



## **Modern Slavery Act Statement**

### **About the EFL**

Formed in 1888 by its twelve founder members, the Football League Limited (with its brand name, **EFL**) is the world's original league football competition and provides the template for leagues the world over. With 72 member clubs, it is also the largest single body of professional clubs in European football and is responsible for administering and regulating the Sky Bet EFL (which consists of the Sky Bet Championship, Sky Bet League One and Sky Bet League Two), the Carabao Cup and the EFL Trophy, as well as reserve and youth football.

On behalf of its clubs, the EFL generates the commercial revenue that sustains football's growth. Through the sale of collective rights, sponsorship, licensing and other commercial activity the EFL delivers in excess of £98 million to its member clubs every season. The EFL also uses additional revenues for, amongst other things, the collective purchase of certain goods and services on behalf of it and/or its clubs.

The EFL is also the owner of EFL Digital Limited (**EFL Digital**), which operates the websites of a majority of EFL member clubs, as well as some football clubs from other UK leagues. This statement is made on behalf of both the EFL and EFL Digital, and any reference to "**we**", "**us**" or "**our**" includes both.

### **Modern Slavery and Our Approach**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and have a zero-tolerance approach to modern slavery. In our continued efforts to achieve this we have sought to implement and enforce effective systems and controls to ensure modern slavery and other forms of unethical activities are not taking place anywhere in our own business or in any of our supply chains.

This statement sets out a summary of the same.

### **Anti-Slavery and Human Trafficking Policy & Other Policies**

We have implemented an Anti-Slavery and Human Trafficking Policy to ensure all relevant staff understand our opposition to such activities and are able to help us avoid, identify and eradicate them as appropriate. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors,



officers, agency workers, seconded workers, volunteers, interns, agents, contractors and external consultants. We have continued to review this policy to ensure it remains relevant and effective.

In addition we operate a range of other policies alongside our Anti-Slavery and Human Trafficking Policy which help support our continuing objectives in ensuring lawful practice and ethics in our business operations. These include, without limitation, our Whistleblowing Policy, Health and Safety Policies, Dignity at Work Policy and an Anti-Bribery Policy.

We also operate a Safeguarding Policy for the purpose of helping ensure the protection of children and vulnerable adults from exploitation and other wrongful behavior. Our latest Safeguarding Children Policy has also been published at: <https://www.efl.com/siteassets/efl-documents/efl-safeguarding-children-policy-18-19.pdf>. We have an appointed Safeguarding Officer who also works closely with EFL staff internally, but also member clubs as the EFL recognizes the role it can play in influencing good practice in this area and we are continuously involved in pioneering initiatives in the field.

## **Training**

Training and/or guidance on the applicable policies and on the risk that the business faces from modern slavery in its supply chains, is provided where relevant. Breaches of our applicable policies may result in disciplinary action for employees or other individuals working on our behalf. All EFL staff have undergone specific safeguarding refresher training within the last year. We are also looking to develop further training initiatives to further ensure staff are kept aware of requirements in this field.

## **Supply Chains & Diligence**

In addition to our own practices we remain committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Our supply chains include suppliers of products and services for our match infrastructure, commercial, broadcasting, licensing, digital, youth development and football management activities. These include, amongst others: broadcasting, digital, information technology and audio-visual services and facilities; maintenance, transport, accommodation and other logistical services; insurance, financial and professional services; football and match operation goods and services; marketing and advertising services; and utilities.

We expect the same high standards from all of our contractors, suppliers and other business partners and take a risk based approach when assessing our relationship with such parties and steps required to achieve our above objectives, having regard to the nature of their activities, products or services, locations and other relevant factors.



Prior to entering into or renewing arrangements with relevant suppliers approval processes are undertaken having regard to (amongst other things) supplier's proposed procedures, processes and values.

Furthermore as part of our contracting processes and when tendering for relevant goods or services we require suppliers to comply with all applicable laws, statutes, regulations and codes from time to time in force in relation to performance of the services. This includes, where relevant, those relating to anti-slavery and human trafficking and the Modern Slavery Act 2015. We have continued to secure contractual commitments and/or other affirmations from suppliers and partners in this regards also included express reference to compliance with anti-slavery requirements within our standard terms and conditions of purchase.

Suppliers are also encouraged to implement reasonable due diligence procedures for its subcontractors, and suppliers and other relevant participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains. In certain instances we may also reserve the right to approve such secondary parties ourselves in advance.

### **Assessment of Effectiveness**

In order to assess the effectiveness of the measures we take, policies and procedures in relation to modern slavery and human trafficking are regularly reviewed. Updates on any actions will be outlined in future statements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the EFL Board of Directors. It constitutes our slavery and human trafficking statement for the financial year ending November 2020.

David Baldwin  
EFL, Chief Executive Officer  
14 December 2020