Code of Conduct for Gambling Related Agreements

SEASON 2024/25 ANNUAL STATEMENT













01 Introduction

In July 2024, The Premier League, EFL, The FA and Barclays Women's Super League (the 'Competitions') formally agreed to adopt a Code of Conduct for Gambling Related Agreements in Football (the 'Code'). The Competitions decided that a single Code, covering the whole professional game, would be beneficial, ensuring consistent application across member Clubs (the 'Clubs') and interlinked competitions.



The Code represents one of the most comprehensive and unified approaches to responsible gambling sponsorship in global professional sport. Season 2024/25 marked the first year of its implementation.

Developed in consultation with the Department for Culture, Media and Sport, the Gambling Commission and the wider sports sector, the Code aims to ensure that all gambling-related partnerships in football are delivered in a way that protects children and vulnerable groups, promotes social responsibility, upholds the integrity of the game and drives reinvestment into Clubs and communities.

The Code is intended to ensure gambling sponsorship partnerships are held to the highest possible standards and reflects a shared and serious commitment to responsible governance across the professional game.

The Code has been created to complement existing statutory requirements contained within the Gambling Act 2005, and those relevant provisions within the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing. In no way does the Code absolve Competitions, Clubs or Gambling Companies party to Gambling Related Agreements from any of those existing requirements or provisions.

The Competitions will continue to evolve the Code during Season 2025/26 – including further strengthening and sharing best practice; engaging with international counterparts and stakeholders; and further embedding football's leadership role in socially responsible gambling sponsorship.

Clubs have voluntarily committed to the Code, which implements a principles-based approach. The principles of the Code are as follows:

i) Protection

To protect children and other vulnerable persons, gambling sponsorship must be specifically designed to limit its reach and promotion to those under the age of 18 and those at risk of gambling related harm;

ii) Social responsibility

Gambling sponsorship must be promoted and delivered in a socially responsible way. This includes ensuring that education and awareness messages are provided as part of all marketing activities;

iii) Reinvestment

The commercial income raised from gambling sponsorship must be reinvested back into infrastructure and programmes that serve football fans and communities. This includes investment in staging strong competitions, improving infrastructure such as stadia and training facilities and providing community and grassroots participation opportunities for local communities;

iv) Integrity

Gambling sponsorship must not compromise the integrity of football competitions nor harm the welfare of those participants who take part in them

As stated within the Code itself, the football industry is committed to ensuring that gambling sponsorship is undertaken in a socially responsible manner, and that the output of Gambling Related Agreements is suitably reinvested back into football and its communities. The Code therefore recognises that the relationship between gambling and football must be conducted responsibly to protect supporters and wider communities linked to football clubs from gambling-related harm.

This statement, jointly published by the Competitions, provides an overview of the Code's first year of implementation. It includes examples of the work undertaken by the Competitions and their member clubs to help support the principles above and adherence to the Code more generally. It also includes a list of all active Gambling Related Agreements[1] during Season 2024/25. Yearly updates will also report any instances where Competitions or Clubs have been found to have failed to adhere to the Code, however, as outlined in this document, the Independent Football Ombudsman (IFO) has confirmed that no complaints were referred to them in Season 2024/25.

¹ Gambling Related Agreements means any agreement: (a) which concerns any advertising, marketing, promotion, supply or provision of betting, gaming, lottery or other gambling related products, services, brands or facilities (whether as part of a shirt sponsor contract, the appointment of a gambling partner or otherwise); and/or (b) where the business activities of any of the parties (or of an associated undertaking to any of the parties) to such agreement include the provision of betting, gaming, lottery or other gambling related products, services or facilities.

02

Examples of Club and Competition implementation of the Code

The following provides a nonexhaustive list of examples of the work by the Competitions and Clubs to help support adherence to the Code.



i) Protection

Protecting children

During Season 2024/25, Clubs undertook comprehensive audits of their media content, such as official Club websites and those pages specifically intended for use or viewing by children. These audits ensure no gambling sponsor logos or promotional materials related to gambling sponsorship appear on any child-focused sections.

In addition, similar audits have taken place for merchandise and products produced by Clubs designed specifically for use by children. Replica kits specifically designed for children do not feature gambling sponsorship logos, whether on the front of shirt or sleeves.

For example, 46 EFL Clubs (including 21 that are part of the EFL Digital collective) had functionality built-in to their websites' Content Management System which enables them to mark pages as 'child friendly', which in turn prevents gambling adverts being delivered by a third party from appearing on that page. As a further layer of protection, the web platform provider (Urban Zoo) runs a daily scan of all news articles for keywords which indicate relevance to younger

audiences – e.g. 'mascot' or 'soccer school' – and automatically turns the pages to 'child-friendly' where found.

Replica kits

Clubs with a front of shirt gambling sponsor had mechanisms in place to enable supporters to purchase adult replica kits without the inclusion of gambling sponsorship logos. For some of those Clubs, unsponsored adult shirts were made available for purchase both online and in physical retail outlets.

Additionally, one Club noted that an unsponsored shirt had been tailored for young supporters aged 14 to 18 who had outgrown junior-sized kits. Supporters could also request assistance via email or by speaking to someone at Club shops, and those Clubs would make appropriate arrangements to accommodate their needs.

All Premier League Clubs and five of the six EFL Clubs with gambling sponsors on the front of their shirts in Season 2024/25 enabled supporters to purchase adult replica kits without the inclusion of gambling sponsor logos.

Academy kits

All Clubs ensure that Academy teams, comprising players predominantly under the age of 18, do not wear kits that include gambling sponsorship logos. This policy also applies to Academy staff, who are likewise prohibited from wearing kit featuring gambling sponsorship logos.

This has been a longstanding commitment made by Clubs, reinforced by The FA's Kit and Advertising Regulations. The Code has therefore helped further reinforce that commitment and the protection of Academy Players.

Clubs withdraw front of shirt gambling sponsorship

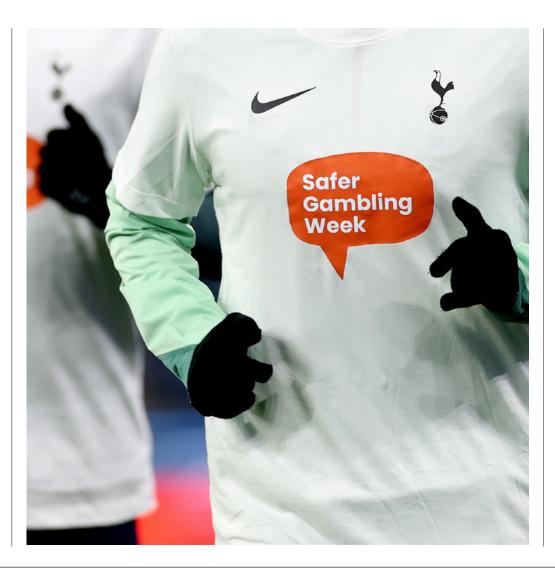
In 2024, Premier League Clubs collectively agreed to withdraw gambling sponsorship from the front of their matchday shirts, becoming the first sports league in the UK to take such a measure voluntarily in order to reduce gambling advertising. The collective agreement will begin at the start of Season 2026/27.

ii) Social Responsibility

Support services and education

For several years, Competitions and Clubs have engaged external partners such as Sporting Chance and EPIC Global Solutions to deliver workshops raising awareness among professional footballers about gambling disorder. This is an important part of the Player Care service provided. Awareness has been further promoted via training ground posters, mobile applications and inclusion as part of Competitions' pre-season squad visits.

The EFL's partnership with Sky Bet is underpinned by a Memorandum of Understanding which includes a commitment to funding a Player education programme focused on the potential dangers of problem gambling. Delivered in partnership with EPIC Global Solutions every year since 2018, the sessions have so far been delivered to 7,260 attendees – including first team and Academy Players and staff, and Academy parents and host families – providing them with the free education, support and advice.



During Safer Gambling Week in November 2024, 45 under-18 and under-21 Players at Blackburn Rovers benefitted from a session delivered by former Player Dominic Matteo, in which he highlighted his own problem gambling issues and the support available to Players today.

Safer Gambling Week

Season 2024/25 saw a number of Clubs support Safer Gambling Week, a crossindustry initiative to promote safer gambling in the United Kingdom, between 18 and 24 November 2024. The relevant match rounds saw the 'Safer Gambling Week' logo used on training kits and the promotion of resources to provide supporters with access to advice and support about gambling issues.

During Safer Gambling Week, the entirety of Sky Bet's allocation on LED advertising boards at EFL games was used to display campaign messaging, in addition to a programme advert, big screen advert and digital ads on EFL Club websites.

Responsible gambling messaging

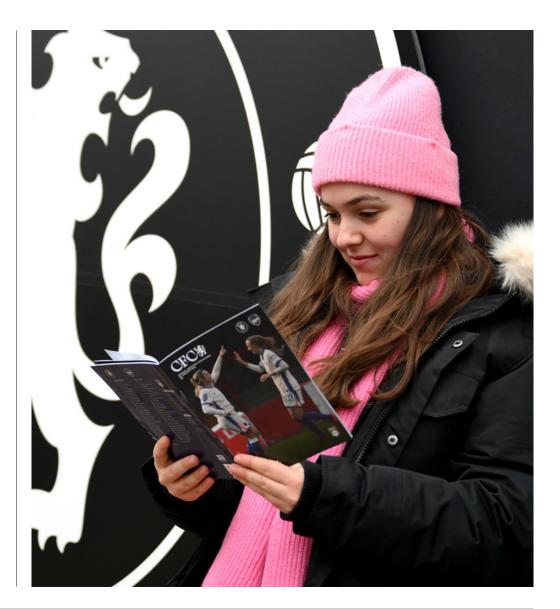
Clubs are committed to promoting responsible gambling through their advertising practices and a significant proportion of LED advertising for Season 2024/25 was dedicated to responsible gambling messaging. There was a notable increase in the presence of responsible gambling messaging across LED advertising compared to the previous season, which has been influenced by the adoption of the Code.

For example, during Season 2024/25, 90 per cent of Premier League Clubs reported sustained or increased levels of responsible gambling messaging integrated into their LED inventory.

Similarly, in EFL grounds with LED advertising boards, at least 50 per cent of Sky Bet's allocation at every game is used to display responsible gambling messaging. This includes all Play-Off games and the Carabao Cup Final. In Season 2024/25 Sky Bet went further and, in addition to the 50 per cent responsible gambling messaging, dedicated a third of its allocation at the Play-Off Finals to the "Every Minute Matters" campaign with the British Heart Foundation.

In addition to LED inventory, Clubs more broadly have implemented a range of responsible gambling messaging across their media and physical assets to promote awareness of and encourage safe betting practices. These measures include, but are not limited to, the following assets:

- Matchday programmes: Including responsible gambling messages and relevant support information.
- Social media platforms: Including the BeGambleAware.org and 18+ logos on content which features gambling sponsorship.
- Club websites: Prominently displaying responsible gambling banners and messaging, including references to BeGambleAware.org and 18+ branding.
- Betting slips and kiosks: Equipped with printed information leaflets promoting responsible gambling.
- Internal stadium screens and posters:
 Messaging throughout on digital screens and static posters.
- Email communications and social promotions: Including appropriate messaging and age restrictions on promotional content involving gambling partners.
- In-stadia big screens: Responsible gambling messages displayed during matchdays and events.
- Team line-up graphics: Removing the gambling sponsor logo in instances where a player under the age of 25 is featured, aligning with best practice guidelines.



iii) Reinvestment

Reinvesting into clubs and communities

Commercial income generated through gambling sponsorship forms an important part of Clubs' reinvestment into infrastructure and community programmes that can benefit football supporters and local communities. Clubs have been encouraged to demonstrate how that reinvestment has been utilised, whether directly or indirectly, through initiatives funded by gambling sponsorship income or broader commercial revenues. During Season 2024/25, examples of reinvestment activities have included, but are not limited to:

- Investment in youth and women's football infrastructure
- Club Foundation and Corporate Social Responsibility (CSR) initiatives
- Redevelopment or construction of stadia
- Enhancements to training facilities and centres
- Community outreach and grassroots participation programmes
- Improvements to hospitality areas and fan zones
- Installation of expanded rail seating and seat reconfiguration

- Upgrades to concourse areas and retail kiosks
- Implementation of digital ticketing systems
- Energy-efficient lighting in stadiums and administrative offices
- Installation of advanced CCTV systems to enhance fan safety
- Pitch renovations and maintenance
- Salaries for community engagement personnel

Case study

Middlesbrough and Kindred support men's mental health

With the support of their Principal Partner, Kindred, Middlesbrough continue to fund MFC Foundation's delivery of Team Talk, a men's mental health initiative that supports participants with their mental wellbeing.

The Team Talk platform uses the local club and its players, manager and staff to encourage engagement in the programme, creating a platform where participants can meet new people, talk to others facing similar challenges, and play football.

Case study

Sky Bet Building Foundations Fund

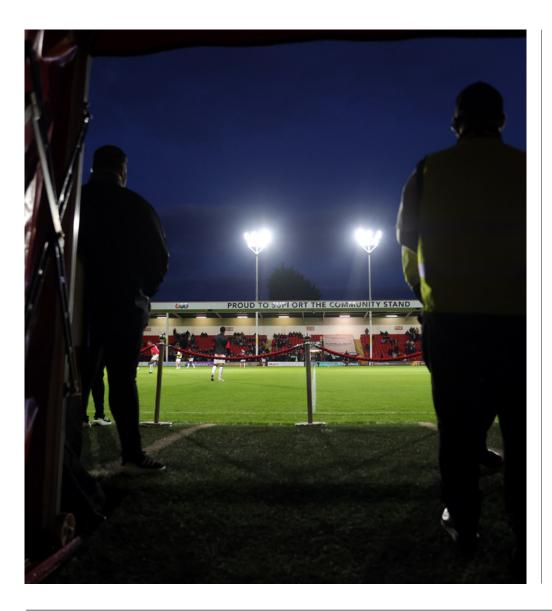


The EFL and Sky Bet's renewed partnership, from 2024/25 to 2028/29, includes a £1 million commitment each season to a new Building Foundations Fund, supporting infrastructure projects and initiatives that help football clubs make a tangible difference in their communities. This will amount to £6 million across the duration of the agreement.

All EFL Clubs are invited to bid for support from the fund. Projects supported to date have included a new 3G pitch for a sports hub in Accrington, a disability football programme in Wigan and a scheme to reduce social isolation through volunteering in Norwich.

As part of the most recent funding announcement in July 2025, £100,000 was committed to a mentoring and football-based programme for young men aged 18–24 facing barriers such as unemployment and poor mental health in Bradford.

The fund is a key strand of the two organisations' commitment to positively impacting the communities in which EFL Clubs are based.



iv) Integrity

Educating participants

At the beginning of each season, The FA conduct Club visits to address first team Players and coaching staff. The visits are mandatory for all professional Clubs and include education on key integrity matters. As well as information about on-field matters and anti-doping, the visits cover The FA's Rules concerning betting and match-fixing, how to report approaches to fix and also how to access support for any gambling concerns. Additionally, online material and a Player Essentials app are distributed each season to include the same information in more detail.

The Premier League also delivers additional support and resource in this area and gambling workshops are available through the Premier League's first team personal development programme. Within this resource, clubs can select from providers to deliver a gambling specific workshop. Wider club staff can also attend these sessions.

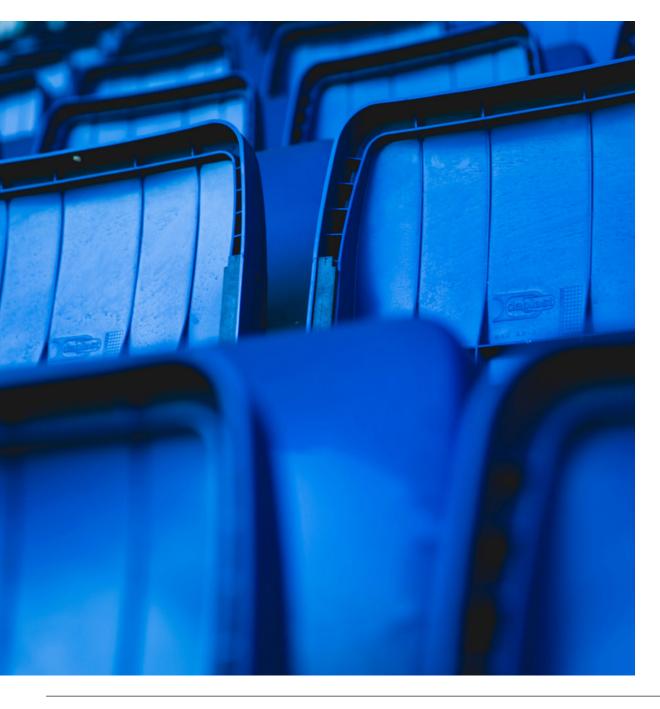
As part of the Personal Development and Life Skills Curriculum which applies to Premier League and EFL Academies, Academy Players receive gambling, anti-corruption and sporting integrity education. This includes detailed education on The FA's betting rules for older age groups, delivered by The FA. Specialist facilitators such as Sporting Chance and EPIC are also available for Academies to access.

Compliance

During Season 2024/25, all Premier League Clubs continued to comply with the relevant Premier League Rule requiring their betting partners to enter into a Memorandum of Understanding with the League. Amongst other things, the Memorandum requires those betting partners to provide accurate and complete information in the event the League is investigating any breach of relevant Premier League Rules and that the partner does not offer gambling markets on certain markets relating to Academy football.

Gambling Commission's Licensing Conditions and Codes of Practice

The Code includes that where a Gambling Related Agreement provides consumers in the UK with facilities for gambling, Competitions and Clubs should only enter into agreements where the Gambling Company is licensed by the Gambling Commission or captured as part of a 'White Label Partnership'. In the event that a Competition and/or Club enter into a Gambling Related Agreement with a Gambling Company that is not providing consumers in the UK with facilities for gambling and is therefore not licensed by the Gambling Commission, they must adhere to those relevant requirements under the Gambling Act 2005 that relate to advertising and 'unlawful gambling'.



<u>03</u>

Compliance with the Code

The Code sets out a robust complaints procedure enabling any individual to raise a complaint about a Competition or Club and their adherence to the Code. This can be completed by submitting details of the complaint via the designated complaints channel.

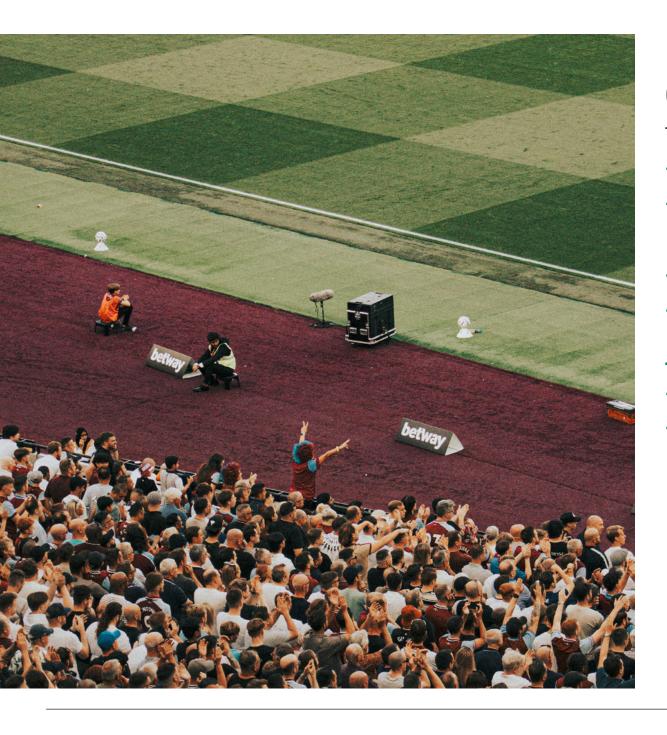
Compliance with the Code

The complaints procedure involves a twostage process. The first stage is where a complaint is made directly to the relevant Competition or Club. This provides an opportunity for the complaint to be addressed. However, if a Competition or Club fails to address the complaint within a set period of time and to the satisfaction of the complainant, the second stage allows that individual to refer the complaint to the Independent Football Ombudsman.

Following confirmation from the IFO, the Competitions can confirm that there have been no instances of any complaints made against either the Competitions or Clubs that have been referred to the IFO. This reflects both strong compliance with the Code and the successful resolution of any issues at the initial stage.

Kevin Grix, Chief Ombudsman at the IFO, said: "We have been pleased to be able to work with football to create a robust, independent process for complaints which allows consumers the comfort to know that a full resolution process is in place when needed."





04

List of active Gambling Related Agreements per Club

Premier League



Club	Gambling Related Agreement
AFC Bournemouth	8xBet, Betway, BJ88, Bet365*, Betano*, Unibet*
Arsenal	Betway
Aston Villa	Betano, Nova88
Brentford	Betway, Fun88, Hollywoodbets
Brighton & Hove Albion	Betway, Bet365*, Unibet*
Chelsea	8xBet, MSport, Betway
Crystal Palace	Bet365, Betway, Kaiyun, Net88
Everton	Stake
Fulham	SBOTOP, Bet365*, Betano*, Betway*
Ipswich Town	8xBet, Bet365*, Betano*, Betway*, Unibet*
Leicester City	8xBet, 12Bet, BC Game, Parimatch, Betano*
Liverpool	Ladbrokes, Interwetten
Manchester City	Betway
Manchester United	Betfred
Newcastle United	Bet365, BetMGM, Fun88, Sportsbet
Nottingham Forest	Kaiyun, 8xBet*, Bet365*, Betano*, Betway*, Fun88*, Parimatch*
Southampton	Rollbit, Bet365*, Betway*, Unibet*
Tottenham Hotspur	BetMGM
West Ham United	Betway
Wolverhampton Wanderers	DEBET, BetMGM, Bet365*, Betway*, Unibet*

EFL



Club	Gambling Related Agreement
Accrington Stanley	N/A
AFC Wimbledon	N/A
Barnsley	QuinnBet*, VBet*
Barrow	QuinnBet*
Birmingham City	Coral, Unibet*
Blackburn Rovers	Spreadex Sports, 8xbet*
Blackpool	VBet*
Bolton Wanderers	N/A
Bradford City	N/A
Bristol City	32Red*, 888 Sport*, Bet365*, Leovegas*, Unibet*, VBet*
Bristol Rovers	N/A
Bromley	N/A
Burnley	96.com
Burton Albion	QuinnBet
Cambridge United	N/A
Cardiff City	QuinnBet, Spreadex Sports
Carlisle United	N/A
Charlton Athletic	Tango Bet, VBet*
Cheltenham Town	QuinnBet
Chesterfield	N/A

Club	Gambling Related Agreement
Colchester United	N/A
Coventry City	32Red*, 888 Sport*, Bet365*, Leovegas*, Unibet*
Crawley Town	N/A
Crewe Alexandra	N/A
Derby County	Bet365*, Leovegas*, Spreadex Sports*, Unibet*, Bet MGM*
Doncaster Rovers	N/A
Exeter City	N/A
Fleetwood Town	QuinnBet*
Gillingham	N/A
Grimsby Town	N/A
Harrogate Town	N/A
Huddersfield Town	Sportsbroker, Grosvenor Casino, Bet365*, VBet*
Hull City	Sportsbet.IO
Leeds United	UNIBET, 8Xbet*
Leyton Orient	Rhino.Bet
Lincoln City	VBet*
Luton Town	N/A
Mansfield Town	Betting.Bet, I-Gaming
Middlesbrough	Unibet, 32Red
Millwall	QuinnBet, Spreadex Sports, VBet, Kwiff, 32Red*, Bet365*, Leovegas*

EFL



Club	Gambling Related Agreement
Milton Keynes Dons	N/A
Morecambe	N/A
Newport County	N/A
Northampton Town	QuinnBet
Norwich City	Spreadex Sports, 32Red*. Bet365*, Leovegas*, Bet MGM*
Notts County	Tango Bet*
Oxford United	Bet365*, Unibet*, Bet MGM*
Peterborough United	Bet365*, Sportsbroker*, VBet*
Plymouth Argyle	N/A
Portsmouth	Leovegas*, Unibet*, Bet MGM*, VBet*
Port Vale	N/A
Preston North End	Spreadex Sports, 32Red*, Bet365*, Stake.com*, Unibet*
Queens Park Rangers	CopyBet, Unibet*
Reading	32Red*, Bet365*, Betting.Bet*, CopyBet*, Unibet*
Rotherham United	N/A
Salford City	N/A
Sheffield United	32Red*, Bet365*, Leovegas*, Spreadex Sports*, Bet MGM*, Unibet*
Sheffield Wednesday	Bet365*, Leovegas*, Stake.com*, Unibet*
Shrewsbury Town	N/A
Stevenage	N/A

Club	Gambling Related Agreement
Stockport County	N/A
Stoke City	Bet365
Sunderland	Spreadex Sports, 32Red*
Swansea City	Bet365*, Unibet*, VBet*
Swindon Town	QuinnBet*
Tranmere Rovers	N/A
Walsall	N/A
Watford	Mr Q, Spreadex Sports, Unibet*, VBet*, Bet MGM*
West Bromwich Albion	Bet365, Spreadex Sports
Wigan Athletic	QuinnBet, Casino Kings, VBet*
Wrexham	N/A
Wycombe Wanderers	VBet*

Barclays Women's Super League



Club	Gambling Related Agreement
Arsenal	Betway
Aston Villa	Betano, Nova88
Brighton & Hove Albion	Betway, Bet365*, Unibet*
Chelsea	8xBet, MSport, Betway
Crystal Palace	Bet365, Betway, Kaiyun, Net88
Leicester City	8xBet, 12Bet, BC Game, Parimatch, Betano*
Liverpool	Ladbrokes, Interwetten
Manchester City	Betway
Manchester United	Betfred
Tottenham Hotspur	BetMGM
West Ham United	Betway

Some sponsors have broader, club-wide agreements and are not specific partners of the women's team alone.

<u>05</u>

Looking forwards

The Competitions are pleased at the successful adoption of the Code and its implementation during its inaugural Season. There is evidence that Clubs have further embedded their existing commitment to socially responsible gambling partnerships, using a wide variety of tools to promote responsible gambling messaging.

The Code will continue to be reviewed by the Competitions and during Season 2025/26, consideration will be given as to how the Code can be further improved.

