

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 2023 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 four competition brands: the DP World Tour, the Challenge Tour, the G4D (Golf for the Disabled) 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 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 environmental and social sustainability.

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 2023 tournament schedules spanned Europe, Africa, Asia and the Middle East with the European Tour group itself responsible for staging 20 tournaments across the DP World Tour and Challenge Tour and 7 events across the G4D Tour. When necessary at these events, 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 326 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:

Modern Slavery Statement

- | | |
|---|--|
| ◆ Audio-visual equipment and services | ◆ Professional services |
| ◆ Broadcasting | ◆ TV Production |
| ◆ Catering products and services | ◆ Property management services |
| ◆ Consultancy services | ◆ Recruitment services |
| ◆ Education and training services | ◆ Security services and police |
| ◆ Financial services | ◆ Ticketing and accreditation services |
| ◆ Health and Safety consultancy | ◆ Travel and accommodation services |
| ◆ IT equipment / software / hardware / services | ◆ Utilities |
| ◆ Marketing / advertising / design services | ◆ Merchandise |
| ◆ Medical treatment / supplies | ◆ 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 2023 financial year.

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.

Modern Slavery Statement

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.

The Procurement team has a key focus on Supplier database management and ensuring relevant due diligence is completed.

In 2023, to supplement existing due diligence processes, we implemented 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.

To further assist, we started to look at third-party sustainability-focussed software, to integrate into our source-to-contract software, and automatically hold ESG policies and documentation for those of our Suppliers who are rated on the platform. Proposed future actions include the purchase of relevant software licence(s) and the roll-out of this platform.

Concerns raised by our procurement and due diligence processes are reviewed to ascertain the risk involved and the actions to take in the given situation with 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 higher-spend Supplier database into the above processes and to build in more robust practices with a view to establishing a firm policy before the end of 2024.

All new potential vendors as part of the RFP process will be required to submit ESG 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.

We have also begun to implement a more thorough process for validating potential new partners/sponsors by detailing a process-flow and introducing specific sign-offs if a potential partner flags a risk in our due-diligence process on our third-party due diligence software.

Modern Slavery Statement

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 2023 we continued regular monitoring of our supply chain including review meetings focussed on policing compliance.

Training and awareness raising

Modern slavery training is included in our suite of compliance training sessions across all employees; it is now rolled out on an annual basis; and is provided to all new starters.

Regular review

We continue to undertake strategic assessment of new Suppliers, partners and sponsors and monitor our supply chain and partner and sponsor portfolios 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:

- ◆ continued work 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;
- ◆ working towards implementing appropriate risk assessment processes in relation to partners and sponsors;
- ◆ 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 2023.

This statement was approved by the Board on 24th June 2024 and is signed on the Board's behalf and on behalf of PGA European Tour and its group companies.

A handwritten signature in black ink, appearing to read "Eric Nicoli".

Name: Eric Nicoli
Director
Date: 24th June 2024