

**POWER
LEAGUE**



**Modern day slavery statement
January 2022 – December 2022**



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Modern day slavery statement 2022

1. Modern day slavery statement

Powerleague is committed to carrying out its business ethically and with integrity. Powerleague will take appropriate steps to identify and reduce the risk of any form of slavery and human trafficking in its business and supply chain. The business will not knowingly support or deal with any business involved in slavery, human trafficking and child exploitation.

We will explore all opportunities to improve our practices and learn from sporting and service industry trends and our own best practice as part of our ongoing commitment to prevent mitigate and address adverse impacts on human rights, including modern day slavery. This policy statement has been approved by the senior leadership team and will be reviewed and published annually.

Christian Rose
Chief Executive Officer

*This statement has been written in accordance with the requirements of the UK Modern day slavery act 2015.
This is Powerleague's first statement and relates to actions and activities during the last financial year 1st January 2022 to 31st December 2022.*



Modern day slavery statement 2022

2. Responsibilities

The CEO and operational members of the board of directors have overall responsibility for ensuring this policy complies with Powerleague's legal and ethical obligations.

The Chief Operating Officer has specific responsibilities for measuring, monitoring and making recommendations to mitigate the risk of the business supply chain supported by the commercial team.

The Chief People Officer has accountability for ensuring the appropriate policies and procedures are in place and that all colleagues in the business are appropriately trained in order that risks are being managed.

The success of this policy and the delivery of its objectives is also supported on a daily basis by all senior managers, heads of department, club managers and their teams.



Modern day slavery statement 2022

3. Our business and structure

This statement covers the activities of Powerleague during the year 2022 and future recommendations for 2023.

Powerleague is the original provider of commercial small-sided football with over 40 football centres in the UK and a league operations arm called Powerplay. Our business is all about bringing local people together, sharing good times as a community enhancing lives with sporting team experiences.

We currently operate in the United Kingdom, including Dublin and the Netherlands.

The business directly employed 498 colleagues across the business.



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4. Our supply chain

Powerleague has relationships with external businesses to support the running of our clubs and venue operations and support office function as follows:

Arrangements for the supply of goods and services (some by contractors) to our clubs, venue operations and support office.

Arrangements to supply temporary contractors or freelancers to supplement staffing or provide specific expertise as and when required.



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5. Our code of conduct and polices relating to the prevention of modern day slavery

Ethical Recruitment

This policy sets out the requirement of our People team and those colleagues who are responsible for the recruitment of others to understand their responsibilities correctly for carrying out right to work checks to ensure legal compliance. This process is supported by technology to ensure full ID checks take place including passports and where relevant work permits. This process to be audited annually.

Code of conduct

At the heart of our commitment to operating a responsible business is our code of conduct which helps our colleagues make the right decisions, within the framework of the law and our own values. At Powerleague our values set out our expectations of everyday behaviors which our colleagues and customers can rely on.

The code of conduct and the policies and procedures that it references must be complied with by all employees and issues of non-compliance are taken extremely seriously.

Whistleblowing policy

We encourage all our colleagues, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation. Employees who have concerns can use our confidential independent helpline or dedicated email service.

Powerleague policies

Contained within our overarching code of conduct we include, equal opportunities, diversity inclusion and antibribery. These are additional to the policies outlined which particularly support the diligence process to avoid modern day slavery and human trafficking,



Modern day slavery statement 2022

5. Our code of conduct and polices relating to the prevention of modern day slavery

Whistleblowing policy

Whilst our policy is primarily directed at our colleagues, the policy also supports and encourages all stakeholders including business suppliers and partners to disclose any concerns they may have without fear of recrimination.

Management of suppliers to prevent modern day slavery within the supply chain

We engage with our suppliers to both convey to them our Anti-Slavery Policy and aim to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

Modern day slavery and human trafficking policy

We remain committed to identifying any areas in our business that maybe used as a potential for the exploitation of vulnerable adults or children and providing training to support continuous improvement in colleague awareness. Our initial training will be provided on induction and reviewed and refreshed annually with addional awareness campaigns as required.

Our modern slavery training covers:

How to identify the signs of slavery and human trafficking; what initial steps should be taken if slavery or human trafficking is suspected;

How to escalate potential slavery or human trafficking issues to the relevant parties within our business.



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6. Risk profiling, impact and control of modern day slavery across the business

Customers

Whilst we believe it to be low risk, we do recognize that our clubs could be used for trafficked individuals to be exploited. We have a zero-tolerance approach to modern day slavery and we are committed to acting with integrity. As such we ensure that we are vigilant with respect to customers in our business and our colleagues are empowered to raise the flag where there may be concerns either directly or anonymously.

Supply Chain

With products and services sourced from around the world there is a possibility of unethical working practices including poor working conditions, welfare and pay may exist within some aspects of the supply chain, particularly during the manufacturing process.

We may terminate our relationship with individuals and organisations working on our behalf who do not uphold our high ethical standards and for those who breach our policies.



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7. Measuring the effectiveness

Training

As a result of our commitment to training, we are confident that all colleagues have access to training and general guidance commensurate with their respective roles.

Any new policy or update to policy is published on FLOW our online training portal that all colleagues have access to. Colleagues will receive notifications of new updates automatically via the system. The people team produces an annual compliance calendar to refresh required training and monitor completion and success rates.

Colleagues complete a number of training tasks specifically in their induction process which includes understanding our codes of conduct, core behaviors, supporting policies and handbook.

We encourage all our clubs to understand their local communities and network and attend events and training opportunities that may be hosted by their local police force as may be relevant.

Audit

Our compliance team ensures that all clubs are taken through an audit process annually along with monthly operational audits completed by senior regional managers. Independent external auditors visit all of our clubs a minimum of once per year to conduct a detailed check of our stocks, and stock holding, auditing also covers a check of goods for and not for resale.

Reporting

Any incidents concerning modern-day slavery can be reported using our internal incident reporting procedure. This process allows for details to be captured relating to any incidents in the business and immediate actions taken as well as allowing for further action required. The COO reviews incidents on a weekly basis as well as having an immediate notification as incidents are reported. Anonymous reporting is also provided by our independent whistleblowing hotline and internally monitored email.



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8. Future Objectives

Retraining of immigration legislation/right-to-work checks with people team and relevant managers along with enhanced technology to support check process will be scheduled and implemented in Q1 & Q2.

Training materials will be reviewed to ensure content is relevant and up to date.

All company-approved suppliers will be written to, requiring confirmation of their compliance to the requirements of the Modern Day Slavery Act 2015.

Audits will commence with our supply chain in 2023 to ensure their compliance with modern day slavery



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A service-led, people-first approach is at the core
of Powerleague