Middlesbrough Football Club Foundation Modern Slavery Statement

ABOUT US

This statement has been prepared and published by Middlesbrough Football Club Foundation ("the Foundation") in accordance with the Modern Slavery Act 2015. It sets out the approach by the Foundation during the year ending 30 June 2025 to prevent modern slavery and human trafficking in its business and supply chains.

We are a charity who is committed to fair employment and supply chain practices in line with our core values and behaviours and all relevant labour legislation.

WHAT IS MODERN SLAVERY?

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms including slavery, servitude, forced or compulsory labour and human trafficking. The underlying principle is the exploitation of a person or the coercion of a person to work against their will for the benefit of another.

OUR APPROACH TO MODERN SLAVERY

We recognise the importance in maintaining a vigilance to identify and address issues associated with modern slavery of any kind in our supply chains. We remain committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the same high standards from our contractors, suppliers and other business partners.

We continue to take a pragmatic approach to promote a zero tolerance of modern slavery in any form in our business or supply chains and prevent worker vulnerability by:

- working with key staff to raise awareness and communicate the importance of due diligence checks and placing responsibility on all departments to take appropriate steps to identify and mitigate modern slavery risks within the commercial lifecycle
- conducting due diligence on our potential suppliers via a Supplier On-Boarding Process
- working closely with suppliers and potential suppliers to ensure they understand the importance of modern slavery due diligence in the supply process. We have established standards of conduct for our business-related practices contained within the Code of Conduct for Suppliers & Representatives which reflects our commitment to our values of Honesty, Integrity, Quality, Inclusion & Teamwork. We expect all suppliers to share, embrace and demonstrate these values together with commitment to legal and regulatory compliance. We expect our Suppliers and Representatives to share our commitment to human rights and equal opportunity in the workplace. In addition to the obligations under the Supplier's agreement, all Suppliers and Representatives are required to follow our ethical standards, which include expected conduct in the areas of regulatory compliance, business practices, and employment
- including obligations on suppliers to comply with the Modern Slavery Act in our contractual agreements and terms of business and refusing to work with suppliers who cannot commit to meeting the standards we expect
- induction and training for staff on Modern Slavery and Trafficking to promote understanding and awareness to assist in recognising and identify potential risks

- having robust Safeguarding Policies and Procedures and training in place to protect children and adults at risk in line with relevant governing body rules and guidance (where applicable) managed by the Safeguarding Team. The Designated Safeguard Officer and Safeguarding Ambassadors are accessible for individuals and staff to raise any safeguarding concerns they have which are then reported directly to the Head of Safeguarding. A formal reporting procedure is in place. The safeguarding Team work closely with the HR Department and Legal Department and in partnership with statutory agencies, local authorities and the football and charity governing bodies. We have a safeguarding reporting platform that facilitates a trusted way to disclose concerns by individuals directly to the Foundation should they feel unable to do so face to face. It is a discreet and confidential way to voice concerns in respect of issues such as bullying, abuse or mental health
- having a clear framework of rules and behaviours and encourage the reporting of any concerns or breaches via the Grievance or Whistleblowing Procedure as applicable so that they can be dealt with appropriately in accordance with our policies and procedures
- having robust recruitment procedures in place supported and communicated by the Recruitment and Selection Policy and conducting eligibility to work in the UK checks before any appointment commences within the Foundation. We have processes in place to ensure that all staff are paid no less than the National Minimum Wage which involves monitoring hours worked by salaried staff to ensure their hours are not excessive resulting in their hourly rate falling below National Minimum Wage. In addition, we use a preferred suppliers list to source temporary workers
- conducting annual reviews, updates and communication of our Equal Opportunities Policy, Whistle Blowing Policy, Bullying & Harassment Policy and Equality and Diversity Statement of Commitment
- committing to ongoing training promoting the eradication of discrimination within the Foundation and also within the region by using our elevated profile and status within the local community via Foundation initiatives supported and promoted by Middlesbrough Football Club including the Active Through Football inclusive football sessions
- proactively promoting equal opportunities by treating people fairly and with respect, by recognising inequalities exist, by taking steps to address them, and by providing access and opportunities for all
- continuing to consult and engage with key staff, best placed to advise on our supply chains, to conduct risk assessments to identify areas within our businesses most at risk, and to develop policies and procedures that are practical and effective in eliminating identified risks
- engaging with local authorities and other stakeholders to maintain open communication about issues affecting the local community and working together to address any concerns

MONITORING EFFECTIVENESS

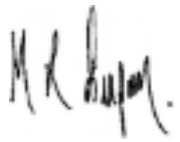
We continue to assess the effectiveness of our approach to Modern Slavery and to ensure ongoing improvement.

Middlesbrough Football Club Foundation Modern Slavery Statement 2026

This statement is made pursuant to section 54 Modern Slavery Act 2015 and sets out the steps taken by the Foundation to prevent Modern Slavery and human trafficking in our businesses and supply chains.

This statement was approved by the Board of Trustees of Middlesbrough Football Club Foundation on [DATE] 2026.

NAME Professor Mark Simpson

TITLE MFC Foundation Chair

MIDDLESBROUGH FOOTBALL CLUB FOUNDATION