



Brighton & Hove Albion FC - Modern Slavery Statement:2020 Respecting Human Rights

Introduction

Modern slavery, forced labour and human trafficking affect all sectors, including football. Modern slavery is a growing global and systemic issue, impacting an estimated 40.3 million people.

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 values underpin our approach to human rights and addressing modern slavery, particularly our values of ‘treating people well’ and ‘acting with integrity’. We understand the risks of modern slavery as constituting the most extreme end of a spectrum that ranges from decent work to serious criminal exploitation.

Section 54 of the Modern Slavery Act 2015 requires companies with a turnover of £36 million or above to publish an annual modern slavery statement. This is the third statement published by the Club since its promotion to the Premier League and it sets out the steps taken by the Club to prevent modern slavery in its business and supply chains during the financial year 1 July 2019 ending in June 2020. The statement can be accessed from the home page of the Club’s website: www.brightonandhovealbion.com.

The term “modern slavery” used in this statement includes slavery, servitude, any type of forced or compulsory labour, and human trafficking.

In line with UK Government guidance on modern slavery reporting, we have published our statement slightly later than usual. This has enabled members of staff who are usually tasked with drafting the statement to dedicate the appropriate time to the task.

COVID-19 Impact

The COVID-19 pandemic has brought huge challenges to both society and professional sports. Competitive Premier League fixtures ceased action from 13 March 2020. The national lockdown requirements introduced by the UK government on 23 March 2020 ceased all training, playing and work within our sites. This created new challenges in relation to maintaining athletic performance remotely and operating the Club successfully from home.

While the 2019-2020 Premier League season restarted on 17 June 2020, the Club’s women’s and Academy teams were unable to complete their seasons. Furthermore, since matches have returned, they have largely been played behind closed doors without spectators. This has had a significant impact on the Club’s operating revenues with losses of £67 million (£25 million of which was directly attributable to the pandemic) being announced by the Club in January 2021.



Likewise, while certain office staff have returned to work at the Club's premises to varying degrees at various stages of the pandemic, business as usual operations have not yet returned to pre-pandemic levels. Despite this, the Club has publicly committed itself to its workforce and no Club employee has been placed on furlough at any time prior to the date of this statement.

Despite having to work largely remotely throughout the pandemic, the key operations and support staff have seen a hugely increased workload due to the need to deal with and address the health risks that COVID-19 presents. There was a vast amount of work to plan, implement and support a "COVID secure" environment for the return to training of the Club's men's senior side initially and then the return to playing matches behind closed doors without fans present (including travel and accommodation relating to those matches). These protocols and policies also had to be expanded to the Club's women's and Academy sides. The Club then had to ensure a "COVID secure" environment for the partial return of office staff to the stadium site including ensuring that all applicable personnel had completed an occupational health assessment and then catering to them accordingly. In addition to all of this, the Club has put in place a huge amount of work in planning and implementing a "COVID secure" plan for welcoming fans back to the stadium. All of this has been done in a fast moving, ever changing pandemic environment which has included multiple amendments, pivots and updates to protocols and policies. The unfortunate consequence of this work has meant that many "business as usual" plans for 2020 had to be postponed until the end of the pandemic.

We recognise that the pandemic has created unprecedented challenges across the globe and in the football industry. People, supply chains and groups vulnerable and susceptible to exploitation and modern slavery are more likely to be adversely affected by the pandemic. The health and safety of our employees, players, customers and suppliers remains a priority for the Club and we will continue to monitor our organisation and those parts of our supply chain where we have leverage to ensure that the risk is reduced.

During the course of the pandemic, the Club has carried out a number of initiatives in order to support its staff, its supply chain and the community, including:

- Setting up the Albion as One Fund (with significant financial support from the players) which has led to donations of circa £400,000 being made to the local community.
- The Great Big Ring Round, where the Club's Supporter Services team called up its older and more vulnerable fans to provide a bit of companionship and support during the government-imposed lockdowns.
- Supporting Albion in the Community (the Club's charity partner) ("AIRC") to deliver free meals to those in need during the government-imposed lockdowns.
- Providing staff at various stages of the government-imposed lockdowns with a Netflix voucher, a fresh fruit and vegetable delivery from a commercial partner, and training and leisurewear kit to support staff members' health and wellbeing.
- Staying connected with supporters, the media, sponsors and staff with regular communications, both written and online.



- Casual workers' pay – we honoured the pay of matchday and casual staff during the period that the season was suspended.

We will continue to review our approach to see whether our processes need to be changed to meet the challenges of COVID-19. In particular, we plan to conduct an internal analysis of the systems and processes that we have been forced to use during the pandemic to assess what learnings we can take into a post-lockdown environment.

Due to the impact of COVID-19 on the Club and in line with the UK Government's [Modern Slavery Reporting During the Coronavirus \(COVID-19 pandemic\)](#) guidance, the publication of the Club's modern slavery statement has been delayed.

About Us

The Club is a professional football club in the English Premier League, which plays its home matches at the American Express Community Stadium in Brighton (<https://www.brightonandhovealbion.com/club/club/contact-us>).

The Club is a wholly owned subsidiary of Brighton & Hove Albion Holdings Limited. Other wholly owned subsidiaries in the group include:

1. The Community Stadium Limited, 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, a professional football club currently competing in the Women's Super League.

The ultimate controlling party of Brighton & Hove Albion Holdings Limited is Mr. A. Bloom by virtue of his shareholding in that company.

The Club's operations are primarily conducted in the UK. Our operations include participating in professional football competitions, commercial sponsorships, retail, property development, ticketing and community projects. For further information about our structure and operations, see: <https://www.brightonandhovealbion.com/>. This statement constitutes the statement made on behalf of the entire group.

Our Commitment to Tackling Modern Slavery

In 2019, as part of the focus of our work on addressing modern slavery risk, the Club set up an Ethics and Compliance Committee whose objective is to *"create and maintain an organisational culture committed to high standards of ethics, integrity and compliance"*. During 2019 and 2020, the Ethics and Compliance Committee met twice. The lockdown announced in March 2020 and the impact of COVID-19 on the Club precluded meetings. However, we will be resuming our programme for 2021. The membership of the Committee has been extended to a representative from AITC and during 2021, we will include representation from the Women's Football Club.



Steps we are taking in the next 12 months

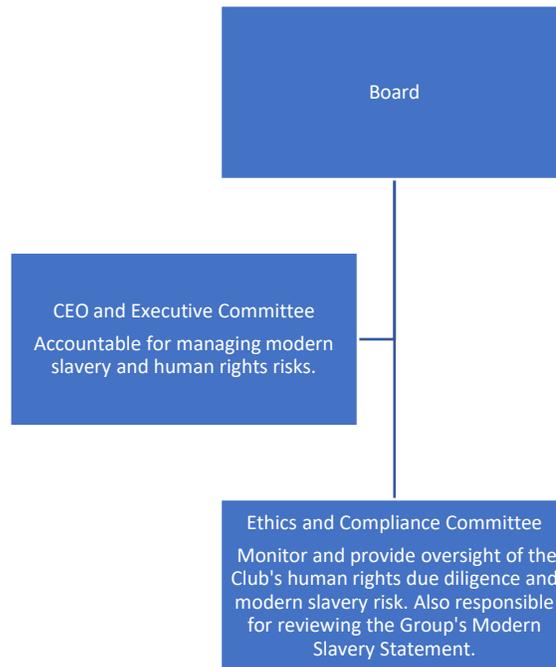
The Club continues to build on the activities and progress made over the past year. Specific targets for the next 12 months are:

- Building on the work that we have started in our Ethics and Compliance Committee to continue to identify critical compliance issues and agree on what is required to develop best practice procedures. The Committee will continue to implement the recommendations in the gap analysis report over the coming year.
- Developing a sustainable procurement framework to address the risk of modern slavery, alongside bribery, corruption and environmental issues.
- Formulate a sustainability policy that will cover human rights and modern slavery issues (informed by the human rights mapping and gap analysis above) which will set out in more detail our approach to integrating modern slavery risk into our overall objectives.
- Continue to develop our training programme to ensure that those employees whose jobs may impact on modern slavery risk are appropriately educated and are better able to identify key risks. This will include e-learning, introductory learning, more in-depth training for key staff members and refresher training courses run by a third party expert.
- An Ethics and Compliance Officer, Rose Read (the Head of People and Culture), has been appointed to oversee the day-to-day implementation of the Club's modern slavery risk mitigation policies and procedures in line with this statement.
- Monitor ongoing impacts of COVID-19 on our operations and supply chain.
- Seek to expand the remit of the Ethics and Compliance Committee to address and support the AITC foundation and the women's football club more specifically.

We are committed to taking steps to ensure that modern slavery does not exist in our business or supply chains. This statement sets out the Club's top-level commitment to addressing the risk of modern slavery and is recognised as being part of the development of an overall strategy to address modern slavery risk as an integral part of the overall objectives of the Club.

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 chair of the Club's newly established Ethics and Compliance Committee is a Board member. In order to ensure that performance against our policies (including our modern slavery policy) is reviewed and updated as necessary, we have appointed the director Robert Comer. This internal governance structure will provide oversight, accountability and transparency at all levels of our business.



Our Policies

We comply with all applicable employment laws relating to working terms and conditions, including pay (we pay the voluntary living wage), and we pride ourselves on our equality work. We have successfully attained the preliminary level of the Premier League Equality Standard and we are now working towards the intermediate level of the standard. Our key policies are reviewed every 3 years (or sooner if required by law) from a legislative, equality and more latterly a modern slavery perspective, incorporating International Labour Organization standards.

We have a robust and forward-thinking safeguarding infrastructure to protect children and vulnerable adults that fall within the scope of the Club's activities. Our safeguarding team have strong links to external child protection agencies. The Safeguarding Policy is available at the following link: <https://www.albioninthecommunity.org.uk/wp-content/uploads/2019/05/0600-BHAFC-AITC-Safeguarding-Children-and-Young-People-Policy-and-Procedures-A4-v4-WEBBSITE.pdf>

We are currently updating our procurement policy which will form the basis of our revised procurement framework that will address the risk of modern slavery, along with risks in relation to environmental impacts and governance requirements.

During 2019, we developed an Anti-Bribery and Corruption Policy and Guidance Note. The Ethics and Compliance Committee provided input into the risk assessment and will participate in the development of training on bribery and its potential links to modern slavery risk.



The Club has started to develop an overall Supplier Code of Conduct that will incorporate its approach to modern slavery and which it aims to complete by the end of 2021. We will roll this out to our key suppliers along with updating our terms and conditions in order to align our key suppliers' standards of compliance with our own.

The Club is reviewing the Whistleblowing Policy with a view to roll it out over the next 12 months. This will allow employees to report any concerns relating to the direct activities or the supply chains of the Club. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The internal Staff 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.

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.

The Club had started considering the requirements to begin its process of developing a risk-based approach to assess the likelihood of the existence of modern slavery within its supply chain before COVID-19 impacted its operations. The Club is picking this up in 2021. This risk assessment process includes our existing suppliers, as well as potential new suppliers. Our gap analysis completed by a third party expert has highlighted the areas where more work is required to address our current procurement framework and documentation.

At the beginning of 2019, the Club carried out a human rights mapping exercise to identify the key areas of risk where abuses of human rights and possible modern slavery risk could arise. We mapped the Club's operations, services and products with a view to determining the impact to people, impact to the environment and the risk of impacts arising. The findings from the mapping exercise will be addressed during the development of our due diligence procedures in 2021 and we are using the risk map to inform how we will address our procurement framework going forward. We have identified a number of potential risk factors for modern slavery, including:

- Risk of outsourced labour;
- Risk arising from products sourced in identified high risk countries and sectors;
- Less leverage to influence third parties in certain business areas; and
- Risk relating to third party sources of youth player recruitment.

With respect to the final bullet point above, the Club has been building the awareness of all Academy staff of the potential risk that third parties and their associates may pose through their use of the Club's brand and reputation to facilitate modern slavery. This has been done through developing the Bribery and Corruption Guidance, as well as our Safeguarding Policy and training. Recruitment of players into the Academy often involves relationships with third parties such as agents, private academies (domestic and overseas), football scouting networks and grass roots clubs. The Club has been working to improve



education in relation to certain key risk indicators including: (a) inducing a player to travel for a significant fee for a spurious trial at the Academy; (b) individuals not associated with the Club purporting to be in a position to offer a trial at the Club in return for a fee; and (c) the presentation of counterfeit official documents to the Academy upon formal signing to the Club indicating false nationality, visa documentation, age or name.

Supply Chain and Due Diligence

The Club recognises that a robust due diligence framework has to underpin its policies and we have started working on how to further develop our current due diligence systems to ensure that they are reflective of our approach and can appropriately address any potential risk arising from modern slavery. We will communicate any changes to our current policies and procedures to our suppliers as appropriate.

We seek to partner with suppliers that share our values. We expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated. 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. Once we have developed our Supplier Code of Conduct, we will look to engage with our key suppliers as part of an overall stakeholder engagement exercise in 2021.

We reviewed one of our key service level agreements to ensure that the contractual terms and conditions were updated to include express provisions which address the Modern Slavery Act requirements. This review is part of a broader review that has taken place and will result in the Club developing a procurement framework and addressing concerns in our supply chain. Moreover, 2021 will see the negotiation of some key partner/supplier contracts in which we will seek to ensure robust modern slavery, ethics and compliance standards are met.

Before being formally appointed, any new suppliers which we consider to represent a higher risk of modern slavery will be required to satisfy us that they operate in a manner which does not tolerate modern slavery and that relevant risks are addressed. These procedures will be developed during 2021 and their effectiveness monitored in 2022.

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.

We have identified the following operations as having a higher risk of exploitation and during 2021 we will be seeking to carry out a risk assessment in relation to each area in greater depth:

- Agencies
- Sub-contracted workers
- Waste operators
- Maintenance



- Security
- IT

Staff Training

Training and capacity building are key to ensuring the prevention of exploitation leading to modern slavery and human rights abuses. Despite the challenges of the COVID-19 pandemic, we have been working on upskilling our key members of staff working in areas of the business with a higher risk of modern slavery to help ensure that staff can identify potential modern slavery risks. This has been achieved through access to online courses.

The Club continues to work with [Ardea International](#), an external consultant, to put together a comprehensive training programme for senior leaders and members of staff. A training matrix was completed as part of a gap analysis conducted in 2019 and is in the process of being developed as part of a training programme carried out over 3 years to include a basic induction for all core staff of the Club.

During 2019, we ran a bespoke masterclass for the senior management team (including a Board member) to provide awareness of the indicators of modern slavery, understanding how to identify and manage the risk of modern slavery, and raising and reporting concerns. We also ran a workshop identifying the gaps in our current approach to addressing modern slavery risk in our policies and procedures. We will review the need to conduct refresher training in the next year to ensure that senior management are made aware of new developments in our approach to tackling modern slavery.

Previously, our Head of People and Culture and Head of Ticketing and Supporter Services participated in an IEMA accredited 6 week course delivered by Ardea International in order to deepen their understanding of modern slavery risk and how to address it. They are in the process of integrating their learnings into their job functions. This participation was extended to the Head of Safeguarding and our paralegal.

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. During 2019, we identified that our reporting mechanisms and Whistleblowing Policy needed updating. We have reviewed our Whistleblowing Policy but will be further developing our reporting processes. We therefore intend to



update the relevant policies in the coming year as they relate to the Club's operations and determine what additional procedures need to be put in place.

Monitoring Effectiveness

Mapping our progress in the past 12 months

The Club continues to build on the activities and progress made over the past year. We acknowledge that some of our targets have been delayed due to the impact of COVID-19 on our operations but we are committed to making further progress to our targets during 2021. Specific targets that have been met during the previous 12 months are:

- Setting up regular meetings for our Ethics and Compliance Committee to continue to ensure compliance and develop best practice procedures. The Committee has started implementing the recommendations in the gap analysis report.
- We have commenced working with an external consultant with relevant expertise to revise the procurement policy and further review our terms and conditions of contract.
- We have reviewed our Whistleblowing Policy and set new targets to address reporting.
- We have continued to develop our training programme to ensure that those employees whose jobs may impact on modern slavery risk are appropriately educated and are better able to identify key risks.
- We recognised that training and awareness raising is key to developing an understanding of how modern slavery risk may arise at the Club or in its supply chain. Training is also a key aspect of the Modern Slavery Act's reporting requirements. Working with Ardea International, the Club ran a bespoke workshop for all of its senior management team, including some members of the Board. In addition to this workshop, the Head of Safeguarding and our paralegal participated in an IEMA accredited online training and support programme run by Ardea International to identify and manage modern slavery risk.

The Club is committed to ensuring that it will monitor the effectiveness of the steps that it will be taking to address the risk of modern slavery across its operations and supply chains. We have appointed an Ethics and Compliance Officer and a member of the Board has also been appointed as the chair to the Ethics and Compliance Committee to ensure that the proposed steps will be enacted and to ensure the continued monitoring and effectiveness of any policy or procedures addressing modern slavery.

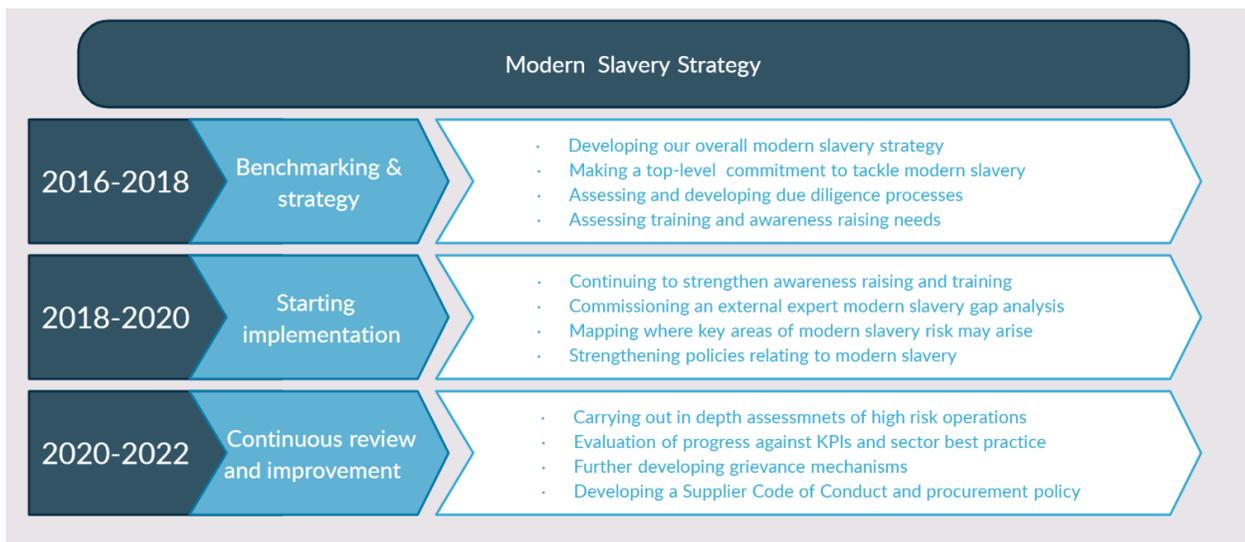
No instances of modern slavery or forced labour have been identified through any of our safeguarding or reporting procedures during 2018, 2019 and 2020. We will continue to monitor the various reporting channels and grievance mechanisms to address any concerns that may arise in a timely and appropriate fashion. We will also develop staff awareness to ensure that our reporting channels can be accessed effectively.

Our initial key performance indicators for the next 12 months are:



| Objective | Action Step | Indicator |
|--|---|---|
| Ensure staff are trained in identifying and mitigating the risks of modern slavery. | Increase staff training compared to the baseline set in 2019. | In 2020, one third of staff in management roles undertook modern slavery training. In the next year, we aim to provide 100% of staff in management roles with introductory modern slavery e-learning. |
| Adequately address modern slavery risk in key supplier contracts negotiated in 2021. | Ensure comprehensive contractual provisions are inserted into all key contracts being negotiated. | In 2021 we will review all key contracts that are being renewed or entered into. |
| Circulation of and education in relation to a new Whistleblowing Policy. | Current Whistleblowing Policy to be updated. Key staff members to attend training. | We will provide 100% of staff with a copy of the updated Whistleblowing Policy in the coming year. |
| Circulation of and education in relation to a new procurement policy. | Develop a formal procurement policy. | In the next year, we aim to train 100% of staff responsible for procurement in the use of the sustainable procurement procedure. |

Our Modern Slavery Strategy:





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.

Approval of the Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Club's modern slavery and human trafficking statement for the financial year commencing in June 2019 and ending 30 June 2020. This statement has been approved by the Club's Board on 31 March 2021.

On the Board's behalf for and on behalf of Brighton & Hove Albion Football Club Limited.

Paul Barber
Chief Executive & Deputy Chairman

Date: 31 March 2021