



**COVENTRY CITY
FOOTBALL CLUB**

...LET'S ALL SING TOGETHER

OTIUM ENTERTAINMENT GROUP LIMITED

T/A COVENTRY CITY FOOTBALL CLUB

Modern Slavery and Human Trafficking Statement

2021/22 Season



#PUSB



Otium Entertainment Group Limited, trading as Coventry City Football Club
Sky Blue Lodge, Leamington Road, Ryton-on-Dunsmore, Coventry, CV8 3FL Telephone: 024 7699 1987

Email: info@ccfc.co.uk Website: www.ccfc.co.uk Tickets: www.eticketing.co.uk/ccfc Retail: ccfcstore.com

Registered Office: Otium Entertainment Group Ltd, trading as Coventry City Football Club, Sky Blue Lodge, Leamington Road, Ryton-on-Dunsmore, Coventry, CV8 3FL | Registered in England & Wales No. 7612487

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the 2021/22 Season and is published in accordance with section 54(1) of the Modern Slavery Act 2015.

The statement sets out OTIUM ENTERTAINMENT GROUP LIMITED T/A COVENTRY CITY FOOTBALL CLUB's ("The Club", "CCFC") commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Otium Entertainment Group Limited which are as follows:

- Otium Entertainment Group Limited
- Sky Blue Sports & Leisure Limited

The Company currently operates in England and plays football games throughout England & Wales and in European competition.

High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking:

- The Manufacture of CCFC football and training kit and associated CCFC branded products.

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

Policies: HR is responsible for creating and reviewing policies, which are endorsed by the Board. The process by which policies are developed is by looking at best practice and adapting to the needs of the Company.

Risk assessments: the Health and Safety Co-ordinator is responsible for risk assessments in respect of human rights and modern slavery.

Due diligence: The CEO and HR are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

We have:

- Implemented a policy that is made available to all business partners. This is published on our website www.cafc.co.uk so that it is easily accessible and demonstrates that we do not tolerate modern slavery and human trafficking. It also shows our commitment to acting ethically and with integrity in all of our present and future business relationships.
- Modern slavery provisions are incorporated into commercial contracts and our standard terms of trading to ensure that our business partners and suppliers are aware of our policies and comply with them.
- Carried out an initial risk assessment of our suppliers to identify specific industry risks.
- Ensured that the Senior Management team are aware and carry out due diligence on business partners and suppliers, prior to engaging them.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires the Senior Management Team to be trained and made aware of this policy.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes personal visits and building long-standing relationships with suppliers, making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier, invoking sanctions against suppliers that fail to improve their

performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company regularly reviews how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all relevant staff to have completed training on modern slavery and monitoring payroll systems.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

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| Update Responsibility: HR | Revision version: 3 |
| | Date for Revision: May 2022 |

Review History

| Number | Date | Review details | Authorised by: | Endorsed by Board |
|--------|----------|---------------------------------------|---------------------|----------------------|
| 1 | Aug 2019 | Development and creation of document. | Sandra Garlick (HR) | Tim Fisher, Director |
| 2 | Nov 2020 | Review and update | Sandra Garlick (HR) | Tim Fisher, Director |
| 3 | Jun 2021 | Review and update | Sandra Garlick (HR) | Tim Fisher, Director |