## Clapton Community Football Club

Old Spotted Dog Ground Rear of 212 Upton Lane, Forest Gate, London E7 9NP



### SOCIALLY RESPONSIBLE INVESTMENT AND BUSINESS ENGAGEMENT POLICY

#### PURPOSE

As part of the desire for Clapton Community Football Club Limited("CCFC", "Club") to provide a viable socially responsible club we acknowledge that there are opportunities for us to invest funds responsibly and engage with businesses who share our values to achieve mutually beneficial partnerships.

#### **DEFINITIONS AND GOALS**

As a community benefit society, the Club was founded on principles set out in the Club Rules "based on the values of self-help, self-responsibility, democracy, equality, equity and solidarity".

This means that in investing any funds held by the club or engaging with any organisation, we need to uphold those values by supporting the reduction and, ideally, elimination of corporate behaviour leading to:

- environmental degradation
- armament sales
- human rights violations
- the institutionalisation of poverty through discriminatory market practices
- racial, sexual and homophobic discrimination
- tobacco production, cultivation and manufacture
- the denial of trade union rights and the exploitation of workers, and
- the giving or receiving of bribes.

The Club will use all reasonable endeavours to ensure that it operates its investment and business engagement policy in a way that is consistent with the aims listed above, in the context of also fulfilling the requirement under the Club Rules of "ensuring the Club operates with financial responsibility, enabling the Club to be run for the long-term interest of the community".

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#### **OUR APPROACH TO INVESTMENT**

Where the Club becomes aware that it directly holds an investment in a company that it considers to be in fundamental breach of acceptable standards of ethical and/or environmental practice, the Club will divest the investment in that company as soon as reasonably practicable and inform the company of its reasons for doing so.

Where investments are made by banks or other third parties in pooled funds or similar vehicles, the Club's requirement is that wherever practicable, the funds in question should seek to avoid direct investment in companies that fall within the exclusions in its Socially Responsible Investment and Business Engagement Policy.

#### OUR APPROACH TO BUSINESS ENGAGEMENT AND SPONSORSHIP

The Club recognises the value of engaging with businesses that share our values to support sponsorship and other business arrangements.

We acknowledge that these engagements are based on a mutually beneficial arrangement where both partners goals are achieved. We recognise that businesses will be focussed on a commercial imperative either in terms of brand alignment with our values or a return on investment.

The branding of CCFC and its values are an integral part of what we do and how we conduct ourselves. Therefore, we will not engage in any business transaction with businesses that engage in any of the corporate behaviour listed above.

To do this, any sponsorship proposals or tenders will include a declaration statement asking businesses to confirm that they do not participate in those behaviours. We will also seek to verify this ahead of any requests for quotes.

#### **REPORTING AND MONITORING**

The General Organising Committee("GOC") has overall responsibility for ensuring that any fund is maintained in accordance with this policy.

The Finance Committee will annually discuss what additional risk factors the club might consider for ensuring the policy is adhered to and its impact on the Club's future sustainability.

The Club will provide a standard declaration sheet to accompany any requests for quotes, sponsorship or tender opportunities which must be completed prior to any consideration of the business arrangement.

The Club will routinely monitor the businesses with whom we have a commercial arrangement and any company or significant individual connected to that company who is found to have engaged in any of the behaviours above.

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In the event of any breach of those behaviours, the Club reserves the right to terminate the contract immediately without financial recompense.

#### **REVIEW OF POLICY**

This Policy will be reviewed by the Finance Committee every two years at minimum, or sooner if warranted by internal or external events or changes.

Changes to the Policy will be recommended by the Finance Committee to the GOC and ultimately to the Members for final discussion and approval.

This policy, if revised, must be distributed to all members of the GOC and to any advisors that might need a copy. It must also appear as a link on the Transparency page of the club's website.