

JUNE 2021

INTRODUCTION

Marylebone Cricket Club (**MCC** or **the Club**) remains committed to combating slavery and human trafficking, and therefore to implementing systems to try to prevent slavery and human trafficking in its business and supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act (**the Act**) and relates to actions and activities during the financial year ending 31 December 2021.

ABOUT THE CLUB

MCC, with approximately 18,350 Full Members and approximately 6,000 Associate Members, is the world's most active cricket club, the owner of Lord's Ground and the guardian of the Laws and Spirit of the game. Founded in 1787, it was incorporated by Royal Charter on 1 July 2013. It is recognised as the sole authority on the game's Laws and moved to its current home in St John's Wood in 1814.

There are few clubs in the world that have made as big an impact on any sport as MCC has made on cricket. Everything the Club does is for the good of the game, from working with local communities to growing cricket's global influence.

Whilst the MCC Committee, as constituted in accordance with the Rules of the Club, is ultimately responsible for the management, property and affairs of the Club, an executive Secretariat, answerable to the MCC Committee, is responsible for the day-to-day administration and operation of the Club.

Further details about MCC can be found on the Club's website at www.lords.org.

MCC'S SUPPLY CHAINS AND DUE DILIGENCE

MCC's supply chains are diverse, and include suppliers of merchandise, software, food and beverages, equipment, workers, maintenance and other services, including catering. MCC's suppliers and service providers are from a number of locations.

MCC recognises that in relation to goods and services provided to it, there may be elevated risks of infringements of employment rights based on the geographical location from which a third party business may operate, as well as along the third party's supply chains, including where the provision of goods or services is sub-contracted to different third parties.

Therefore, MCC seeks to work with third parties which share the Club's values. The contractual terms and conditions that the Club puts in place with third parties are regularly reviewed and include provisions designed to ensure that any risks of modern slavery in the Club's business and supply chains are appropriately and effectively addressed. All contracts include express terms requiring third parties to comply with

MCC'S SUPPLY CHAINS AND DUE DILIGENCE

CONTINUED

the Act, to include similar provisions in their own contracts and to notify the Club if they become aware of any slavery or human trafficking in their own business and/or supply chains.

The Club undertakes risk assessments of its businesses to identify areas most at risk from slavery and human trafficking. This is a continuous exercise for existing third parties and is carried out in respect of potential new suppliers and service providers.

As part of that risk assessment and general due diligence, the Club considers the geographical risks of modern slavery and human trafficking by consulting the global slavery index and Freedom House where third parties can be checked for their labour standards, compliance in general, and slavery and human trafficking in particular. Further, all new suppliers and service providers are required to complete a Modern Slavery Questionnaire to confirm that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour, and to place similar requirements on their respective suppliers and service providers.

The Club is committed to ensuring that any third parties with whom it engages adhere to high ethical standards. In this regard, MCC's due diligence procedures are designed to:

- (a) establish and assess areas of potential risk in its business and supply chains;
- (b) monitor potential risk areas in its business and supply chains; and
- (c) try to prevent the risk of slavery and human trafficking occurring in its business and supply chains.

MCC's Procurement Manager works alongside the wider Finance team and the Legal Department to help identify potential risks regarding slavery and human trafficking. Were MCC to identify a risk of modern slavery or human trafficking within the business of a supplier or service provider (or potential supplier or service provider), MCC would engage with the supplier or service provider in order to investigate further its concerns and work out its next steps before implementing an appropriate and timely response, which, depending on the outcome of the investigation, might include the termination of the contract with the supplier or service provider.

POLICIES

As part of its commitment to combating modern slavery, the below policies are in place. These policies are annually reviewed, and if deemed necessary, updated by the Club.

- (a) **Whistleblowing, Health & Safety, Safeguarding and Harassment & Bullying Policies**, which reinforce the Club's commitment to supporting safe practices, and encourage employees to report any concerns related to the direct activities, or the supply chains of, the Club. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- (b) **Code of Conduct**, which makes clear to all workers the actions and behaviour expected of them when representing the Club. The Club strives to maintain the highest standards of worker conduct and ethical behaviour when managing its supply chains.

POLICIES CONTINUED

- (c) **Recruitment / Agency Workers Policy**, which ensures that the Club uses only specified, reputable employment agencies to source labour and annually verifies the details of any agency's current pre-screening / verification processes with regard to: (i) identity; (ii) nationality and immigration status (including entitlement to undertake the work in question); (iii) employment history; and (iv) unspent criminal convictions, before accepting workers from that agency.
- (d) **Invitation to Tender**, which third parties are required to complete as part of the Club's tender process. Amongst other things, the Invitation to Tender asks them to answer questions with respect to their compliance with the Act. These responses are then considered as part of the overall tender process, and are an important factor when determining whether the third party is awarded business with the Club.

FURTHER STEPS AND CONTINUED COMMITMENT

MCC continues to review its human rights efforts, and monitor best practice, so as better to understand how it can further strengthen its commitment to try to prevent slavery and human trafficking taking place within its organisation or its business and supply chains.

In addition to those outlined above, the steps MCC has taken to prevent slavery or human trafficking from occurring in its business or supply chains to date, and the plans for the future include the following:

- (a) providing ongoing training and guidance to all employees in respect of obligations under the Act and specifically, how to identify and report any breaches of the Act;
- (b) key performance indicators, which would hold the suppliers and service providers to account by reinforcing compliance with the Act and stating that they shall ensure their suppliers are openly committed to ethical labour practices; and
- (c) such other actions as a result of ongoing monitoring to strengthen supply chain auditing and verification.

The Club recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains.

The Club will continue to enhance its capacity to identify, prevent and mitigate any impacts in this field.

This statement is approved by the Club's Chief Executive & Secretary for the financial year ending 31 December 2021.



Guy Lavender
Chief Executive & Secretary
Marylebone Cricket Club