within the tender.

Additional due diligence may also be undertaken by way of a physical audit/inspection of the new Supplier if deemed necessary to satisfy the European Tour group that the Supplier is operating to the required standard.

Key performance indicators to measure effectiveness of steps being taken

In order to assess the effectiveness of the measures we take, we regularly review our policies and procedures in relation to modern slavery and human trafficking and will include updates on any actions we take in future modern slavery statements. We work to ensure our practices match what is required by law and best practice and this sets the benchmark for effectiveness.

Our goals are set out in this statement and achievement of these assist us in measuring our performance and progress and providing the framework for working towards enhanced systems.

In 2022 we continued regular monitoring of our supply chain including review meetings focussed on policing compliance.

Training and awareness raising

In 2021 we included modern slavery training in our suite of compliance training sessions across all employees. This course is now rolled out on an annual basis and the course is provided to all new starters.

Regular review

We continue to undertake strategic assessment of new Suppliers in accordance with our Procurement Policy and monitor our supply chain pursuant to our contract approval mechanism.

Corporate, Social Responsibility and Sustainability review

A working group is responsible for reviewing our impacts on the environment and society to ensure we continue to seek excellence in every aspect of our business; meeting our business requirements while minimising the social, environmental and ethical impacts of those requirements.

Future Steps

We intend to take the following further steps to tackle this issue during the coming financial year:

- working towards implementing stronger risk assessment processes, to take account of the physical location of a Supplier and the nature of the goods/services supplied and with results categorised as high or medium risk triggering investigation;
- continued awareness raising sessions for our management and colleagues expanding on the annual training already implemented;
- continued regular monitoring of our supply chain including review meetings focussed on policing compliance;
- continued focus on due diligence in relation to our business and supply chain; and
- continued work to assess the adequacy of our procedures; attainment of our goals; and future enhancements.

Modern Slavery Statement

Board Approval and Director's Signoff

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the European Tour group's slavery and human trafficking statement for the financial year ending 31 December 2022.

This statement was approved by the Board on 26th June 2023 and is signed on the Board's behalf and on behalf of PGA European Tour and its group companies.



Name: Eric Nicoli
Director
Date: 26th June 2023