



SWANSEA CITY ASSOCIATION FOOTBALL CLUB LIMITED
(incorporating SWANSEA STADIUM MANAGEMENT COMPANY LIMITED)
MODERN SLAVERY STATEMENT

Introduction

This statement covers the activities of Swansea City Association Football Club Limited incorporating Swansea Stadium Management Company Limited (together referred to as the 'Club'). Swansea City Football 2002 Limited is the holding company of the Club.

The Club does not tolerate modern slavery or human trafficking in its organisation or in its supply chain.

This statement sets out the steps that the Club has taken to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. The Club is committed to combatting all such forms of modern slavery.

Our Group Structure and Business

The Club is a professional EFL Championship football club which plays its home matches at Liberty Stadium and participates in domestic club competitions. The Club has a number of other business operations, including; football operations, commercial partnerships, media distribution, ticketing, retail and community projects. The Club also has an international presence.

The majority of the Club's operations are conducted in the UK through the Academy and Development Centres across South Wales. The Club has some limited overseas activities in the United States of America. For further information about the business, its organisational structure and operations visit www.swanseacity.com

Sodexo Limited are the Club's events management company providing food, beverage and events management services at the Liberty Stadium.

In addition to these the Club has an affiliated charity, Swansea City Community Trust, which works across South Wales within the community providing a range of services, education and training to disadvantaged individuals and groups.

Our Supply Chain

The Club uses a wide range of suppliers who supply player and replica kit, IT and other office equipment, food and beverages, events facilities, retail items, digital media, labour, broadcasting services, audio-visual services, consultancy services, couriers, entertainment, insurance services, maintenance services, medical

treatment/supplies, pitch-related products and services, professional and other financial services, recruitment and security services, travel and accommodation providers and utilities.

These include a small number of suppliers, direct or indirect, in countries deemed to be higher risk, based on the Global Slavery Index.

Our Commitment to Tackling Modern Slavery

The Club is committed to equality and high ethical standards within our business and sustainability within business operations. The Club complies with all applicable employment laws relating to working terms and conditions, including pay and the Club prides itself on its equality work. The Club has successfully attained the intermediate level of the Premier League Equality Standard.

As part of this commitment the Club is reviewing its existing business and people policies to help ensure that its business operates in an ethical and responsible way that takes into account modern slavery risk. The policies identified to be reviewed (with the greatest relevance to modern slavery) are:

- Health and Safety Policy;
- Equality Policy
- Grievance Procedure;
- Safeguarding Policies;
- Bribery and Corruption Policy
- Procurement Policy.

Our Policies and Procedures

Our Modern Slavery and Human Trafficking policy confirms our commitment to acting ethically and with integrity in all of our business relationships and in future business relationships.

The policy also confirms our intention to implement and effect systems to eradicate the risk of modern slavery and human trafficking taking place within our business and/or supply chains.

The policy also provides that all new or revised commercial contracts will include a clause stipulating the other party's commitment to tackling modern slavery and human trafficking.

We have a robust Grievance Procedure and Whistleblowing Policy together with a tailored Speak Up Speak Out Policy for safeguarding issues and concerns. The Club prides itself on workplace communication, strong management and grievance procedures to ensure that any complaints are properly identified and addressed.

The Club's Recruitment Policy ensures that we operate a safe recruitment process, asking specific questions of individuals and ensuring that those working with children and vulnerable adults are DBS checked.

Safeguarding Team

The Safeguarding Team plays a key role in ensuring that those involved with the Club, whether a member of staff, a first team player, an academy player, customer or supporter are free from the risk of harm and are safe when utilising the Club's facilities.

The Safeguarding Officers are trained to represent different departments. The Safeguarding Officers provide a direct link for all stakeholders to raise any concerns or issues which arises. There is a robust referral process in place for any form of concern.

The Safeguarding Team has a direct link with the Local Authority Designated Officer, South Wales Police (including a designated Police Officer in the Academy and for match days) and the Prevent Officer located within the Wales Extremist and Counter Terrorism Unit at South Wales Police.

On match days, there is a designated matchday safeguarding officer, who is able to respond to any concerns raised.

Supplier Adherence to Values and Ethics / Next Steps

We do not and will not tolerate modern slavery and human trafficking. We now include modern slavery provisions within our commercial contracts to ensure suppliers understand our commitment to our policy. The provision is as follows:

MODERN SLAVERY

The Club has a zero-tolerance approach to modern slavery and is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Although the Club is responsible for ensuring compliance with relevant legislation in relation to modern slavery within their own business, it is the Partner's responsibility to ensure their own compliance with relevant legislation.

We will also be implementing, within the next financial year, a new-supplier policy which will both:

- (i) assess the risk of modern slavery and human trafficking in any new supplier and its own supply chains before we engage with that supplier; and,
- (ii) give us the ability to monitor and audit suppliers once they have been engaged.

Our audit, legal and business operations teams are involved in ensuring this process works effectively and will monitor it regularly, adapting as necessary to the changing needs of our business.

Due Diligence Processes for Modern Slavery and Human Trafficking

To continue to promote our initiative to identify and mitigate the risk of human slavery and human trafficking in our supply chains, we will within the next financial year conduct a review of new suppliers across the Club.

This review will involve each department reviewing and evaluating the new suppliers within its supply chains and we will then review the results.

This review will involve a review on suppliers' reliance on seasonal, low-paid or low-skilled workers.

If the results of the review highlight any risk then we will take the necessary actions.

In light of the above, we will, within the next financial year, implement systems to:

- Identify and assess potential risk areas in our supply chains – no new supplier will be appointed without them going through our risk assessment.
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains, which we will manage through our new supplier process and our contracts which will, going forward, give us the ability to monitor our supply chains and potential risk areas.
- Monitor potential risk areas in our supply chains.

Reporting

If we or anyone working for us becomes aware of any instance of modern slavery occurring within our operations or our supply chain, our Modern Slavery Policy provides for the reporting of these matters to an appropriate manager and/or the Head of Safeguarding. Where a supplier is implicated, we will engage with the relevant supplier(s) and implement an appropriate and timely response. This may include the immediate termination of the supply agreement. In all instances, however, we would seek to prioritise the safest outcome for the victims of the modern slavery activity. There have been no instances of modern slavery reported to date.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we will be delivering in-house training to the necessary personnel.

Leaflets will also be made available at all the Club sites for employees and the general public to peruse.

Additional steps taken

1. The Club have taken steps to pay all employees, regardless of worker status, the National Living Wage as recommended by the Living Wage Foundation.

2. The Club's Equality Policy now includes a statement in relation to our legal obligations under the Modern Slavery Act 2015.

Monitoring Effectiveness

The Head of Safeguarding is responsible for ensuring continued monitoring of the effectiveness of the Club's Modern Slavery Policy and along with the Safeguarding Team ensuring appropriate steps are taken should any issues arise.

Annual Review

This statement will be reviewed and published annually. We will 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.

The Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes Swansea City Association Football Club Limited and Swansea Stadium Management Company Limited's slavery and human trafficking statement for the financial year ending 31st July 2018 as approved by the Board on the

Signed on the Board's behalf by: 

Gareth Davies, Company Secretary

Dated: 06-03-2019