

Modern Slavery and Human Trafficking Statement

Introduction

The International Tennis Federation (“ITF”) is committed to understanding all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains. This statement is prepared for the purposes of Section 54(1) of the Modern Slavery Act 2015 and relates to actions and activities during financial year ending 31 December 2018. This is our first statement of this nature, and in it we identify what processes we already have in place, as well as what further actions will be taken to review and improve our practices in this important area.

1. Our business and supply chains

The ITF is the governing body for tennis worldwide, and consists of ITF Limited (registered in the Bahamas) and ITF Licensing UK Ltd (registered in England and Wales). The ITF is headquartered in London. Our business activities include, but are not limited to, the administration and regulation of the game of tennis, the organisation of international competitions, the development of tennis through a global development programme and the promotion of the game through television, PR, marketing, event management and sponsorship activities. Our day-to-day operations and strategic direction are determined by both our Executive Team and ITF Board of Directors. More information on our structure is available [here](#).

We aim at all times to carry out our business in full compliance with applicable local law and best practice. That includes, but is not limited to, proper respect for human rights and a commitment to combating abuses of those rights, whether through human trafficking, slavery, child labour or otherwise.

We use a number of UK suppliers for the sourcing of merchandise related to our competitions and activities. We also source tennis-specific equipment that is used in our development work and competitions. The remainder of our suppliers are standard business-to-business suppliers, delivering services such as IT, consulting, transport, and logistics. The majority of our employees are employed on a permanent basis.

The majority of our competitions are delivered by our national associations or third-party organisers, pursuant to our competition regulations and sanctioning requirements but not individually contracted as suppliers of our services. We contract directly with the organisers of our individual and team championships.

2. Policies

We have strong human resources policies in relation to pay, conditions, and benefits which ensures good treatment of our employees. Our employees are not represented by an employee union, but individuals are free to join a union if they wish. We benchmark our working conditions against industry best practice. We also have existing policies and procedures relating to procurement, grievances, disciplinary issues and whistleblowing.

We are confident that these are sufficient to allow and encourage any employee with relevant information about modern slavery or human trafficking to come forward without fear of retaliation and also to allow the ITF to take any necessary corrective action immediately. The publication of this statement will also encourage those external to the ITF to speak up if they have any concerns.

We will review our policies in 2019 following our risk assessment (see below), to identify whether further policies (or amendments to existing policies) are required.

3. Risk assessment, prevention and mitigation

The ITF will complete its modern slavery risk assessment during 2019, and the outcome will be reported in our next statement. However, we have reviewed guidance in the Beyond Compliance report published by CORE Compliance, and believe that our purchase of tennis equipment and merchandise are the primary risk areas in relation to our activities, given the widely acknowledged existence of poor practices in manufacturing and the compounding of that risk through lengthy supply chains. The remainder of our activities do not rely on complex supply chains, agency/subcontracted workers, labour recruiters, low profit margins, cheap or unskilled labour, and therefore are low risk. Modern slavery is recorded as a risk on our organisational risk register. Our Finance and Administration department, and our Legal department, have responsibility for compliance, and report to the Finance and Audit Committee.

4. Due diligence processes

Our suppliers

The ITF undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. From 2019, this will include specific review of modern slavery and human trafficking risks, where needed according to the risk assessment we will conduct.

Our due diligence will include:

- a contractual requirement to be introduced on new or renewed contracts for certain suppliers (such as manufacturers or suppliers of equipment) to comply with applicable anti-modern slavery and anti-human trafficking legislation;
- clarification from certain suppliers, where requested and appropriate, about their practices and how they protect against the risks of modern slavery and human trafficking in their businesses;
- monitoring practices by suppliers with a high risk of modern slavery or human trafficking; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate their supplier agreement, which may include the termination of the business relationship.

We have conducted due diligence on the modern slavery policies in place with our merchandise suppliers. Each have modern slavery policies and codes of conduct that they apply to their supply chain (using industry best practice such as the Ethical Trading Initiative Base Code). We are currently conducting due diligence in relation to our equipment manufacturers which are based overseas, and will report on progress in our 2019 statement.

We fund the development of tennis in countries with limited resources, and are proud of this vital work. We recognise that in such countries there may be an increased risk of local business practice including slavery and/or human trafficking, for example where we contribute to the physical construction of courts and other facilities. We rarely enter contracts or issue procurement instructions direct to manufacturers and construction companies in those countries. However, it is a condition of this funding that the grantees conduct due diligence of potential suppliers with regard to slavery and human trafficking, and have the right to audit the supplier's records.

In 2019, we will review our tournament and event management activities to identify what steps should reasonably be taken to mitigate the risk of modern slavery and human trafficking.

Our people

Our employment practices meet or exceed UK statutory obligations, and apply to all direct employees and contractors. The majority of our employees are employed on a permanent basis. We do not employ personnel on a temporary seasonal basis and where fixed term contracts apply these are rarely for less than 12 months.

In partnership with our regional and national associations, the ITF facilitates the operation of three regional training centres. Staff at these centres are employed by the regional association, but the ITF pays the costs of these staff, ensuring that these personnel are appropriately paid. We are reviewing the employment procedures at these training centres, and we will consider modern slavery and human trafficking as part of that review.

5. Effectiveness and KPIs

As a not-for-profit organisation, the ITF's business model and key performance indicators (KPIs) are not designed around commercial profit. Staff performance is not measured by reduction in costs, which may contribute to an environment where modern slavery is overlooked in the pursuit of lower procurement.

As detailed in this statement above, our actions for 2019 are:

- Complete risk assessment;
- Review policies to identify changes required to address modern slavery risks;
- Embed modern slavery due diligence in to our existing due diligence and procurement policies;
- Review need for targeted training.

The outcome of these actions will be reported in our 2019 statement.

6. Training

From 2019, the ITF will require relevant staff members to complete training on modern slavery as a module within our wider e-learning training programme. This will support a good understanding across the ITF of the issues involved with modern slavery and human trafficking and will assist us with identifying potential areas of risk within our supply chain.

Following our risk assessment in 2019, we will review whether any further training or capacity building is required for particular groups.

This statement was approved on [16 April 2019] by ITF Licensing (UK) Ltd's Directors. It will be reviewed and updated annually.



David Haggerty
Chief Executive – ITF Licensing (UK) Ltd

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