



Brighton & Hove Albion FC - Modern Slavery Statement December 2025

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’. We are passionate about taking steps to ensure that we don’t have instances of modern slavery in our operations and supply chain and pride ourselves on demonstrating continuous improvement.

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 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 to the Club includes 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 the domestic and international broadcasting rights. The Club’s operations are primarily conducted in the UK. The Club employs 487 core club staff members and 815 casual club staff workers who predominantly perform match day and events roles. The Foundation employs 53 core staff members and 119 casual staff members. The significant majority of our staff are employed and based in the UK. For further information about our structure and operations, see:

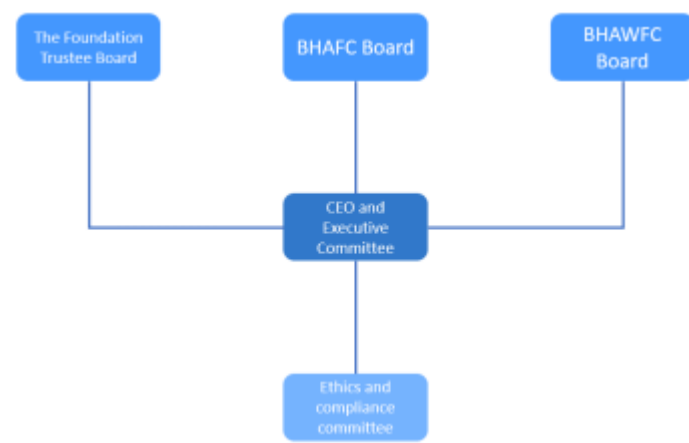
<https://www.brightonandhovealbion.com/>.

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 2025, the Ethics and Compliance committee met to discuss the modern slavery strategy and how it will be practically embedded throughout the Club and with its suppliers.

The Club has recently undertaken a governance review, assessing our governance structures, policies and processes against recognised best-practice standards. This review has enabled us to identify opportunities to further strengthen our governance framework, including enhancing the ways in which we assess and manage modern slavery risk. These findings will inform our ongoing improvement actions to ensure robust and responsible governance across all areas of our operations.

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 this year.
- A Sustainable Procurement Policy has been developed and has been approved by the Board 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 labour 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, including modern slavery risk into procurement, the Club aims to drive positive changes across the supply chain and support long-term community and environmental well-being. "Social Value" criteria are now embedded into the Club's formal invitation to tender ("ITT") documentation and on-boarding forms. Our 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.

Each policy is supported by a clearly designated owner who is accountable for its implementation and ongoing effectiveness. Where appropriate, our policies include defined monitoring mechanisms and enforcement processes to ensure compliance, including procedures for identifying, reporting and addressing any breaches. In addition, our Supplier Code of Conduct has a distinct process for managing non-compliance, which focuses on working collaboratively with suppliers to correct violations rather than immediately terminating the relationship. This structure helps us maintain consistent standards and ensures that our policies operate as intended across all areas of the Club.



The Club has a Human Resources 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. We have made significant progress in conducting specific risk assessments by evaluating suppliers for modern slavery risks and quarterly reviewing these assessments to ensure ongoing compliance.

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
- 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
- Retail

We have continued to address these risk areas, building on the previous year's work to strengthen our approach in these spaces. Through our ongoing risk assessment processes, we identified retail as an area of potential modern slavery risk, particularly due to limited visibility over parts of our retail supply chain and therefore have made this a key area of interest to assess as a priority. Over the past 9–12 months, we have strengthened our engagement with suppliers, with our Procurement Manager meeting more than 50 key suppliers, including several retail suppliers. We are now implementing a dedicated retail strategy,



which will include a comprehensive supply chain mapping exercise supported by information provided by our retail suppliers to improve our understanding of sub-tier suppliers at both tier 2 and 3 levels. As part of our long-term approach, we also plan to conduct site visits to key sub-tier suppliers to carry out audits ahead of a tender process to establish a multi-lot retail framework that will further enhance transparency and oversight across our retail supply chain.

In 2025, we also conducted a tender process to establish a multi-lot framework for team coach travel, and for our catering agency staff, with the objective of professionalising our operations. These specific tenders both have evaluation criteria that request suppliers to submit their Modern Slavery & Ethical Conduct policy, as well as questions related to employment practices, mandatory notification of sub-contracting, right-to-work checks, commitment to the national living wage, DBS checks provided prior to engagement of workers. For the Coach Travel tender, worker welfare and training had an entirely separate question as part of our evaluation criteria.

In 2024, the Club appointed a Procurement Manager, a new role for the Club. The Procurement Manager is responsible for progressing the Club's supply chain risk assessments and onboarding processes to identify and mitigate modern slavery risks, whilst also embedding ethical sourcing control, in collaboration with the Club's Sustainability Manager. The Procurement Manager also has ownership of tender governance and supplier onboarding. A Procurement Policy is now effective as a policy within the Club which standardises the sourcing, tendering, evaluation and contract award process.

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 significant progress having been made and all Club departments feeding into the register. The majority of departments have now been completed and so we intend to finalise the risk register in early 2026, with the register to be reviewed on a bi-annual basis thereafter.

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 by introducing supplier questionnaires, site visits, and third-party audits. We take corrective actions when issues are identified to ensure compliance



In 2025, the Club implemented a supplier management framework with a pre-approval process for suppliers as part of our strengthened procurement process. This includes assessing suppliers for ethical risks using an onboarding questionnaire. To date, 85% of all suppliers have completed the supplier questionnaire, which consists of checks for right to work validation, subcontracting oversight and mandatory acceptance of the Club's Supplier Code of Conduct. This onboarding process also enables third-party screening, including credit checks and ethical risk indicators. 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. This supplier management framework expands to current suppliers to ensure we are proactively managing contracts and gaining a deeper understanding on their supply chain.

As an ongoing effort to improve and embed sustainable procurement and tendering processes, the Club has ensured that social value and sustainability are key aspects of tender documentation. All applicable tenders now include ethical sourcing and labour standards and Supplier Code of Conduct acceptance as a part of our pass/fail criteria. Specifically, regarding modern slavery, the Club includes criteria which, when applicable, asks the supplier to confirm compliance with the UK Modern Slavery Act 2015, and requires demonstration of right-to-work checks. In terms of scored criteria, the Club includes questions for the prospective suppliers, consisting of supply chain due diligence, risk assessment and mitigation plans and generally how our suppliers approach modern slavery implementation and training within their organisation. Statements and commitments made via our tender responses are then included within the subsequent contract, to ensure that we are proactively carrying out annual re-assessment of modern slavery risk, but also to allow the Club a right to audit. This is important as it demonstrates to our suppliers that the Club places social value, including addressing modern slavery as a risk, at the heart of its decision-making.

We have also made efforts to increase transparency of what we expect from our suppliers, and as such we have recently held a "Meet the buyer" event for our waste management services to begin the discussion on these provisions with possible suppliers

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. We have implemented 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 now require all new suppliers sign the Supplier Code of Conduct and complete the supplier questionnaire as a



demonstration of their commitment to operate fair and equitable practices. Similarly, any tender launched by the Club includes the Supplier Code of Conduct and requires the return of a signed version with any tender response.

Outside of the instances where we have incorporated the Supplier Code of Conduct into our supplier contracts, we have sent it for signature to 140 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.

In 2024, 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.

The Club's Procurement Manager, in collaboration with the legal team are currently designing a Procurement & Contract Portal, which will act as the Club's single reference point for any supplier agreements. This Portal will include a dedicated section that stores the information of all our active suppliers, increasing oversight but also enabling the Club to launch specific ESG questionnaire to current and prospective suppliers.

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 with an external consultant, Ardea International, to put together a comprehensive training programme for senior leaders and employees.

We have previously provided modern slavery eLearning for our core staff. In 2025, we developed an internal modern slavery e-learning module which will be integrated into the Club's internal Learning Management System. The training will be made mandatory for all core staff within the Club as part of onboarding and regular refresher training.



To enhance directors' understanding of these critical issues as part of the broader approach to embedding ethical and sustainable principles across the Club, a board briefing focused on directors' responsibility in addressing human rights risks will be presented in a board report. This initiative aims to ensure the Board is well-informed and equipped to oversee effective strategies for identifying and mitigating modern slavery risks within the Club's operations and supply chains.

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.



As part of our approach to monitoring the effectiveness of our actions, we conducted a benchmarking exercise comparing our current measures and disclosures against the updated Government Statutory Guidance on transparency in supply chains. This review enabled us to identify areas where we can further align our practices and reporting with emerging best practices. The insights gained through this exercise will inform our improvement plans and help ensure that our approach to preventing modern slavery remains robust, transparent and continually evolving.

This year, we have continued to host 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.

This year, the Club has achieved the following KPIs:

| Target KPI for FY2025 | How have we done? |
|--|---|
| Increase the number of staff trained on modern slavery across the Club through expanding the modern slavery e-learning | 71 current staff have previously completed the training, to be rolled out to the full employee workforce in early 2025 via the Club's Learning Management System |
| Increase the number of suppliers committed to our Supplier Code of Conduct | 212 suppliers have. committed to the Supplier Code of Conduct All new suppliers have signed |
| Extend the number of suppliers to have completed the supplier risk assessment and received corrective actions | The number of suppliers who have completed the assessment is increased significantly since the previous year All new suppliers have completed the assessment |

Our key performance indicators this year 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
- Enhance board awareness of modern slavery/ human rights risk
- Engage 30% of retail suppliers as part of retail-specific supply chain mapping and risk assessment
- Publish data regarding the percentage of high-risk suppliers who have been audited, and the percentage of suppliers who actively have a corrective action plan

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 continue to continuously improve and strengthen its approach to addressing modern slavery.

Overall, the Club has achieved or is on track for the steps we set ourselves last year. We have included updates in this Statement, but a summary is provided in the table below:

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



Steps we shall be taking in the next 12 months:

- 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 recommendations from the ongoing governance and policy review
- Continue to improve sustainable procurement and tendering processes and increase engagement with suppliers
- Develop and implement the retail strategy
- Develop a Remediation Protocol defining the Club's process to respond to instances of modern slavery

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 2024 and ending 30 June 2025. 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: 14 December 2025

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.