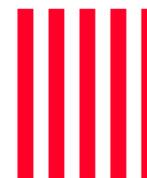




SOUTHAMPTON FOOTBALL CLUB

Modern Slavery & Human Trafficking Statement

1 January 2021



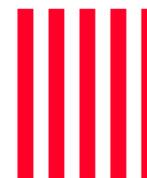
1. INTRODUCTION

This statement has been published in accordance with the Modern Slavery Act 2015. It is our third annual statement and commitment made in relation to the prevention of modern slavery. The statement sets out the steps taken by Southampton Football Club, Southampton Girls and Women's Football Club Limited and Saints Foundation, our club's affiliated charity, to prevent and address modern slavery and human trafficking. This sets out the steps that we have taken during the 2019/2020 season and has been approved by the boards of each organisation.

Since the publication of our last statement on modern slavery and human trafficking in March 2019, we have completed a review of the risks faced in relation to these issues by our sporting, commercial and other business practices. This has included consideration of how those risks occurring in our business activities and supply chains may have changed over that time and confirmation that no incidents have arisen. This, updated, statement has been produced as the result of that review.

We remain committed to guarding against both modern slavery and human trafficking risks internally, in the communities around us and in our wider national and global activities. We are increasingly aware of the need for us to assess the potential impact that we can have through our activities on everyone we work with. This commitment is aligned and reflected in the recent launch of the clubs positive sustainability agenda. One of the core pillars of our sustainability strategy is working in a way that is ethical and ensures fair treatment of everyone.

Over the period of time since our 2019 statement, we have worked to improve our due diligence procedures and to increase the awareness of modern slavery and human trafficking risks throughout our operations. This has been achieved by training key staff and starting to communicate more widely about the importance of addressing the risks that we face when planning any activities or engagement. Over the course of the next twelve months, we will continue our work to enhance the procedures as set out in this statement and make our staff, as well as those we work with externally, aware of our commitment to helping eliminate modern slavery and human trafficking.



2. WHAT IS MODERN SLAVERY

Modern slavery is a violation of fundamental human rights. It can take many forms which include:

- forced labour
- slavery
- servitude
- human trafficking

These types of offences were consolidated into one piece of legislation when the Modern Slavery Act 2015 was passed. This Act specifically makes it a crime to exploit or traffic any person for the benefit of another person or organisation.

3. ABOUT US

Southampton Football Club is an established Premier League football club with business interests and operations in the UK and across the rest of the world. We employ approximately 400 members of staff and also have a number of casual workers who perform match day and events roles for us. The significant majority of our staff are employed and based in the UK.

Our business is split into three principal divisions:

- Football
- Commercial
- Business support services

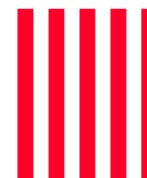
This means that we have a significant number of local, national and global sporting and commercial partners as well as a range of suppliers who operate in different parts of the world.

We also have strong links to the following:

- **Saints Foundation:** a charity that is affiliated to the club, Saints Foundation, which is responsible for developing and running programmes to help the vulnerable and those in need in the communities around us;
- **Saints Learning:** a training division delivering adult and apprenticeship training programs internally and in partnership with a number of local colleges; and
- **Gather & Gather:** a catering and events company within the CH&Co Catering Limited group to which the club outsources its catering and events operation.

We choose to assess our risks in relation to modern slavery and human trafficking on an ongoing basis. Our activities mean that we need to be particularly mindful of the significant levels of risk that arise in relation to the recruitment of young players and fact that we could be targeted directly or have our name wrongly used by those who may be involved in human trafficking.

Other areas where we could face a heightened level of risk include the range of roles and salaries of players and staff who work with our senior and Academy teams (this produces a level of risk because of the length of their working day, especially when away match travel is considered), labour at the sites that we operate, the production of club branded merchandise and the production of uniforms, workwear and equipment used in our own workplaces.



4. WHY DO WE PRODUCE A MODERN SLAVERY STATEMENT?

We believe that the implementation of policies and working procedures to eliminate modern slavery and human trafficking is important to ensure that we:

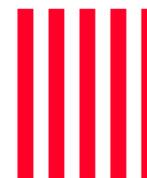
- properly understand the risks that we face in relation to modern slavery and human trafficking as the result of our sporting, commercial and other business activities;
- ensure that we apply the same standards of ethical working to all areas of the club, including the operations of our men's and women's senior teams and our boys' and girls' Academy or development teams so that everyone understands our expectations and commitment to eliminating modern slavery and human trafficking;
- are able to properly respond to the growing expectations inside and outside of the club. This includes regulators, our fans, partners and other businesses who increasingly expect us to engage effectively on all issues that relate to sustainability and ethical business operations;
- properly safeguard our players who make up our senior teams, Academy teams and Girls & Women's programme. To be able to fully protect everyone appropriately we must understand how the recruitment of players internationally, particularly young players, can potentially lead to their exploitation and human trafficking;
- continue to meet our legal obligations. We are required by the Modern Slavery Act to publicly disclose the steps we are taking to mitigate modern slavery risk through the club. It is important for us to always comply with any regulations that apply to us. This will reduce our risk of legal liability but, more importantly, also means that everyone can continue to have confidence that we are working in an ethical way that treats people fairly;
- can clearly show our commitment and positive response to the increasing scrutiny and level of expectation placed on us as a Premier League Club in regards to labour exploitation in the operation of major sporting events;
- can show our alignment to FIFA, the Premier League and other governing bodies who have also started to take a stronger stance on modern slavery. By doing this we will be able to influence other clubs and the communities around us by raising awareness and tackling the key issues collaboratively.

5. OUR COMMITMENT TO ELIMINATING MODERN SLAVERY & HUMAN TRAFFICKING

As set out in our previous statements, we do not tolerate any form of modern slavery or human trafficking in any part of our organisation or anywhere in our supply chain.

This statement sets out the steps that we have taken to eliminate modern slavery and human trafficking. It also provides an outline of our current plans to make sure that we continue to use ethical working practices, and to ensure that the partners and external parties that we work remain fully compliant with the Modern Slavery Act.

We are wholeheartedly committed to operating our business in an ethical, transparent and legally compliant way. We expect all of our staff and anyone else working for or with us, including those in our supply chain, to comply with the laws and regulations that apply to us. It is only with their assistance that we will be able to ensure that we are able to properly tackle modern slavery, human trafficking and their root causes.

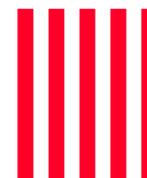


6. OUR BUSINESS AND OUR SUPPLY CHAIN

We are aware of the need to be conscious of the working conditions and practices within our supply chain. Following the introduction of the Modern Slavery Act we have risk assessed all of our business partners and have completed due diligence on them. We have also adopted a Procurement Policy to specifically cover our expectations in relation to ethical trading. This policy is subject to ongoing review to ensure that it remains relevant to our operations.

Our business is extremely diverse meaning that we have suppliers that work across a broad range of industries including suppliers of IT and office equipment, playing and replica kit, retail, digital media services, food and drinks and labour.

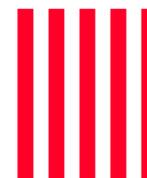
One area of emerging importance that we have become aware of is the risk of human trafficking of minors. This has included agents and other parties moving young players across borders. We remain committed to eliminating this practice, and, as set out below, this will form a key area of focus for us over the next twelve months.



7. OUR PROGRESS SO FAR

Since our last modern slavery statement, we have taken the following steps to improve our performance:

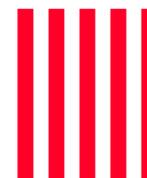
- Completion of training by the legal team and appropriate members of our board and senior management. This has included being part of a pilot programme focusing on sustainability and the prevention of modern slavery and trafficking in sport that was arranged by Ardea International.
- Established a board champion to lead the implementation of our policies and management systems related to modern slavery and human trafficking.
- Maintained a clear statement that is made available to all business partners and on our website that sets out our expectations around ethical trading and the fact that we do not tolerate any form of modern slavery or human trafficking.
- Established a clearer, more mature governance framework in which modern slavery and human trafficking compliance sits. This allows proper evaluation and reporting of concerns, trends and new or emerging risks. This includes coverage and evaluation of risk in relation to modern slavery at our Audit & Risk Committee and Safeguarding Board.
- Started to work with the Academy and other teams within our Football Division to evaluate and ensure that we eliminate the potential of human trafficking as much as we possibly can.
- Established an internal working group to produce and start to implement a formal sustainability strategy. This embeds working in an ethical way throughout all of our business operations as one of its core pillars.
- Continued to include modern slavery provisions in our standard terms and conditions of business and commercial contracts to ensure that our suppliers adhere to our policies.
- Continued to conduct a full annual review of our own payment policies, processes and rates to all staff and contractors.
- Used our existing risk assessment to inform internal training requirements and a project to update our supplier/partner due diligence questionnaire.
- Established a multidisciplinary working group including members of the Legal, Finance and Procurement teams to continually review and improve our procurement and purchasing processes to reduce the risks that we face in relation to modern slavery.
- Maintained our accreditation from the Living Wage Foundation. This means that we voluntarily agree to pay every member of staff over the age of 18 a fair wage – in line with the cost of living and significantly above the current national minimum wage. We also impose this obligation on third party organisations who supply us with staff to work at our sites.



8. OUR NEXT STEPS

While we have made good progress internally on the steps that we have in place to prevent and eliminate modern slavery and human trafficking, we remain committed to improving our work in relation to these issues. Over the next twelve months we will:

- further extend external training to safeguarding and procurement teams. This will include providing training to all of our board and senior management team;
- ensure that increased awareness around modern slavery is embedded in our safeguarding approaches;
- implement a clear policy statement to work alongside our annual modern slavery and anti-trafficking statement;
- work closely with our Football and Academy departments (this will include teams that work on both our male and female programmes) to establish clearly documented policies and frameworks that relate to the prevention of modern slavery and human trafficking. This will include building a full action plan to bring certainty to our work in these areas. This is a key area of work for us as we believe that this work may, in time, help to influence the work of other clubs and governing bodies;
- complete the full internal and external launch of our sustainability strategy. This will establish some clear KPIs that we can continue to evaluate our performance on preventing modern slavery and human trafficking;
- begin work on developing a management system that complies with the requirements of ISO 20121 (Sustainable Event Management). It is expected that we will achieve full certification by the end of 2021/2022 season;
- continue work to develop effective relationships with key local and national external partners (e.g. local police forces and enforcement bodies). This will allow us to understand and get advice on emerging threats, risks and intelligence;
- complete a full review of our Code of Conduct/Ethics. This will allow us to launch fully updated internal and external codes by mid-2021;
- complete a full review of partners and suppliers to allow contracts, terms and due diligence on each to be updated;
- evaluate how automation and technology might be used to help us complete onboarding and ongoing monitoring or evaluation of our external partners and suppliers; and
- update this statement to allow more effective tracking of these “next steps”.



9. NON-COMPLIANCE

There are no current issues of non-compliance with modern slavery or human trafficking laws that we have been made aware of.

Should any potential non-compliance be reported to us, we will work to remedy any areas in which we or our suppliers do not meet the appropriate standards that we expect to work to. In the event of any external party not meeting those standards, this may include ultimately ceasing to trade with partners who do not continue to meet our requirements or breach relevant regulations.

10. ROLES & RESPONSIBILITIES

This policy is owned by the our Legal and Safeguarding teams.

Any issues may be reported to:

- Tim Greenwell, board member with responsibility for overseeing our approach to preventing modern slavery and human trafficking.
- Zoe O'Sullivan, our Head of Legal.
- Kim Mundy, our Head of Safeguarding.

In order to assess the effectiveness of the measures that we have taken as a collective group of companies, we will continue to continually review and update the policies and procedures that we have adopted in relation to preventing modern slavery and human trafficking. This review will be led by the individuals named above. Any actions or improvements that we make to our policies or working practices will be included in our future statements.

11. MANAGEMENT ENDORSEMENT

This statement has been approved by our board of directors and was reviewed in December 2020.

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Toby Steele
Managing Director
Southampton Football Club Limited

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Tim Greenwell
Chief Legal & Risk Officer
Southampton Football Club