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| <b>SECTION</b>          | People and Culture             |
| <b>POLICY</b>           | Anti-Slavery Policy            |
| <b>DATE OF CREATION</b> | February 2024                  |
| <b>VERSION</b>          | 1                              |
| <b>DATE OF ISSUE</b>    | 1 <sup>st</sup> September 2026 |
| <b>DATE OF REVIEW</b>   | 31 <sup>st</sup> August 2027   |

## 1. Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Club Doncaster takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers, and other business partners, we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all individuals who work for us or on our behalf in any capacity, including Employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy is not part of any Employee's employment contract, and we reserve the right to change it at any time.

## **2. Policy responsibilities**

Club Doncaster is ultimately responsible for ensuring that this policy conforms to our legal and ethical commitments, as well as that all people under our control abide by it.

Club Doncaster is in charge of implementing this policy on a daily basis, monitoring its usage and effectiveness, and dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels are responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get proper and ongoing training on it and the subject of modern slavery in supply chains.

Feedback and suggestions for the improvement of this policy are welcomed.

Any comments, suggestions or queries are encouraged and should be addressed to the HR and Safeguarding Manager.

## **3. Policy compliance**

You must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our Company or supply chains is the duty of everyone who works for us or is under our authority. Refrain from engaging in any action that might lead to or imply a violation of this policy.

If you have reason to believe that a conflict with this policy has occurred, is happening, or may occur in the future, please contact your line manager or a business director as soon as possible. You are urged to express concerns about any issue or suspicion of modern slavery in any aspect of our business or any supplier tier's supply chain as soon as possible.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you have any doubts about whether a specific act, the treatment of employees in general, or their working circumstances inside any tier of our supply chains represents any of the numerous types of modern slavery, please contact your line manager or a company director.

We want to promote transparency and will assist anybody who expresses serious concerns in good faith under this policy, even if those worries turn out to be incorrect.

We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any section of our own business or in any of our supplier networks.

Dismissal, disciplinary action, threats, or other unfavourable treatment as a result of voicing a concern is considered detrimental treatment. If you suspect you have been subjected to such treatment, you should immediately notify your line manager. If the problem is not resolved, and you are an Employee, you should file a formal complaint.

#### **4. Communication and awareness**

Training on this policy, as well as the threat our Company faces from modern slavery in its supply chains, is part of the induction process for all new Employees, and updates will be offered through established channels of communication between the Company and you.

Our zero-tolerance stance to modern slavery must be conveyed to all suppliers, contractors, and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

#### **5. Non-compliance**

Breaches or abuse of this policy will be subject to investigation and, if necessary, dealt with under Club Doncaster's Disciplinary Policy and Procedure.

#### **6. Changes to this policy**

This policy/procedure does not form part of any Employee's contract of employment, and it may be amended and reissued at any time.

This policy will be reviewed annually.