

Lawn Tennis Association Limited's Modern Slavery and Human Trafficking Statement

Introduction

This statement has been published in accordance with the UK Modern Slavery Act 2015, which requires businesses to disclose the steps they are taking to tackle slavery, servitude, forced or compulsory labour and human trafficking (together known as modern slavery).

It covers the six areas outlined in the Home Office guidance:

1. Organisation structure and supply chains;
2. Policies in relation to slavery and human trafficking;
3. Due diligence processes;
4. Risk assessment and management;
5. Key performance indicators to measure the effectiveness of steps being taken; and
6. Training on modern slavery and trafficking.

Our statement sets out the steps taken by Lawn Tennis Association Limited ("LTA") to prevent modern slavery in its business and supply chain for the financial year ending 31 December 2022.

The LTA is committed to having practices to combat modern slavery and human trafficking and to implementing robust systems to try to ensure that we and our supply chains are free from modern slavery and human trafficking.

LTA's Structure and Supply Chain

We are a limited liability company that operates as the national governing body for tennis in Great Britain, the Channel Islands and the Isle of Man. The LTA carries out a wide variety of activities which include the staging of tennis tournaments, the organisation of national campaigns and coaching programmes to encourage tennis participation.

The LTA has an Executive Team which is charged with the day-to-day operation of the LTA. The LTA's Board of Directors determines the strategy of the LTA on the basis of proposals submitted by the Executive Team. More details about the LTA's governance structure can be found [here](#).

The LTA uses a wide range of suppliers to fulfil its objectives as a national governing body. Having considered our wider supply chain, it is our view that the supply chains that present an enhanced risk of slavery or human trafficking include our clothing and equipment suppliers and our food and drink suppliers. We are developing the LTA's approach to monitoring and addressing potential modern slavery and human trafficking so that the implementation of measures we adopt, both internally and in the supply chain, is proportionate and appropriate to the assessment of risk.

Our policies on slavery and human trafficking

Given the nature of the LTA, the importance of ethical behaviour in all aspects of our business is a very high priority. In order to provide the foundation for ensuring that the LTA lives by high ethical standards we live by a number of formal policies, including:

- Equality and diversity policy
- Immigration endorsement policy
- Privacy policy
- Disclosure and barring service policy
- Safeguarding and protection in tennis policy
- Tennis coach qualification policies and procedures
- Transgender policy

All of the above can be accessed from the LTA website.

In the context of modern slavery and human trafficking, as part of our drive to safeguard against modern slavery and human trafficking in our supply chains, or in any part of our business, we have adopted a Modern Slavery and Human Trafficking Policy. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes

Our due diligence process to ensure all those in our supply chain and our contractors comply with our values includes:

- The incorporation of provisions in our supply contracts to require compliance with prevailing modern slavery and anti-human trafficking legislation and guidance; and
- Raising enquiries with suppliers when onboarding them about their practices and how they guard against the risk of modern slavery and human trafficking in their businesses and supply chain.

If the LTA identifies a risk of modern slavery or human trafficking within the business of a supplier or potential supplier, we will investigate these risks further. The LTA may require that the relevant supplier provides further information to enable the LTA to further investigate the concerns and/or to take measures so that the LTA can be satisfied that the relevant supplier has properly addressed such risks.

Failure by a potential supplier to satisfy the LTA that it has sufficient protections in place to manage the risks of modern slavery and human trafficking may result in the LTA declining to engage the supplier. The LTA also reserves the right in its supply contracts to terminate the same in the event the contract counterparty fails to comply with its contractual obligations in relation to modern slavery and human trafficking.

Risk assessment and management

We have a substantial supply chain and so we take a risk-based approach to human rights and modern slavery risks. We propose to carry out a detailed risk and gap

assessment to ensure we understand where salient risks are most likely to appear in our supply chain and business.

As part of our risk management our [Whistleblowing Policy and hotline system](#) enable staff and suppliers to report any concerns, including about modern slavery and any other human rights violations, securely and without fear of recrimination.

Our confidential whistleblowing hotline is available to all employees and suppliers. All reports to the hotline are reviewed and, where necessary, investigated. All cases are thoroughly investigated and the outcome is reported to the Executive Team. The Board of Directors will also receive reports on whistleblowing cases and trends. There were no reports relating to modern slavery made via our whistleblowing line in the 2022 financial year.

Employees learn about our hotline through our staff training including guidance on the types of issues they can report.

Key performance indicators to measure effectiveness of steps being taken

We keep the developments in applicable law under review as well as relevant governmental guidance. We also share best practice within peer organisations who have a governance role in national sports. We strive to remain in step with all developments in law and best practice and to an extent we use that as a benchmark for the effectiveness of the steps we take.

We also set ourselves goals for improvement and measure our performance by the attainment of those goals. We set out below some of the initiatives we will be evaluating in the forthcoming year that are specific to our programme to defeat modern slavery and human trafficking.

Training

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have implemented and continue to ensure mandatory training for all staff members to ensure that staff members are aware of the risks associated with modern slavery and human trafficking and question suppliers where relevant.

Future Modern Slavery and Human Trafficking projects:

In the next year we will evaluate, and where appropriate, adopt:

- Advanced level staff training on the issues and risks around modern slavery and human trafficking, for staff members with management responsibilities, in areas that may most come into contact with the potential for modern slavery and human trafficking;
- The implementation of ethical risk assessment processes;
- Targeted auditing of higher risk suppliers to assure ourselves that they are not tainted by modern slavery and human trafficking and that their procedures policies and processes are suitably robust;

- The introduction of a supplier Modern Slavery Questionnaire to provide self-certification on an annual basis for all material and all higher risk suppliers to the LTA; and
- A Supplier Code of Conduct to underscore the importance of ethical business practices.

This statement is made by the Lawn Tennis Association Limited pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022

A handwritten signature in blue ink that reads "L. Mervyn Davies". The signature is written in a cursive style with a large, stylized 'D'.

Lord Davies

Chairman of the Lawn Tennis Association Limited

Date: 7 December 2022