

# Marylebone Cricket Club Modern Slavery & Human Trafficking Statement 2019

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## INTRODUCTION

Pursuant to Section 54 of the Modern Slavery Act ("the Act") this statement sets out the steps taken by Marylebone Cricket Club ("MCC" or "the Club") to prevent modern slavery and human trafficking in its businesses and supply chains.

MCC is committed to preventing slavery and human trafficking within its businesses and supply chains, and imposes the same high standards on its suppliers and service providers.

This statement relates to actions and activities during the financial year ending 31st December 2019.

## ABOUT THE CLUB

MCC, the world's most active cricket club and owner of the Laws of Cricket and guardian of the Spirit of the Game, is incorporated by Royal Charter. MCC is a private members' club, and owns Lord's Cricket Ground, 'The Home of Cricket', which is an International and County Cricket Ground. Further details about MCC can be found on the Club's website at [www.lords.org](http://www.lords.org).

## MCC'S SUPPLY CHAINS AND DUE DILIGENCE

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 chains are appropriate and effectively addressed. All contracts include express terms requiring third parties to comply with 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 supply chains.

The Club undertakes regular 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.

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 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 still, Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

## 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.
- (c) **Recruitment/Agency Workers Policy**, which ensures that the Club uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency 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 ultimately 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, to better understand how it can further strengthen its commitment to ensure slavery and human trafficking is not taking place within its organisation 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:

- (a) providing ongoing training and guidance to all employees in respect of obligations under the Modern Slavery Act and specifically, how to identify and report any breaches of the Act;
- (b) 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 businesses; 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.

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This statement is approved by the Club's Chief Executive & Secretary for the financial year ending 31st December 2019.

Signature:



G.W. Lavender | Chief Executive & Secretary | Marylebone Cricket Club