

# Modern Slavery Policy

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is to be interpreted in accordance with that Act. This statement constitutes our slavery and human trafficking statement of the financial year ending 31 December 2023.

The directors, senior management and everyone who works for Flight Club Darts Limited, and its subsidiaries recognise that Modern Slavery breaches fundamental human rights and is a crime. Modern Slavery also violates the fundamental values and everything our Company stands for.

As part of the hospitality industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to every aspect of the Modern Slavery Act 2015 and require our suppliers and business partners to have the same respect and commitment.

## Our Business

Flight Club Darts Limited (Topco) is a private limited company that wholly owns and operates an estate of 19 Flight Club and Electric Shuffle brands across the UK and USA.

We licence the Flight Club brand to our partners State of Play Hospitality and Night Owl Entertainment in USA and Australia, respectively. We are a minority shareholder in the USA business. At the end of 2023 there were six Flight Clubs in USA and two in Australia.

We employ the substantial majority of our 1000+ employees directly, who are subject to pre-employment checks to confirm their identity and right to work in the UK, prior to them starting work at Flight Club, Electric Shuffle, or the central team.

## Our Supply Chain

Flight Club and Electric Shuffle purchase goods and services required to carry out its day to day business and this activity is managed by dedicated procurement managers within functions overseen by the Directors of the business.

We are committed to ensuring that we are not supplied by anyone who engages in human trafficking and modern slavery.

We continue to strengthen our approach to managing the risk of modern-day slavery within our business and supply chain. Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent, and mitigate any risks of modern slavery or human trafficking of our own suppliers' policies in relation to combating modern slavery and will continue to enhance our procedures to help us identify, prevent, and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

## Monitoring and Compliance

- We are conducting a full audit into existing suppliers and ask that they confirm in writing that they will not allow slavery or human trafficking in their business or supply chains and have implemented policies and procedures to that effect.
- We ask any new suppliers to confirm in writing that they will not allow slavery or human trafficking in their business or supply chains and have implemented policies and procedures to that effect.
- We seek to include in our arrangements with suppliers a right to suspend or terminate our contracts with them where we have reasonable grounds to suspect that there has been a breach of the Act
- We will continually review our policies on Modern Slavery with a view to identifying any additional policies and codes of conduct that need to be put in place
- Our Learning & Development Team will deliver workshops to educate our teams on the significant size of this issue, signs to spot, how to respond to the identified slavery and human trafficking risks. In addition, we provide briefing tools to our on-site Leaders to ensure these issues are spoken about regularly.
- We only use specified and reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency. All agencies must have their own Modern-Day Slavery & Human Trafficking policies in order to partner with us.
- We will publish a copy of this statement on our website.

## Our Policies:

As an organisation we have policies, standards, and procedures in place, which fully support our efforts in ensuring no slavery or human trafficking takes place within our head office and venues. These include:

- Equality, Diversity & Harassment Policy
- Whistleblowing Policy
- Young Workers Policy
- Right to Work Procedures
- Flexible Working Policy
- Health & Safety Policy

This statement has been approved by the Directors of Flight Club Darts Limited.

Ross Shepley Smith  
Chief Financial Officer  
Red Engine (Flight Club Darts Limited and Electric Shuffle Limited)

July 2024