



Brighton & Hove Albion FC - Modern Slavery Statement

December 2024

Introduction

The 2023 [Global Slavery Index](#) highlights that there are 50 million people living in modern slavery globally. Slavery, forced labour and human trafficking affect all sectors, including professional sports.

Brighton & Hove Albion Football Club Limited (the “**Club**”) is committed to acting professionally and conducting its business in an honest and ethical manner, ensuring that the principles of equality and sustainability are integrated within its business operations. The Club’s ‘[Team Brighton Values](#)’ underpin its approach to human rights and addressing modern slavery risk, particularly the values of ‘treating people well’ and ‘acting with integrity’.

Our Commitment to Tackling Modern Slavery

"Football, as a game watched and played by billions of people around the globe, has an important role to play in upholding human rights and combatting modern slavery. We recognise that the privilege of playing at the highest level of the professional game brings with it a huge responsibility to ensure that our business is conducted in a way that upholds the highest standards of ethics, compliance, and human rights. We continue to live by our club's core values - act with integrity, treat people well, exceed expectations, aim high and never give up, and make it special. Our values are non-negotiable, and I do not doubt they have served us well through recent years."

Paul Barber OBE, Brighton & Hove Albion Chief Executive and Deputy Chairman

We are committed to taking steps to ensure that modern slavery does not exist across the Club’s operations or supply chains. This statement sets out the Club’s top-level commitment to addressing the risk of modern slavery and forms part of our approach to addressing modern slavery risk.

About Us

The Club is a professional football club that plays in the Premier League. We play our home matches at the American Express Stadium in Brighton. Our operations include participating in professional football competitions, commercial sponsorships, retail, ticketing, community projects, and business support services.



The Club is a wholly owned subsidiary of Brighton & Hove Albion Holdings Limited (the “**Holding Company**”). The ultimate controlling party of Brighton & Hove Albion Holdings Limited is Mr. A. Bloom, by virtue of his shareholding in that company.

Other wholly owned subsidiaries in the group include:

1. The Community Stadium Limited (“**TCSL**”), a property development and construction company, which owns the stadium, the training ground and the land adjoining the training ground.
2. Brighton & Hove Albion Women’s Football Club Limited (“**BHAWFC**”), a professional football club currently competing in the FA Women’s Super League.

Together, the Club, the Holding Company, TCSL and BHAWFC are referred to in this statement as the ‘Group’. This statement constitutes the statement made on behalf of the entire Group. Save where the context specifies otherwise, references in this statement to the Club refer to the entire Group.

Brighton & Hove Albion Foundation (the “**Foundation**”) is the official charity of the Club. Through the power of football and the brand of the Club, the Foundation delivers accessible opportunities that support the health and wellbeing, education and aspirations of the local community. As above, any reference in this statement to the Club shall also include a reference to the Foundation.

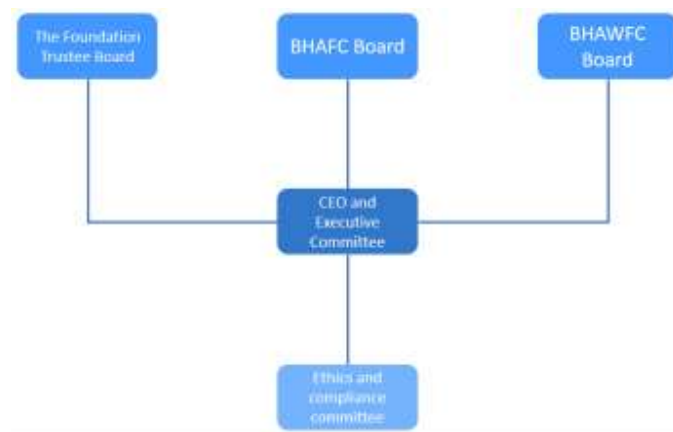
The Club has a broad range of domestic and international commercial partners, sponsors, and suppliers. We also benefit from the distribution and broadcasting of live football content. Such revenue is derived from domestic and international broadcasting rights. The Club’s operations are primarily conducted in the UK. We employ approximately 435 members of full-time staff and also have 842 casual workers who predominantly perform match-day and events roles. The Foundation employs 54 core staff and has 121 casual employees. The significant majority of our staff are employed and based in the UK. For further information about our structure and operations, see: <https://www.brightonandhovealbion.com/>.

Governance for Anti-Slavery Initiatives

Our approach and the steps taken to address modern slavery have the full support of our Board and Executive Team which oversees all strategic decisions in this area. The Club has an Ethics and Compliance Committee (the “**Committee**”) whose objective is to *“create and maintain an organisational culture committed to high standards of ethics, integrity and compliance”*. The chair of the Committee is Robert



Comer, a Board member. This internal governance structure will provide oversight, accountability and transparency at all levels of our business. The governance structure of the Committee is set out below:



Ethics and Compliance Committee meetings are used to ensure that developments in managing the risk of modern slavery are addressed. During 2024, the Ethics and Compliance committee met to discuss the modern slavery strategy, as well as the Recruitment Protocol and how it will be practically embedded throughout the Club and with its suppliers.

Our Policies and Accreditations

BHAFC is an equal opportunity employer and respects the right to work freely. We are Living Wage accredited. We pride ourselves on our equality work and have successfully attained the advanced level of the Premier League Equality, Diversity and Inclusion Standard – PLEDIS (previously known as the Premier League Equality standard).

We have several policies that govern the treatment of all people working with the Club and the conduct of our operations.



- Our Employee Code of Conduct also sets out the Club's expectations of staff in relation to the fair and equal treatment of colleagues and any third parties engaged in the course of working for the Club.
- Our Supplier Code of Conduct formally sets out the expectations of the Club in maintaining the highest ethical standards, behaviours and compliance. This includes adherence to legal and best practice standards relating to human rights and modern slavery, as well as broader sustainability issues. This is being rolled out to our key suppliers and incorporated into terms and conditions of contracts.
- Our Anti-bribery and Corruption Policy, Gifts and Hospitality tracker and guidance note continue to underpin our ethics and compliance programme.
- Our Whistleblowing Policy enables employees to report any concerns relating to the direct activities or the supply chains of the Club. The Policy and supporting process have been reviewed and developed against the requirements of "ISO 37002:2021 - Whistleblowing management systems" to ensure that it is fit for purpose to deal with modern slavery and human rights issues.
- Our Safeguarding Policy includes references to modern slavery risk and was reviewed and updated in 2024.
- A Sustainable Procurement Policy has been developed and will be sent to the Board for approval in 2025. The Sustainable Procurement Policy establishes guidelines to ensure that purchasing decisions support environmental stewardship, social responsibility, and economic efficiency. It emphasizes sourcing from suppliers who prioritise ethical labor practices, reduced environmental impact, and sustainable resource use. The policy promotes transparency, encourages the use of renewable or recycled materials, and aligns with broader sustainability goals to minimise waste and carbon footprint. By integrating sustainability into procurement, the Club aims to drive positive changes across the supply chain and support long-term community and environmental well-being.
- Our newly adopted Sustainability Strategy sets out how we will leverage our unique strengths and success on the pitch to improve people's lives and act on climate change. This Strategy factors in the links between environmental impacts, social inequality, and ethical governance.

In 2024, the Club adopted a new HR system to allow all staff to access policies and enable the Club to assign mandatory ethical policies to relevant members of staff. Our key policies are kept under review and are revisited and reviewed at least every three years (or sooner if required by law) from a legislative, equality and human rights perspective, incorporating International Labour Organisation standards.



Risk Assessment

As a Premier League football club, the Club procures a wide range of goods and services to support the success of the Club. As a result of a previous human rights mapping exercise, undertaken with a third-party expert, the Club identified a number of potential risk areas for modern slavery, including:

- Risk of outsourced labour and recruitment agencies;
- Risk arising from services in sectors with greater exposure to modern slavery risk;
- Risk arising from products sourced from high-risk countries and sectors; and
- Less leverage to influence third parties in certain business areas.

Applying these risk areas to our activities, we have identified the following operations as having a higher risk of exploitation:

- Use of Agencies
- Subcontracted workers such as security, catering and cleaning staff
- Waste operators
- Maintenance
- Security
- IT
- Construction

We have continued to address these risk areas, building on the previous year's work to strengthen our approach in these spaces.

In 2024, the Club appointed a Procurement Manager, a new role for the Club. The Procurement Manager will be responsible for progressing the Club's supply chain risk assessments and onboarding processes, which will involve identifying and mitigating modern slavery risks.

As part of a wider risk assessment process, the Club is in the process of building an internal risk register. This will record the details of all risks that have been identified throughout the Club, including modern slavery, with plans for how those risks will be addressed. This process is still underway, with the intention to finalise it in early 2025.



Supply Chain and Due Diligence

The Club recognises that a robust due diligence framework must underpin its policies. We are further developing our current due diligence systems, to ensure that they appropriately address any potential risk of modern slavery.

The Club is developing a risk-based approach to assess the likelihood of the existence of modern slavery within its supply chain and the process is ongoing. This risk assessment process includes our existing suppliers, as well as potential new suppliers. Last year, the Club refreshed the inherent sustainability risk assessment of the Club's most significant suppliers by spend. Suppliers were asked to complete our bespoke sustainability assessment. To date, 73% of all suppliers have completed the supplier questionnaire. The Club is in the process of analysing the data from these assessments. These assessments will be progressed by the Club's Procurement Manager over the next 12 months to increase the proportion of suppliers to have completed the supplier questionnaire. The Club will also continue to analyse suppliers' responses to the questionnaires and implement corrective actions in response.

The Club is also piloting a pre-approval process for suppliers as part of our strengthened procurement process. This will include assessing suppliers for ethical risks and will be rolled out over the next 12 months. We seek to partner with suppliers that share our values. We expect our supply chain to operate fair and equitable practices. The Club intends, where possible, to leverage its position and status to seek to require that all third parties working with the Club comply with standards set by the Club and take appropriate steps to ensure that there is no slavery in their supply chains. In order to do so, we are continuing to implement our Supplier Code of Conduct and continue to engage with our key suppliers and staff responsible for supply chain standards as part of an overall stakeholder engagement exercise following the risk assessment process. We seek to have all new suppliers sign up to the Supplier Code of Conduct as a demonstration of their commitment to operate fair and equitable practices, whereby modern slavery is not tolerated.

Outside of the instances where we have incorporated the Supplier Code of Conduct into our supplier contracts, we have sent it for signature to 110 Club suppliers. To date, we have recorded a return rate of 65%. We aim to continue to increase the number of suppliers signed up to the Supplier Code of Conduct in the coming year.

Where non-compliance with our standards is identified, appropriate consequences for breaches will be made clear in supplier contracts, subject to working with our suppliers to assist them with identifying any areas of risk within their supply chains and to mitigate these risks as appropriate.



This year, the Club adopted a Third-Party Recruitment Protocol in response to the identified risks associated with third-party recruitment, both directly and through the use of Agencies. The purpose of the Protocol is to formally communicate the Club's expectations and to provide guidance to Club employees on how to interact with an Agency provider and any subcontracted workers. The Protocol provides a set of principles that underpin the minimum standards we expect from an Agency and employees who interact with them.

Training

Training and capacity building are key to ensuring the prevention of exploitation leading to modern slavery and human rights abuses. The Club continues to work – where appropriate with external consultants - to put together a comprehensive training programme for senior leaders and employees.

We have previously provided modern slavery eLearning for our core staff. In the coming year, it is intended that modern slavery e-learning will be integrated into the Club's internal Learning Management System. The intention is to make the training mandatory for all core staff within the Club as part of onboarding and regular refresher training.

Specific internal roles and partners will also receive guidance on the Third-Party Recruitment Protocol. This capacity-building exercise is currently being scoped.

During 2024, the ethics and compliance committee also undertook a learning exercise based on a case study to highlight what the Club should do if unethical labour practices were to arise in the value chain.

As part of its longer-term strategy, the Club is working to identify ways to raise awareness of modern slavery issues, for example via education programmes for staff and fans, as well as collaborative work with our sponsors, partners and other key stakeholders.

Raising Concerns and Dealing with Issues

An important aspect of a due diligence framework is the ability of workers and others to raise concerns about any abuse of human rights, labour rights, modern slavery, non-compliance with policies and other related issues. The Club prides itself on workplace communication and strong management and grievance procedures to ensure that any complaints are properly identified and addressed.

We have a grievance mechanism and whistleblowing policies in place which have been reviewed for effectiveness in dealing with modern slavery risk.



No instances of modern slavery or forced labour have been identified through any of our safeguarding or reporting procedures to date. We will continue to monitor the various reporting channels and grievance mechanisms to address any concerns that may arise in a timely and appropriate fashion.

The Third-Party Recruitment Policy adds a further mechanism for stakeholders to report issues and provides a process to safeguard individuals and follow up on any concerns raised relating to third party staff.

Monitoring Effectiveness

The Club is committed to monitoring the effectiveness of the steps that it will be taking to address the risk of modern slavery across its operations and supply chains. A member of the Board has also been appointed as the chair of the Committee, while two other board members are also members of the Committee. This Board oversight ensures that the Committee can work to ensure that the proposed steps will be enacted, and to oversee the continued monitoring and effectiveness of any policy or procedures addressing modern slavery.

This year, we have continued to host regular meetings of the Committee to discuss our approach to modern slavery across the Club. The agendas of these meetings included reviewing progress of actions to address modern slavery risk, discussing, and implementing better processes to ensure that the risks are properly addressed moving forward.

Our key performance indicators are:

- Increase the number of staff trained on modern slavery across the Club through expanding the modern slavery e-learning
- Increase the number of suppliers committed to our Supplier Code of Conduct
- Extend the number of suppliers to have completed the supplier risk assessment and received corrective actions

Annual Review

This statement will be reviewed and published annually. We will continue to review our stated commitments during the year as we develop our internal procedures, to ensure that appropriate steps are taken to combat the risk of human rights abuse, human trafficking or slavery in our business and supply chain.



Next steps

The Club seeks to continuously improve and strengthen its approach to addressing modern slavery.

Steps we shall be taking in the next 12 months:

- Continue to operationalise the Supplier Code of Conduct by further engaging suppliers and staff
- Continue risk assessment process of high-risk suppliers and the monitoring of responses
- Continue to develop and expand our modern slavery training programme across the Club
- Embed the Third Party Recruitment Protocol
- Undertake a governance and policy review
- Improve and embed sustainable procurement and tendering processes
- Increase engagement with suppliers

Approval of the Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's modern slavery and human trafficking statement for the financial year commencing June 2023 and ending 30 June 2024. This statement has been approved by the Holding Company's Board on behalf of all subsidiaries within the Group.

Signed on the Board's behalf for and on behalf of Brighton & Hove Albion Holdings Limited.

A handwritten signature in black ink, appearing to be "Paul Barber", written over a horizontal line.

Paul Barber

Date: 5 December 2024

Chief Executive and Deputy Chairman and director of The Brighton and Hove Albion Football Club Limited, and a director of Brighton & Hove Albion Holdings Limited.