



MODERN SLAVERY STATEMENT

31 MARCH 2019





RESPECT

We have a rich, detailed and fascinating history. Embrace it. We celebrate the diversity among our fanbase and workforce, and honour every supporter and staff member.

We'll work with the integrity and the respect that this great Club, its incredible story and its fantastic people deserve.



ST MARY'S FOOTBALL GROUP LIMITED: MODERN SLAVERY STATEMENT



This statement has been published in accordance with the Modern Slavery Act. It sets out the steps taken by all companies within St Mary's Football Group Limited (the "Group") during the Group's financial year ending 30 June 2018 to prevent modern slavery and human trafficking in our business and supply chains.

Our commitment

As set out in our previous statement dated May 2017, we do not tolerate any form of modern slavery or human trafficking in our organisation or anywhere in our supply chain. This statement sets out what steps we have taken to date to eliminate modern slavery and human trafficking. It also provides an outline of our plans to improve the controls that we have in place to increase the effectiveness of our supplier evaluations and ensure that our own practices remain compliant with all applicable laws.





OUR GROUP

For the financial year ending 30 June 2018, the Group featured three primary trading companies:

1. Southampton Football Club Limited

A Premier League football club with global presence.

2. St Mary's Catering Limited (trading as Halo Conferences & Events)

An events management company providing food, beverage and events management services.

3. St Mary's Training Centre Limited

A training company that delivers adult and apprentice training courses.

In addition to these companies, the Group has an affiliated charity, Saints Foundation, an operating company in North America and four other inactive group companies.





WE PLAY THE RIGHT WAY

We uphold the true values of the game, not just on the pitch but off of it too. We are committed to supporting and improving the communities we work with and those around us. This belief in sustainable, responsible development and fair treatment of others is at the heart of our commitment to eliminating modern slavery and promoting ethical trade.



OUR BUSINESS AND OUR SUPPLY CHAIN



The Group continues to be aware of the need to be conscious of the working conditions and practices within our own labour force and within our supply chain. Following the introduction of the Modern Slavery Act, we published our first Modern Slavery Statement in May 2017.

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. We also have an extremely diverse workforce which includes permanent full and part-time employees, casual members of staff as well senior and academy players.

We pay all permanent members of staff above the UK Living Wage Foundation and all casual staff above the UK National Living Wage.





OUR PROGRESS TO DATE



Over the past two years the Club has put in place a number of controls and other measures designed to help highlight or mitigate areas of risk. This includes the following work:

- risk assessing of all of our business partners and completing due diligence on them;
- updating our procurement policy and processes to ensure that all of our staff are aware of our expectations in relation to ethical trading;
- developing internal awareness among our staff around the importance of completing proper due diligence on all business partners and using our standardised procurement processes. Specifically, we have highlighted importance of:
 - always knowing who we are doing business with;
 - the requirement to get a competent person to risk assess the type of supplier that we are engaging with; and
 - the requirement to work within the Group's framework and commitment to eliminating modern slavery and human trafficking;
- implementing contractual terms to commit all suppliers and third parties to comply with Modern Slavery and ethical trading legislation;
- completing annual minimum wage audits and attaining a level of full compliance with UK regulations for all of our staff;
- clearly setting out our expectations to our own staff through the commitments made in our Code of Ethics/Code of Conduct. This helps our staff to make informed ethical and legal decisions; and
- establishing clearer guidelines that help to ensure due diligence is carried out on all business partners before we engage with them.



OUR CURRENT FOCUS



We published our first modern slavery statement in May 2017. We are currently conducting a full review of the effectiveness of our current controls and this is focussed on the following in particular:

- further identifying the greatest areas of risk that we face;
- raising awareness of Modern Slavery and sustainable development among our staff and other stakeholders;
- starting to implement a more formally structured, risk-based management system to establish suitable, adequate and effective controls in relation to modern slavery. This management system is based on ISO management system principles and will adopt continuous improvement as a core value.

We anticipate that our current review will be completed by October 2019.





OUR NEXT STEPS



Over the next twelve months we will:

- continue to evaluate our internal processes to ensure full, ongoing compliance with the law internally;
- embed our commitment to sustainable and ethical development to the Group's growing international operations. A Group restructure means that there are growing opportunities in overseas markets, most particularly Asia. We are aware that this will bring us into contact with some higher risk areas in terms of ethical trade, trafficking and modern slavery;
- create a more structured approach to sustainable and ethical development. This will involve reviewing the good practice that is undertaken within the Group as well as extending existing awareness programmes and working procedures;
- conduct a further full review and evaluation of all direct (Tier 1) suppliers and business partners that work with the Group;
- evaluate the requirement for us to implement self-assessment questionnaires for all business partners to complete annually;
- continue to work collaboratively with our business partners and seek to exert commercial influence where it might be possible to make improvements to their ethical or social business performance;
- review our procedures around ongoing monitoring of business partners to ensure that these remain effective;
- implement a more complete training and awareness programme to cover all staff and contractors;
- establish and maintain an effective register to properly record our due diligence, concerns raised and any areas of non-compliance or other incidents or "*near misses*" that may impact the Group;
- extend our approach to management of CCO risk to modern slavery so that a similar management system is established;
- implement a Compliance Working Group and Risk & Opportunities Committee to allow more effective discussion, monitoring and evaluation of modern slavery and human trafficking as those issues affect the Group.



ONGOING COMPLIANCE



Since the publication of our first modern slavery statement, we have not had any recorded instances of non-comformity or non-compliance with regulations. Our controls have caught and flagged a number of instances where a possible business partner may present too much of a risk for us to work with. Such issues have led us to not engaging with that partner. None of these cases was so severe as to require any further referral to a regulatory body or law enforcement agency.

Where possible, we still work to remedy any areas in which our suppliers do not meet the standards that we expect. However, we do continue to include ultimately ceasing to trade with partners who do not continue to meet our internal criteria for selection or breach relevant regulations among the sanctions that we may use should any concerns be raised.





BOARD & SENIOR MANAGEMENT ENDORSEMENT

This statement has been reviewed by our board of directors and was approved on 31 March 2019. This statement will be reviewed annually, and, the date of next review shall be no later than 31 March 2021.

Signed on behalf of the board by Toby Steele, Managing Director, and Tim Greenwell, Director of Legal & Risk.



MANIFESTO

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WE ARE SOUTHAMPTON
A CLUB BUILT ON FAITH FROM THE VERY BEGINNING
A FAITH IN OURSELVES, A FAITH IN EACH OTHER

WE HAVE OUR BELIEFS
OUR OWN WAY OF DOING THINGS
THAT GUIDE EVERYTHING WE DO

WE DON'T JUST BUY SUCCESS
WE BREED IT
WE DON'T TAKE SHORTCUTS
WE EARN IT

EVERY SECOND OF EVERY MOMENT OF EVERY DAY
WE'VE BEEN TO THE EDGE OF THE ABYSS
AND HAVE COME BACK STRONGER
BECAUSE WHATEVER THE PRESSURE
HOWEVER GREAT THE TEMPTATION
WE NEVER STOP
WE NEVER LOSE FAITH
WE KEEP MOVING FORWARDS
WE ARE THE SAINTS

IT'S NOT JUST A NAME
IT'S WHO WE ARE
WE WILL BE IN THAT NUMBER
WE MARCH ON
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