



Modern Slavery and Human Trafficking Policy

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to seek to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of our contracting processes with high value or high risk suppliers, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and external consultants.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 2.2 The primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery are split between the Head of Legal and Head of People and Culture as follows:

Head of Legal- supply chain
Head of People and Culture- employees and contractors or other "workers"
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Head of Legal or Head of People and Culture.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.

- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our BHA business or supply chains of any supplier tier at the earliest possible stage.
- 3.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Head of Legal or Head of People and Culture or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.5 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Head of Legal or Head of People and Culture or report it in accordance with our Whistleblowing Policy.
- 3.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of People and Culture without delay.

4. Communication and awareness of this policy

- 4.1 Training on this policy and on the risk our business faces from modern slavery in its supply chains will be rolled out in 2020.
- 4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Interaction with other policies

Safeguarding

If your concern relates to welfare or harm or abuse of young people or adults at risk, reporting concerns to the BHA's Lead Safeguarding Manager may be more appropriate via safeguarding@britishhorseracing.com. Further details regarding the BHA's safeguarding policy can be found at <https://www.britishhorseracing.com/regulation/safeguarding/>. If in any doubt, report your concerns either via the safeguarding procedure or the Whistleblowing Policy.

Employee grievances

Separately, if you are an employee of the BHA and you have a complaint or personal grievance relating to your position or personal circumstances, you should refer to the BHA's Grievance Procedure, available via the HR Policy Area on Workplace.

Integrity of the sport

This policy covers concerns relating to modern slavery or human trafficking within the BHA as an organisation or within its supply chains. This policy does not cover other people or organisations involved in racing, notwithstanding that such entities or persons may be licensed or registered with the BHA, e.g. Jockeys, Trainers and Owners. However, the BHA

operates RaceWISE a reporting line, aimed at encouraging both members of the public and the racing industry to come forward with information about any wrong doing in the sport of horseracing, details can be found at <https://www.britishhorseracing.com/RaceWISE/> and reports can be made online or via 0800 085 2580.

5. Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.