

Modern Slavery Statement (Financial Year End 30 June 2024 – FY23/24)

Introduction

Modern slavery remains an issue that is affecting businesses in all sectors, across the globe. In 2023, the UK Home Office reported the highest number of referrals of potential victims of modern slavery made via the National Referral Mechanism (NRM), since the NRM was initiated in 2009¹. Whilst the UK Government has been reported as having the strongest governmental response to modern slavery² globally, businesses must continue to manage the day-to-day modern slavery risks in their operations and their supply chains.

The 2023/24 football season saw the Club promoted to the Premier League, and as a result, the Club was able to continue its dedication to conducting all of its activities consistent with the highest standards of business ethics.

In addition to its core football operations, the Club has a number of other key business activities, including partnerships, ticketing and retail, that continue to support both the Club's day-to-day business, and its longer term ambitions.

We have an obligation to our employees, shareholders, customers, suppliers, community representatives and other business contacts to be honest, fair and forthright in all of our business activities.

In accordance with this ethical approach, we do not tolerate modern slavery or human trafficking in our organisation or in our supply chain.

What is modern slavery?

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including forced labour, slavery, servitude and human trafficking.

This crime can manifest itself in many ways, but what each of its forms will have in common is the exploitation of a person for another person or another person's (or organisation's) benefit.

The UK Modern Slavery Act 2015 ("MSA") consolidates anti-slavery and human trafficking offences into one piece of legislation.

Under the MSA it is an offence to:

(a) Hold another person in slavery or servitude or require another person to perform forced or compulsory labour;

¹ <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2023/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023#:~:text=In%202023%2C%20the%20NRM%20received,set%20out%20in%20the%20annex.>

² <https://www.walkfree.org/global-slavery-index/>

- (b) Arrange or facilitate the travel of any person across borders with a view to that person being exploited (i.e. conduct or be involved in human trafficking); or
- (c) Commit an offence with the intention to commit human trafficking.

Our commitment to fighting modern slavery

We have a zero tolerance approach to modern slavery and human trafficking, in all its forms, within our supply chains.

We are committed to running our business in an ethical and lawful manner and, as such, all persons working for us and all persons in our supply chain, must support the practices outlined in this statement and help us to ensure that modern slavery is not taking place in or associated with our business.

Our supply chain

Third parties in our supply chain include manufacturers and suppliers of our licensed products and merchandise, office and other equipment suppliers, IT services providers, food and beverage manufacturers and distributors, maintenance providers, catering service providers, advertising and design agencies, photographers, recruitment and employment agencies, travel and accommodation service providers, utilities providers, education and training services providers, and other individual consultants. The majority of our suppliers are UK-based with domestic supply chains, and, whilst the UK may represent a lower risk area in terms of modern slavery (according to the 2024 Global Slavery Index), we know that does not diminish our responsibility to support the eradication of modern slavery.

We exercise a cross-functional approach to managing our supply chain, to help ensure that it is slavery free, and to ensure that any concerns are reported and addressed appropriately. This approach applies throughout the supplier lifecycle, from the onboarding of new suppliers, through to managing suppliers' provision of services, and then reviewing relationships after services have been completed. Whilst we are proud to have longstanding relationships with several suppliers, we often carry out full-scale tender processes in the market, to ensure that we continue to develop and improve the high standards that we receive from suppliers working with the Club.

Our anti-slavery policies and procedures

The Club continues to maintain its standalone anti-slavery and human-trafficking policy, with which we expect our suppliers, contractors and other business partners, as well as those working for us, to comply.

To support our anti-slavery and human-trafficking policy, and other Club policies, our whistleblowing policy aims to reassure employees that they can raise genuine concerns without fear of reprisal. We hope that by encouraging staff to report

suspected wrongdoing, we will continue to build a transparent culture in order to further help us tackle corruption and crime, including any incidents of modern slavery.

We encourage anybody connected with us to speak up if they have concerns about slavery in our business or within our supply chain.

In terms of protecting our people, we only use specified, reputable employment agencies to source labour, and we always verify the practices of any new agency before accepting their workers.

We recognise that a number of our operations and activities are provided to children, young people and vulnerable adults, and that additional measures need to be taken in order to protect these groups. The Club maintains and practises a comprehensive safeguarding policy to address these risks, overseen by the Club's head of safeguarding.

Supplier Due Diligence

The contractual terms and conditions that we put in place with our suppliers are continually reviewed and updated to include provisions designed to ensure that any risks of modern slavery in our supply chain are appropriately and effectively addressed.

We have continued to develop and deploy a range of standard agreements and Club terms of business with our suppliers. to include express terms requiring our counterparties to comply with all applicable laws relating to anti-slavery and human trafficking, to include similar requirements in their own contracts, and to notify us if they become aware of any slavery or human trafficking in their own supply chains. This exercise is under constant review and can adapt in light of new legislation as is relevant.

Before a new supplier can be accepted by the Club, the Supplier must provide a self-declaration of its compliance with a range of legislation, including anti-bribery and modern slavery. The Club's Procurement team will oversee this initial supplier onboarding process and will then engage the Club's legal team as necessary, e.g. to assist with ensuring appropriate contracts are put in place. The Procurement team also operate a dedicated procurement policy which, in addition to committing to achieve the best commercial results the Club, focusses on improving the standards of procurement practices that uphold the Club's environmental, health and safety, and corporate responsibilities (including modern slavery).

During the past year, the Club has managed a roster of over 1,900 suppliers, with over 300 new suppliers having successfully completed the Club's onboarding process to become part of the Club's supply chain. For transparency, only in exceptional circumstances will a supplier be onboarded without completing the Club's process. In the 23/24 financial year, the only categories of supplier that

were subject to an exception were other football clubs and player intermediaries, although they are each subject to both national and global regulation.

Training

We know that we must continue to raise awareness of modern slavery within our business and amongst our suppliers. This will help ensure the transparency of our supply chain, and equip our employees with the knowledge they need to understand and address the risks in our operations. We are committing to ensuring that our procurement function will undertake annual modern slavery training each year, with the ambition to widen this commitment to other functions over time. This commitment has been in place for several years now, and continues to improve the knowledge of our procurement team, including new recruits.

Review of FY23/24 measures

The Club's due diligence and supplier onboarding processes are managed primarily by the Club's procurement team. As set out above, in the 23/24 financial year, all members of the procurement team again attended seminars (as is normal on an annual basis as part of the Club's Learning and Development programme) that focussed on the topic of eradicating modern slavery, and were hosted by the Chartered Institute of Procurement & Supply. In addition, each member of the procurement team completed additional online training on raising the awareness of modern slavery and human trafficking, again as part of the Club's Learning and Development programme.

In addition to its standard due diligence and onboarding process, the Club also has continued to obtain external due diligence reports on potential commercial partners, ahead of entering into contracts with such parties. This is ahead of the introduction of a new finance and procurement system during the 2024/25 season, which will provide further ability for the Club to continually monitor onboarded suppliers and advise of any changes to allow the Club to increase visibility of suppliers. Despite the additional time and expense of procuring such reports, the Club recognises the importance of carrying out this additional measure, especially when working with new partners based outside of the UK.

The Club can also report that in all instances where it contracted with suppliers using its standard goods and/or services contract, suppliers agreed to include contractual provisions confirming that they had not committed any offences under the Modern Slavery Act 2015, and that they have appropriate controls in place to ensure that no modern slavery offences are taking place in any of their supply chains or in any part of their own businesses.

Assessment of effectiveness

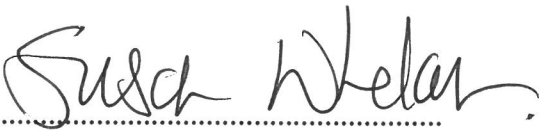
Over the next year, we will continue to monitor the effectiveness of our measures by reviewing the number of suppliers that successfully complete our standard due

diligence supplier onboarding process, and the percentage of relevant contracts executed by the Club that contain suitable compliance obligations on suppliers.

In addition, we will regularly review and refine our policies and procedures in relation to modern slavery and human trafficking. We will encourage our stakeholders to report any suspected issues and prioritise taking a proactive approach to addressing concerns, rather than reacting to issues after they have arisen. Finally, we will audit the frequency and completion rate of the training completed by our teams, to use as a minimum benchmark for subsequent years.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by LCFC to prevent modern slavery and human trafficking in our business and supply chain.

Approved by the LCFC Board and signed by Susan Whelan on behalf of Leicester City Football Club Limited.



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Susan Whelan

CEO