

1. INTRODUCTION

Marylebone Cricket Club (**MCC** or the **Club**) opposes modern slavery, a crime and violation of fundamental human rights. It takes various forms including slavery, servitude, forced labour and human trafficking (**Modern Slavery**). MCC recognises that Modern Slavery is complex and minimising the risk of Modern Slavery requires everyone at the Club to play a part.

To this end, MCC is committed to combating Modern Slavery in its operations and supply chains by taking steps and implementing systems to try to prevent it.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the **Act**) and highlights the actions and activities MCC has taken during the financial year ending 31 December 2022.

2. ABOUT THE CLUB

MCC, a private members' club and international cricket ground, 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, MCC was incorporated by Royal Charter on 1 July 2013.

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 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.

3. MCC'S SUPPLY CHAINS

MCC's supply chains are diverse. The Club operates in many business sectors ranging from ticketing, hospitality, food and beverage to technology, retail, licensing, catering and other services including construction and maintenance services. Many of these business sectors are serviced by workers.

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where MCC does business is important. Whilst MCC's suppliers are predominantly within the UK, MCC recognises that in relation to certain goods and services, there may be elevated risks of labour rights infringements based on the geographical location from which a third-party business may operate, as well as along the third party's supply chain, especially where provision of goods or services is sub-contracted to different third parties.

MCC is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to prevent Modern Slavery taking place in its own business or supply chains.

4. SUPPLIER SET UP AND ONGOING MANAGEMENT OF RISK

The Club is committed to ensuring that any third parties with whom it engages adhere to high ethical standards. MCC's due diligence, risk assessments and ongoing management procedures are designed to:

- establish and assess areas of potential risk in its business and supply chains;
- monitor potential risk areas; and
- try to prevent the risk of Modern Slavery occurring in its business and supply chains.

MCC also seeks only to work with third parties which share the Club's values. To this end, new suppliers are required to complete a Modern Slavery Questionnaire to confirm that they provide safe working conditions, treat workers with dignity and respect, act ethically and within the law in their use of labour, and that they place similar requirements on their own suppliers. Modern Slavery Questionnaires are reviewed at regular contract management meetings.

Further, supply contracts 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. They include express terms requiring third parties to comply with the Act, to include similar provisions in their own suppliers' contracts and to notify the Club if they become aware of any Modern Slavery in their own business and/or supply chains. Use of sub-contractors requires MCC's prior written authorisation.

In addition, suppliers must agree to have appropriate systems in place to ensure continuous compliance with the Act. Breach of the Act will allow MCC to terminate its relationship with a supplier with immediate effect.

The Club also undertakes risk assessments to identify areas most at risk from Modern Slavery. This is a continuous exercise for existing third parties and is carried out in respect of potential new suppliers.

As part of these risk assessments and general due diligence, the Club considers the geographical risks of Modern Slavery by consulting the global slavery index and Freedom House, where third parties can be checked for their labour standards, compliance in general, and Modern Slavery in particular.

MCC's Procurement Manager works alongside the Legal Department to help identify potential risks regarding Modern Slavery. Where MCC identifies a risk of Modern Slavery within the business of a supplier or potential supplier, MCC will engage with the supplier in order to investigate its concerns and have them addressed. This might include the Club not entering into a contract with a potential supplier.

5. **POLICIES AND OTHER RELEVANT DOCUMENTS**

As part of its commitment to combating Modern Slavery, the Club has various policies in place including those set out below.

- **Whistleblowing, Health & Safety, Safeguarding and Harassment & Bullying Policies.** These reinforce the Club's commitment to supporting safe practices, and encourage staff to report any concerns related to the Club's activities or its supply chains. This includes any circumstances that may give rise to an enhanced risk of Modern Slavery.
- **Code of Conduct.** This makes clear to all staff the actions and behaviour expected of them when representing the Club. The Club strives to maintain the highest standards of conduct and ethical behaviour when managing its supply chains.
- **Recruitment / Agency Workers' Policy.** This ensures that the Club uses only reputable employment agencies to source labour and annually verifies the details of an agency's 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 an agency.
- **Invitation to Tender.** Suppliers of certain products or services are required to complete an Invitation to Tender. It asks them to answer questions about their compliance with the Act. Their responses are then considered as part of the overall tender return, and are an important factor when determining whether the third party is awarded business with the Club.

These policies are annually reviewed, and if deemed necessary, updated by the Club.

6. AWARENESS AND TRAINING

In order to ensure awareness and understanding of the risks of Modern Slavery, the Club provides training to new employees as part of their induction. Training involves:

- an explanation of Modern Slavery;
- what MCC is doing to ensure Modern Slavery is not taking place in its business and supply chains;
- the indicators of Modern Slavery and how to spot them; and
- employees' responsibilities for reporting any concerns with regard to Modern Slavery.

7. CONTINUED COMMITMENT AND FURTHER STEPS

MCC continuously reviews and improves upon its approach to Modern Slavery and ethical sourcing including by:

- identifying any emerging risks in its supply chains;
- monitoring suppliers for adherence to best practice; and
- reviewing and refining its policies, procedures and contractual arrangements.

The Club plans to provide refresher training and guidance to employees in respect of obligations under the Act and targeted training to those involved in procurement and/or with responsibility for supply chain management,

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



Guy Lavender
Chief Executive & Secretary
Marylebone Cricket Club