



## **ETHICAL TRADING POLICY**

### **1. POLICY STATEMENT**

- 1.1 This policy sets out position and procedures of Celtic Plc and its subsidiary, Celtic FC Limited, (together the “Celtic Group”) in relation to modern slavery.
- 1.2 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. The Celtic Group has a zero-tolerance approach to modern slavery and 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 ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 We are committed to ensuring there is transparency in our own business and in our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.4 We undertake and we require all direct suppliers to undertake that the risk of modern slavery is minimised by ensuring that: working conditions are safe and hygienic and that safety is effectively managed; employment is freely chosen and no forced or bonded labour is used; labour practices do not involve the harsh or inhumane treatment of employees; exploitative child labour is not used; fair and reasonable wages are paid to employees and working hours are not excessive; employees’ rights to trade union membership and collective bargaining are respected; and that no discrimination is practised.
- 1.5 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, external consultants, third-party representatives and business partners.
- 1.6 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 relevant Board of Directors for each company within the Celtic Group 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 Compliance Manager for the Celtic Group is the Company Secretary of Celtic Plc. The Compliance Manager has 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.

- 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 Compliance Manager.

### **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 We contractually require our suppliers to comply with this policy and all laws relating to modern slavery. We expect that our suppliers will hold their own suppliers to the same high standards. We retain the right to audit our suppliers once a year, if necessary, to satisfy ourselves of compliance.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the Compliance Manager or report using the hotline number promoted by [www.modernslavery.co.uk](http://www.modernslavery.co.uk) – 0800 0121 700. If you think someone may be in immediate danger call 999.
- 3.6 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 the Compliance Manager.
- 3.7 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 Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

**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, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

**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 and our suppliers if they breach this policy.