Aston Villa

Modern Slavery Website Statement

Introduction, organisation structure and supply chains.

This statement has been produced in accordance with the Modern Slavery Act 2015 ("**MSA**"). NSWE UK Limited is the holding company of a group of companies which include Aston Villa Football Club Limited, NSWE Sports Limited, Aston Villa Limited, Aston Villa FC Limited, Aston Villa Women's Football Club Limited and Aston Villa Foundation and this statement is made on behalf of that group of companies ("**AV Group**").

The AV Group includes a professional football club based in Birmingham, England, which participates in domestic and European football matches (the "**Club**"). The AV Group's main operations are UK based and it has a number of other business operations, other than but connected to football, including ticketing, retail, hospitality, commercial partnerships and community work.

Modern slavery is estimated to affect 40.3 million people worldwide, affecting every country including the UK. The MSA was introduced to try and combat modern slavery and covers four activities which are defined by reference to the European Convention on Human Rights being slavery, servitude, forced or compulsory labour and human trafficking. Commercial organisations who supply goods and services in the UK with a turnover of more than £36 million are required by law to produce a modern slavery statement setting out the steps they are taking to ensure that modern slavery and human trafficking are not taking place within their own business or supply chains.

The AV Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of its business.

Policies and practices.

The AV Group complies with all UK employment legislation for its employees and workers ("**staff**"). We recognise that we must treat our own staff fairly and within the law if we are to set an example for our suppliers and other third parties. To that end we have numerous policies and procedures in place to ensure that our staff are treated fairly and within the law.

We continue to strengthen our commitment to Equality, Diversity and Inclusion (EDI). We have achieved the Premier League Equality, Diversity and Inclusion Standard at the Intermediate Level, reflecting the progress we have made in building an inclusive culture. We are now working towards the Advanced Level, and work is already underway to achieve this. Alongside the EDI Lead, the Club have appointed an EDI Officer to support with the ongoing commitments. Our approach is guided by the Equality Act 2010, ensuring that every protected characteristic is respected and that discrimination has no place within our organisation. We also remain committed to fair employment practices, including paying all directly employed staff no less than the Living Wage Foundation rate.

We have an extensive suite of over sixty staff policies and procedures which cover the whole employee relationship starting at the recruitment stage and including areas such as core hours, flexible working, and equal opportunities and diversity.

In addition, we take our safeguarding of children and adults at risk duties very seriously and we have a strong safeguarding team backed up by a series of policies to protect children and adults at risk.

If a staff member is concerned about anything within our business or within that of our suppliers', we encourage them to raise concerns in accordance with our Whistleblowing Policy. Any issues raised would be treated in the upmost confidence and taken extremely seriously.

All policies are reviewed periodically or sooner if changes to law or practice dictate.

The AV Group also has a supplier Code of Conduct ("**Code**") which prohibits human rights abuses in our supply chain. Practices such as human trafficking, physical abuse of workers, restricting workers' freedom of movement, confiscation of passports and worker documentation, unsafe work environments, failure to pay adequate wages, excessive and/or forced overtime, illegal child labour, and many other aspects of worker welfare are addressed in the Code. The AV Group suppliers agree to follow our Code and to ensure that their suppliers also comply. From time to time, we may acknowledge and accept a supplier's code of conduct as equivalent to our Code.

The Code demonstrates AV Group's commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere in our supply chains. In addition, we include requirements to comply with the MSA in our purchasing terms and conditions. We have not previously audited our suppliers on compliance with the Code, however we are looking at whether we should do this in some specific areas, and if so, what form this audit should take.

Due Diligence processes.

In response to the global concerns and growing awareness around modern slavery, the AV Group set up a working group in 2021 to understand more about, and assess the risk of, modern slavery in the AV Group's supply chain and its operations. The working group meets periodically.

The working group sets out a road map of actions and aims for the upcoming year and beyond. Pursuant to that road map, the following actions have so far been undertaken:

- The working group uses the "Walk Free" Global Slavery Index (the "**Index**") to identify the categories of spend we have within the AV Group that could be at risk of modern slavery.

- While most of our spend categories are not identified as being those where exploitation is known to occur, we do have a few potentially high-risk categories;

    - Catering services;
    - Cleaning;
    - Clothing;
    - Food and beverages;
    - IT equipment, software and hardware;
    - Merchandise;
    - PPE;
    - Security Services.

- Working with key internal stakeholders and based on historical spend data, the working group will identify suppliers in these high-risk categories with an annual spend of £10,000 or above;

- These suppliers are then sent a questionnaire designed to determine what policies and procedures they have in place, and what measures they take to mitigate the risk of modern slavery occurring in their operations and in their supply chains. In addition, the working group also review the supplier's modern slavery statements to see what steps were reported as being taken in the last financial year;

- Supplier's responses are assessed on a weighted scoring matrix and this risk assessment enables us to identify any concerns and questions. Follow-up questions are issued, and discussions are held with medium-low scoring supplier's to better understand their responses and, where appropriate, make recommendations for improvement.

- Conducted a review of our existing supplier base to identify any other businesses where further information regarding modern slavery needs to be obtained;

- Started to investigate training options for suitable training at executive and staff level to ensure that key and relevant individuals within the AV Group are aware of the AV Group's commitment to eradicating modern slavery.

- Developed a new and more comprehensive Modern Slavery Questionnaire and scorecard with more focus on the recruitment and management of staff in addition to an assessment of their supply chains.

The working group further identified the following objectives to undertake in the upcoming twelvemonth period and beyond:

- Keep the existing supplier base under review to identify any other businesses where further information regarding modern slavery needs to be obtained;

- Assess whether the AV Group should conduct audits of its suppliers for compliance with the MSA and, if so, what form this should take;

- Continue to broaden awareness of modern slavery within the AV Group. Identify suitable training at executive and staff level to ensure that key and relevant individuals within the AV Group are aware of the AV Group's commitment to eradicating modern slavery;

- Further engage with the AV Group's Academy to facilitate training and awareness of modern slavery in the player recruitment and training process. We recognise that the recruitment of players into our Academy is potentially a high risk area for modern slavery. Unscrupulous individuals have the potential to use the Club's name to lure unsuspecting young people into the UK or sports sector with false promises;

- Produce and issue a new set of key performance indicators to enable us to assess the effectiveness of the steps that are being taken.

- To issue a newly developed Modern Slavery Questionnaire to all suppliers in high-risk categories with a spend in excess of £10k PA. The responses will be assessed against the new scorecard to identify if any follow-up action is necessary.

Risk assessment and management of suppliers.

If we were to discover a violation of our Code, we would respond in a manner commensurate with the nature and extent of the violation. "Critical violations" require immediate and decisive remedial action and may result in the termination of the business relationship. For less serious violations, we would allow the supplier a reasonable time to develop and implement a remediation plan. In those instances, we will conduct follow-up audits to monitor progress against the remediation plan.

In general, we would prefer to work with the supplier to correct violations rather than immediately terminating our relationship. Termination is unlikely to correct the underlying issue and may cause further hardship to workers and their families who depend on the employment. However, if the supplier fails to make satisfactory progress toward improvement, we will consider ending our business relationship with that supplier.

We also encourage anyone who is aware of violations of the law or our Code to notify their Line Manager or the AV Group's Legal Department in confidence.

Key performance indicators to measure the effectiveness of the steps being taken.

The AV Group recognises that whilst it has taken some important key steps forward in tackling modern slavery, there is more that is to be done in the future.

We have a set of key performance indicators to assess the effectiveness of the steps being taken and they will be updated to include the targets for next year.

Training on modern slavery and trafficking.

The members of the working group have been looking at further training options which may be suitable for both the working group and other individuals within the Club. The AV Group recognises that it will need to expand the number of individuals who will be required to undertake training on modern slavery. This is one of the objectives in the roadmap for the upcoming twelve-month period.

Statutory statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the AV Group's slavery and human trafficking statement for the financial year ended 31 May 2025. This statement was approved by the Board in April 2026.



NSWE UK Limited

9 April 2026