



## Modern Slavery and Human Trafficking Statement

This statement sets out QPR Holdings Ltd and Queens Park Rangers Football & Athletic Club Ltd (The) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during financial year 1 June 2020 – 31 May 2021.

As part of the Professional Football Industry, the organisations recognise that it has a responsibility to take a robust approach to modern slavery and human trafficking.

The organisations are absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

Our business is organised into three business activities, Corporate Business, Academy Football and First Team Football.

### Countries of operation and supply

The organisations operates in the UK, within in the Professional Football industry and conducts limited scouting activities abroad.

### Responsibility

Responsibility for the organisations' anti-slavery initiatives is as follows:

The board of directors have overall responsibility for ensuring its Anti-Slavery and Human Trafficking Policy complies with the organisations legal and ethical obligations.

The Chief Executive Officer (CEO) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

HR is responsible for ensuring all related policies are kept up to date and is communicated to staff.

### Investigations

The CEO is responsible for investigating allegations of modern slavery in the organisations business or supply chains.

### Relevant policies

The organisations operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations



### **Anti-Slavery and Human Trafficking Policy**

The organisations have a zero tolerance approach to modern slavery and are committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

Further information in relation to Anti-Slavery and Human Trafficking can be found on the following websites; [www.antislavery.org](http://www.antislavery.org)

### **Whistleblowing policy**

The organisations encourage all of its employees, workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisations. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Further advice and support can be obtained from Protect (formerly Public Concern at Work), from Protect (formerly Public Concern at Work), a whistleblowing charity: <https://protect-advice.org.uk> or helpline number 020 3117 2520.

### **Employee code of conduct**

The organisations code makes clear to employees the actions and behaviour expected of them when representing the organisations. The organisations strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

### **Supplier/Procurement code of conduct**

The organisations are committed to ensuring that its suppliers adhere to the highest standards of ethics. 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. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. Suppliers are required to provide the Commercial Director with a copy of their ethical charter and/or audits carried to demonstrate their compliance in relation to modern slavery and human trafficking.

### **Recruitment Policy**

Right to work checks are carried out consistently and diligently in line with current U.K. legislation. Employer's Guide to Right to Work Checks, documents from List A or B; the official documentation is checked and verified in order to prevent illegal working and are retained on the employee files.

Right to work in the U.K. checks are supplemented by additional security checks within areas of the organisations' that are subject to satisfactory DBS disclosure. Full guidance relating to the importance of all pre-employment checks is provided to line managers. In addition, the organisations' standards are to reference check the last five years of employment of employees joining the organisations i.e. by obtaining 2 references.

Where required, the organisations use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The organisations HR department is still duty-bound to conduct the checks described above on workers appointed through an agency, to undertake permanent roles.



### **Awareness-raising/Training**

The organisations have raised awareness of modern slavery issues circulating, by email, a copy of the organisations Anti-Slavery and Human Trafficking Policy along with a copy of this statement and a reminder of how to access all of the organisations policies.

The organisations' have provided train the trainer training, in conjunction with Barnardos Nightwatch, to key members of staff, who will assist in providing training across the organisations' to help staff identify and alert the organisations of any risks of modern slavery, within its organisations' and supply chains.

### **Board approval**

This statement was approved by the organisations' board of directors May 2020.

**Lee Hoos**  
**CEO**

**On behalf of QPR Holdings Ltd and Queens Park Rangers Football & Athletic Club Ltd**