



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 Papa John's 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 behaviour. Our latest Safeguarding Children Policy has also been published at: <https://www.efl.com/-more/governance/safeguarding/>. We have an appointed Safeguarding Officer who works closely with EFL staff internally, but also member Clubs as the EFL recognises 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 or is anticipated to be undertaken imminently by way of reminder. We are also looking to develop further training initiatives to 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 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.

Our starting point is to ensure that we contract only with established companies here in the UK or in other developed territories throughout the World.

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 regard and 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.

The 2020/21 Season saw several new commercial engagements, including onboarding of new key suppliers. We ensured anti-slavery was a key consideration through procurement and contracting processes and have selected partners and suppliers who share our commitment in this area.



Case study - Official Match Ball Supplier

At the start of Season 2021/22, the EFL changed ball supplier for the first time in 45 years as the League's iconic relationship with Mitre came to an end.

Mitre has now been replaced by PUMA. This followed an initial full tender process and thereafter resubmission of bids. As part of the EFL's approach to market, all potential bidders were invited to make submissions in relation to their company values and provide details of all policies, procedures and practices in relation to equal opportunities and non-discrimination, health and safety and CSR.

PUMA's statement under the Modern Slavery Act 2015 (and other worldwide / regional equivalents which it is bound to honour) can be accessed on the Puma website.

The EFL reviewed all such submissions before selecting its chosen partner. Our standard contractual terms of acquisition includes comprehensive provisions requiring it to ensure that the manufacturing and distribution of the Footballs takes place in such factories or workplaces:

- (a) that apply a standard of ethical treatment in relation to their workers;
- (b) where the workers are paid not less than the statutory minimum for the country in which they are employed;
- (c) where working conditions are safe and hygienic;
- (d) where no worker employed compulsorily works more than 12 hours a day;
- (e) where no worker employed compulsorily works more than six days a week;
- (f) where no discrimination is practised whether based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation;
- (g) where the workers' presence in the workplace is voluntary and not as the result of any direct or indirect coercion;
- (h) where no harsh or inhumane treatment is allowed;
- (i) where the workers' rights to freedom of association and collective bargaining are respected; and
- (j) that comply with all applicable employment standards, regulations or other legal or statutory requirements for the country in which they are employed including, but not limited to, requirements relating to pay, working conditions, health, fire and safety regulations.

The EFL retains the right to audit compliance with those obligations.

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.

In the year to 31 July 2021 the EFL has not received any complaints, whether from external parties or otherwise, related to the provision of goods or services to the EFL in a manner that could be said to infringe any of the principles that we strive to uphold. We will remain in dialogue with our partners and suppliers as appropriate.

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 July 2021.



A handwritten signature in black ink, appearing to read 'T. Birch', is centered on a light gray, textured rectangular background.

Trevor Birch
EFL, Chief Executive Officer
February 2022