

# Marylebone Cricket Club Modern Slavery & Human Trafficking Statement

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## INTRODUCTION

This is MCC's statement pursuant to Section 54 of the Modern Slavery Act. It sets out the steps taken by the Club to prevent modern slavery and human trafficking in its business and supply chains.

MCC takes a zero tolerance approach to slavery and human trafficking and it expects its supply chains to take the same stance. MCC is committed continuously to developing and maintaining effective systems and controls to ensure that it addresses the threat of modern slavery within its business and in all its business relationships, in particular in its supply chains. MCC welcomes the transparency that the Modern Slavery Act encourages.

This statement relates to actions and activities during the financial year ending 31st December 2018.

## MCC'S BUSINESS AND SUPPLY CHAINS

Third parties in the Club's supply chains include suppliers of merchandise, software, food and beverages, equipment, workers, maintenance and other services including catering.

MCC seeks to use 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 supply chain are appropriate and effectively addressed. All contracts include express terms requiring third parties to comply with the Modern Slavery 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 supply chains.

The Club undertakes regular risk assessments of its business to identify areas most at risk from slavery and human trafficking. This is a continuous exercise for existing third parties and is carried out for potential new suppliers and service providers. The Club will ensure that it continually focuses on the areas most at risk.

The Club is committed to ensuring that any third parties with whom it engages adhere to the highest standards of ethics. To this end, 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. In addition, as part of its due diligence, the Club also consults 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.

## POLICIES

The Club operates various policies and procedures to assist in identifying potential modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations, including but not limited to:

- (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 employees and casual workers the actions and behaviour expected of them when representing the Club;
- (c) **Recruitment/Agency Workers Policy**, which verifies the practices of any new agency by ascertaining details of their pre-employment screening processes before any employees or workers are accepted to work on behalf of the Club; and
- (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 Modern Slavery Act. These responses are then considered as part of the overall tender process, and ultimately whether the third party is awarded business with the Club.

## FURTHER STEPS AND CONTINUED COMMITMENT

MCC continues to review its efforts, as well as reviewing and monitoring best practices in the sports and entertainment industry, to understand how it can further strengthen its commitment to ensure slavery and human trafficking is not taking place within its business or its supply chains.

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



implementing a Supplier/Service Provider Code of Conduct regarding the use of forced labour, which would codify the obligations and expectations that the Club has in relation to its suppliers and business;



providing ongoing training and guidance to all employees in respect of obligations under the Modern Slavery Act; and



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

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This statement is approved by the Club's Chief Executive & Secretary for the financial year ending 31<sup>st</sup> December 2018.

Signature:



G.W. Lavender | Chief Executive & Secretary