THE ANNUAL SURVEY OF FOOTBALL CLUB FINANCE DIRECTORS 2021

FOOTBALL: TIME FOR A COMEBACK

HOW FOOTBALL CLUBS AND INVESTORS ARE RESPONDING TO DEVELOPMENTS IN FOOTBALL FINANCES

IDEAS | PEOPLE | TRUST



FOOTBALL: TIME FOR A COMEBACK THE ANNUAL SURVEY OF FOOTBALL CLUB FINANCE DIRECTORS 2021

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A WORD FROM IAN CLAYDEN

PARTNER HEAD OF PROFESSIONAL SPORTS, BDO

As I write this foreword, and reflect on the past and future for football, it is easy to be somewhat overwhelmed by the breadth and depth of change that is upon us. Sport, and in particular football, is uniquely characterised by the diversity of its stakeholder groups and this elevates the impacts of change to a different level.

On the one hand, being the world's number one sport attracts enormous cash flows. On the other, with great power comes great responsibility and at times it feels like everyone wants to have their say in how football and football clubs should be operated. Every social, economic and political advantage afforded to football come at a price. I guess that is why we write about it!

Current winds of change, include: COVID-19 impacts on capital structures and financial stability; club and League financial structuring; central Government intervention; new commercial and digital opportunities, investor evolution; augmentation of financial reporting requirements; stakeholder consideration, Environmental, Social & Governance responsibilities ('ESG')... the list goes on.

So, in response to unparalleled levels of uncertainty, we have taken a slightly different approach to our Annual Survey of Football Club Finance Directors report this year and have used the data provided to support our answers to the biggest questions in the business of sport today:



We hope this new format helps navigate the reader to their areas of particular interest. However, for those who want to crunch the data for themselves, we have continued to make this accessible in the back end of this report.



TO FOOTBALL CLUB FINANCES IN 2020/21?

WHAT HAPPENED

WHO / WHAT KEPT **FOOTBALL AFLOAT?**



X V V X

HOW SIGNIFICANT IS FOOTBALL'S **DIGITAL FUTURE?**



WOMEN IN FOOTBALL: **A PERSPECTIVE FROM THE** SPORTS CONSULTANCY

WHO WILL BE TAKING FOOTBALL FORWARD?



PLAYERS: HAS THERE BEEN A SHIFT IN THE BALANCE OF POWER?



THE ROUTE TO POST-**COVID-19 REVENUE GROWTH FROM ENGLISH FOOTBALL CLUBS: A PERSPECTIVE FROM TWENTY FIRST GROUP**



WHAT DO STAKEHOLDERS **EXPECT FROM FOOTBALL CLUBS IN FUTURE?**

As always, we are incredibly grateful to all respondents to our survey, taking the time to provide open and honest responses to our questions. Football club Finance Directors have been through a tough time on account of the pandemic, and in this regard their contribution to our survey this year is even more generous.

Thanks also to The Sports Consultancy and Twenty First Group, both authorities in respective fields of sports consulting and data-led sports intelligence, and both an absolute pleasure to work with.

ENVIRONMENTAL AND SOCIAL GOVERNANCE (ESG)

This is the first year that we have included questions with a specific focus on ESG, which has become critical to the success of organisations across all sectors. It is becoming a top priority for all Boards, and appears on the agenda to such an extent that directors can do little to ignore it.

Key stakeholders including employees, customers, suppliers, regulators and local communities are demanding that organisations consider how their operations impact the world, their contribution to society and how they conduct themselves.

The allocation of extra resource to meet the increasing demands in this area is just one adjustment that directors have to consider, as cubs, like other organisations, grapple with aligning their corporate purpose, strategy and risk identification to the ESG agenda and capture data that enables accurate reporting of progress, in this area.

ESG has developed a powerful meaning in terms of how the world is to adapt and change but it is still not consistently understood by everyone. The criteria that organisations should be aware of include: As a final comment to this foreword. I will take a moment to reflect on Euro 2020. Football teams at all levels put themselves out there to entertain us and allow us to dream. This summer the England team collectively carried the weight of the nation's expectations on their shoulders and to a man did us proud, as we are sure they will again in 2022. Our thanks are extended to EVERY one of them.

ENVIRONMENTAL CRITERIA

- The resources consumed and the waste discharged. This includes energy, water and other materials; all of which will have environmental consequences
- Encompasses carbon emissions, waste, water and wider climate change considerations subject to their type of industry
- Every organisation creates positive and negative impacts.

SOCIAL CRITERIA

- The relationships your organisation has and the reputation it fosters with people and institutions in your communities
- Includes workforce relations, diversity and inclusion
- Every organisation operates within a broad, diverse society and has the opportunity to choose how to create, influence and impact.

GOVERNANCE CRITERIA

- The internal system of practices, controls and procedures your organisation adopts in order to govern itself, make effective decisions, comply with the law, and meet external stakeholder needs
- Can include board quality equality and diversity, and cybersecurity
- Executive pay, ownership and business ethics.



WHAT HAPPENED TO FOOTBALL CLUB FINANCES IN 2020/21?











The impact of COVID-19 has been apparent across all sectors, and although professional football has been able to continue almost entirely throughout the 2020/21 season, the empty stadia's have been there for all to see.

The impact of playing behind closed doors, and the lost revenue as a result, has been significant throughout the football pyramid (albeit more acute outside of the English Premier League (EPL)) and it is no surprise that 78% of Respondents in our survey have rated their Club's financial position as either "could be better" or "in need of attention".

However, a crucial point to make is that revenue cannot be considered in isolation. Many businesses have experienced a dramatic reduction in revenue over the pandemic, but due to the various Government support measures and adjustments to their cost base, have managed to temporarily mitigate these losses and preserve cash.

Whilst it is undeniable that COVID-19 has had a dramatic impact on football club finances, the percentage of respondents reporting losses in 2020/21 is actually no greater than in 2019/20.

Respondents who confirmed that their Club is dependent upon its principal shareholders to fund losses has risen from

57% to 66%

However, these responses do not take account of the scale of the losses. The available support measures and cost-cutting exercises performed by clubs will have helped to reduce losses, at least in the short term, but they will only serve to paper over the cracks and do not present a long-term sustainable solution for club finances.

When considering these results, one thing is for certain: trading losses will ultimately have a negative impact upon cash. There is only so long that a business can incur losses before cash pressures become critical, and it is no surprise that the proportion of Respondents who confirmed that their Club is dependent upon its principal shareholders to fund losses has risen from 57% to 66%. The cash flow test is crucial, particularly as it is one of the tests of insolvency (can a business pay its creditors as they fall due), and as a result it is always at the forefront of a director's mind.

Fortunately, over the pandemic there has not been a wave of corporate insolvencies within the UK. In fact, we have seen the opposite. During 2020, the number of corporate insolvencies in the UK fell by almost one-third, from a normalised level of 17,000 per year to 12,000. However, there is a big risk that issues are being stored up and that more businesses will begin to face insolvency as society begins to unlock and Government support measures are removed.

It will be interesting to see whether more corporate entities, including football clubs, start to look at the restructuring options introduced via the Corporate Insolvency & Governance Act 2020, as discussed in our article from October 2020, that provides some breathing space to cash-starved businesses for fully explore their options and preserve solvency.

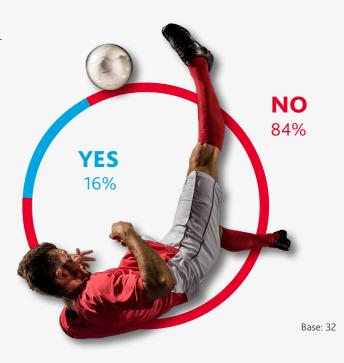
HOW WOULD YOU RATE YOUR CLUB'S CURRENT FINANCIAL POSITION?

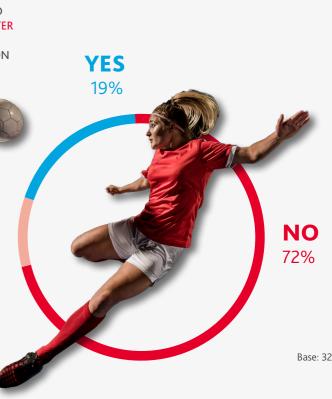
DO YOU EXPECT TO MAKE A PROFIT **BEFORE** PLAYER TRADING AND AMORTISATION IN YOUR 2020/21 ACCOUNTING PERIOD?

DO YOU EXPECT TO MAKE A PROFIT AFTER PLAYER TRADING AND AMORTISATION IN YOUR 2020/21 ACCOUNTING PERIOD?

DON'T

KNOW



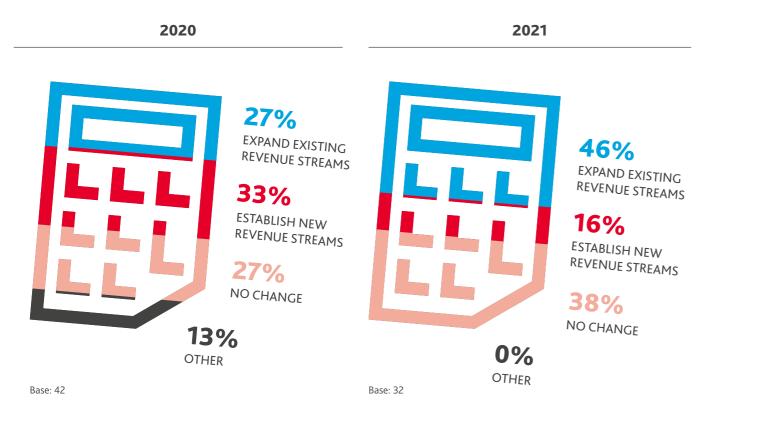


OPERATIONAL FOCUS AREAS FOR CLUBS

Partly through need, and partly through opportunity, COVID-19 has forced Clubs to reflect on their commercial performance and our survey tells us that there is a particular focus in 2021/22 on expanding existing revenue streams – which in response to the pandemic now includes match streaming revenues. Almost half (46%) of Respondents have said that this is their primary focus area, compared with 27% in 2020. Only 16% are focusing more on establishing *new* revenue streams (versus 33% in 2020).

However, this is a period of uncertainty and Securing promotion, achieving there are some wildly differing views within an impact on ticket revenues and the market in terms of what will happen to sponsor appeal

DO YOU PLAN TO EXPAND ANY EXISTING REVENUE STREAMS OR ESTABLISH NEW REVENUE STREAMS FOR THE 2021/22 SEASON?



different revenue streams over the course of the forthcoming season. For instance, 25% of Respondents believe that season ticket revenue will increase by over 5%, whereas 41% of Respondents believe that this same revenue stream will decrease by over 5%.

The truth is that nobody really knows for certain what tomorrow will bring, and clubs are simply preparing themselves for different scenarios and considering the options available. Over the longer term, it goes without saying that most would like to expand both existing and new revenue streams (including attracting the next generation of fans). 88% of Respondents confirmed that this is the case - with some of the key focus areas being:

- Investment in new technologies to enhance the fan experience, enticing supporters back into the ground and driving up revenues (e.g. access control, cashless systems and CRM)
- Improved digital experience, particularly in respect of match day streaming and App/Website development to increase supporter interaction and traffic. A focus upon e-gaming is also becoming more prevalent
- Diversification in respect of stadium utilisation, with more focus upon commercial revenue streams and non-match day events

Consideration of stadium naming rights and digital advertising options.

25% of Respondents believe that season ticket revenue will **increase** by over **5%**, whereas

41% of Respondents believe that

this same revenue stream will decrease by over 5%

The strategic focus on digital is explored further in the digital growth opportunity section of this report. Investment capital permitting, some of the above can be activated in a relatively short time frame. Others, in particular stadia related strategies, take longer.

However, those clubs with the necessary capital have demonstrated that these strategies are achievable and are already putting greater commercial distance between them and other clubs. Successful implementation will inevitably increase revenue, with an assumption that with comparably low associated costs, this would quickly translate to enhanced profitability and liquidity.

The real question is whether clubs, laden with debt in a post-COVID-19 era, have access to investment capital or whether they need to seek additional equity capital on which they can then make a return.

Growth must be 'responsible growth' of course, and this is explored further with regard to ESG below.

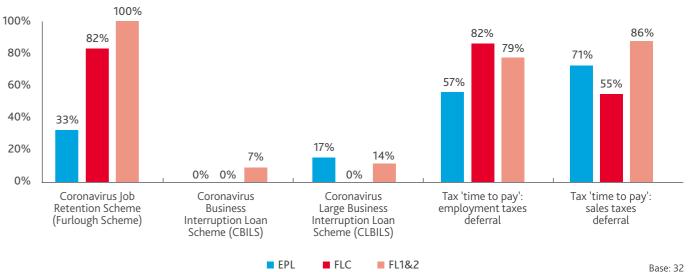
Certain Respondents to our survey simply don't believe it is possible to enhance existing revenue streams or establish new ones. One Respondent in particular stated that it is "fairly naive to assume it is even possible; this is only for big clubs". On the basis that this Respondent does not represent a FL1 or FL2 Club and is therefore higher up the pyramid (EPL), it clearly highlights some scepticism and divergence within the industry.

In summary, over the course of the last 12 months the impact on the revenue and profitability of football clubs is as expected. It has been a challenging time. Revenue has declined, and with an inability to flex player costs to mitigate lost revenues, the majority of clubs have continued to make losses. However, if capital is or can be made available, there will be opportunities to either reverse or manage this trend. As society unlocks over the course of the next 12 months it will be interesting to observe the investments made by clubs throughout the pyramid. It will be particularly interesting to see if match day revenues can be enhanced at the same time as digital revenues (such as streaming) can be developed into a core revenue stream.

WHO/WHAT **KEPT FOOTBALL**

AFLOAT?

HAS YOUR CLUB TAKEN ADVANTAGE OF THE FOLLOWING COVID-19 GOVERNMENT SUPPORT SCHEMES?





LEE PARTNER





LENEY ASSOCIATE DIRECTOR



conditions, including: over a year playing behind closed doors; media refunds; sponsorship concessions; incremental COVID-19 operating costs; inflexible player wages, and the majority of Clubs expecting exceptional losses in the 2020/21 season, the first question that many will be asking is how have Clubs survived? The second will be can this continue?

With extremely tough trading

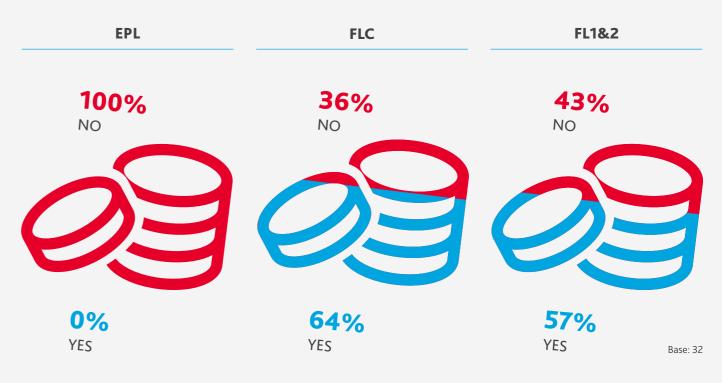
Two thirds of Respondents said that their club was reliant on its principal shareholder(s) to fund operating losses. In context, this is in addition to VAT and PAYE deferrals, EPL solidarity, EFL loans, Coronavirus Business Interruption Loans (CBILS), and Bounce Back Loans (BBLS), Coronavirus Job Retention Scheme (CJRS) grants, and in many cases, deferral rather than repayment of season ticket income.

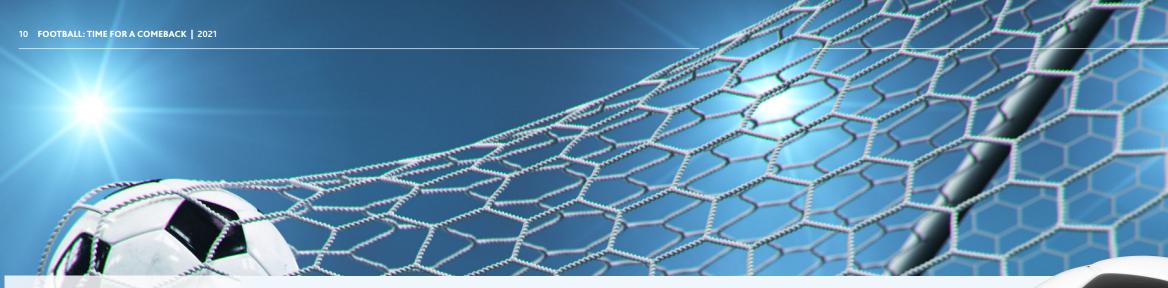
In early stage lockdown, significant shareholder support was foreseeable of course. This time last year we wrote that "the ability of Clubs to invest and possibly survive will come down to the willingness and ability of shareholders to inject further funding".

Overall, shareholders have delivered.

With the notable exceptions of Bury and Wigan, it would appear that, over the last 17 months, with all the 'reliefs' noted above, shareholders have been able to provide sufficient support to clubs to carry them through to the reopening of turnstiles.

HAS YOUR CLUB BEEN IN RECEIPT OF ADDITIONAL LOAN FUNDING FROM ITS LEAGUE?





If the reader thinks that the Government, the banks or the leagues have 'bailed out' footballs clubs, they should note that this is not quite the case. Granted, 'relief' has been available, and in many cases this has provided a lifeline, but this is temporary. With the exception of furlough, the above support measures have been in the form of loans or advanced funding, which will need to be repaid out of future income streams.

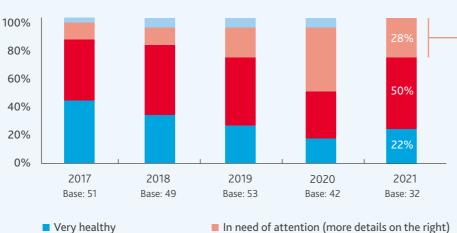
It should also be noted that a huge number of fans across all leagues took the option to defer their 2020/21 season tickets to 2021/22: in effect, providing emergency funding to clubs, but at the expense of new season ticket money coming in this year.

So, going forwards into the 2021/2022 season, with new levels of debt to service, we will repeat ourselves and say that "the ability of clubs to invest and possibly survive will come down to the willingness and ability of shareholders to inject further funding".

So, question number two, can this continue?

With 28% of Respondents stating their current financial position is "in need of attention" and 66% confirming that their Club remains reliant on principal shareholders to fund operating losses, the answer to this question depends on the depth of (existing or new) shareholder's pockets.

HOW WOULD YOU RATE YOUR CLUB'S CURRENT FINANCIAL POSITION?



Very healthyCould be better but not bad

not bad A cause for grave concern / on the verge of administration



STREAMING ETC."



28% ALL LEAGUES

14%

CLUBS' ABILITY TO INVEST: THE ROLE OF SHAREHOLDERS AND LENDERS

Despite the difficulties clubs are facing, our Respondents still recognise the need for continued investment into the playing squad, club infrastructure and diversification of revenue streams in order to remain competitive.

When asked how Club's anticipate these investments being funded their responses were in the following order, through existing shareholders (50%), existing cash (41%) and third party debt (34%). However, looking at these results in more detail by League, there is a clear separation between the EPL and the EFL.

None of the EPL Respondents suggested existing cash reserves would be used to fund development, despite one of the responses suggesting they anticipate over £100m to be spent over the next two years on non-player capital spend. Instead over half of EPL responses suggested they would be utilising third party debt. Compare this to the FL1&2 responses, only one Club said they would be looking to use third party debt to fund their investment. The harsh reality is that with bank appetite for lending outside of the EPL being limited to accelerating receivables, the burden falls between existing cash (if available) and shareholder support. Player disposal windfalls help of course but it is hard to resist fan pressure to reinvest.

Credit Committees of large financial institutions have a number of lending criteria which must be met for credit to be offered (whether for traditional lending or CBILS/BBLS). Increasingly, this includes ESG metrics as financial institutions grapple with shareholder expectation of reduced lending to organisations that have no appropriate ESG focus.

36% FL1&2

27%

FLC

One financial condition is almost always a positive reserve balance and the majority of Clubs are not in this position having invested all free cash in the first team squad. This was the number one reason Clubs suggested finance is not readily available. Lenders are also put off by other debt on the balance sheet, which is often the case with football clubs (in particular loans due to shareholders).

Combine this with the risk of relegation or loss of European revenues, lending to football clubs is seen as too risky for the majority of lenders as longer term revenue can be highly volatile. Clubs typically have good visibility of revenue for the next 12 months, and this is why the majority of external finance in football is short term and typically secured against future television revenue or transfer fee receivables. This type of finance has its uses, but does not facilitate longer term non-player development strategies.

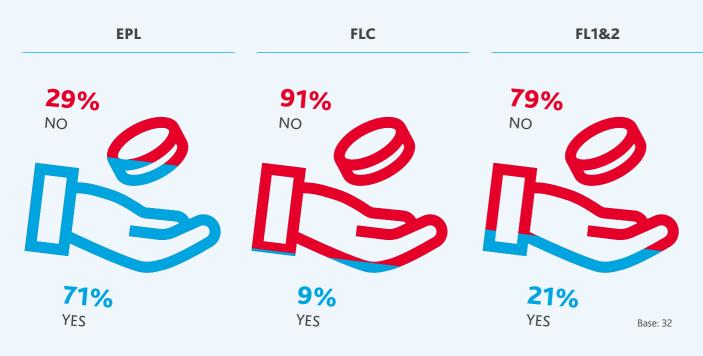
So why do EPL club's see the availability of finance so differently to lower league clubs? It is because they are bigger and therefore generate significantly more revenue? Well yes, but this is not the full story.

EPL clubs do generate more revenue but have commensurately higher costs. If lenders can place restriction on these costs (through transfer fee or salary level covenants for example) they can make this work.

Additionally, EPL Clubs have the financial protection of parachute payments. These offer relegated clubs EPL distributions for up to three years post relegation, and it is without question that mainstream lenders take this into account.



ARE YOU CURRENTLY SEEKING THIRD PARTY DEBT FINANCE?



Whilst availability of finance is clearly weighted to the larger clubs, it was pleasing to see that all but one Respondent said that availability (or lack there of) external finance had not impacted their Club's ability to compete as a club. All in the same boat as it were!

On the one hand it is encouraging to see that so many Clubs have weathered the storm this far. Without some astute financial management, 'reliefs' and shareholder support, we would have seen more Clubs either change hands or worse.

On the other, there remains an overriding concern over debt levels that, at best are limiting the opportunity for clubs to invest in potentially lucrative new revenue streams. So, with possibly tougher times yet to come, and support packages starting to ease, the pressure is far from off shareholders.

2021 | FOOTBALL: MEBACK 13

"MAIN LENDING BANKS WILL NOT TOUCH FOOTBALL AS A RULE."

"THE 'FUNDERS' VIEW THAT THE CURRENT FOOTBALL MODEL AS A BUSINESS IS NOT SUSTAINABLE.'

"FINANCIAL ACCOUNTS WOULD TYPICALLY SHOW A LOSS WHICH MOST COMPANIES/BANKS WOULD PREFER NOT TO PROVIDE **CREDIT AGAINST. STADIUMS ARE OFTEN ON RENTED LAND SO** LITTLE ASSET ASSURANCE."

THE DIGITAL

GROWTH OPPORTUNITY





ARTNER

ASSOCIATE DIRECTOR

HISTORICAL BARRIERS TO DIGITAL

Whilst digital opportunities have been on the horizon for some time, many factors held clubs back from fully embracing the digital age, including:

- Traditional revenue sources, focused around match day income and broadcast revenue, meant that this potential additional revenue was not required
- EPL and EFL, in seeking to protect match day income, put blackout rules in place preventing the broadcast of matches at 3pm on Saturdays
- Fans who attended games didn't want streaming as it would dilute their importance to the club and their experience
- It was perceived as expensive for clubs to install, without certainty that i) it would work, and ii) people would pay for it.

Once these barriers were removed and match day revenues were taken away, clubs needed to supplement their income, presenting the perfect opportunity to embrace digital.

There was support from the EFL, not only in allowing streaming to take place for all matches, but in making its iFollow platform available to clubs to stream matches.

The sudden need for digital solutions provided a proof of concept, from both a demand and supply viewpoint, to clubs who may have previously been reluctant. The technology was shown to be capable of providing the required level of service and the uptake demonstrated that people are willing to pay for a streaming service.

Whilst for men's football, digital is a largely unexplored opportunity, in women's football a digital presence has been a necessity. Without the mainstream media coverage, women's football has had to be more innovative and build up a digital presence.

Fans attending games in stadia have often opposed moves towards the availability of live games, which is crucial to a credible digital offering. This is part of a view that fans that attend the games are the "real fans" and allowing armchair fans access to all games would dilute their importance to their club, both in terms of support and revenue.

However, the pandemic showed that people do not want to watch games in empty stadia with no atmosphere. This actually heightens the role of the fans who attend games, making them a key part of the product. This role could be further expanded with fan-led content on the digital service. There may also be an argument for reducing match day ticket prices if (i) crowds are enhancing digital revenues and (ii) digital revenues grow to an appropriate level.

One of the most appealing factors with digital services, is the data that clubs and their partners, are able to gather. Clubs can start to gain a better understanding of who and where their fanbase is and what they particularly like and dislike. Services can then be tailored to either the existing fanbase, a new target fanbase or a combination of the two.

With the sensitivity of data usage, and invasion of privacy, clubs will need to ensure that they are handling data responsibly, and that their chosen partners are the right kind of organisations.

THE RIGHT CHOICE OF PARTNERS

We expect that there will be greater scrutiny on the ethical nature of where commercial investment comes from; organisations will be called out by various stakeholders for



engaging with investment that has come from a source that is not appropriate. Of course, gambling sponsorship is currently in the spotlight amidst reports that the Government is planning new controls over betting operator kit sponsorship. This would impact approximately half of the EPL and many lower league clubs who for some time have seen betting companies as their highest yielding sponsorship options.

GLOBAL APPEAL FOR SPONSORS

Clubs across all leagues say suitable sponsors are becoming harder to find, and if Euro 2020 is anything to go by, sponsors will need to come from further afield in the future



Base: 32

DO YOU THINK SUITABLE SPONSORS AND **OTHER COMMERCIAL PARTNERS ARE:**

72% 3% 25% BECOMING BECOMING NO REAL HARDER TO FIND **EASIER TO FIND**

An immersive digital experience with enticing content that can be accessed anytime, is a sure-fire way to attract the TikTok generation of fans to football clubs. This will, in turn, attract different sponsors who are seeking to target this younger generation.

Digital platforms will turn the dynamic for sponsors on its head. There could be a move away from the traditional sponsorship model of paying fixed sums for names on kits and advertising boards around stadia towards fully integrated value driven models based on access to fans, the team activities and performance, and the wider market.

As the digital platform can be accessed from anywhere in the world, UK sponsors could use this to access new markets, or new sponsors from overseas could be drawn into UK football. Clubs would be able to allow different commercial partners to have different rights in different jurisdictions including different shirt sponsors depending on where the viewer is located.

IMPORTANT ROLE FOR PLAYERS

The importance of players could be augmented beyond on-field performance.

Players and behind-the-scenes access to players, can drive digital content because fans want access to players.

But as well as players driving demand for digital services, the move towards digital could change the way that players are valued.

Rather than value being based on a combination of talent, age and remaining contract length, values could be driven by the player's public appeal and potentially by their social media following. The success, and infectious smile, of Son Heung-Min at Tottenham Hotspur has led to them overtaking Manchester United as the most popular foreign club in South Korea, and trends like these do not go unnoticed by clubs and potential commercial partners.

INVESTMENT FROM THE DIGITAL SECTOR

As we have seen in recent years, there has been a significant entrance into the football market from some of the streaming giants. Amazon Prime Video streamed its first Premier League game in 2019, and has produced a number of football documentaries including "All or Nothing", which has shown behind the scenes trials and tribulations of a number of sports teams in the NFL, Rugby Union and the Premier League.

Large-scale digital streaming companies, such as Amazon Prime and DAZN, may want to take their own shot at providing market leading digital platforms for clubs. Whilst to date the EFL's iFollow has been popular for the streaming of games, there may be greater opportunities for clubs, and their Partners, to seize commercial digital opportunities with their own solutions.

IS DIGITAL A GOLDMINE FOR EQUITY INVESTORS?

Our co-authored publication with The Sports Consultancy, 'The Investment Pitch: Private Equity In Sport', expands on why PE and professional sports have finally become compatible, including what investors are looking for in investments:



RECURRING REVENUES

e.g. game day income

CONTRACTED REVENUES

e.g. partnership broadcast, sponsorship & host cities

DISRUPTORS

e.g. social media investment

INTELLECTUAL PROPERTY

e.g. chain of control across key IP

GROWTH

e.g. revenue growth

CASH GENERATION

e.g. positive cash flow over the investment period

STRONG MANAGEMENT TEAMS

e.g. skills, experience, vision

SCALABILITY AND LATENT POTENTIAL

e.g. new fan markets

BRAND LOYALTY

e.g. season tickets sales / retention

As set out above, digital platforms offer opportunities to investors in most of these areas. In short, digital is what will attract new investors to football. Private Equity in particular may be interested in what they can do to further enhance these opportunities, by introducing digital specialists and other synergistic organisations.

WOMEN IN FOOTBALL: **A PERSPECTIVE**

FROM THE SPORTS CONSULTANCY





KIRSTEN SIBBIT-IOHNSTON ASSOCIATE DIRECTOR Consulting, The Sports Consultancy





ABOUT TSC

TSC is the leading independent boutique advisory working with the world's leading events, sponsors, venues and hosts in the development, investment and commercialisation of sports and entertainment assets. Over the last 15 years, TSC have built a client portfolio that includes the world's leading international federations, private commercial rights holders, host governments and institutional investors.

When we first started working with The FA in 2019, the recently professionalised

Women's Super League (WSL) and semi-professional Women's Championship were in their first season and whilst ambitions for the sport were high, expectations were more modest.

Since then, the WSL has seen significant increases in income from its two major revenue streams through the Barclays sponsorship deal and the recent Sky Sports and BBC broadcast deals.

In the recent broadcast tender, strong competition enabled the WSL to achieve both reach and revenue with Sky Sports investing up to £15m per season in fees, production, marketing and exposure commitments and the BBC showing up to 22 games per season. This, in addition to the significant sponsorship investment from Barclays, has brought more money into the game and enabled greater distribution of money to clubs.

However, our experience in 2018/19, which has been reflected in BDO's research this year, is that clubs are still not sold on the benefits of the women's game.

The investment in the women's game has often been about doing 'the right thing' rather than doing something that has a genuine business benefit. This has limited the women's game to reach its potential and generate the kind of revenue that is possible.

Within most clubs, women are not given the opportunities to excel as athletes in the same way as their male counterparts. When Casey Stoney resigned from her role as Head Coach of Manchester United Women, the media reported frustrations with the training facilities and infrastructure available for the women's team. Women's salaries are significantly lower. While this is to be expected given the excessive salaries paid to the top men's footballers, some female footballers are earning barely the living wage.

A recent FIFA study into

women's football highlights the resourcing disparity in the women's game. It found that 73% of women's league champions have higher player wages than that of other teams in their league. Not only does this affect the overall competitiveness of the leagues but it also weakens the value proposition from an investor and viewing perspective.

This highlights the opportunity for leagues and clubs. By improving talent and increasing the number of inspirational personas, clubs can grow their sponsorship opportunities as a result of more interest and exposure.



WHAT WILL DRIVE FUTURE GROWTH?

The FA's approach to selling both the sponsorship and broadcast rights for the WSL separately from any men's rights, is a positive sign for the future. FIFA's study found that leagues with broadcast rights exclusively for the women's league generated more revenues.

From a club perspective, there is potential to see much greater returns, but this is dependent upon their commitment to the women's game. FIFA's analysis discovered that clubs with a detailed vision for their women's teams had 224% higher average revenues.

Clubs need to see their women's teams as both a revenue stream in their own right and as something that can benefit the club as a whole – offering more opportunities to win matches and building an attractive brand that partners want to align with. Gender equality is increasingly important for brands and broadcasters, providing an opportunity for leagues and clubs to leverage this to build stronger, long-term partnerships for their women's teams.

Broadcast revenues currently account for an average of only 6% and 18% of total revenues for women's clubs and leagues respectively.



Traditional men's football leagues Serie A, English Premier League and La Liga attribute 56%, 40% and 40% of total league revenues to broadcast respectively.

This is, in part, due to the number of fixtures played each season. In the EPL and La Liga, 20 teams compete over 380 matches played per season, more than twice as many games as the 123 match season average across the leading 30 women's league surveyed.

Raising more revenues for the sport as a whole will require more women's football of the top quality that is more visible to more people. Increasing the proportion of matches produced (correlated to increasing the number of professional women's teams) and subsequently broadcast could increase the appeal of the women's game to broadcasters. More teams investing in the game will quickly push standards up.

We've seen this to an extent in the WSL where clubs have invested more in attracting overseas talent and retaining English talent with transfer fees and higher salaries. If there is greater strength in depth in the women's game and a greater level of professionalism of the athletes, that could pave the way to expanding the size of the league and increasing the number of matches played.

As fans flood back into stadia following the relaxation of restrictions and a successful Euro 2020, the demand for football appears to be unwavering.

In fact, with recent events only serving to demonstrate the inelasticity of our demand for football in all its forms, investor appetite may well have strengthened. Yes, we have seen significantly fewer transactions of late, with uncertainty creating a temporary divergence between buy-side and sale-side pricing expectations, but we have seen some, and we can well expect a flurry of deals as the new normal beds in.

Broadly speaking, owners and executives have made remarkable efforts to continue to trade through the pandemic. However, having injected support equity, and taken on debt that will become due before long. further investment in growth may well be beyond the reach of many owners.

Ultimately, in many cases this will play into the hands of sophisticated, institutional and private equity investors who have the means to look forward, not back, and base investment decisions on new as well as existing revenue streams. This is particularly true in the case of US investors who believe elements of the US brand and media

led model can be replicated in the UK. All indicators suggest that the institutional investor will up the ante.

THE PANDEMIC HAS NOT DAMPENED **INVESTOR** APPETITE, **BUT WHY SELL NOW?**

In this year's survey responses, we are seeing no let-up in interest from new investors - nearly half (44%) of Clubs having recently

been approached by potential suitors¹ – albeit with only 22% of Clubs considering a full or partial exit², most Clubs are saying that they are not for sale. Burnley FC was the only completed EPL takeover

It is unsurprising that relatively few shareholders are currently seeking a full exit while there are COVID-19 and Brexit headwinds. Unless owners are forced to sell, they are best advised to do so from a position of bargaining strength, with existing income streams at their highest and with new future revenue streams on the table. For investors, unless a bargain can be found, it is prudent to wait until there is more certainty over future trading (or, rather, less uncertainty over short term set-backs).

during lockdown.

It is in partial exits where we have seen most recent deal activity, with multi-club and overseas academy strategies the principal reasons for seeking joint ventures. Manchester City, Everton and Leeds in the EPL have all attracted further shareholder investment since 2019.

This is perhaps why, even though the number of shareholders seeking full or partial exit is low, it is **higher than** last year (14% in 2020).

In the most simple of terms, some owners are seeing value in giving up a share of the pot on the promise of a bigger pot.

With that said, COVID-19 restrictions continue to ease, fans are returning to stadia, and the EPL broadcasting deal has been rolled forward for a further three years. Clubs can therefore finally start to plan with less uncertainty. This points to increased M&A activity in the short to medium term, with new owners determined to pursue new opportunities. In answer to the question of why sell now: if there is a need to sell. owners may finally have an opportunity to do so at a reasonable price; if there is a desire to sell, a strong case can be made for the financial returns to come from a new global digital future.

SHAREHOLDER INVESTMENT **DRIVING INCREASED VALUATIONS AND INCREASED DEBT**

Shareholders have been fundamental in keeping Clubs afloat during the pandemic. With shareholder funding being used to prioritise improved fan engagement, academies and real estate³ (perhaps an element of 'prepping for sale'), it should help make clubs more sustainable, with higher. more diversified, post-COVID-19 income streams. It is this new normal trading that we see most businesses (across all sectors) point to when setting valuations.

WHO WILL BE TAKING

FOOTBALL FORWARD:

THE FUTURE OF FOOTBALL INVESTMENT







¹[Q8a] As far as you are aware, within the last 12 months has the Club been subject to an informal or formal approach from prospective investors with a view to take an equity stake in the club?

²[Q7] Are the current equity owners of the Club considering a full or partial exit within the next 12 to 18 months?

³[Q9] What are your key strategies other than promotion and avoiding relegation, for development / growth in order to further strengthen the football Club?

⁴[Q8b]: Types of investors which have approached clubs in the last 12 months.



Valuing football clubs is unique for a number of reasons (relegation and promotion, transfer windows, centralised media rights, P&S regulation to name but a few) but a multiple of one to two times revenue is where most football club takeover valuations sit

Based on our benchmarking data, the clubs that achieve or exceed the upper end of this normal range are typically those with international fan engagement and multi-club/academy strategies, with diversified income streams. As well as sustaining their Clubs, shareholders' recent investment priorities should drive higher business valuations.

On the flip side, a negative consequence of increased shareholder investment - on top of the various ticketing and sponsorship deferrals (discussed earlier) - is increased indebtedness on clubs' balance sheets. In our experience, this is often a key point of negotiation between buyers and sellers. However, early in M&A processes, we always advise careful planning around deal structure and completion mechanics, which can ensure fair compensation for indebtedness for both parties.

UK TOP FLIGHT FOOTBALL AS AN **ATTRACTIVE PROPOSITION FOR INSTITUTIONAL INVESTORS**

Despite its unique characteristics, it appears that private equity and institutions finally view football - or at least the EPL and EFC as a genuine business asset class⁴.

While some investors (including high net worth investors) have historically been lured to the lower leagues with the objective of climbing through the divisions and tripling valuations, competition across the leagues has made this an increasingly challenging and expensive gamble.

TYPES OF INVESTORS THAT HAVE APPROACHED CLUBS IN THE LAST 12 MONTHS



Instead, the main opportunity football now presents to institutional investors is the ability to grow and broaden commercial revenue streams on the back of a captive and loval existing customer base, and new domestic and international customers hungry for media content, both of which are considered lucrative assets. It also helps that c.£120m+ of EPL club revenues are from contracted broadcasting distributions and – together with sponsorship income - are highly predictable.

Our co-authored publication with The Sports Consultancy, 'The Investment Pitch: Private Equity In Sport', expands on why private equity and professional sports have finally

become compatible, and hence why PE investment in sports is becoming increasingly commonplace.

CONSIDERABLE AND GROWING INVESTMENT DEMAND FROM THE USA

Much of the increased institutional demand is driven by the US. Nearly two-thirds of approaches to Clubs have been from the US⁵ and (as shown opposite) investment from over the Atlantic also accounted for most completed M&A transactions across domestic leagues in 2020 and 2021. There were also high profile US investments made in Roma and Spezia Calcio, although the UK remains the top choice for most US investors. US private equity, institutions and franchises have both the funds and expertise, which makes them a good fit for UK sport. Many have dedicated teams, with transferable skills, leading advanced marketing and fan engagement strategies, often making hundreds of millions in revenue from their brand and commercial rights. Investors know that importing these strategies to the UK, and even exporting content back to the US spectator markets, can be transformative.

Base: 13

The option of US institutional investors - in addition to high net worth investors, who remain interested in football - should therefore be a good thing for clubs, supporters and owners who generally want their clubs to thrive post-acquisition.

FAN OWNERSHIP NOT WORKABLE(?), **BUT STAKEHOLDERS NEED TO BE** CONSIDERED

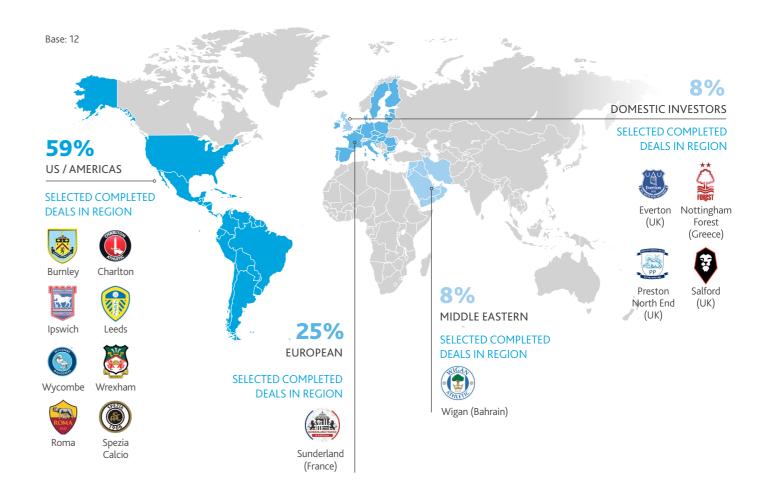
The last 12-18 months have shone a light on the importance of governance and whether football clubs are structured in a way that promotes consideration of wider stakeholders, in particular, the fans.

Some have pointed to fan ownership models as a potential solution to this, and it's in FL1&2 where fan investment has historically been most prevalent, and most needed. 28% of approaches to FL1&2 Clubs in the last 12 months were either from individual fans seeking entry into football ownership or broader supporters groups⁶. The issue of fan ownership and the Government's fan-led review is explored in more detail below ('What stakeholders expect from football clubs in future?')

Of course, this is broader than just the fans, as we discuss later. Clubs (and businesses in general) are becoming increasingly aware of the influence of environmental, societal

% APPROACHES TO CLUBS (ALL LEAGUES) IN THE LAST 12 MONTHS. BASED ON JURISDICTION OF INVESTOR

AND SELECTED CLUBS SUBJECT TO TAKEOVERS OR FURTHER INVESTMENT IN 2020 AND 2021 (BASED ON MEDIA COVERAGE)



⁵[Q8c] As far as you are aware, within the last 12 months has the Club been subject to an informal or formal approach from prospective investors with a view to taking an equity stake in the club? If yes, where have they been from.

and governance factors on their business. The most progressive investors we work with have ESG at the forefront of their business plans; they are also clear that ESG is no longer a box that needs to be ticked, but is an important tool for enhancing the value of their business.

To reflect on the question of who will take football forwards, the answer football appears to be heading towards is sophisticated, forward-thinking investors, as long as they have wider stakeholders' views properly considered and longer term sustainability.

A PERSPECTIVE FROM TWENTY FIRST GROUP





OMAR CHAUDHURI CHIEF INTELLIGENCE OFFICER, Twenty First Group

THE ROUTE TO POST-COVID REVENUE GROWTH FOR ENGLISH FOOTBALL CLUBS

TWENTY FIRST GROUP_

One of the truisms of running a football club is that no matter how much revenue you generate, your costs will follow in lockstep. For most football clubs, this has for many years been just about manageable. But, thanks to COVID-19, for the first time in living memory clubs suffered a significant negative revenue shock that was not because of relegation. Clubs have long mitigated the risk of relegation through clauses that reduce wages, but there was limited means to do this in a pandemic. For the average Premier League club, wages to revenue exceeded 75% in 2019/20. In the Championship this ratio jumped over 130%, representing a roughly 25% increase on the previous season for both divisions.

Indeed, one of the motivations for the ill-fated European Super League was an ambition to control costs. Irrespective of whether you believed the clubs could realise the forecasted revenues, it was notable that the spending regulations were a more cogent part of the plan than the sporting aspects.

It has therefore become clear to us at Twenty First Group that without radical reform – or at least a simpler mechanism by which to implement existing rules – clubs need to continue to grow revenues to maintain breathing space with costs.

In the current climate, this looks a daunting challenge. There has been very few signs of growth in the media rights market since the start of the pandemic, not just in football but in other sports too. And while a return to full capacities means match day revenue will hopefully return to pre-COVID-19 levels, even England's wealthiest clubs have not been able to grow this income stream without making significant investment in new stadia or stands. The average club in the top two divisions grew match day revenue by just 13% between 2015 and 2019 (wages, by contrast, grew 61%).

COMMERCIAL REVENUE IN FOOTBALL

One revenue stream that English clubs are actively exploiting is commercial revenue, which grew 54% in the five seasons before the pandemic outbreak. This in part is because sponsors recognise that there is almost no platform like English football. But sponsors are also increasingly aware that simply having eyeballs on their signage isn't sufficient to develop a meaningful connection with fans.

Some of the most forward-thinking football clubs are therefore thinking about bringing more value to the table to prospective sponsors. Firstly, they are using data to truly understand their audience, beyond social media likes and follows. Having a greater understanding of the types of supporters they have, and their preferences, means clubs can deliver much more tailored Content and insight – allowing brands to partner on activations that speak directly to the right audiences.

The average club in the top two divisions grew match day revenue by just



between 2015 and 2019 (wages, by contrast, grew 61%) This content is also now going far beyond behind-the-scenes video or man-of-thematch social posts. Brands like Aon and KPMG in golf, IBM in tennis, and FedEx in football have attached themselves to successful activations that give fans a much deeper understanding of the sport, using performance data to tell stories about the challenges, probabilities, and successes of the athletes on the course, court, or pitch. It is becoming imperative that clubs offer something more than a name on LED boards and training kits; brands want to enhance the narrative around the matches and competitions in a way that fans truly benefit from that sponsor's involvement. The clubs that can think creatively and offer this will be able to attract greater commercial revenues as a result.

At the start of the decade, **spending on under-21s** represented under

8% of the market, but in the last two seasons this has jumped to 12% of all spending

In 2019 the top 15 leagues on the continent added

31% to their 'traditional' revenue through transfer

income, with all the other 'big 5' leagues above 20%

TRANSFER REVENUE GROWTH

The other source of revenue that English clubs are looking to grow is transfer revenue. It is an income source that has been especially exploited in Europe. According to figures from UEFA, in 2019 the top 15 leagues on the continent added 31% to their 'traditional' revenue through transfer income, with all the other 'big five' leagues above 20%. However, Premier League clubs only generated a 12% uplift in revenue from player sales, while the Championship sat below Italy, France, and Portugal's top divisions.

The most obvious way to resolve this issue is to invest in youth. In the 2020/21 season, the only segment of the market to experience growth in transfer income was on players aged under 19; for older age groups the interest in paying fees totally collapsed. At the start of the decade, spending on under-21s represented under 8% of the market, but in the last two seasons this has jumped to 12% of all spending. Interest in young players is even more heightened than ever and will likely remain so, and consequently it has never been more important to have a productive academy and an ability to spot undervalued young talent.

Above all, growth in commercial and transfer revenue will require clubs to see where the industry is heading, and a boldness to get ahead of what rivals are doing today.

TWENTY FIRST GROUP_

ABOUT TWENTY FIRST GROUP

Twenty First Group provides groundbreaking sports intelligence to drive sporting success and unlock commercial value. In professional football, they work with teams, brands, agencies, and investors to identify and value talent, improve performance, conduct due diligence, and deliver sporting excellence.

ABOUT OMAR CHAUDHURI

With a decade's experience in the industry, Omar supports organisations across sport in strategic decision-making and storytelling using the power of data. In football, he has worked with Champions League finalists to League Two clubs, helping clubs unlock their sporting and commercial potential using data.



PLAYERS: HAS THERE BEEN A SHIFT IN THE BALANCE OF POWER?

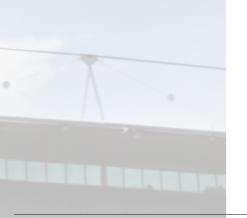




DAVID ROGERS ASSOCIATE DIRECTOR



DIGBY JACKSON SENIOR MANAGER



Players heading towards the end of their contracts creates an interesting dynamic in the balance of power between player and club, although much of this depends on the player and club in question.

At the end of the 2019/20 season, with uncertainty rife in the midst of the pandemic, 31% of Clubs, primarily in FLC and FL1&2, said that they would let contracts expire to reduce their wage bill. This figure has risen slightly in 2021 to 35%, again concentrated in Football League clubs 7.

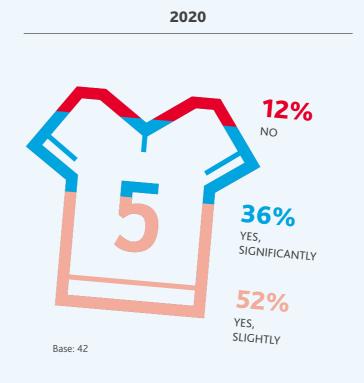
Whilst there is clearly still a large amount of pressure on Clubs, the percentage of Clubs expecting to apply downward pressure on contract renewal has decreased from 88% in 2019/20 to 40% in 2020/21, with greater pressure imposed by FCL and FL1&2 Clubs.

This is also shown in the proportion of Clubs that said they would spend less or the same on wages, which has decreased from 95% in 2019/20 to 75% in 2020/218.

⁷Q56c – For contracts that will be expiring over the summer, do you plan to extend contracts in much the same way as you did pre-COVID, let enough contracts expire to reduce overall squad size, make more use of one year extensions on the same terms, or other

⁸Q56b In your budget for 2021/22, do you expect to spend more, the same or less on the payroll cost of the first team squad than the 2020/21 season

DO YOU EXPECT TO SUCCESFULLY APPLY DOWNWARD PRESSURE ON PLAYERS' SALARIES UNDER CONTRACT RENEWAL?



Despite Clubs in FLC and FL1&2 being in an uncertain financial position, they still held the balance of power over the future of players whose contracts were expiring, or due to expire.

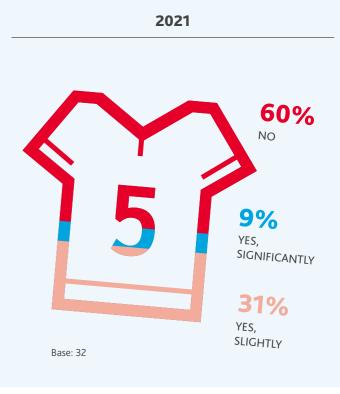
In the EPL, and in a number of other major Leagues across Europe, the balance of power is different; it is more with the players. There are several instances of players entering the final 12 months of their contracts, and holding out on signing new contracts. As the club, and prospective buyers, know that the player can leave for free when his contract expires, prospective buyers are prepared to pay less and selling clubs have to weigh up whether to cash in, albeit at a lower value, or hold on and risk the player leaving for free. Alexis Sanchez was an excellent example of this. back in 2018, when Manchester United and Manchester City competed to sign him,

before he chose to move to Manchester United on a four-and-a-half-year deal worth £14m a year after tax, a wage that would not have been affordable if there had been a sizeable transfer fee, and would not have been so high but for the competition for his signature.

Whilst for high-profile players in high demand, this presents opportunity, in the lower league, this would be a perilous position for players, with a release upon contract expiry potentially being the end of the road.

Part of the consideration for clubs, in terms of renegotiating contracts and making transfers both in and out, is weighing up the financial versus performance impact of their decisions. Again, taking the player entering the final 12 months of their contract, the club must

⁹Q59 Are you likely to increase or reduce your transfer budget for 2021/22?



decide if the gain of keeping the player for the season and re-signing or letting them go for free at the end, outweighs the financial benefit of making the sale and receiving a transfer fee.

This is a particular consideration when clubs plot their business model, as some clubs are reliant on player sales and developing players for future sale in order to balance the books.

In relation to transfers, in 2019/20 no Clubs said that they planned to increase their transfer spend. Whilst opinion was largely the same in 2020/21, a small number of Clubs said they were seeking to increase their transfer budget, though this may merely be a return to pre-pandemic levels9.

As a demonstration of post pandemic positivity, EPL Clubs have shown a desire to flex their muscles over the coming year, with 71% of EPL Respondents stating they would be net buyers of players (compared to only 25% last year), while FLC and FL1&2 continue to be majority net sellers.

This may be evidence that EPL clubs are better able to bounce back from the financial impacts of COVID-19, and the greater and longer lasting impact that the pandemic has had on lower league clubs, driven by the lower league clubs higher dependence on match day revenue without the support of lucrative television and sponsorship deals (which EPL clubs can leverage to take on additional debt). The ability to bounce back from COVID-19, and the relative financial strength of the EPL clubs means that they are able to invest in players. And while the clubs themselves are in a powerful position, it is this ability to spend that actually gives power to players who are the recipients of more interest and better wages, amongst other things.

For EFL clubs, and their players, the opposite is true as less available funds puts a greater squeeze on players.

Clubs across Europe have suffered mightily as a result of both the pandemic and financial regulations. Many clubs are now having to sell players to both generate funds and reduce their wage bills. FC Barcelona is one club which is reportedly paying the price for years of overspending, and are now seeking to reduce their wage bill in order to be able to sign new players, including the release of Lionel Messi. This predicament, common across Spain and other European Leagues, means that EPL clubs have a competitive advantage and are able to swoop in and sign players at potentially below-market rates, including some of Europe's most promising up-and-coming talent.





And speaking of up-and-coming talent, the pandemic has again increased the emphasis for academy investment, particularly in FL1&2, where 64% of Clubs said there was a greater need for investment, the same level as in 2020¹⁰.

The main reasons provided for the increased importance of academies related to club finances, both in terms of generating income from player sales by generating sell-on value, and reducing outgoings on both transfers and wages, with academy players adding to squad depth at much lower wage levels.

Somewhat surprisingly, given the might of EPL Clubs and their power in the transfer market, 71% of EPL Clubs expect to see their academy to first team conversion rate increase vs. 42% last year. This suggests that EPL Clubs are increasingly viewing their academy as a key source of first team talent,

perhaps inspired by the success of young English players in the EPL, the Bundesliga and on the international stage. Whilst EPL Clubs expect more academy players to feature in the first team, there is a firm intention to keep squad sizes and wage bills at the same level going forward¹¹, potentially making room for other players on higher wages.

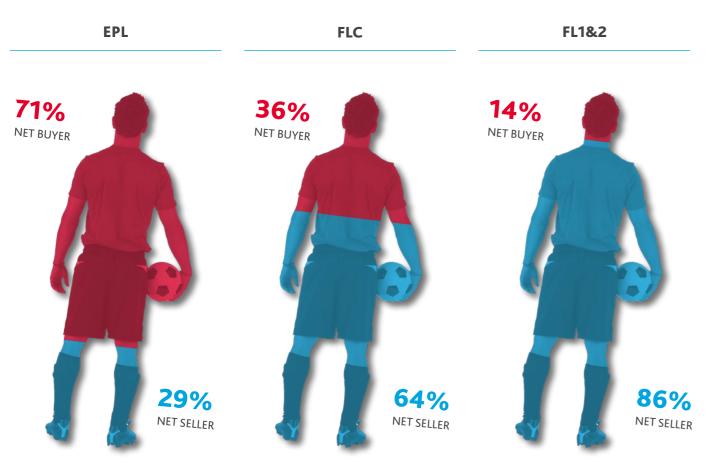
Despite expectations that football league clubs may become more reliant on their academies post-pandemic, there was a decline in the number of FL1&2 Clubs expecting to see their academy to first team conversion rate increase, down from 53% to 43%. Much of this reluctance to play academy players in the lower leagues seemed to relate to the pressure for short-term success, which doesn't give clubs the luxury of allowing time for player development.

¹¹Q 56a In your budget for 2021/22, do you expect your first team squad size to be bigger, the same or smaller than the 2020/21 season? And Q56b In your budget for 2021/22, do you expect to spend more, the same or less on the payroll cost of the first team squad than the 2020/21 season?

¹²European Super League: YouGov poll finds 79 per cent of fans oppose elite competition

IN TERMS OF SPEND, DO YOU INTEND TO BE A NET BUYER OR SELLER OF PLAYERS?

2021 Base: 32



¹⁰Q47a Has COVID-19 increased the emphasis on the need for an academy?

SUPER LEAGUE

On Sunday 18th April 2021 it was announced that 12 clubs from England, Italy and Spain had agreed to take part in a new European Super League (ESL). From England, this was Arsenal, Chelsea, Liverpool, Manchester City, Manchester United and Tottenham Hotspur.

This decision, which was subsequently reversed, has had a wide-ranging effect across the game including the executives of these clubs resigning their positions in the European Club Association. There is now ongoing analysis as to whether the big clubs will take similar decisions again or whether controls can be put in place to reduce that risk materialising.

THE PLAYER RESPONSE

Players, both from clubs involved and not involved, voiced their dissatisfaction at the prospect of the European Super League. Much of the opposition was based on the concept of football being for the fans.

Ex-players also made comment, with Gary Neville calling for financial punishment and points deductions.

THE FAN RESPONSE

Fans protested online and outside grounds to oppose the Super League. The participating teams were not only targeted by opposition fans, but also by their own.

A poll conducted by YouGov after plans to form the league were announced found that 79% of fans were against the proposals¹².

THE PREMIER LEAGUE, FA, UEFA AND **FIFA RESPONSE**

The League was condemned by the Premier League, FA, UEFA and FIFA. UEFA announced it would use all available measures to stop the project. The remaining 14 Premier League clubs met and voted against the plans unanimously.

THE POLITICAL RESPONSE

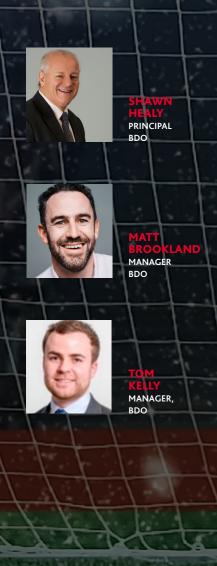
The Prime Minister and Leader of the Opposition made comment, supporting the actions of UEFA and the Premier League in opposing the Super League.

THE OWNER RESPONSE

By Tuesday 20th April 2021 all six of the Premier League clubs had pulled out, and in the following days, the owners of these clubs issued apologies to their fans.

WHAT DO STAKEHOLDERS

EXPECT FROM FOOTBALL CLUBS IN FUTURE?



Much of our report this year is pointing to growth opportunities for football. In fact, with COVID-19 highlighting the importance of professional sport to our nation, with demand for content being accentuated, and with the penetration of digital markets being accelerated as a result, there is every reason to expect further institutional investment into football.

So, in the coming months and years we can absolutely expect to see financial reporting responsibilities such as Strategic Reporting and ESG (Environment, Social and Governance) forced up the agenda.

Gone is the concept of financial reporting being simply for shareholders. Football clubs, like all companies, need to consider the needs of wider stakeholder groups and this is now very much reflected in the Financial Reporting Council's (FRC) requirements for annual reports.

The FRC continues to set the UK's Corporate Governance and Stewardship Codes and promotes transparency and integrity in business.

The work of the FRC is aimed at investors and others who rely on company reports.

Investor stakeholders are considered in detail in our 'Who will be taking football forward: the future of football investment' section of the report above.

The two elements of annual financial reporting receiving the most regulatory attention at this moment in time are the Strategic Report (including Section172 of the Companies Act) and, for private companies, SECR (Streamlined Energy and Carbon Reporting) and TCFD (Climate Related Financial Disclosures).

In both cases, explored further below, this is not a simple tick box exercise. The expectation is that all companies that meet the large company criteria¹³ - including football clubs will provide information that is:

- Fair and balanced
- Clear, concise and comprehensive
- Entity specific and
- Explains linkages between these disclosures and the financial information in financial statements.

This forces football clubs to be answerable to wider stakeholder groups for the impacts of their decisions.

Notwithstanding personal opinions on matters such as a European Super League, what we have seen in recent months is the influence that these wider stakeholder groups can have if they object to a football clubs' strategic decisions.

¹³Two or more of: Turnover greater than £36m; Total assets greater than £18m; Employees over 250. This covers all English Premier League Clubs and a number of English Championship clubs.

FINANCIAL REPORTING REGULATORS

PLAYERS

HMRC

FOOTBALL

CLUB

STAKEHOLDERS IN FOOTBALL

The following pages outline what each football club stakeholder will expect from clubs in the future.

COMMUNITY

GOVERNMENT

LEAGUES & GOVERNING BODIES

FINANCIAL REPORTING REGULATORS

Owners and directors of football clubs are connected to their respective clubs either through a direct investment or through their employment with a club. They are the key decision makers and have the power to implement change within football clubs, whether this is externally or internally driven.

In the coming years, external regulatory influences are likely to impact football clubs to a much greater degree. These influences are likely to become apparent through a combination of heightened regulatory attention on Section 172 statements within Strategic Reports, increased ESG reporting requirements and any outcomes from the ongoing UK Government fanled review of football governance.

Section 172 statements require companies that meet the large company criteria to prepare a Section 172 statement. A Section 172 statement should include details of:

- The issues, factors and stakeholders considered relevant in making key decisions, and how directors have formed those decisions
- The methods used to engage with stakeholders and understand the issues to which they must have regard
- The effect of that regard on the company's decisions and strategies during the year.

In May 2021 the Fan Engagement Index found that the 'Big Six' English clubs all ranked in the bottom half of English professional football clubs for fan engagement¹⁵. This is probably in part due to the actions of Owners and Directors in signing their respective clubs up to the European Super League. This raises a question of how large football clubs can claim ongoing compliance with Section 172 at current levels of engagement with a key stakeholder group such as fans.

Work should already be ongoing within clubs to review and produce ESG-focused

strategies, aligned to the most appropriate guide, for example the UN Sustainable Development Goals (SDGs). In addition to internal strategies, there is growing Government led regulation that clubs will have to comply with: (i) TCFD, which focuses on Governance, Strategy, Risk Management and Metrics; and (ii) SECR, the most common at the moment within the UK, as well as S and G focused regulation, the Modern Slavery Act 2015 and The Equality Act 2010 Gender Pay Gap Information Regulations 2017.

The breadth of regulation will increase, especially following the COP26 meeting (the 2021 United Nations climate change conference), being held in the UK in November 2021 and the amalgamation of the standards bodies to create International Sustainability Standards Board (ISSB). However, given Brexit, there are differences between what UK clubs have to adhere to/disclose compared with large clubs in Europe. Therefore, coupled with the other changes that owners need to focus on, sorting out internal data collection, systems, and developing the ability to report is of paramount importance with regards to ESG compliance.

Our survey showed that:

- 83% of Clubs do not have an ESG strategy (including 57% of EPL clubs)
- Only two respondents have a carbon neutral target (one in the EPL and one in the FLC)
- Only two respondents have joined the United Nations Sport for Climate Change Initiative (again, one in the EPL and one in the FLC).

However, what is encouraging is that nearly two-thirds of Respondents have identified their ESG risks and inline with TCFD (albeit largely without specific targets) and over half are specifically considering ESG as part of their clubs wider decision making.

We note that only two Respondents have commercial sponsors that require ESG targets to be met as part of their commercial agreements. We suspect that as this changes in the future, which seems inevitable in the EPL before too long, it will become apparent to football that this is an important area where action is an immediate requirement.

Whatever further changes occur in the foreseeable future, owners and directors will continue to be the individuals responsible for their implementation, and will have to act accordingly.



Opinion will be divided on where players should, and in fact do, rank in the hierarchy of football's stakeholders. In the lower leagues. players - as stakeholders - are likely to require the same consideration, with the same level of employer duty of care, as employees in other industries. If this is not entirely the case now, one can expect this to be more explicit going forwards.

Unsustainable player salary to turnover ratios have been highlighted in our report for as long as we have been publishing it. However, COVID-19 has accelerated downward pressure on wages, and now lower squad sizes and salary caps highlight a new wave of concerns for players and the PFA.

See section 'Players: has there been a shift in the balance of power' for further analysis of the relationships between clubs and players. However in relation to regulation over player costs, our survey found that 66% of Respondents across all Leagues believe that a salary cap would improve the financial sustainability of football clubs¹⁶.

cap is perhaps a good example of how players will respond to what might be considered

¹⁵BBC Sport: How do the 'big six' rate on a new fan engagement table?

The PFAs response to a Championship salary

a necessary adjustment, and a good example of how delicately this stakeholder group needs to be managed.

At the other end of the spectrum it is clear that players, or perhaps more pertinently a smaller echelon of elite players, may be considered key stakeholders by virtue of their sheer value to a football club. Whether as players or tradeable assets, as individuals or as a collective, players can have a substantial impact on club decisions, club performance, fan satisfaction, media appeal, retail revenues and so on.

We explore below the impact that players are able to exert on the wider community, but they are also able to use their influence to impact on the policies of the media, their clubs and a host of other stakeholders. For example, the player-led response to racial injustice and racial abuse received by players and the community at large is influencing club and media policies. Players also have the ability to challenge their club's approach to a number of other issues, such as the environment, community impact, board diversity, etc.

So, we would suggest that whether it be because of higher relative influence afforded to individuals (at the absolute elite level), or lower individual bargaining power bringing about more unified action as a collective (at the lower leagues level), players will expect more, rather than less, from clubs in the future.

With players comes high salaries. With high salaries, comes agents. With high salaries and agents comes HMRC – another stakeholder considered below.

¹⁶Question 39: Do you believe that one or more of the following measures would improve the financial sustainability of football clubs? (select all that apply).





Fans (in stadia, pubs or living rooms) are the lifeblood of football clubs and the industry as a whole. Arguably, they hold the largest amount of influence over football clubs despite, in the main, not having any equity interest or direct decision-making powers.

Fans purchase the season tickets, club merchandise and television packages that provide much of the revenue that fuels the industry, and in some cases have provided clubs credit in the form of deferred season ticket payments during periods of football behind closed doors. For this 'investment' they expect a return-in-kind in the form of the pursuit of a dream. If the return on their investment falls short of their expectations, they will be a dissenting stakeholder: collegiate and disruptive.

The European Super League saga has been a catalyst for debate concerning the potential changes that should be made to the football industry. It highlighted an apparent disconnect between the priorities of owners of certain football clubs and those of the fans that support them. This has subsequently initiated discussions regarding whether fans should have a larger role in decision-making at football clubs.

In many ways this is not different to the real commercial risks faced by other industries where they are not aligning the way they operate their businesses to their customers' expectations. We can see this, for example, in the FRCs expectations for how businesses should be considering and disclosing how environmental matters may present real commercial risks. Social media and the power and speed of the herd can have almost immediate operating and financial implications.

One element of this discussion concerns the issue of fan ownership of football clubs, which is a topic included for discussion in the UK Government's fan-led review of football governance. The UK Parliament debated the 50+1 ownership model in light of a petition to debate the topic receiving over 100,000 signatures¹⁷.

A survey conducted by Power to Change found that 71% of respondents agreed that supporters should have greater opportunity to own clubs¹⁸.

The risk shareholders may want to consider of course is that fans can dilute a shareholder's equity value without acquiring any of their own.

Despite views on fan ownership being unworkable, it should not be completely dismissed as an option, at least not without due consideration. Competition law that takes into account heritage and culture (as seen in France), or structured proportionate fan ownerships (as seen in Germany) appear to be dismissed as 'unworkable' in the media far too readily. Maybe this is a not too distant throw-back to a pre-Brexit era under EU legal jurisdiction, and maybe new opportunities exist for a workable solution that enables greater fan representation without stifling investor appetite.

Whether a majority fan ownership model could be applied on a wide scale is a complex issue, which would likely be subject to legal scrutiny if such proposals were made. What is evident is that fans expect greater transparency and consideration in the decision-making process at football clubs. Once again we refer the reader to the requirements of Section 172 reporting above.



For instance, the work Marcus Rashford has done with FareShare is one example of a player giving back extraordinary amounts to his community and beyond. After receiving online abuse and having his mural defaced after missing a penalty during the Euro 2020 final, the community in Withington and beyond have come to his defense across social media. The defaced areas of his mural have since been covered up and had hundreds of messages of support attached. This incident highlights the interdependency between players and their communities, which in turn has a positive impact on performance and club success.



The same concept can be applied to football clubs themselves. Members of local communities often provide clubs with fans, who subsequently part with their money to purchase tickets and other merchandise

Local community members will be directly employed with their local club, or run businesses that depend on the football infrastructure and match-days. It is estimated that the Premier League and its clubs support around 100,000 jobs in the United Kingdom¹⁹. It follows that local communities are important stakeholders for football clubs.

Clubs make an unheralded contribution to their local communities, either directly or through club-associated charitable foundations such as Everton in the Community or Norwich City Community Sports Foundation. Football clubs also stepped-up throughout the pandemic. Brentford, for example, set up the #BeeWell campaign, which aims to support children and adults with their physical and mental wellbeing²⁰

awarded Project

COVID response

of the Year for

⁷ UK Parliament: MPs to debate petitions relating to football governance

¹⁸ Independent: Football fans want opportunity to own their clubs, new poll reveals

¹⁹ Premier League: This is Premier League - Economic and social impact

²⁰ EFL Trust: COVID-19 - How our Championship Clubs show support in the community

²¹ EFL Clubs collectively ²² Premier League: Clubs continue to help NHS fight Coronavirus

A SELECTION OF **CLUB'S VIEWS ON INCREASED LEVELS OF** FAN OWNERSHIP OF FOOTBALL CLUBS:

"Fan board engagement brings a local dynamic, especially with overseas / investment owners, although emotion may overrule business sense."

FL1/FL2 CLUB

"Until football is sustainable at all levels of the game the majority of Clubs need a sponsor or a shareholder willing to fund the Club on an annual basis..."

FL1/FL2 CLUB

In aggregate, English Football League clubs helped to deliver over 1.4 m food parcels and took part in over 500,000 phone calls to elderly and vulnerable people, as well as season ticket holders²¹. In June, London clubs Brentford, Chelsea, Tottenham Hotspur and West Ham hosted mass vaccination centres in a bid to vaccinate as many community members as possible²²

The important point to be made here is that there is a social contract between clubs and their communities that requires clubs to consider the local community to be a 'stakeholder' that is considered in its wider decision making. Existing shareholders, in the main, appreciate this and guard against the commercial implications of breaching this contract. In our experience, potential investors in football clubs are made very aware of this during any pre-acquisition due-diligence process.

2021

"...Clubs need professional management, not driven by fans who have short term emotional responses and want 3 things that are not easy to reconcile: winning games and having the best players; fans not having to pay very much for anything, and sustainable football clubs..."

EPL CLUB

"...Strongly in favour of fan ownership and fan control in football clubs. Would be in favour of any motions promoting this.'

FL1/FL2 CLUB

"It is difficult to see how an owner who has spent hundreds of millions of pounds buying and investing in a club would allow that to be diluted. However, a fan voice with access to the club's decision makers is important to ensure their views are heard and taken into consideration.'

EPL CLUB

"Our Supporters Trust...do not have the resources to support the club financially.

FLC CLUB

"... Our current owners are all. first and foremost, fans of the football club, who view themselves as current custodians. We support the principles behind calls for increased fan ownership, but agree [with the media] that these will need to be achieved via some other route."

FLC CLUB

The UK Government has become increasingly vocal regarding the need for further oversight

of the football industry. Even before COVID-19, Government considerations regarding oversight were, in part, gaining traction in response to financial difficulties experienced by several clubs. This escalated during COVID-19, in recognition of the Government and Football working together to provide live football to fans during lockdown, but was most amplified in the wake of the European Super League announcement - just four days later, on 22 April 2021, the UK Government announced it was conducting a fan-led review of football governance.

The interim findings were recently published²³, and are summarised as follows:

Finance

Clubs operating at a level of consistent losses, despite record revenues, is unsustainable in the long term.

Regulation and governance

- There is no single body responsible for stewarding the game.
- Current governance structures have not delivered sufficiently on an equality, diversity and inclusion agenda.
- Fans have been consistently underrepresented in governance.

Establishing an Independent Regulator

An Independent Regulator for English Football should be established to address issues including cost controls, real time financial monitoring, minimum governance requirements and revised separate tests for owners and directors of clubs.

The leagues and governing bodies have

not had an easy time overseeing the men's

suspended and the financial position of many

clubs to become close to perilous. Profit and

sustainability rules were flexed in response

game over the past year. COVID-19 sent

shockwaves through the entire football

pyramid, which caused seasons to be



Protecting heritage assets

Existing protections of key club heritage items of great cultural and emotional importance to fans is not sufficient, e.g. clubs losing rights to their home grounds.

Deepening fan engagement and transparency

Clubs have made insufficient progress in demonstrating fan engagement and transparency. This lack of transparency extends to football authorities.

Navigating financial gaps

- Good governance must be allied to genuine financial reform
- One of the most difficult issues in club financing and sustainability is the sharing of revenue between leagues.

Reforming football authorities' governance

There is a need for greater independence in the decision-making structures of the existing football authorities.

Investing in football

 Greater investment, and better flow of finance, is needed into grassroots football, amateur football, and women's football.

Growing women's football

The sport faces complex and difficult decisions regarding the best approach to take for future stability and growth at both elite and grassroots levels.

Protecting the welfare of young players

Greater steps are needed to protect the welfare of young players, particularly young players who are part of football academies but do not go on to have professional careers.

Contributing to the gambling review

Concerns have been raised about the high levels of gambling advertising in and around football, and the impact that this had on supporters, players, and also the game.

Our survey results show only 31% of Respondents across all leagues think establishing an industry regulator would help improve the financial sustainability of football clubs and only a quarter think an independent review panel for football club accounts would improve the financial sustainability of football club . The reader may not be surprised to learn that we agree with the minority in this case.

²³Department for Digital, Culture, Media & Sport, Notice, Fan Led Review of Football Governance: interim findings and recommendations, 22 July 2021

LEAGUES & GOVERNING BODIES

to an unprecedented and immediate loss of revenues that simply could not be mitigated by cost reductions, but there is no escaping the question mark over whether the current financial fair play rules, either in their design or application, are fit for purpose.

75% of survey Respondents across all leagues have indicated they do not believe the current financial fair play rules are meeting their principal objective of promoting sustainability²⁶ and 59% of respondents across all leagues do not believe financial fair play requirements have been applied consistently in their leagues, which includes 100% of Championship Respondents²⁷. It is clear that the way the EFL and EPL have responded to alleged financial fair play infringements has alienated some clubs.

However, if dealing with P&S compliance and the COVID-19 pandemic wasn't difficult enough, leagues and governing bodies were compelled to contend with the European Super League proposals and the ensuing power struggles.

This particular matter has subsided for the time being, but it highlights the complex dynamic of maintaining fairness and longevity in an environment where, by virtue of different commercial opportunities available to different clubs, some clubs are more equal than others.



HMRC responded quickly to the pandemic with a range of support measures, with the Coronavirus Job Retention Scheme (CJRS) perhaps receiving the most publicity.

Our survey indicated that 81% (see Q5A) of Respondents furloughed staff to some extent. In a minority of cases, in response to a better understanding of both the short to medium-term financial impacts of the pandemic and public sentiment, furlough receipts were repaid.

However, for many clubs, in particular in FL1&2, this has been a lifeline, helping to keep clubs afloat in the way that the Government intended.

The EFL cites four pillars to its values structure: Aspiration, Progress, Credibility and Community. The EPL is less explicit but it is probably safe to assume that they have a similar outlook. With global opportunities for some, supported by increasing levels of private equity and commercial partnering, regulation will need to evolve as quickly as the commercial landscape does, otherwise an imbalance between these pillars may cause the roof to fall in. So, as clubs seek to rethink their business models, and give global consumers what they demand, it may be wise for clubs and club owners to expect more, rather than less, regulatory interest. But is this a bad thing?

Typical accountant's response... "It depends."

There is a temptation here to suggest that the problem is simply one of economics. There is undoubtedly untapped demand for football content that, if satisfied, will create additional revenues that will create a competitive advantage (or profits for owners).

Clearly, we are not against competition! However, behavioural economics comes firmly into play here too, in particular with regard to how individuals and groups (consumers and influencers) make decisions that don't correlate with the underlying assumptions of a future cash flow model. As we emerge from the pandemic, HMRC will be focusing on compliance with the complex CJRS regulations and will be carrying out checks to ensure grants were correctly issued and seeking recovery where this is deemed not to have been the case.

For many clubs in the football pyramid it will take some time for income streams to return, but against this back drop, HMRC will also be looking to ensure clubs comply with the terms of any tax/VAT deferment and Time To Pay arrangements.

Our survey suggests that three-quarters of Respondents entered into one or the other, so this is something many will have to contend with, and it is often our experience that varying the terms of either can present a difficult challenge.

One would hope that, from a club perspective, HMRC takes a pragmatic approach to this but two-thirds of our survey Respondents think that it is unlikely.

Owning clubs, or broadcasting rights, are quite different to owning football. Leagues, and at the extreme, Governments, have an important part to play in protecting the wider stakeholders in football and this may well protect clubs and owners from unintended consequences, such as a fan rebellion, that could create adverse variances between 'actuals' and 'forecasts'.

Some might suggest that testing the waters in this regard has proven to be fairly easy to do.

²⁶Question 34a: Do you believe that the current financial fair play regulations are meeting their principal objective of promoting sustainability? ²⁷Question 35: Do you believe that financial fair play requirements have been applied consistently by the clubs in your league?

HMRC'S VIEW ON AGENTS

With circa £316m being spent on agents' fees for the year ending after the January 2021 transfer window, it is perhaps of little surprise that this remains an area of close HMRC scrutiny.

It has long been the practice that an agent will act in a dual representation capacity and the club will pay the full Agent fee. Because part of that fee relates to the player, this element is then declared as a taxable benefit for the player.

The club suffers a National Insurance Contribution (NIC) charge, but can recover VAT on the non-player element. Deciding what the "split" of that fee is has often been seen as problematic and for some time all stakeholders, including HMRC, appeared to accept a 50:50 split was applicable in most circumstances.

The key issue, in a nutshell, is a divergence of opinion as to who is really benefiting from the services of the Agent - and to what extent. We flagged this to EPL and EFC clubs in Autumn 2020, and a revision to HMRC guidance on the matter followed in Spring 2021. We are now likely to see HMRC scrutinising the details of each transaction and in many cases taking the stance that without evidence to the contrary, the Agent's services have been provided solely to the player.

It remains to be seen how this will pan out, but this stance will result in an increase in tax costs to the player, NIC costs and a reduction in VAT recovery for the club.

Our survey suggests that threequarters of EPL and half of EFC clubs will now change their behaviour on how they deal with Agents going forwards, so it looks like a change will arise and whether this pushes up Agents fees to compensate or leads to other changes in practice will be keenly observed by stakeholders especially HMRC.



FINANCING THE CLUB

1. WHAT DIVISION WAS YOUR CLUB IN FOR THE 2020/21 SEASON

%	
English Premier League	7
English Football League Championship	11
English Football League 1	9
English Football League 2	5
	32

2. HOW WOULD YOU RATE YOUR CLUBS' CURRENT FINANCIAL POSITION?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Very healthy	22%	29%	18%	21%
Could be better but not bad	50%	57%	55%	43%
In need of attention	28%	14%	27%	36%
A cause for grave concern / on the verge of administration	0%	0%	0%	0%
Base: 32	100%	100%	100%	100%

3. IS YOUR CLUB DEPENDENT ON THE PRINCIPAL SHAREHOLDER(S) TO FINANCE ANNUAL REVENUE SHORTFALLS OR OPERATING LOSSES?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	66%	71%	73%	57%
No	34%	29%	27%	43%
Base: 32	100%	100%	100%	100%

4. HAS YOUR CLUB USED FUNDING FROM A SECONDARY SOURCE? (NB: EXCLUDING COVID-19 GOVERNMENT SUPPORT SCHEMES))

%	
Advance on Media/Central distributions	
Advance season tickets - one year	
Advance season tickets - two or more years	
Bonds	
Crowd funding	
Player transfer fee receivables	

5a. HAS YOUR CLUB TAKEN ADVANTAGE OF THE FOLLOWING COVID-19 GOVERNMENT SUPPORT SCHEMES?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Job Retention Scheme (Furlough Scheme)	81%	33%	82%	100%
Coronavirus Business Interruption Loan Scheme (CBILS)	3%	0%	0%	7%
Coronavirus Large Business Interruption Loan Scheme (CLBILS)	10%	17%	0%	14%
Tax 'time to pay' : employment taxes deferral	75%	57%	82%	79%
Tax 'time to pay' : sales taxes deferral	72%	71%	55%	86%
Other	6%	0%	0%	100%
IF 'OTHER' PLEASE SPECIFY				
FL2				Rates relief
FL1		Bounce back loan scheme		

5b. HAS YOUR CLUB BEEN IN RECEIPT OF ADDITIONAL LOAN FUNDING FROM ITS LEAGUE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	47%	0%	64%	57%
No	53%	100%	36%	43%
Base: 32	100%	100%	100%	100%

ALL LEAGUES	EPL	FLC	FL1&FL2
25%	29%	36%	14%
10%	0%	9%	14%
7%	0%	0%	14%
7%	0%	0%	14%
13%	0%	0%	29%
42%	33%	36%	50%

FINANCING THE CLUB

6. IN LIGHT OF THE IMPACTS OF COVID-19, HAVE YOU SOUGHT ADDITIONAL BANK FACILITIES?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes: successfully	22%	43%	18%	14%
Yes: unsuccessfully	13%	0%	27%	7%
No	66%	57%	55%	79%
Base: 32	100%	100%	100%	100%

IF YOU HAVE ANSWERED 'YES: UNSUCCESSFULLY' PLEASE PROVIDE REASONS FOR THIS:

FLC "Applied for CBILS but	FL1&2 "Only CBILS funding."
application was declined as	Only Child Inding.
the business had been loss	FLC
making historically."	"Tried CLBIL, impossible to get. By the way the Loan
FL1&2	funding is a myth as it is
"Not eligible for CBILS	a Club funding organised
scheme as football clubs	centrally, most definitely not
are not viable in normal	a loan from EFL as portrayed
times and are reliant on	on media."
shareholders to fund."	

7. ARE THE CURRENT EQUITY OWNERS OF THE CLUB CONSIDERING A FULL OR PARTIAL EXIT WITHIN THE NEXT 12 TO 18 MONTHS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	22%	14%	9%	36%
No	78%	86%	91%	64%
Base: 32	100%	100%	100%	100%

8a. AS FAR AS YOU ARE AWARE, WITHIN THE LAST 12 MONTHS HAS THE CLUB BEEN SUBJECT TO AN INFORMAL OR FORMAL APPROACH FROM PROSPECTIVE INVESTORS WITH A VIEW TO TAKE AN EQUITY STAKE IN THE CLUB?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	44%	43%	36%	50%
No	56%	57%	64%	50%
Base: 32	100%	100%	100%	100%

8b. IF YES, HAVE THESE INTERESTED PARTIES BEEN:

%	
Football fans seeking entry into English football	
Institutional/Investment portfolio investors	
Long term supporters of the club	
Other profile building or speculative investors	
Other professional sports franchises	
Base: 13	

8c. IF YES, HAVE THESE INTERESTED PARTIES BEEN:

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Domestic investors	8%	0%	0%	17%
US/Americas	59%	100%	75%	33%
European	25%	0%	25%	33%
Middle Eastern	8%	0%	0%	17%
Far Eastern	0%	0%	0%	0%
Other	8%	0%	0%	100%
Base: 12	100%	100%	100%	100%
IF 'OTHER' PLEASE SPECIFY				
FL2				Various

ALL LEAGUES	EPL	FLC	FL1&FL2
8%	0%	0%	14%
23%	50%	50%	0%
8%	0%	0%	14%
61%	50%	50%	71%
0%	0%	0%	0%
100%	100%	100%	100%

FINANCING THE CLUB

8d. ARE THE CLUB'S CURRENT CONTROLLING PARTIES:

%	ALL LEAGUES	EPL	FLC	FL1&FL2	
Domestic investors	47%	29%	36%	64%	
European	9%	14%	18%	0%	
Far Eastern	13%	29%	18%	0%	
Middle Eastern	6%	14%	0%	7%	
US / Americas	13%	0%	27%	7%	
Varied (more than one apply)	13%	14%	0%	21%	
Base: 32	100%	100%	100%	100%	
IF 'VARIED' PLEASE SPECIFY					
FL1			Supp	orters trust	
EPL		US and Middle Eastern			
FL2	Majors	Major shareholder English but based in USA			

9. WHAT ARE YOUR KEY STRATEGIES OTHER THAN PROMOTION AND AVOIDING RELEGATION, FOR DEVELOPMENT / GROWTH IN ORDER TO FURTHER STRENGTHEN THE FOOTBALL CLUB?

%		ALL LEAGUES	EPL	FLC	FL1 &FL2	%		ALL LEAGUES	EPL	FLC	FL1 &FL2
Qualifying for 1	1st	38%	67%	0%	20%	Growing	1st	18%	0%	0%	40%
European cup	2nd	15%	33%	0%	0%	the Club's	2nd	27%	67%	33%	0%
competitors	3rd	8%	0%	50%	0%	international fan	3rd	36%	33%	33%	40%
	4th	38%	0%	50%	80%	base	4th	18%	0%	33%	20%
		100%	100%	100%	100%			100%	100%	100%	100%
Development of	1st	26%	0%	33%	33%	Improving fan	1st	14%	0%	0%	27%
academy facilities	2nd	16%	0%	17%	22%	engagement (e.g.	2nd	48%	0%	44%	55%
	3rd	53%	100%	50%	33%	digital and social	3rd	24%	100%	22%	18%
	4th	5%	0%	0%	11%	media)	4th	14%	0%	33%	0%
		100%	100%	100%	100%			100%	100%	100%	100%
into other 2r	1st	20%	0%	40%	11%	Monetising data	1st	8%	0%	0%	20%
	2nd	20%	0%	20%	22%	sets and exploring	2nd	33%	25%	40%	30%
leisure activities	3rd	20%	0%	0%	33%	media rights (e.g. streaming Club generated content)	3rd	38%	50%	50%	20%
(e.g. hotels, restaurants &	4th	40%	100%	40%	33%		4th	21%	25%	10%	30%
bars, travel &								100%	100%	100%	100%
tourism, retail)		100%	100%	100%	100%	Obtaining	1st	37%	40%	50%	25%
Further	1st	10%	0%	0%	20%	additional	2nd	16%	20%	17%	13%
investment into	2nd	20%	0%	50%	20%	principle	3rd	21%	20%	17%	25%
women's football	3rd	30%	0%	0%	60%	shareholder investment	4th	26%	20%	17%	38%
	4th	40%	100%	50%	0%	investment		100%	100%	100%	100%
		100%	100%	100%	100%	Other real estate	1st	47%	20%	60%	56%
Growing the	1st	39%	0%	29%	50%	development	2nd	26%	40%	0%	33%
Club's domestic	2nd	30%	0%	29%	36%	/ investment /	3rd	11%	0%	40%	0%
fan base	3rd	9%	50%	0%	7%	stadium expansion	4th	16%	40%	0%	11%
	4th	22%	50%	43%	7%			100%	100%	100%	100%
		100%	100%	100%	100%						

Base: 12

IF 'OTHER' PLEASE SPECIFY

FL1

Investment in playing squad for current and future years

FINANCING THE CLUB

10. THE PRESS APPEAR TO DISMISS FAN OWNERSHIP AS UNWORKABLE. HOWEVER, WHAT ARE YOUR VIEWS ON INCREASED LEVELS OF FAN OWNERSHIP OF FOOTBALL CLUBS?

FL1&2	FLC				
"Clubs need to be run by	"I share the views of the press and struggle to see how this				
business people."	dynamic would actually work in an environment where Clubs				
EPL	in general are privately owned businesses and the burden for				
"Fan board engagement	their continued existence falls upon the owners. How is this				
brings a local dynamic,	fan ownership going to be introduced in the current economic				
especially with overseas	environment where there is a paucity of prospective investors				
investment owners,	and on what basis would any transfer of shareholdings from				
although emotion may	existing shareholders to " fan ownership " be based ."				
overrule business sense."					

FL1&2

"Fans have such a wide range of views on almost all matters it is difficult to imagine how the decision making process could work and satisfy those fans who might be dissatisfied with a majority owner making decisions. The financial impact of fan ownership would change the game enormously."

"Agreed unworkable." EPL "I think it is difficult to see it

working in practice."

FL1&2

FLC

"Strongly in favour of fan ownership and fan controll in football clubs. Would be in favour of any motions promoting this."

FL1&2

"I would have concerns about fan ownership if not the right people as fans can let their heart rule their head and I have seen some success but also some other clubs where fan ownership

hasn't been successful."

FLC "Will not work in the current system, with the cash requirements for success too significant. There needs to be an enhancement of sustainability through proper checks and balances to allow for this type of ownership model to exist longer term."

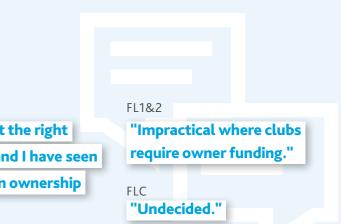
FL1&2

"Sole ownership at EFL level sets a very low ceiling for club progression. Partial fan ownership has many advantages though."

FLC

FL1&2

FLC "Ridiculous, unnecessary and completetly against Club's financial health interest as it would raise potential issues in financing deals at the very core of today's football."



"In league two this is not something that would work well due to potential additional funds that may be required."

"The demand for fan ownership seems to be driven by the prevalence of an ownership model dissociated from the fanbase/local community. Our current owners are all, first and foremost, fans of the football club, who view themselves as current custodians. We support the principles behind calls for increased fan ownership, but agree that these will need to be achieved via some other route."

> FL1&2 "Until football is sustainable at all levels of the game the majority of Clubs need a sponsor or a shareholder willing to fund the Club on an annual basis ; Fans as shareholders would not fit this model."

DEBT AND INVESTMENT TRENDS

11a. ARE YOU CONSIDERING ANY OF THE FOLLOWING AREAS OF NON-PLAYER CAPITAL SPEND IN THE NEXT 12/18 MONTHS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Investment into other sports (e.g. eGaming)	9%	43%	0%	0%
Academy development/expansion	44%	57%	45%	36%
Commercial real estate development	28%	57%	18%	21%
Hotel/restaurant/other commercial property development	38%	29%	55%	29%
Investment in other commercial ventures (eg hotels, etc)	22%	57%	9%	14%
None of the above	16%	14%	9%	21%
Non-essential non-player capital spend is on hold due to the current circumstances	9%	0%	9%	14%
Residential real estate investment/development	22%	29%	36%	7%
Stadium expansion	34%	57%	45%	14%
Strategic alliances with overseas Clubs	13%	43%	0%	7%
Strategic tie-ins with clubs from other sports (e.g. American Football, Rugby, Basketball, eSports)	3%	14%	0%	0%
Other	9%	0%	0%	21%

Base: 32

'IF OTHER, PLEASE SPECIFY:

FL1	Training ground investment and completing part complete stand
FL1	Training Ground Development
FL2	Training ground development, player training facilities improvement

11b. WHAT IS THE PROJECTED LEVEL OF YOUR NON-PLAYER CAPITAL SPEND DURING THE NEXT TWO YEARS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
<£2.5m	53%	0%	45%	86%
£2.5m-£10m	22%	29%	36%	7%
£10m-£25m	13%	29%	9%	7%
£25m-£50m	6%	14%	9%	0%
£50m-£100m	0%	0%	0%	0%
>£100m	6%	29%	0%	0%
Base: 32	100%	100%	100%	100%

11c. HOW WILL THIS BE FUNDED?

%	ALL LEAGUES	EPL	FLC	FL1&FL2		
Cash	41%	0%	45%	57%		
Shareholder investment (debt or equity)	50%	57%	55%	43%		
Third party debt	34%	86%	36%	7%		
Other	6%	0%	0%	14%		
Base: 32						
'IF OTHER, PLEASE SPECIFY:						
FL1	Group profits and existing bank financing					
FL1	Enabling development					

12. ARE YOU CURRENTLY SEEKING THIRD PARTY DEBT FINANCE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	28%	71%	9%	21%
No	72%	29%	91%	79%
Base: 32	100%	100%	100%	100%

13a. DO YOU FEEL THERE IS SUFFICIENT DEBT LIQUIDITY IN THE MARKET, SUCH THAT YOUR CLUB COULD OBTAIN THIRD PARTY DEBT FINANCE IF IT WAS NEEDED AND SERVICEABLE?

%	ALL LEAGUES	EPL	FLC	FL1&2
Yes	59%	100%	45%	50%
No	28%	0%	27%	43%
Not applicable	13%	0%	27%	7%
Base [,] 32	100%	100%	100%	100%

13b. WHAT DO YOU FEEL ARE THE MAIN OBSTACLES TO OBTAINING CREDIT/DEBT IN THE MARKET?

FL1&2

"Banks are risk adverse and football is an industry banks credit departments do not want to engage with."

FLC

"Clubs are not creditworthy due to years of accumulated losses making them high risk for the repayment of debts."

FL1&2

"Financial accounts would typically show a loss which most companies/banks would prefer not to provide credit against. Stadiums are often on rented land so little asset assurance."

EPL

"Lack of certainty over timing of fans returning in full and club's finances recovering."

FLC

"The parlous state of the Football Industry and the lack of perceived security for asset backed finance ."

DEBT AND INVESTMENT TRENDS

FLC

13c. HAS THE AVAILABILITY OF FINANCE AND FINANCING OPTIONS IN THE MARKET AFFECTED YOUR ABILITY TO COMPETE AS A CLUB?

FL1&2 "In broad terms No, we live within the loss funding limits set by the shareholders." 2 EPL; 4 FLC; 3 FL1&2 "No." FLC "No as our owners have continued to support the Club.'

FL1&2 "No as we havent needed any."

FL1&2 "No would only use for capital expenditure projects."

EPL

"Yes, two big 6 clubs got very substantial and cheap **COVID-backed loans which** were not available to other clubs.."

"No, as a football club we follow a zero-debt model and would have continued in this manner were it not for the pandemic. Our development activities are likely to require some short term financing but ultimately aim to deliver a new stadium unencumbered by debt.

FL1&2 "No, borrowing would do little to affect our SCMP figures."

FL1&2 "No, not generally used by League 1 clubs."

FL1&2

"No, we only spend what cash we know we have."

FL1&2

"No. Our club does not rely on external finance to meet operating costs."

FLC "No. We have received finance from our ownership group via convertible loan

FL1&2 "To compete no, but given

note finance."

the current financial climate, third party financing for football clubs is very expensive and therefore debt service could be seen as a barrier to competing."

EPL

"We have not used financing for transfer purposes, but to ensure more stability due to **COVID** related losses. We still compete at the lower end of the transfer market.'

13d. HOW COULD THE FOOTBALL LEAGUES IMPROVE THE WAY ACCESS TO FINANCE IS FACILITATED AND CONTROLLED IN ORDER TO SUPPORT DEVELOPMENT, SUSTAINABILITY AND COMPETITION?

FL1&2

"A central funding facility should be available for co projects with applications to this funding pot made projects which have financial return for clubs e.g. £1m at affordable rates to build an education cent stadium which would generate long-term revenue greater sustainability."

FLC

"Difficult to see what the Football Leagues themse in that respect, it is up to the individual clubs to ru businesses in as an efficient and sustainable way a Loss making Clubs will always be reliant on their o fund on year on year losses unless of course such l controlled by regulation."

FL1&2

"Its very difficult to try and introduce new "contro been operating without problem. At the point whe will only impact a few clubs each year, those clubs regulation not all clubs face. Sustainability measu create a natural hierarchy with big clubs at the top the competitive nature of the leagues. We can't los this quest. Often these controls can be rushed thro considering the possible implications. It will not be

	FL1&2				
certain	"Better distribution of				
e to finance	finance through the football				
borrowing	pyramid."				
re in the	5140.2				
	FL1&2				
es to ensure	"Borrowing avaliable from				
	EFL/FA/PL instead who				
	offer assurance to banks.				
elves can do					
un their own	EPL				
	"Explore providing central				
as possible.	facilities that are secured				
owners to	against broadcast revenues				
osses were	and made available to all				

ols" and regulation to clubs when they have
ere ownership changes is an easy route but
s may feel disadvantaged to be subject to
res that rely on clubs being self-financing will
o and small clubs at the bottom and reduce
se sight of what fans love about football in
ough as a reaction to an event without fully
e easy!.

REVENUE AND PROFITABILITY

14. DO YOU EXPECT TO MAKE A PROFIT **BEFORE** PLAYER TRADING AND AMORTISATION IN YOUR 2020/21 ACCOUNTING PERIOD?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	16%	29%	9%	14%
No	84%	71%	91%	86%
Base: 32	100%	100%	100%	100%

16. ASSUMING STADIA RESTRICTIONS HAVE BEEN LIFTED, WHAT DO YOU EXPECT THE IMPACT OF ECONOMIC CONDITIONS TO HAVE ON THE FOLLOWING REVENUES STREAMS IN 2021/22 COMPARED TO PRE-COVID-19?

SEASON TICKET SALES	ALL LEAGUES	EPL	FLC	FL1&FL2
Increased <5%	25%	43%	27%	14%
Increased >5%	3%	0%	0%	7%
No Impact	22%	43%	18%	14%
Reduced <5%	9%	14%	0%	14%
Reduced >5%	41%	0%	55%	50%
	100%	100%	100%	100%
CORPORATE ENTERTAINING PACKAGES				
Increased <5%	22%	43%	18%	14%
Increased >5%	3%	0%	0%	7%
No Impact	25%	29%	36%	14%
Reduced <5%	22%	29%	18%	21%
Reduced >5%	28%	0%	27%	43%
	100%	100%	100%	100%
MATCH DAY CATERING				
Increased <5%	19%	14%	27%	14%
Increased >5%	6%	14%	0%	7%
No Impact	28%	43%	27%	21%
Reduced <5%	22%	29%	18%	21%
Reduced >5%	25%	0%	27%	36%
Base: 32	100%	100%	100%	100%

15. DO YOU EXPECT TO MAKE A PROFIT **AFTER** PLAYER TRADING AND AMORTISATION IN YOUR 2020/21 ACCOUNTING PERIOD?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	19%	0%	18%	29%
No	72%	71%	82%	64%
Don't know	9%	29%	0%	7%
Base: 32	100%	100%	100%	100%

MATCH DAY TICKETS	ALL LEAGUES	EPL	FLC	FL1&FL2
Increased <5%	16%	43%	0%	14%
Increased >5%	9%	0%	18%	7%
No Impact	28%	43%	36%	14%
Reduced <5%	16%	14%	9%	21%
Reduced >5%	31%	0%	36%	43%
	100%	100%	100%	100%
MERCHANDISING				
Increased <5%	16%	14%	27%	7%
Increased >5%	6%	14%	0%	7%
No Impact	41%	43%	45%	36%
Reduced <5%	22%	29%	18%	21%
Reduced >5%	16%	0%	9%	29%
	100%	100%	100%	100%
SPONSORSHIPS				
Increased <5%	16%	14%	9%	21%
Increased >5%	6%	14%	0%	7%
No Impact	22%	29%	27%	14%
Reduced <5%	31%	43%	45%	14%
Reduced >5%	25%	0%	18%	43%
ase: 32	100%	100%	100%	100%

REVENUE AND PROFITABILITY

17a. DO YOU PLAN TO EXPAND ANY EXISTING REVENUE STREAMS OR ESTABLISH ANY NEW REVENUE STREAMS FOR THE 2021/22 SEASON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Expand existing revenue streams	46%	43%	64%	36%
Establish new revenue streams	16%	14%	9%	21%
No change	38%	43%	27%	43%
Other	0%	0%	0%	0%
Base: 32	100%	100%	100%	100%

17b. PLEASE ELABORATE ON YOUR ANSWER ABOVE

FL1&2 "Always c	consider ways to
expand re	evenue to overcome
other sho	ortfalls post
COVID."	
FL1&2	

"Consolidate our position, get fans back into the

stadium and watching live football."

FL1&2

"Expect a natural caution on supporters especially elderly plus the impact on the economy and jobs will be felt in 2021/22."

FLC "After such a long period without fans, clearly the main focus is to get them back into the ground and see existing revenue streams return to normal. We will invest in new technologies that would tie in to on-going restrictions, but also drive up revenues moving forward (access control/cashless/CRM)."

FLC FLC "Hopeful for the bounce back effect, and the demand for leisure activities and event attendance ." traffic." FL1&2 "Promotion to League FL1&2 One (from L2) will have an immediate impact on gate receipts, season tickets, sponsor appetite and value receipt."

"We are looking at developments of our App and Website to increase supporter interaction and

"Small fanbase restricts many options."

18a. WOULD YOU LIKE TO EXPAND ANY REVENUE STREAMS OR ESTABLISH ANY NEW REVENUE STREAMS IN THE LONGER TERM?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	88%	86%	82%	93%
No	13%	14%	18%	7%
Base: 32	100%	100%	100%	100%

18b. PLEASE ELABORATE ON YOUR ANSWER ABOVE

FL1&2	FLC	FLC
"We need to make more from	"fairly naive to assume it is	"We are constantly hoping
our excellent social media	even possible, this is only for	to expand revenues and
and website followings."	big clubs."	without owner funding,
		this is vital to our continued
FL1&2 "Non match day facility	FLC "Delivering a new stadium	competitiveness."
usage."	for the club is the linchpin of	FL1&2
	the longer-term strategys."	"By moving to a new
FL1&2		stadium."
"We are looking at	FL1&2	5140.0
streaming."	"With the growth of our	FL1&2 "Increase ticket and
	fanbase."	hospitality sales."
FLC		nospitality sales.
"Develop and increase	FL1&2	EPL
local sponsors and catering	"More diversification to place	"Redevelopment of Stadium
income."	less reliance on match day	site."
	income but challenging in the	
EPL	current environment."	FL1&2
"We would like to expand		"Expand our non-match day
into e-gaming."		revenue by more effective
		marketing of the stadium
		facilities ."

REVENUE AND PROFITABILITY

19a. ARE YOU PLANNING TO ADJUST THE PRICE OF SEASON TICKETS AND INDIVIDUAL MATCH DAY TICKETS FOR THE FORTHCOMING SEASON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	31%	14%	27%	43%
No	69%	86%	73%	57%
Base: 32	100%	100%	100%	100%

19b. IF YES, BY WHAT PERCENTAGE DECREASE/INCREASE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
More than -7.5%	60%	0%	67%	67%
-5-7.5%	0%	0%	0%	0%
-2-5%	10%	0%	0%	17%
-1-2%	0%	0%	0%	0%
1-2%	10%	0%	33%	0%
2-5%	10%	100%	0%	0%
5-7.5%	0%	0%	0%	0%
More than 7.5%	10%	0%	0%	17%
Base: 10	100%	100%	100%	100%

20. ARE YOUR REVENUES FROM KEY COMMERCIAL CONTRACTS, SUCH AS SPONSORSHIP:

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Increasing	22%	57%	9%	14%
Largely unchanged	66%	43%	82%	64%
Falling	13%	0%	9%	21%
base: 32	100%	100%	100%	100%
21. DO YOU THINK SUITABLE SPONSORS ARE:	S AND OTHER COMM	IERCIAL	PARTN	IERS
ARE:	S AND OTHER COMM	IERCIAL	PARTN FLC	IERS
ARE: %				
	ALL LEAGUES	EPL	FLC	FL1&FL2
ARE: % Becoming easier to find	ALL LEAGUES 3%	EPL 0%	FLC 0%	FL1&FL2 7%

Base:

22a. IN LIGHT OF THE CURRENT CIRCUMSTANCES SURROUNDING COVID-19, WHAT IS YOUR VIEW OF THE IMPACT ON BROADCASTING INCOME ON YOUR **BUSINESS AND THE WIDER INDUSTRY?**

FL1&2	FLC
"As important as before."	"Broadcasting in
	Covid-19 has hig
FLC	model to suppor
"Broadcasting income is very	model to suppor
important to football clubs."	FLC
	"Broadcasting re
FL1&2	Championship. V
"Impacts will be felt in next	the Premier Leag
round of TV deals."	fairly between a

CLUB OPERATIONS

ncome remains essential to the business. ghlighted the need for a fairer distribution ort the football pyramid."

evenue is a major revenue stream for the We believe this share should be reviewed with ague and reviewed to ensure wealth is spread all clubs."

CLUB OPERATIONS

FLC "Broadcasting revenues could be better distributed within the business."

FLC "Broadcasting income remains essential to the business. Covid-19 has highlighted the need for a fairer distribution model to support the football pyramid."

"L2 & L1 clubs had a huge benefit from I-Follow the ability to

post Covid. Income from broadcasting rights are key for the PL

stream away games would have a marked effect on income

FL1&2

"For the medium term this is obviously contracted but in the longer term as the way fans watch games will change and the demographics change the current expectation is for income to fall."

FL1&2

FL1&2 "Important however BBC are looking to reduce the income for clubs."

FPI

"Largely unchanged due to

the new three year Premier

League deal."

FL1&2

"Likely to reduce going forward."

FLC "More reliant on this than

ever.'

and EFL to fund the payments to lower league clubs." FLC FLC "Moving to a Premier League season, we will rely heavily on broadcasting income staying consistent so any

reduction would have an impact on the club."

FL1&2 "Too low."

FLC "Renegotiation of broadcasting contracts will become increasingly challenging in the COVID-19 world and one would anticipate downward pressure."

"PL is healthy and the big 6 superleague extravaganza made it stronger in the long run. This is an issue for other leagues, not in the UK for at least next 5ys."

EPL

"Short term blip but movement to streaming will be the main challenge. It has revealed the issues in pay TV in some markets."

22b & 22c. DO YOU THINK YOUR LEAGUE HAS TAKEN APPROPRIATE ACTION TO MITIGATE THE IMPACT OF THE CURRENT CIRCUMSTANCES? PLEASE PROVIDE AN EXPLANATION FOR YOUR ANSWER.

FLC

"Absolutely, both EFL and EPL did the right things. EPL is managed by very professional and competent people. The EFL may be more noisy but generally tags along EPL decisions given that's where the money ultimately comes from."

FLC

"EFL appears to have worked hard with other stakeholders to ensure clubs have access to financing where mainstream debt is not available.'

"No, we received a premier	"The impact w
FL1&2	FLC
funds available."	for our level."
"Yes - but were restricted by	"Yes, bailout v
FL1&2	FL1&2
P&S during the pandemic."	else they coul
"EFL should have dropped	"I think so, I ca
FLC	FL1&2

League 'Bailout' of just over £400k so that doesn't help much when no income for over 14 months."

would have been less severe had the EFL pushed the sustainability agenda harder historically. Our club has suffered by association. That said, the EFL deserve credit for the actions taken in mitigation once the gravity of the situation became clear. The EPL should do and should have done more.



CLUB OPERATIONS

23. WHAT ARE YOUR BIGGEST CONCERNS FOR YOUR CLUB OVER THE NEXT 12 MONTHS?

RELEGATION	ALL LEAGUES	EPL	FLC	FL1&FL2
1st	25%	43%	27%	14%
2nd	3%	0%	0%	7%
3rd	22%	43%	18%	14%
	100%	100%	100%	100%
ABILITY TO ATTRACT / RETAIN SPONSORSHIP				
1st	22%	43%	18%	14%
2nd	3%	0%	0%	7%
3rd	28%	0%	27%	43%
	100%	100%	100%	100%
ABILITY TO RAISE NEW CAPITAL				
1st	27%	33%	0%	40%
2nd	27%	67%	33%	0%
3rd	45%	0%	67%	60%
	100%	100%	100%	100%
COMPLIANCE WITH FINANCIAL FAIR PLAY REGULATIONS				
1st	15%	0%	25%	20%
2nd	15%	50%	0%	0%
3rd	69%	50%	75%	80%
	100%	100%	100%	100%
FLEXIBILITY/INFLEXIBILITY OF PLAYERS' SALARIES				
1st	35%	50%	0%	44%
2nd	24%	0%	25%	33%
3rd	41%	50%	75%	22%
Base: 32	100%	100%	100%	100%

IMPACT ON ATTENDANCES DUE TO CURRENT ECONOMIC ENVIRONMEN	ALL LEAGUES	EPL	FLC	FL1&FL2
1st	62%	33%	40%	85%
2nd	31%	67%	40%	15%
3rd	8%	0%	20%	0%
	100%	100%	100%	100%
LIQUIDATION				
1st	13%	0%	0%	20%
2nd				
3rd	88%	100%	100%	80%
	100%	100%	100%	100%
POTENTIAL FALL IN OR REIMBURSEMENT OF TV INCOME				
1st	25%	50%	0%	40%
2nd	33%	50%	60%	0%
3rd	42%	0%	40%	60%
	100%	100%	100%	100%
POTENTIAL LOSS OF OR REDUCTION IN TRANSFER FEE INCOME				
1st	33%	50%	44%	13%
2nd	33%	25%	44%	25%
3rd	33%	25%	11%	63%
	100%	100%	100%	100%
SEASON TICKET PRICING				
1st	11%	0%	0%	20%
2nd	44%	0%	0%	80%
3rd	44%	100%	100%	0%
	100%	100%	100%	100%
TAX ISSUES				
1st	10%	0%	0%	14%
2nd	10%	0%	0%	14%
3rd	80%	100%	100%	71%
	100%	100%	100%	100%

FLC

CLUB OPERATIONS

24a. DO YOU AGREE WITH THE CURRENT PARACHUTE PAYMENTS SYSTEM FOR CLUBS RELEGATED FROM THE EPL?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes, I agree with the amounts and periods of payments	38%	100%	27%	14%
No, the payments are too high and anti-competitive for other clubs	50%	0%	64%	64%
No, the period of receipts should be extended	6%	0%	9%	7%
No, the period of receipts should be shortened	6%	0%	0%	14%
Other	3%	0%	9%	0%
Base: 32				
'IF OTHER, PLEASE SPECIFY:				

Parachute payments are too blunt an instrument

and relegated clubs should be assessed for funding based on need.

24b. IN LIGHT OF COVID-19, HAS YOUR VIEW CHANGED IN THIS REGARD, AND IF SO, WHY? DO YOU FEEL THAT THIS HAS EXACERBATED THE CURRENT SITUATION?

2 EPL; 4 FLC; 6 FL1&2	FLC
"No."	"No , on a personal level CCFC have just experienced relegation
FL1&2	with a 2 yr parachute after 1 yr in the PL but the PL cost base
"No, parachute should be	lasts longer than 2 yrs. This forces relegated Clubs to make
scrapped."	decisions for short term mitigation rather than long term
	benefit."
FL1&2	
"No, we still feel the current	FL1&2
system is anti-competitive."	"The impact filters all the way down to L2 in terms of wage
	inflation/ demands. The EFL clubs need to become more
FL1&2 "Its worse now because some	sustainable - this can only be achieved by cutting wages
its worse now because some	bills at all levels and paracute payments have to be reduced
clubs have GUARANTEED	
income while other are	significantly to achieve this."
impacted by COVID."	

25a. DO YOU USE THE WAGES TO TURNOVER RATIO AS A KEY PERFORMANCE INDICATOR OF THE CLUB'S FINANCIAL HEALTH?

%		EDI	FLC	
%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	72%	86%	82%	57%
No	28%	14%	18%	43%
Base: 32	100%	100%	100%	100%
IF YES, WHICH RANGE IS YOUR TARGET IN?	ALL LEAGUES	EPL	FLC	FL1&FL2
< 50%	9%	0%	9%	14%
51% - 55%	9%	14%	0%	14%
56% - 60%	6%	14%	9%	0%
61% - 65%	13%	14%	0%	21%
66% - 75%	19%	29%	27%	7%
>75%	16%	14%	36%	0%
Did not specify	28%	14%	18%	43%
	100%	100%	100%	100%

26. WHAT WAGES TO TURNOVER RATIO DO YOU CURRENTLY OPERATE IN?

IF YES, WHICH RANGE IS YOUR TARGET IN?
< 50%
51% - 55%
56% - 60%
61% - 65%
66% - 75%
>75%

Base: 32

ALL LEAGUES	EPL	FLC	FL1&FL2
16%	0%	0%	36%
3%	0%	9%	0%
9%	0%	9%	14%
13%	29%	0%	14%
22%	29%	18%	21%
38%	43%	64%	14%
100%	100%	100%	100%

CLUB OPERATIONS

27. IF YOU COULD MAKE ONE CHANGE TO THE FINANCIAL STRUCTURE OF THE ENGLISH FOOTBALL LEAGUES, WHAT WOULD IT BE AND WHY?

FL1&2	FL1&2	
"Better distribution of	"Better spread of gate money fo	r away clubs with higher
finance between football	attendance figures."	
pyramid."	FL1&2	EPL
FL1&2	"Imposition of a salary cap	"Ensure the Big 6 can never
"Change in EFL split	with reference to a club's	throw their weight around
between Leagues - make	turnover."	ever again."
Championship %		
lower."	FLC "Increasing FA Cup prize money	- ridiculously low compared to
FL1&2 "Fairer distributions between	the amount of the money FA rais	ses."
leagues."	FLC	FLC
	"Parachute payments."	"New sustainability rules to
FLC		ensure clubs spend within
"Less of a cliff edge between PL a	and EFL - there needs to be	their means but are also
some re-balancing, but with rule	es to ensure that this is not	reflective of clubs financial
purely pushed into playing costs	. A salary cap and fairer split of	situation, whether that be
revenue will introduce EFL susta	inability and will improve the	club controlled or owner
product through more competiti	veness"	funded."
FL1&2	FL1&2	
"Tighter P&S control,	"Re distribution of wealth is the	priority - we need to establish
greater share of broadcasting	how we do that, whether it need	ds independent regulation or a
reveues for EFL clubs."	new body that sits above etc."	

FLC

"Reduce the financial gap between Premier League and Championship to reduce thefinancial pressure for Clubs to chase promotion at all costs."

28. IN RESPONSE TO COVID-19 HAS YOUR CLUB:

Furloughed staff?	
Deferred any tax or VAT payments?	
Entered into a 'time to pay' arrangement with HMRC?	
None of the above	

29a. HMRC HAS ANNOUNCED A NEW APPROACH TO AGENT FEE EXPENDITURE, ESPECIALLY WHEN DUAL REPRESENTATION OCCURS. SELECT THE STATEMENT(S) YOU AGREE WITH:

The HMRC move away from a 50% split is justified HMRC is constructively engaging with the sport The HMRC record retention expectation is achievable and realistic This will trigger a move away from dual representation

Base: 32

%

29b. WILL THE CHANGE IN HMRC STANCE ON AGENTS FEES CHANGE BEHAVIOURS OF THE:

%
Agent
Club
Player
None of the above
Base: 32

29c. HAS THE CLUB BEEN APPROACHED BY A PLAYER OR THEIR AGENT FOR ASSISTANCE REGARDING THE PLAYER'S PERSONAL TAX POSITION?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	28%	57%	27%	14%
No	72%	43%	73%	86%
Base: 32	100%	100%	100%	100%

TAXATION

ALL LEAGUES	EPL	FLC	FL1&FL2
75%	29%	82%	93%
72%	71%	73%	71%
69%	57%	73%	71%
6%	14%	9%	0%
	75% 72% 69%	75% 29% 72% 71% 69% 57%	75% 29% 82% 72% 71% 73% 69% 57% 73%

ALL LEAGUES	EPL	FLC	FL1&FL2
34%	0%	45%	43%
16%	0%	18%	21%
19%	14%	27%	14%
50%	86%	27%	50%

ALL LEAGUES	EPL	FLC	FL1&FL2
6%	0%	0%	14%
53%	71%	55%	43%
6%	0%	0%	14%
34%	29%	45%	29%
100%	100%	100%	100%

TAXATION

30. CONSIDERING YOUR INTERACTIONS WITH HMRC DURING COVID-19, DO YOU FEEL IT HAS TAKEN THE RIGHT APPROACH?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	53%	43%	36%	71%
No	47%	57%	64%	29%
Did not specify	0%	0%	0%	0%
Base: 32	100%	100%	100%	100%

31. AS THE GAME RETURNS TO NORMAL DO YOU THINK HMRC WILL TAKE A PRAGMATIC APPROACH?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
70			TEC	
Yes	31%	14%	9%	57%
No	66%	86%	91%	36%
Did not specify	3%	0%	0%	7%
Base: 32	100%	100%	100%	100%

32. IF NOT, DO YOU FEEL SUITABLY PREPARED FOR A ROBUST CHALLENGE FROM HMRC?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	72%	71%	100%	50%
No	13%	14%	0%	21%
Did not specify	16%	14%	0%	29%
Base: 32	100%	100%	100%	100%

33. IN LIGHT OF THE EPL AND EFL AMENDMENTS TO FINANCIAL FAIR PLAY RULES TO ACCOUNT FOR THE EFFECTS OF COVID-19, DO YOU EXPECT TO COMPLY WITH CURRENT FINANCIAL FAIR PLAY / PROFITABILITY AND SUSTAINABILITY RULES FOR THE PERIOD 2019 TO 2021?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	81%	71%	73%	93%
Yes, but has required net positive income from player trading	13%	29%	18%	0%
Yes, but has required/will require significant one-off non-player trading transactions	6%	0%	9%	7%
No	0%	0%	0%	0%
ase: 32	100%	100%	100%	100%

34a. DO YOU BELIEVE THAT THE CURRENT FINANCIAL FAIR PLAY REGULATIONS ARE MEETING THEIR PRINCIPAL OBJECTIVE OF PROMOTING SUSTAINABILITY?

9	%
Y	/es
Y	/es, if enforced appropriately
Ν	No, a new financial control structure is required
Ν	No, but with some adjustments will do
R	Regulation is not necessary
Ba	ase: 32

34b. DO YOU FEEL THIS HAS WIDENED THE GAP **BETWEEN** DIVISIONS?

%		ALL LEAGUES	EPL	FLC	FL1&FL2
Yes		75%	71%	82%	71%
No		25%	29%	18%	29%
Other		3%	0%	9%	0%
Base: 32					
'IF OTHER, PLEASE SPECIFY:					
FLC	Owners are allowed to fund c£35m pa losses in the PL but only £13m pa in the EFL yet they're still the same owners if your club has been relegated. This reduction in loss allowance is illogical.				

FINANCIAL SUSTAINABILITY

ALL LEAGUES	EPL	FLC	FL1&FL2
3%	0%	0%	7%
16%	14%	18%	14%
44%	57%	36%	43%
31%	14%	36%	36%
6%	14%	9%	0%
100%	100%	100%	100%

FINANCIAL SUSTAINABILITY

34c. DO YOU FEEL THIS HAS WIDENED THE GAP **WITHIN** DIVISIONS?

%		ALL LEAGUES	EPL	FLC	FL1&FL2
Yes		63%	57%	55%	71%
No		38%	43%	45%	29%
Other		3%	0%	0%	7%
Base: 32					
'IF OTHER, PLEASE SPECIFY:					
FL2	Believe it will do if sustainability becomes t	he principle objective	e (which it ha	asn't been	in the past)

35. DO YOU BELIEVE THAT FINANCIAL FAIR PLAY REQUIREMENTS HAVE BEEN APPLIED CONSISTENTLY BY THE CLUBS IN YOUR LEAGUE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	41%	71%	0%	57%
No	59%	29%	100%	43%
Base: 32	100%	100%	100%	100%

36a. DO YOU BELIEVE THAT FINANCIAL FAIR PLAY REQUIREMENTS HAVE BEEN APPLIED CONSISTENTLY BY THE CLUBS IN YOUR LEAGUE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	25%	71%	0%	21%
No, enforcement powers do not allow the league to ensure consistency within the spirit of the regulations	28%	29%	45%	14%
No, they are enforced too strongly	6%	0%	9%	7%
No, they are not enforced strongly enough	41%	0%	45%	57%
Base: 32	100%	100%	100%	100%

36b. IF NO, PLEASE ELABORATE ON YOUR ANSWER ABOVE:

FLC	FLC
"Clubs have broken the rules	"It is clear that se
and the EFL are very slow in	compliance' from
applying sanctions."	'grey areas' just o
FI 1&2	need teeth other
"Clubs have manipulated the	
allowance rules to comply	FLC
	"Sanctions need
with P&S."	
FI 1&2	FLC
"In the past this has been the	"To slow to enfo
case."	itself."
FLC	
"Points penalty for P&S breache	es is a nonsense crea
clubs seeking to gain a sporting	advantage over oth
Championship. No other FFP reg	gulations (past or p
include such penalties but inste	ad impose sanction
encourage clubs to return to co	mpliance with the r

FLC	FLC			
"Sanctions are too remote	"The enforceme			
from breaches and	takes too long			
punishments don't seem to	are not in sease			
fit crimes."	which leads to a			
	process."			

some clubs have an objective of 'getting to m a position of non-compliance. Add backs and destroy the purpose of these rules. The rules erwise the foxes will go crazy in the hen house!"

to be imposed in real time and in season."

orce action. Need to be within the season

eated by hers in the oresent) ns that rules."

and therefore on or instant a drawn out EPL
"No club in the Premier
League has ever been
sanctioned as far as I am
aware!"

FL1&2

"The sustainability of football as a business model cannot be underestimated and how Clubs are financially regulated are part of that process."

FINANCIAL SUSTAINABILITY

37. IN THE ABSENCE OF FINANCIAL FAIR PLAY REGULATIONS, WOULD YOUR OWNER INVEST MORE MONEY IN ORDER TO REALISE THE CLUB'S AMBITIONS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes, to a significant degree	9%	29%	9%	0%
Yes, to some extent	19%	43%	18%	7%
No, the amount we are permitted to invest is sufficient	41%	14%	55%	43%
No, there is no more to invest	31%	14%	18%	50%
Other	13%	0%	9%	21%

Base: 32

'IF OTHER, PLEASE SPECIFY:EFL1We would continue as we areEFL2Potentially would have done in the pastEFLCWe would continue to promote a sustainable financial modelEFL2Only to the level that the shareholders could afford not only in the investment year
but over a defined period

38. DO YOU AGREE THAT FOOTBALL CLUB FINANCES SHOULD BE SUBJECT TO ADDITIONAL SCRUTINY?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	66%	29%	73%	79%
No	34%	71%	27%	21%
Base: 32	100%	100%	100%	100%

39. DO YOU BELIEVE THAT ONE OR MORE OF THE FOLLOWING MEASURES WOULD IMPROVE THE FINANCIAL SUSTAINABILITY OF FOOTBALL CLUBS? (SELECT ALL THAT APPLY)

%

Establishment of an independent industry regulator to monitor finances An approved list of football club auditors An independent review panel for football clubs accounts More frequent disclosure of accounts and/or trading statements More timely disclosure of audited accounts Salary cap None of the above

Base: 32

40. IF NOT MENTIONED ABOVE, WHAT MEASURES DO YOU THINK SHOULD BE INTRODUCED THAT WOULD IMPROVE THE FINANCIAL SUSTAINABILITY OF FOOTBALL CLUBS?

FLC	FL1&2
"Closer financial monitoring	"Its not going to
of clubs and stronger, more	to become the i
timely action and sanctions	financial picture
where appropriate."	penalties which
	will limit spendi
EPL	to make profits
"Measurement of debt."	owners making
FLC	will this drive in
"Player spend cap linked to	elsewhere? We
income Proof of funds to	
over losses for next 2 years ."	

ALL LEAGUES	EPL	FLC	FL1&FL2
31%	0%	36%	43%
13%	0%	36%	0%
25%	0%	27%	36%
41%	0%	45%	57%
34%	0%	64%	29%
66%	57%	64%	71%
13%	43%	0%	7%

be a simple as a one-part solution. It needs
ndustry norm, regulations that look at the
of a season will be retrospective as will the
hasn't worked in the past. Whilst salary caps
ng this will create other issues - if clubs start
how are they distributed? Fans won't want
money. If salary caps exclude younger players
flation in U21 wages? Have squad sizes worked
need radical new solutions."

FINANCIAL SUSTAINABILITY

41. IN WHICH OF THE FOLLOWING LEAGUES/DIVISIONS DO YOU BELIEVE A SALARY CAP IS APPROPRIATE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
English Premier League	44%	57%	27%	50%
English Football League - Championship	66%	57%	64%	71%
English Football League - League One	88%	86%	82%	93%
English Football League - League Two	91%	100%	100%	79%

Base: 32

42. IN WHICH OF THE FOLLOWING LEAGUES/DIVISIONS DO YOU BELIEVE A SALARY CAP IS APPROPRIATE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Wage-to-Turnover ratio	41%	29%	27%	57%
Debt-to-Equity ratio	22%	14%	9%	36%
Total Expenses-to-Turnover ratio	22%	0%	27%	29%
Transfer fee limits/restrictions	13%	0%	18%	14%
None of the above	41%	57%	55%	21%

43. IF NOT MENTIONED ABOVE, IF YOU COULD AMEND OR REPLACE THE CURRENT FINANCIAL FAIR PLAY SYSTEM, WHAT FINANCIAL METRICS WOULD YOU CONSIDER MONITORING TO IMPROVE FINANCIAL SUSTAINABILITY?

1 EPL; 1 FLC; 3 FL1&2	FLC	FLC
"Salary cap."	"Cash / liquidity available."	"I would not replace but
FL1&2	FLC	improve the current method.
"A full range of measures	"Clubs should be financed via	Reporting needs to be real
A full fallge of measures	Clubs should be financed via	
needs to be considered	equity investment not loans	time, rules to be clear (i.e.
based on traditional business	from ownership."	stadium sales etc)."
reviews including going		
and a state of the	FLC	FLC
concern audits, long term	"Wage to turnover linked to	"Wage to turnover linked to
funding, sustainability,	overall salary cap ."	overall salary cap ."
liquidity testing."		

FLC

"It is not sustainability the issue but Fair Play and making sure Clubs do not become more competitive due to Equity funding. They should grow organically, equity cannot make up for losses forever as it is unfair and increase Moral Hazard in the industry which spreads across all leagues."

44. WHAT REVISIONS, IF ANY, SHOULD BE MADE TO OWNERS AND DIRECTORS TESTS?

FL1&2	FL1&2				
"Don't know but there needs	"More robust fina				
to be more."	measures as wel				
FI 1&2	statement of mo				
"Greater scrutiny in to	investment."				
funding sources."	FL1&2				
FLC	"More stringent b				
"I am unaware of the terms."	checks on money				
	and previous dire				
FLC "Leagues should be much	including referen				
more wary/ban club	strike-offs."				
purchases funded by debt.	FL1&2				
If an owner can't afford to	"You can put in w				
buy a club how can they be	allows a club to l				
expected to fund its losses."	As happened witl				





legally change hands the powers are limited.

th Bury."

FINANCIAL SUSTAINABILITY

45a. WOULD YOU BE IN FAVOUR OF CELTIC AND RANGERS JOINING THE ENGLISH PREMIER LEAGUE/ ENGLISH FOOTBALL LEAGUE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	22%	0%	18%	36%
No	78%	100%	82%	64%
Base: 32	100%	100%	100%	100%

45b. IF YES, HOW DO YOU THINK THE TRANSITION SHOULD BE MANAGED?

FL1&2

"22 team PL for one season with five

relegation places."

FL1&2

"Increase no of teams in League 2."

FLC

"Into the Championship."

FL1&2

"Introduce them at Championship level and see how they get on. Not sure what impact this will have on the rest of Scottish football though."

FL1&2

"Would need to go through the leagues."

FL1&2

"Transition into Championship."

45c. IF YOUR ANSWER IS NO, WHY NOT?

FLC

"Automatic entry into either of the EPL/EFL would undermine the pyramid structure of football and be a unfair on those Clubs they would effectively relegate. Entry has to be earned not gifted.

EPL "Because it would deny two English clubs the right to compete at the highest level."

FL1&2

"Don't think it would add much if anything to the leagues in terms of revneues. Their statures are not what they used to be so the pull of a game in Glasgow is no longer as attractive."

EPL

"They have their own league, likely to be an independent country in the future too."

46a. WHAT IS YOUR CURRENT ELITE PLAYER PERFORMANCE PLAN (EPPP) GRADE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
1	34%	100%	36%	0%
2	25%	0%	55%	14%
3	38%	0%	9%	79%
Not applicable	3%	0%	0%	7%
Base: 32	100%	100%	100%	100%

46b. HOW DO YOU EXPECT THIS TO CHANGE IN THE 2021/22 SEASON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Higher	3%	0%	9%	0%
Lower	3%	0%	0%	7%
The same	94%	100%	91%	93%
Base: 32	100%	100%	100%	100%

47a. HAS COVID-19 INCREASED THE EMPHASIS ON THE NEED FOR AN ACADEMY?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	50%	43%	36%	64%
No	50%	57%	64%	36%
Base: 32	100%	100%	100%	100%

47b. PLEASE ELABORATE ON YOUR ANSWER ABOVE

FLC	FL1&2	FL1&2
"Academy development is	"Development of academy	"Greater focus on bringing
a key part of the club and	players saves spending on	through players due to both
will continue to be so going	transfer fees. Developing	lower wages and potential
forward."	players can be loaned out."	sell on value."

YOUTH DEVELOPMENT

YOUTH DEVELOPMENT

-L1&2	FL1&2	FL1&2
"Greater need for revenues	"Home grown players are	"More home grown players
from academy players and	critical for both squad depth	adds to financial stability
academy players moving to	and potential future sales."	and can generate valuable
first team."	FLC	transfer funds."
11&2	"The Academy has been	FL1&2
"No change - always	very important to us for a	"Our academy importance
important."	number of years and this will	remains the same."
	continue."	
LC		EPL
"The need for the Academy to	produce an end result of a pipe	"We have always been
line of players for the 1st team has never been more critical for		reliant on our Academy for a
		pathway into the first team.
the long term financial viability	y of clubs and as a counter to the	

48. HOW DOES YOUR BUDGET FOR YOUTH DEVELOPMENT IN THE 2021/22 FINANCIAL PERIOD COMPARE TO THE BUDGET FOR 2020/21?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Significantly higher	16%	14%	18%	14%
Slightly higher	28%	43%	36%	14%
The same	47%	43%	27%	64%
Slightly lower	9%	0%	18%	7%
Significantly lower	0%	0%	0%	0%
Base: 32	100%	100%	100%	100%

49. WHAT ARE YOUR MEDIUM TO LONG TERM INTENTIONS FOR YOUR YOUTH ACADEMY?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Close it	0%	0%	0%	0%
Decrease investment in it	9%	0%	18%	7%
Increase investment in it	50%	71%	45%	43%
No change	41%	29%	36%	50%
base: 32	100%	100%	100%	100%

50. ARE YOU EXPECTING TO INCREASE YOUR ACADEMY PLAYER TO FIRST TEAM CONVERSION IN THE 2021/22 SEASON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	56%	71%	64%	43%
No	44%	29%	36%	57%
Base: 32	100%	100%	100%	100%

51. WHAT ARE THE OPPORTUNITIES AND CHALLENGES THAT YOU FACE IN PROGRESSING ACADEMY PLAYERS IN TO YOUR FIRST TEAM?

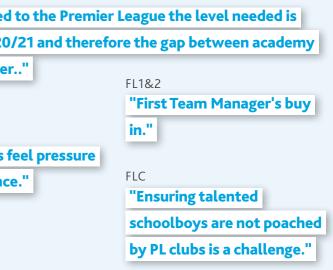
FLC	FLC		
"Attracting players of	"Being promoted		
sufficient quality into our	higher than in 20		
Academy structure due to	players is greater		
club location."			

FL1&2

"Breaking into the first team is difficult, managers feel pressure over their job so hard to give young players a chance."

FL1&2

"Gap from U18's to First Team with no U23's."



YOUTH DEVELOPMENT

52. DO YOU CURRENTLY OPERATE AN OVERSEAS ACADEMY AND/OR FEEDER SYSTEM?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes, we already have one (or more)	3%	14%	0%	0%
Yes, but we are looking to reduce our investment in it/them	3%	0%	0%	7%
No, but we are looking for one (or more)	3%	0%	9%	0%
No and we are not intending to invest in this area	91%	86%	91%	93%
Base: 32	100%	100%	100%	100%
IF YES, WHICH COUNTRY/COUNTRIES DO YOU OPERATE THE ACADEMY/ACADE	MIES IN?			
FPI				Belgium

53. WHAT ALTERNATIVES TO THE CURRENT YOUTH SYSTEM WOULD YOU LIKE TO SEE TAKE EFFECT?

FLC "EPPP is too expensive and costs need to be reduced."





"Keep as is but improve compensation under EPPP."

54a. WHAT PERCENTAGE OF PLAYERS IN YOUR FIRST TEAM HAVE CLAUSES IN THEIR CONTRACTS STIPULATING THAT THEIR WAGES WILL BE REDUCED IF THE CLUB IS RELEGATED?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
<25%	16%	29%	9%	14%
26-50%	6%	0%	9%	7%
51-75%	3%	0%	9%	0%
76 - 99%	25%	29%	9%	36%
100%	50%	43%	64%	43%
Base: 32	100%	100%	100%	100%

54b. WHAT IS THE RANGE OF THE PERCENTAGE REDUCTIONS?

%		ALL LEAGUES	EPL	FLC	FL1&FL2
<20%		13%	0%	9%	21%
21-30%		28%	14%	18%	43%
31-40%		22%	14%	36%	14%
41-50%		25%	43%	27%	14%
>50%		0%	0%	0%	0%
Other (please specify)		13%	29%	9%	7%
Base: 32		100%	100%	100%	100%
'IF OTHER, PLEASE SPECIFY:					
EFL2			No p	layers have	this clause
EFLC	Range of 30% to 54% .N with relegation clauses from EF				

55. DO YOU EXPECT TO SUCCESSFULLY APPLY DOWNWARD PRESSURE ON PLAYERS' SALARIES UNDER CONTRACT RENEWAL?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
No	60%	86%	45%	57%
Yes, significantly	9%	0%	18%	7%
Yes, slightly	31%	14%	36%	36%
Base: 32	100%	100%	100%	100%

PLAYER COSTS

PLAYER COSTS

56a. IN YOUR BUDGET FOR 2021/22, DO YOU EXPECT YOUR FIRST TEAM SQUAD SIZE TO BE BIGGER, THE SAME OR SMALLER THAN THE 2019/20 SEASON?

%	ALL	LEAGUES	EPL	FLC	FL1&FL2
Bigger		6%	0%	0%	14%
The same		50%	86%	36%	43%
Less		44%	14%	64%	43%
Base: 32		100%	100%	100%	100%

56b. IN YOUR BUDGET FOR 2021/22, DO YOU EXPECT TO SPEND MORE, THE SAME OR LESS ON THE PAYROLL COST OF THE FIRST TEAM SQUAD THAN THE 2020/21 SEASON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
More	25%	0%	18%	43%
The same	28%	71%	18%	14%
Less	47%	29%	64%	43%
Base: 32	100%	100%	100%	100%

56c. FOR CONTRACTS THAT WILL BE EXPIRING OVER THE SUMMER, DO YOU PLAN TO:

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Extend contracts in much the same way as you did pre-COVID	39%	67%	27%	36%
Let enough contracts expire to reduce overall squad size	35%	17%	64%	21%
Make more use of one year extensions on the same terms	19%	17%	9%	29%
Other	6%	0%	0%	14%
Base: 32	100%	100%	100%	100%
'IF OTHER, PLEASE SPECIFY:				
EFL2		Waiting for r	new manag	er to decide

EFLZ	waiting for new manager to decide
EFL2	Change of division (promotion) has a significant impact on contract negotiation
	so there will be a varied mix of contracts negotiated

57. THERE HAVE BEEN CALLS FOR GREATER REGULATION TO BE IMPOSED ON VARIOUS AREAS IN FOOTBALL, INCLUDING PLAYER TRADING (I.E. TRANSFER FEES) AND PLAYER WAGES (I.E. CAPS). PLEASE DESCRIBE THE ACTIONS/ REGULATION/DEREGULATION THAT YOU WOULD LIKE TO SEE INTRODUCED.

EPL	2 FL1&2, FLC
"Agent fee cap and player	"Salary cap."
wage cap."	FI 1&2
	"Salary caps intr
EPL	Satar y caps intr
"Salary caps could make	limits on agents
sense."	imposed."
	FL1&2
EPL	"Definitely like t
"I'd like no changes."	caps regulated a
	game."
FL1&2	
"No option to state	FLC
undisclosed fee."	"Wage cap intro
	linked to increas
	via basic award.'



PLAYER TRANSFERS

58. IS LIQUIDITY IN THE TRANSFER MARKET:

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Improving	0%	0%	0%	0%
Worsening	72%	71%	91%	57%
Unchanged	28%	29%	9%	43%
Base: 32	100%	100%	100%	100%

59. ARE YOU LIKELY TO INCREASE OR REDUCE YOUR TRANSFER BUDGET FOR 2021/22?

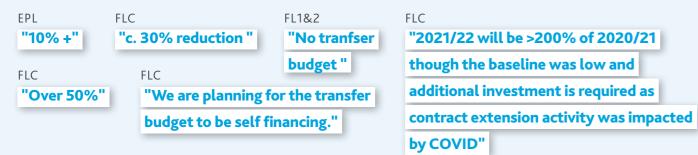
%	ALL LEAGUES	EPL	FLC	FL1&FL2
Increase	9%	14%	9%	7%
Reduce	38%	57%	36%	29%
No change	53%	29%	55%	64%
Bace: 32	100%	100%	100%	100%

Base: 32

60a. ARE YOU LIKELY TO INCREASE OR REDUCE YOUR TRANSFER BUDGET FOR 2020/21?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Increase	0%	0%	0%	0%
No change	63%	71%	55%	64%
Reduce	28%	29%	27%	29%
None of the above	9%	0%	18%	7%
Base: 32	100%	100%	100%	100%

60b. PLEASE QUANTIFY THE ABOVE CHANGE (+/- %)



61. IN TERMS OF SPEND, DO YOU INTEND TO BE A NET BUYER OR SELLER OF PLAYERS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Net buyer	34%	71%	36%	14%
Net seller	66%	29%	64%	86%
Base: 32	100%	100%	100%	100%

62. HOW DO YOU ANTICIPATE THAT YOUR PLAYER LOANS IN WILL CHANGE?

%	
Decrease	
Increase	
Stay the same	
Base: 32	

63. HOW DO YOU ANTICIPATE THAT YOUR PLAYER LOANS OUT WILL CHANGE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Decrease	19%	14%	27%	14%
Increase	28%	29%	36%	21%
Stay the same	53%	57%	36%	64%
Base: 32	100%	100%	100%	100%

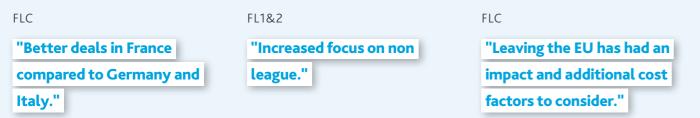
64a. HAS COVID-19 IMPACTED WHERE YOU EXPECT TO BUY PLAYERS FROM? (EG TARGETING DIFFERENT LEAGUES, COUNTRIES)

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	13%	0%	27%	7%
No	88%	100%	73%	93%
Base: 32	100%	100%	100%	100%

ALL LEAGUES	EPL	FLC	FL1&FL2
19%	0%	18%	29%
22%	29%	18%	21%
59%	71%	64%	50%
100%	100%	100%	100%

PLAYER TRANSFERS

64b. IF YES, PLEASE ELABORATE ON YOUR ANSWER ABOVE.



64c. IN RELATION TO THE ABOVE QUESTIONS IN THIS SECTION, WHAT ARE THE **KEY DRIVERS BEHIND YOUR EXPECTATIONS?**



66. IN WHAT OTHER WAYS HAVE YOUR STRATEGIC PRIORITIES CHANGED WITH RESPECT TO TRANSFERS AND PLAYER LOANS IN LIGHT OF COVID-19?

new players join the group."

FLC		FLC
"As noted above (60b and 64	lc) COVID 19 has made us prioritise	"COVID19 has reinforced
out of contract player transf	ers and the loan market and steer	our priorities, as opposed to
away from longer term play	er contracts."	changing them."
FL1&2	EPL	FL1&2
"Focus on greater	"More loans as it is harder	"No real changes."
development on younger	to find the funds for transfer	
players with a view for sellin	g fees."	FL1&2
on."		"There is a need to generate
		additional revenue via player
FL1&2		sales."
"They haven't, we have just	changed our processes on when	

65. DO YOU FEEL THAT THE CURRENT LEVELS OF PLAYER TRANSFER FEES ARE SUSTAINABLE FOR DOMESTIC FOOTBALL CLUBS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	34%	29%	45%	29%
No	66%	71%	55%	71%
Base: 32	100%	100%	100%	100%

ESG

67a. DOES YOUR CLUB HAVE AN ESG STRATEGY IN PLACE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	17%	43%	10%	8%
No	83%	57%	90%	92%
Base: 29	100%	100%	100%	100%

67b. IF YES, WHICH FRAMEWORKS IS THIS BASED UPON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Global Reporting Initiative (GRI)	33%	50%	0%	0%
Sustainability Accounting Standards Board (SASB)	17%	25%	0%	0%
UN Sustainable Development Goals (SDGs)	33%	0%	100%	100%
None	17%	25%	0%	0%
Base: 6	100%	100%	100%	100%

68. HAS YOUR CLUB JOINED THE UNITED NATIONS SPORTS FOR CLIMATE ACTION INITIATIVE?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	7%	14%	10%	0%
No	93%	86%	90%	100%
Base: 29	100%	100%	100%	100%

69. HAS YOUR CLUB IDENTIFIED ESG RISKS AND OPPORTUNITIES?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	38%	71%	40%	17%
No	62%	29%	60%	83%
Base: 29	100%	100%	100%	100%

70. IS ESG SPECIFICALLY CONSIDERED AS PART OF YOUR CLUBS WIDER DECISION MAKING?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	45%	86%	50%	17%
No	55%	14%	50%	83%
Base: 29	100%	100%	100%	100%

71. IS PERFORMANCE AGAINST ESG METRICS CONSIDERED AS PART OF PERFORMANCE APPRAISALS AND REMUNERATION REVIEWS FOR EXECUTIVE PAY?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	10%	29%	0%	8%
No	90%	71%	100%	92%
Base: 29	100%	100%	100%	100%

72. WHAT ARE YOUR BIGGEST ESG AREAS OF FOCUS FOR YOUR CLUB OVER THE NEXT TEN YEARS? (THIS CAN BE RANKED EITHER A 1,2 OR 3 PRIORITY)

	ALL LEAGUES	EPL	FLC	FL1 &FL2		ALL LEAGUES	EPL	FLC	FL1 &FL2
Understanding and raising awareness of ESG within your club	28	6	10	12	Embedding your ESG strategy within your club	28	6	10	12
1	9	2	2	5	1	4	2	2	12
2	3	_	- 1	2	2	5	2	_	3
3	1	1			3	4		2	2
4	3	1	2		4	3		1	2
5	3	1	1	1	5	4		2	2
6	1	1			6	1		1	
7	2		2		7	1			1
8	2		1	1	8	2	2		
9	1			1	10	1		1	
11	1		1		11	1		1	
14	2			2	12	1			1
					13	1			1

ESG

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Improving privacy and data security	28	6	10	12
1	1			1
3	1			1
4	2	1	1	
5	1		1	
6	3	1	2	
7	3		1	2
8	1			1
9	2	1		1
10	6	1	1	4
11	3		2	1
12	4	1	2	1
13	1	1		

	ALL LEAGUES	EPL	FLC	FL1 &FL2	
Increasing participation in women's football	28	6	10	12	
2	1			1	
3	1			1	i
4	2			2	
5	2		1	1	4
6	1		1		8
7	1	1			(
8	2		2		
9	2	1		1	
10	3	2		1	
11	7	2	2	3	
12	4		3	1	
13	2		1	1	

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Increasing biodiversity, within the club's infrastructure	28	6	10	10
			10	12
2	1	1		
4	1			1
6	6	1	1	4
7	2		1	1
8	7	2	4	1
9	2			2
10	3			3
11	3	1	2	
12	2	1	1	
13	1		1	
12	4	1	2	1

	ALL LEAGUES	EPL	FLC	FL1 &FL2
easing staff well g	28	6	10	12
	3	1	1	1
	4	1	2	1
	6	2	3	1
	2		1	1
	5			5
	4	1	2	1
	1		1	
	1			1
	1			1
	1	1		
	1 1 1	·		1

cr

ALL LEAGUES	EPL	FLC	FL1 &FL2
28	6	10	12
1			1
1			1
1			1
3	1	2	
1		1	
1			1
2	2		
4		2	2
12	3	4	5
2		1	1
	LEAGUES 28 28 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	LEAGUES EPL 28 6 1 - 1 - 1 - 3 1 1 - 1 - 28 28 4 - 12 3	LEAGUES EPL FLC 28 6 10 1 - - 1 - - 1 - - 1 - - 1 - - 1 - - 1 - 1 1 - 1 1 - - 1 - - 1 - - 1 - - 1 - - 1 - - 1 - - 1 - - 1 - - 2 2 2 4 - 2 12 3 4

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Meeting your ESG targets	28	6	10	12
1	1			1
4	4	1		3
5	4			4
6	3	1	2	
7	3		2	1
8	1	1		
9	4	1	3	
10	3	2	1	
11	3		1	2
13	2		1	1

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Increasing the equality, diversity and inclusion of your club	28	6	10	12
1	1			1
2	8	2	4	2
3	4	2	1	1
4	2	1	1	
5	2	1	1	
6	2			2
8	1			1
9	4			4
10	3		2	1
11	1		1	

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Planning for the effects of extreme weather affecting matches being				
played	28	6	10	12
3	1			1
7	4			4
8	2		1	1
9	5	1	3	1
10	5	1	2	2
11	2			2
12	4	3		1
13	4	1	3	
14	1		1	

ESG

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Reducing social media abuse	28	6	10	12
1	4		3	1
2	1		1	
4	4	2	2	
5	3	1	1	1
6	2			2
7	3	1	1	1
10	1		1	
11	1			1
12	6	1	1	4
13	2	1		1
14	1			1

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Setting ESG targets	28	6	10	12
1	2		1	1
2	1			1
3	4	1	1	2
4	2			2
5	5	3	2	
6	5		3	2
7	1	1		
8	2		2	
9	2	1	1	
11	1			1
12	1			1
13	1			1
14	1			1

1 2		ALL LEAGUES	EPL	FLC	FL1 &FL2
2	Reducing your clubs environmental impact i.e energy, water, waste	28	6	10	12
-	1	2	1	1	
	2	2		1	1
1	3	6		3	3
2	4	2		2	
1	5	3		1	2
	6	3	2		1
1	7	4	2	1	1
4	8	3	1		2
1	9	1			1
1	10	1		1	
	11	1			1

L1					
2		ALL LEAGUES	EPL	FLC	FL1
12		LEAGUES	EPL	FLC	&FL2
1	Other	28	6	10	12
1	1	1	0	0	1
2	2	1	0	1	0
2	3	0	0	0	0
	4	1	0	0	1
2	5	0	0	0	0
	6	0	0	0	0
	7	1	0	0	1
	8	0	0	0	0
1	9	0	0	0	0
1	10	0	0	0	0
1	11	1	1	0	0
1	12	2	0	1	1
	13	1	0	0	1
	14	20	5	8	7

73a. DO YOU HAVE SPECIFIC ESG TARGETS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	21%	29%	10%	25%
No	79%	71%	90%	75%
Base: 29	100%	100%	100%	100%

73b. IF YES, WHAT DO YOU FEEL ARE THE MAIN OBSTACLES TO ACHIEVING YOUR ESG TARGETS?

FLC	FL1&2
"Cost and current restrictions	"We have a large
limiting revenue generation."	never quite gets

74a. HAS YOUR CLUB SET A CARBON NEUTRAL TARGET?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	7%	14%	10%	0%
No	93%	86%	90%	100%
Base: 29	100%	100%	100%	100%
				0% 100%

74b. IF YES, WHAT IS YOUR TARGET (AND AS APPROPRIATE BY WHICH DATE)?

%	
Being set at next board meeting	

We are in the process of setting a carbon neutral target, but not yet set

75. DOES YOUR CLUB OFFSET ITS CARBON EMISSIONS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	17%	43%	20%	0%
No	83%	57%	80%	100%
Base: 29	100%	100%	100%	100%

ge of high priority projects which may mean this the attention it requires."

FLC	
FL10.2	FLC
FLI&Z	FL1&2

ESG

76a. DOES YOUR CLUB PUBLICALLY REPORT ON ESG RELATED MATTERS?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	43%	71%	70%	8%
No	57%	29%	30%	92%
Base: 30	100%	100%	100%	100%

76b. IF YES, WHICH OF THE FOLLOWING ARE REPORTED:

%	ALL LEAGUES	EPL	FLC	FL1&FL2
All apart from TCFD	8%	20%	0%	0%
Streamlined Energy and Carbon Reporting (SECR)	77%	80%	57%	200%
Equality, Diversity and Inclusion	46%	60%	43%	0%
Modern Slavery Act	46%	40%	57%	0%

Base: 13

77. DOES YOUR CLUB RECEIVE INDEPENDENT ASSURANCE ON THE INFORMATION THAT IS REPORTED?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	40%	71%	40%	23%
No	60%	29%	60%	77%
Base: 30	100%	100%	100%	100%

78. DOES YOUR SPONSORS OR TV COMPANIES REQUIRE YOU MEET ESG CRITERIA AS PART OF THE DEAL?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	3%	0%	0%	8%
Some do	3%	14%	0%	0%
No	93%	86%	100%	92%
Base: 30	100%	100%	100%	100%

79. WHAT SUPPORT DO YOU NEED FROM YOUR LEAGUE, TO MITIGATE THE RISKS POSED BY ESG?

FLC	FL1&2
"Additional support,	"Arrar
guidance in managing and	grants
monitoring ESG ."	suppo

EPL

"Any support woud be good."



WOMEN'S FOOTBALL

80a. DO YOU HAVE A PROFESSIONAL OR SEMI-PROFESSIONAL WOMEN'S TEAM?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	50%	100%	40%	31%
No	50%	0%	60%	69%
Base: 30	100%	100%	100%	100%

80b. IF YES, WHAT LEAGUE DO THEY PLAY IN?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Professional	7%	14%	0%	0%
Women's Championship	7%	0%	25%	0%
Women's National League Northern Premier Division	27%	0%	50%	50%
Women's National League Southen Premier Division	13%	14%	0%	25%
Women's Super League	40%	71%	25%	0%
Other	33%	0%	0%	125%

Base: 15

'IF OTHER, PLEASE SPECIFY:

EFL1	Womens National League South League One
EFL1	League below this is midlands league
EFL2	local nottingham division
EFL1	Women's National League Division One South East
EFL1	League below the above

81. IS THE WOMEN'S TEAM IN A SEPARATE LEGAL ENTITY TO THE MEN'S TEAM?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Yes	83%	100%	80%	75%
No	17%	0%	20%	25%
Base: 29	100%	100%	100%	100%

82. WHAT TYPE OF CONTRACTS ARE THE FEMALE PLAYERS ON?

%	ALL LEAGUES	EPL	FLC	FL1&FL2
Professional	28%	86%	20%	0%
Semi-professional	24%	14%	30%	25%
Other	48%	0%	50%	75%
Base: 29	100%	100%	100%	100%

83. IN RELATION TO THE WOMEN'S TEAM, OVER THE LAST 3 YEARS, HAVE THE FOLLOWING INCREASED, DECREASED OR STAYED THE SAME:

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Player costs				
All increased	3%	14%	0%	0%
Decreased	3%	0%	0%	8%
Increased	48%	86%	50%	25%
Stayed the same	45%	0%	50%	67%
Base 29	100%	100%	100%	100%
	ALL LEAGUES	EPL	FLC	FL1 &FL2
Attendances				
7%	0%	10%	8%	0%
46%	83%	40%	33%	8%
46%	17%	50%	58%	25%
	100%	100%	100%	100%
Base: 28				

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Media revenue				
Decreased	4%	0%	0%	8%
Increased	36%	100%	20%	17%
Stayed the same	61%	0%	80%	75%
Base: 28	100%	100%	100%	100%

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Sponsorship				
Decreased	4%	0%	0%	8%
Increased	54%	100%	40%	42%
Stayed the same	43%	0%	60%	50%
Base: 28	100%	100%	100%	100%

	ALL LEAGUES	EPL	FLC	FL1 &FL2
Ticket revenue				
Decreased	11%	17%	10%	8%
Increased	36%	67%	20%	33%
Stayed the same	54%	17%	70%	58%
Base: 28	100%	100%	100%	100%

FL1&2

FL1&2

WOMEN'S FOOTBALL

84. WHAT HAS BEEN THE BIGGEST CHANGE YOU HAVE NOTICED IN RELATION TO WOMEN'S FOOTBALL OVER THE LAST 5 YEARS?

EPL	FLC	FLC
"Formation of super	"Increase in spectators."	"Increased exposure across
league and introduction of		media outlets and interest
professionalism; increased	FLC	across our supporter base."
media awareness."	"The cost and the	
	external focus."	FL1&2
EPL		"More interest from fans."
"It has grown and profession	alised but income has not	FLC
increased to match costs ."		
		"Investment."

85. WHAT DO YOU SEE AS BEING THE BIGGEST CHANGE COMING TO WOMEN'S FOOTBALL OVER THE NEXT 5 YEARS?

FL1&2	EPL		
"Greater investment from	"Hopefully income will		
governing bodies."	increase as costs continue to		
FL1&2	increase."		
"Higher number of	FLC		
professional players	"Increase in sponsorship		
and increased levels of	to coincide with extended		
sponsorships."	broadcasting."		
FL1&2	FLC		
"There will be more interest	"Sustainability vs Equality		
and involvement."	Protecting the brand."		

FLC		
"The movement to a		
wider professional or semi		
professional structu	re	
throughout the pyramid.		

"More media coverage."

EPL

"More broadcast income."





	LEE CAU
	Partner
R)	Business
	+44 (0)73
	lee.cause



SIMON HALL Corporate Finance +44 (0)797 619 8836

~	HARRIE
60	Senior A
241	Business /
	+44 (0)75
14	harriet.ri

T RICHARDS Audit Manager Assurance 58 097 6569 ichards@bdo.co.uk

Senior Manager



MATT BROOKLAND +44 (0)203 219 4026 matt.brookland@bdo.co.uk



TOM KELLY Manager +44 (0)781 335 3623

KEY CONTRIBUTORS

AUSER

ess Restructuring 0)739 212 5468 user@bdo.co.uk



SHAWN HEALY Principal Employment Tax +44 (0)779 271 4954 shawn.healy@bdo.co.uk

DAVID ROGERS

Associate Director Forensic and Valuation Services +44 (0)775 278 0955 david.s.rogers@bdo.co.uk



LUKE LENEY **Associate Director** Corporate Finance +44 (0)779 424 3827 luke.leney@bdo.co.uk

TOBY ANKERS

Corporate Finance +44 (0)758 309 0086 toby.ankers@bdo.co.uk



DIGBY JACKSON Senior Manager Corporate Finance +44 (0)796 623 7369 digby.jackson@bdo.co.uk

Forensic and Valuation Services tom.kelly@bdo.co.uk

FOR MORE INFORMATION:

IAN CLAYDEN

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