# Royal Opera House Covent Garden Foundation Modern Slavery and Human Trafficking Statement October 2024 – September 2025

#### Introduction

Section 54 of the Modern Slavery Act 2015 requires certain organisation with turnover over £36 million per annum to publish a statement each year outlining the steps it has taken to ensure there is no slavery or human trafficking in its business or supply chain. Royal Opera House Covent Garden Foundation is a large organisation for these purposes and welcomes the opportunity to state very clearly its policy in these respects.

This statement is made on behalf of the Royal Opera House Covent Garden Foundation and its subsidiaries; however, we note that only the Royal Opera House Covent Garden Foundation is required to make this statement.

The Royal Opera House Covent Garden Foundation unreservedly condemns modern slavery and human trafficking wherever in the world it occurs and is committed to a zero-tolerance approach by continuously improving its practices in relation to every part of its business as well as its supply chain. The Royal Opera House Covent Garden Foundation is required to publish annually, on its website, its activities over the latest financial year aimed towards the eradication of modern slavery and human trafficking. This is our ninth annual statement.

### **Our Organisation**

We are a cultural powerhouse, bringing together two world-class performing companies in one of the UK's leading arts institutions, supported by a cast of more than 3,000 employees, including technical staff, creatives, and freelancers.

Based primarily at the Royal Opera House in the heart of London's Covent Garden, with production and logistics sites in Thurrock and Aberdare, our work is enjoyed by audiences in our two theatres and globally through our streaming platform, cinema Season and company tours. Our work in schools and communities up and down the country is driven by our curriculum linked programmes, specially designed to inspire creativity, widen access to the arts and diversify the future of opera and ballet. These sit alongside industry-leading talent development projects, regional partnerships, our Young RBO scheme, and a raft of daytime events, family activities, tours, exhibitions, and concerts in our Covent Garden home.

Responsibility for our Modern Slavery approach sits with the Finance, Legal & Business Affairs department. Should there be any questions or concerns as to the implementation of these requirements, please direct them to the Chief Financial Officer. If any staff are concerned that modern slavery or human trafficking is taking place in our business or supply chains, they should raise their concerns to the Chief Financial Officer or through the Whistleblowing policy.

## **Our policies**

In order to maintain our high standards of corporate governance, ROH has in place the following policies, which are described in brief on our website and are made available to staff, suppliers and contractors as required.

- Modern Slavery and Ethical Sourcing Policy
- Procurement Policy
- Bullying and Harassment Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

There were no submissions made via our Whistleblowing avenues in 2024-2025 which related to concerns around modern slavery.

### Our risk assessment approach

The organisation sources a wide range of goods and services, from the U.K., Europe and, to a lesser extent, globally. While we are conscious that modern slavery and human trafficking can occur in any sector, we take a risk management approach to modern slavery due diligence to ensure the most efficient use of resources.

We segment our suppliers using a risk assessment matrix based on a combination of contract value, sector and the location. This is done using best practice guidance from organisations such as the Ethical Trade Initiative and input from external experts.

We will decline to enter or renew a contract with a supplier or potential supplier if our counterparty is unable to give us sufficient confirmations and commitments. However, we also go beyond this: prioritising suppliers who show that they take these commitments seriously rather than those who do the minimum required.

## **Actions over the past year:**

During the 2024/25 Season we have continued to be vigilant with our supply chain, both new and existing suppliers.

### Operational Activities:

- We have continued to assess the Modern Slavery Act 2015 adherence for high value/high risk area suppliers, forming a key step of the RBO's competitive tendering process where relevant.
- Updated and reissued our Procurement Policy, including due diligence monitoring for Top 100 suppliers.
- Included our Supplier Code of Conduct on our website which incorporates The Ethical Trading Initiatives 'Base Code' <a href="https://www.ethicaltrade.org/eti-base-code">https://www.ethicaltrade.org/eti-base-code</a>

#### Training and communication activities:

- Continued roll-out of our online Modern Slavery Awareness training module, completed by 100 staff members in the past year, bringing the total to 362 staff members since September 2023. Staff with procurement responsibilities are required to refresh themselves with this training every 2 years. Numbers are monitored and reminders sent to key staff.
- Used internal communication to continue to promote awareness, including articles in our staff newsletter, 'House News'.

#### **Ensuring effectiveness in the future**

Plans for the coming year include:

- Continue our existing induction, awareness and training activities. Modern Slavery will
  form part of an updated procurement training module to be delivered across the new
  season to new and existing staff who are involved in purchasing at RBO.
- Engage with selected low value/high volume suppliers, particularly those in high risk
  areas, and work with them to ensure they have properly identified modern slavery risks
  and mitigated them as far as practically possible in line with the RBO's code of conduct
  to ensure our suppliers understand our stance on modern slavery.
- Work with the Communications team to ensure that a process is in place for staff when non-compliance with Modern Slavery is brought to our attention.
- Implement our new finance and procurement system, understand the reporting for easily identifying our high-risk procurement category suppliers and use this information to plan our quarterly due diligence cycle.

# Approval process

Approved by the Chief Executive Officer, Alex Beard, 07 October 2025

Approved by the Board of Trustees, 07 October 2025