

SCOTTISH RUGBY LIMITED MODERN SLAVERY ACT 2015 SLAVERY AND HUMAN TRAFFICKING STATEMENT

Scottish Rugby Limited falls within the ambit of the Modern Slavery Act 2015.

This Statement is published in accordance with the requirements of Section 54 of that Act. It provides a brief explanation of: Scottish Rugby's structure, business and supply chains; the approach taken to assessing and managing risk; steps taken in relation to suppliers and the supply chain; policies and values which are considered relevant to the issue of modern slavery and human trafficking; training of relevant staff and reporting.

The term 'modern slavery' used in this statement includes slavery, servitude, and any type of forced or compulsory labour and human trafficking.

Structure, business and supply chain

Scottish Rugby Limited is the main operating company of the Scottish Rugby Union, which is the governing body of the sport of rugby union in Scotland. The organisation derives its revenues largely from the sale of tickets to attend international and professional team rugby matches, sponsorship, broadcasting, provision of hospitality and payments from international bodies of which the organisation is a member.

Almost all of our operations are conducted in the UK. With the exception of retail and merchandising, supply chains are short and predominantly service-based, with the point of delivery of service within Scotland. Retail merchandising does involve the manufacture, through the organisation's external contractor, Macron, of goods, particularly clothing, overseas.

Our work is underpinned by our strong values and our commitment to equality, diversity and inclusion.

For further information about Scottish Rugby Limited, its organisational structure and operations, please see: <http://scottishrugby.org/about-us>.

Assessing and managing risk

Scottish Rugby is committed to having systems to safeguard against modern slavery existing within our business and supply chains. We have reviewed our operations and our supply chain to assess the risk of modern slavery taking place taking into account a number of factors, including the nature of our activities, their location, the sources from which we are supplied goods or personnel and the risk profile of relevant locations.

Many of the organisation's activities are outsourced, we have decided to continue to focus our attention on those elements which incorporate the provision of hospitality services, retail and merchandising and the provision of stewarding services. These are the areas which are considered, in the context of the business as a whole, to be most relevant to issues surrounding modern slavery and human trafficking. Taking account of the small number of suppliers involved, the detailed contracts and service agreements in place and the well-established and reputable nature of the contractors, that risk is itself considered to be small.

However, we remain vigilant for any suspected instances of forced labour across all aspects of our business and we expect our supply chain to operate fair and equitable practices whereby forced labour is not tolerated.

Due diligence processes with suppliers and the supply chain

We seek to partner with suppliers that share our values, and we expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated.

Our contracts contain provisions requiring compliance with applicable laws and, as appropriate, good industry practice. Failure to adhere can ultimately result in termination. The contractual terms and conditions that we put in place with our suppliers are regularly reviewed.

It has been recognised that garment manufacturing overseas may carry with it a greater risk in relation to the treatment of labour. Ahead of re-engaging with our retail service provider in 2019, our supplier was required to sign a specific Code of Conduct which includes confirmation that they comply with the Modern Slavery Act 2015 and must apply that Code of Conduct to its own suppliers. The renewal process also allowed us to review the supplier's policies, procedures, processes and values before re-engaging them and . we continue to monitor their working practices as our contractual relationship continues.

A senior manager of Scottish Rugby experienced in the merchandising industry has regularly visited supplier factories in China in previous years to inspect working conditions and worker welfare at several facilities operated by the retail service provider's suppliers. The results from those visits have been satisfactory and were reported to Scottish Rugby's Board of Directors following each visit. Due to the pandemic, we have been unable to travel to audit our suppliers in person over the past couple of years, however we have utilised globally recognised third party auditors to carry out these checks on our behalf and these audits will continue in 2022/23. We hope a member of Scottish Rugby will be able to carry out a factory visit over the course of this season.

Tender processes involve specific consideration of whether there is a risk of slavery or human trafficking and seek additional supplier or contractor assurances where that risk is identified. Our Procurement department have received training in identifying potential risks regarding slavery and human trafficking.

We use the following methods to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We deal with well-established reputable organisations on a long-term basis with service level agreements and requirements to adhere to applicable laws and good practice Scottish Rugby has taken some steps towards satisfying itself that modern slavery and human trafficking is not occurring in its supply chain.

We continue to review statements published by our suppliers on the use of forced labour to ensure that they in turn are taking what appear to be appropriate steps.

Maintain communication and personal contact with our supply chain to ensure their understanding of, and compliance with, our expectations.

Further steps, including formal contractual warranties and indemnities and additional rights of inspection of workplaces and records are likely to be introduced where appropriate into new contracts and on contract extension to provide greater assurance in future.

Policies and Values

Scottish Rugby has a number of well-publicised core values: Leadership, Enjoyment, Achievement, Engagement and Respect. In pursuit of these a number of policies exist which are relevant to the area of modern slavery and human trafficking but these do not yet specifically address the subject. These include a policy on Inclusion Diversity & Wellbeing Policy, a probity policy which encourages the reporting of improper or unethical business practices and Whistleblowing. As part of the regular review of policies specific reference to slavery and human trafficking will be introduced where appropriate.

Scottish Rugby has robust procedures for recruiting people. The organisation has a permanent full time People department with professionally qualified employees who manage recruitment and employee management processes. Job vacancies are subject to internal approvals of terms and conditions and pay. Most recruitment of non-playing people is through direct application to Scottish Rugby; recruitment consultants and agencies are used sparingly. Applicants are encouraged to complete equality and diversity questionnaires as part of the recruitment process and references are checked with previous employers. Scottish Rugby is a registered sponsor with the Home Office and takes particular care in the recruitment, employment, resettlement and integration of foreign workers.

Training

Specific training focussed on the issue of modern slavery and human trafficking has been carried out for those considered to be most likely to have an exposure to the issues involved, principally employees dealing directly with the main suppliers and contractors mentioned above, in procurement, finance and people department. The aim of this training has been to increase awareness of human slavery issues and to help those colleagues understand them and be alert to relevant indicators, their particular relevance to Scottish Rugby, and their role in managing them in accordance with our values. As policies are updated and communicated, the organisation will continue to provide and reinforce training as required. Employees have also been provided with training in relation to the policies in place and the wider values of Scottish Rugby. This has included an award-winning training programme for managers and leaders within the business which includes, among other things, principles of equality, inclusion and diversity and a number of other areas of employee welfare and behaviour.

Refresher training will be carried out with key people over 2022/23.

Reporting

The organisation reports both to its Board of Directors and, as appropriate, a designated Audit and Risk Sub-Committee in relation to a number of areas including probity, combatting fraud and whistleblowing. The Board's Safeguarding, Wellbeing, Diversity and Inclusion Committee


over the course of the coming year will become the ESG Committee, the remit of which specifically covers other issues of slavery and human trafficking.

Scottish Rugby's Continued Commitment to Tackle Modern Slavery

Scottish Rugby recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains, and to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field.

We will continue to work with our commercial partners to better understand their processes and policies to prevent modern slavery within their organisations and supply chains and will continue to assess the effectiveness of the measures we take and we will regularly review and refine our policies and procedures in relation to modern slavery.

This statement was approved on behalf of the Board of Directors on 29 November 2022.

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Lesley Thomson

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