



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

1. INTRODUCTION

Marylebone Cricket Club (**MCC** or the **Club**) maintains a zero-tolerance stance on modern slavery, a crime that violates basic human rights, and manifests in various forms such as slavery, servitude, forced labour, and human trafficking (**Modern Slavery**).

Combating the risk of Modern Slavery is an integral part of the Club's environmental, social and governance (**ESG**) programme, as it continues to prioritise responsible and ethical sourcing and working to prevent Modern Slavery within its organisation and supply chain.

In compliance with Section 54 of the Modern Slavery Act 2015 (the **Act**), this statement outlines the actions and initiatives undertaken by MCC during the financial year ended 31 December 2024.

2. ABOUT THE CLUB

MCC is a renowned private members' club, owner of an international cricket ground and is the most active cricket club globally. Founded in 1787 and incorporated by Royal Charter on 1 July 2013, MCC is the owner of Lord's Ground and the guardian of the Laws and Spirit of Cricket.

The MCC Committee is responsible for managing the property, funds, and affairs of the Club in accordance with the Club's Rules. An executive team, accountable to the Committee, handles day-to-day administration and operations.

For more information about MCC, visit the Club's website at www.lords.org.

3. MCC'S SUPPLY CHAINS

MCC recognises the importance of oversight across its supply chains to understand and mitigate risks of Modern Slavery.

MCC's supply chains include ticketing, hospitality, food and beverage, technology, retail, licensing, catering, and other services such as construction and maintenance. Many of these sectors involve the engagement of workers.

While MCC's suppliers are primarily based in the UK, the Club acknowledges that certain goods and services may pose heightened risks of labour rights' violations based on geographical location and supply chain complexity.

As a result, MCC remains committed to conducting its business ethically and with integrity, and to implementing and enforcing robust processes and controls to prevent Modern Slavery within its business and supply chains.

4. SUPPLIER SET UP AND ONGOING MANAGEMENT OF RISK

The Club is committed to ensuring that third parties with whom it engages uphold high ethical standards. MCC's due diligence and ongoing processes and controls are designed to identify and assess potential risks within its business and supply chains, monitor these risks, and prevent the occurrence of Modern Slavery.

Prior to any formal engagement by the Club, new suppliers are required to complete a Modern Slavery Questionnaire to confirm adherence to safe working conditions, dignified treatment of workers, ethical practices, and legal labour usage. This Questionnaire is scrutinised by the Procurement Manager and, if required, the Legal Department. As part of this review, the Procurement Manager also considers areas vulnerable to Modern Slavery by assessing geographical risks and consulting resources like the Global Slavery Index and Freedom House to evaluate third parties' labour standards and compliance.

If a risk is identified, the Club will seek to engage with the supplier to investigate further and attempt to resolve concerns. If this is not possible, the Club may refrain from further professional engagement and the issue of any formal contract.

All contracts with third parties are drafted, or scrutinised and updated where necessary, to include provisions that address the risk of Modern Slavery. Contracts require:

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- (a) compliance with the Act, and place similar requirements on the supplier's own suppliers;
- (b) immediate notification to MCC of any Modern Slavery in their own business and/or supply chains;
- (c) a commitment to human rights and having policies and practices in place to comply with applicable laws and regulations;
- (d) a requirement to monitor changes to social factors, including human rights, and to take reasonable steps to implement such changes to social measures to ensure compliance and best practice; and
- (e) MCC's prior written authorisation for sub-contracting.

Any breach of these contractual provisions gives MCC the right to terminate the supplier relationship with immediate effect.

5. **POLICIES AND OTHER RELEVANT DOCUMENTS**

To support its commitment to combating Modern Slavery, the Club has various policies in place and which are reviewed and updated as appropriate, for example:

Invitation to Tender	As part of any Invitation to Tender to be a supplier, there is a requirement to answer questions about compliance with the Act, which is considered as part of the overall return, and is an important factor when determining whether the third party is awarded business with the Club.
Recruitment / Agency Workers' Policy	The Club ensures that it only uses reputable employment agencies to source labour and annually requests and reviews details of an agency's pre- screening / verification processes regarding: (i) identity; (ii) nationality and immigration status (including entitlement to undertake the work in question); (iii) employment history and references; and (iv) unspent criminal convictions, before accepting workers from an agency.
Staff Code of Conduct	This code outlines expected actions and behaviour for all staff when representing the Club. The Club strives to maintain the highest standards of conduct and ethical behaviour when engaging with, and managing, its supply chains.
Supplier Code of Conduct (Code)	<p>The Code sets out the behaviours and minimum standards that MCC expects of its suppliers. The focus is primarily on employment and working conditions, environmental practices and general ethical business practices, including Modern Slavery. It forms a key part of the Club's ESG strategy.</p> <p>The Code also requires suppliers to carry out appropriate due diligence on any prospective supplier/sub-contractor which forms part of their supply chain to investigate their stance and actions on human rights, treatment of workers, risk assessments for countries from which materials, components or finished goods are sourced and ensuring the supplier/sub-contractor can also meet the requirements set out in the Code.</p> <p>Current suppliers are required to provide annual written confirmation to the Club that it has appropriate systems in place to monitor compliance with the Code.</p>
Whistleblowing, Health & Safety, Safeguarding, Grievance and Harassment &	These policies reinforce the Club's commitment to supporting safe practices and ensuring it has open and transparent grievance and reporting processes for all staff.



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Bullying and Sexual Harassment Policies.	Staff are encouraged to report any concerns related to the Club's activities and/or its supply chains. This includes any circumstances that may give rise to an enhanced risk of Modern Slavery. The Club also seeks to raise awareness of these policies so that staff know what it is doing to promote their welfare.
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Any breach of any of these policies may result in the immediate termination of any engagement.

6. **AWARENESS AND TRAINING**

The Club provides Modern Slavery training to new employees during its employee induction programme.

Training covers:

- (a) an explanation of Modern Slavery and reporting requirements under the Act;
- (b) MCC's efforts to prevent it in its operations and supply chains;
- (c) the benefits of rigorous measures to tackle Modern Slavery and the consequences of failing to eradicate Modern Slavery from MCC's business and supply chains;
- (d) how to identify the signs of Modern Slavery;
- (e) employees' reporting responsibilities; and
- (f) an assessment to confirm each employees understanding.

7. **CONTINUED COMMITMENT AND FURTHER STEPS**

The Club continually reviews the effectiveness of its actions against Modern Slavery. Future initiatives include:

- (a) enhanced oversight and auditing rights for high-risk suppliers;
- (b) ongoing identification of emerging supply chain risks;
- (c) regular monitoring of suppliers for compliance and best practices; and
- (d) refinement of policies, procedures and contractual entitlements.

This statement was approved and signed on behalf of the Club by for the financial year ended 31 December 2024:

Robert Lawson
Chief Executive & Secretary
Marylebone Cricket Club