



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

MODERN SLAVERY STATEMENT

Introduction

We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain.

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

It covers the activities of Swansea City Association Football Club Limited incorporating Swansea Stadium Management Company Limited (together referred to as the 'Club').

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 an EFL Championship football club which has an international presence.

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 and labour.

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

Our Policies on Modern Slavery and Human Trafficking

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.

Supplier Adherence to Values and Ethics

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.

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.

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. All new commercial agreements include the following clause:

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.

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

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 11-07-2018

Signed on the Board's behalf by: *G Davies*

Gareth Davies, C.F.O.

Dated: 11-07-2018