

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 31st December 2018. 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 600 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 predominantly sourced via UK providers. 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. E.g. Jockey Club Catering is a joint venture with Compass Group UK, an organisation with an equally strong stance.

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.

All Employment Contracts and Casual Worker Agreements since 2016 include reference to MSA15 and The Jockey Club's compliance with it. All employees who have contracts pre-dating 2016 have received information regarding the Act and particularly drawing attention to the Whistleblowing policy. The information is available in The Jockey Club's Employee Handbook and on The Jockey Club's intranet.

Our group purchasing policy requires evidence of a suppliers' compliance with MSA15. In 2017 we received confirmation that our top 80% of supplier by spend comply with the Act. Our requirement to comply with the Act has been written in to our standard terms and conditions as well as larger group contracts meaning that all new suppliers are bound by the requirement as well as capturing current suppliers when they renew their contracts. It has been made clear to all suppliers that any breach of our agreement could result in immediate termination of that contract.

FURTHER STEPS

We recognise that our suppliers can have complex supply chains and consequently it is challenging to monitor or control the working conditions of individual suppliers. We aim to reduce supply chain complexity to enable easier facilitation of these risk factors. We are assessing which organisations fall in to the highest risk and assessing how best to further challenge these suppliers to ensure they are committed to the Act.

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
- The new supplier form includes a link to MSA information for our suppliers

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 for the financial year to 31st December 2018.

A handwritten signature in blue ink, appearing to read 'S. Bazalgette', is centered on the page.

Signed by Simon Bazalgette, CEO of The Jockey Club

Date: 16th April 2019

