

MODERN SLAVERY STATEMENT

The Foundation Group

1. The Foundation Group comprises the following three companies:
 - a. The **Football Foundation** is a UK registered charity and company limited by guarantee. As a charity, the Football Foundation is governed by its Memorandum and Articles of Association. Funding is received from the very top of the professional game through the Premier League, The FA and from the Government, via Sport England. The Football Foundation is responsible for dispersing this funding to develop community football facility projects in England.
 - b. The **Premier League Stadium Fund** is the 'non-charitable' arm of the Football Foundation and is funded wholly by the Premier League. It funds stadium facility projects for clubs operating in the FA National League System and the English Football League.
 - c. The third company in the Foundation Group is the non-charitable wholly owned trading company, **The Football Foundation Trading Limited**.
2. Further information on the Foundation Group structure and business is set out in the relevant annual report and accounts.

Foundation Group supply chains

3. The Foundation Group provide capital grants to support the development of new and refurbished sports facilities. Our grantees mainly comprise schools, academies, football clubs, community groups, and local authorities. Our grantees are wholly responsible for the delivery of their project and robust due diligence is undertaken before funding is awarded to ensure that any investment provided will achieve the funding criteria and essential outcomes.
4. The Foundation Group also partners with specialist consultants to support the development of our framework agreements and contracts. These framework agreements are in place for several of our programmes of work (for example 3G pitches, PlayZones, and modular project builds) to ensure a consistent approach to the quality of the projects the Foundation Group support, thereby protecting the investment of our funding partners.
5. The Foundation Group contracts with third parties to provide goods and services to allow it to carry out its role (some of the suppliers are local while others are engaged on a global scale). The Foundation Group remains committed to taking steps to try to ensure its suppliers and funding partners, who meet the threshold prescribed by the section 54 of the Modern Slavery Act 2015, have published a modern slavery statement setting out the ways in which they are working to combat modern slavery

and human trafficking. By way of further commitment to ensuring compliance within the supply chain, the Foundation Group has included anti-slavery and human trafficking clauses in certain contracts with suppliers, requiring those parties to comply with all applicable anti-slavery and human trafficking laws (including the Modern Slavery Act 2015).

6. Outside of our capital grant funding supply chain, the Foundation Group's supply chain consists mainly of IT delivery and support; professional advisers (such as legal and auditing); tech and digital service providers; insurance services; marketing/design services; recruitment service providers; and maintenance service providers – such as printing services. We procure a small amount of goods in the form of IT and communications hardware, office supplies, and other materials used in our day-to-day operations.

The Foundation Group Policies and Processes

7. Our policies, standards, and procedures reflect our commitment to acting ethically and with integrity in all our business relationships and that together, seek to reduce the risk of modern slavery in our work. This includes our framework agreements, grant terms and conditions, as well as our own HR and compliance policies, which contain robust recruitment and hiring processes.
8. The Football Foundation Group has invested in management and reporting software to monitor our compliance with a broad range of Environment, Sustainability, and Governance (ESG) standards, which includes requirements relating to modern slavery and human rights. The use of this reporting tool allows the Football Foundation Group to set up ambitions and follow an action plan to improve our scoring in the following areas: Climate, Economic, Diversity and Inclusion, Social and Environment impacts.
9. We are committed to providing a framework through which the Foundation Group team members can raise a whistleblowing concern made in the public interest. This Policy is designed to support and guide our team to raise such concerns at an early stage and in a way which brings about timely and proportionate investigation and action, as required.
10. Complaints and appeal policies are in place to guide grant applicants and other external agencies, should they wish to raise any concerns about the Foundation Group and the way we work, our team members or operational partners.
11. All existing and new team members are also required to read and sign up to our Fair Play Policy. This outlines our expectations of our team, as well as what they can expect from us. In signing this, our team are committing to upholding our values, treating everyone with respect and dignity, and speaking out should they have concerns or experience any wrongdoing.

12. To further identify and mitigate risk, our policies and processes are updated on a periodic basis to make sure they remain fit for purpose and to measure their continued effectiveness.

The Foundation Group Due Diligence Processes

13. The Foundation Group is committed to taking measures aimed at trying to ensure that our business and supply chains are free from modern slavery and/or human trafficking.

14. We will endeavour to identify and mitigate risk by:

- a. Asking all existing and prospective suppliers involved in tendering processes to make a positive affirmation that they and their supply chains are similarly free from modern slavery, and their tier 1 suppliers do not endorse, enable, or facilitate human trafficking or slavery within their businesses.
- b. Continuing to include clauses in new or renewed contracts with partners and suppliers related to those entities' compliance with the Modern Slavery Act and considering further actions in relation to high-risk suppliers.
- c. To raise awareness and ensure our team members remain vigilant, a one-page guide will be provided to all existing and new team members, to raise awareness of modern slavery and human trafficking, and to outline the Foundation Group's expectations.
- d. Monitoring completion of modern slavery training by team members when provided.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Foundation Group's slavery and human trafficking statement for the financial year ending May 2024.

Martin Glenn
Chairman

11 September 2024