

# THE JOCKEY CLUB

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

This statement is made on behalf of The Jockey Club and relates to The Modern Slavery Act 2015 for our financial year ending 31<sup>st</sup> December 2016. The Jockey Club has a zero tolerance approach to modern slavery of any kind within our operations and supply chain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees are encouraged to report concerns using our Whistle Blowing policy and management are expected to investigate, and where necessary act upon, these concerns.

### OUR BUSINESS AND SUPPLY CHAIN

The Jockey Club has been at the heart of British Racing for many years and today is the largest commercial group in the sport, comprised of four main operating brands, which between them mean we are involved in virtually all aspects of the British Racing Industry. These are:

- Jockey Club Racecourses – our racecourse arm
- Jockey Club Estates – our training grounds and estate management
- The National Stud – our breeding and educational arm
- Racing Welfare – our charity

We are also unique for a commercial business in that we don't make profits for shareholders. Instead we invest all profits back into the sport to support its long term health so British racing will continue to be enjoyed by millions for many years to come. The Jockey Club employs over 550 permanent people in various locations across the UK. In addition, there are thousands of temporary workers employed directly or indirectly by our partners and suppliers to service peaks of high demand at major horse racing meetings and other events.

In recent years sustainable and ethical principles have become increasingly important to us which are reflected in our supply chain. Our products and services are primarily sourced via UK providers. Approximately half of our supplier spend is managed on a group basis with the remainder being procured at a more local level. We also have joint ventures with key providers including catering. We expect the joint venture managements to share our intolerance on Modern Slavery and Human Trafficking.

## **POLICIES AND CONTRACTUAL CONTROLS**

Relevant internal policies include Environmental, Health & Safety, Whistleblowing, Equal Opportunities, Sustainability, Bullying and Harassment, and Purchasing amongst others and provide a means of raising concerns, and as appropriate redress without fear of reprisal. Our management structure for each site ensures that we can directly implement our policies and procedures, conduct appropriate training and monitor compliance.

In addition, our group purchasing policy now requires evidence of a suppliers' sustainability and ethical values (including compliance with the Modern Slavery Act 2015). We intend to advise all our contractors of our commitment to the principals of The Modern Slavery Act 2015 and expect them to do the same. Any breach of the Act with any supply agreement can be expected to result in immediate termination.

Our supply chain has two strands, those mandated to supply all our racecourses and who are generally larger and contracted under bespoke group commercial terms. All our other suppliers are subject to standard TJC terms and conditions.

## **FURTHER STEPS**

We are working towards mapping the supply chain to assess risk and developing strategies to manage risk.

Our objective is to ensure our supply chain meets these expectations:

- Employment is freely chosen
- Freedom of association and right to collectively bargaining respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Working hours are not excessive
- No discrimination is practiced
- No harsh or inhumane treatment is allowed

Additionally, workers must not pay deposits for work and employers must not keep originals of identity documents.

Our long term target is to ensure all our suppliers meet these standards by complying with this criteria. The first steps in achieving this are to work with our current group supply chain and then to cascade to non-group suppliers identified by our risk analysis.

Notwithstanding this requirement, our suppliers often have their own complex supply chains and consequently, it is challenging to monitor or control the working conditions of

individual suppliers. However we are keen to reduce supply chain complexity to more easily identify and mitigate risk as the policy develops.

### **ASSESSMENT OF EFFECTIVENESS IN PREVENTING MODERN SLAVERY**

We understand that Modern Slavery risk is not static and will continue to mitigate this risk on an on-going basis.

In addition we will review and assess the effectiveness of our policy annually and take appropriate action, if required.

Areas for consideration:

- Employee training levels
- Supply chain communication
- Supply chain auditing
- Investigations into reports of Modern Slavery and remedial actions taken
- CEO to write to suppliers emphasising our commitment to the Act
- PO document to include MSA agreement from suppliers

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 for the financial year to 31<sup>st</sup> December 2016.

A handwritten signature in black ink, appearing to read "Simon Bazalgette". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Signed by Simon Bazalgette, CEO of The Jockey Club

Date: 10<sup>th</sup> April 2017