



Modern Slavery Statement 2018

This statement has been published by The Gibson O'Neill Company Limited for and on behalf of itself and its group companies ("the Group") including Bulkhaul Ltd, Middlesbrough Football & Athletic Company (1986) Limited and Rockliffe Hall Limited in accordance with the Modern Slavery Act 2015. It sets out the progress made by the Group during the year ending 30 June 2017 to prevent modern slavery and human trafficking in its business and supply chains. We have a wide range of suppliers and commercial partners who operate in different industries and territories throughout the world.

WHAT IS MODERN SLAVERY?

Modern Slavery is a crime and a violation of fundamental human rights. Modern Slavery can take many forms including slavery, servitude, forced or compulsory labour and human trafficking. The underlying principle is the exploitation of a person or the coercion of a person to work against their will for the benefit of another.

OUR APPROACH TO MODERN DAY SLAVERY

As a Group we recognise the importance of maintaining vigilance to identify and address issues associated with Modern Slavery of any kind in our supply chains. We remain committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the same high standards from our contractors, suppliers and other business partners.

We continue to take a pragmatic approach and promote a zero tolerance of modern slavery in any form in our business or supply chains. Over the past year we have:

- reviewed and updated our contractual agreements and terms of business to include obligations on suppliers to comply with the Modern Slavery Act;
- communicated our zero-tolerance approach to existing suppliers and required them to sign written statements affirming that they do not endorse, enable or facilitate slavery or human trafficking of any kind within their business or within their own supply chain;
- communicated with key staff the importance of preventing Modern Slavery in our supply chains raising awareness and incorporating such due diligence checks into our procurement processes;
- embedded our Anti-Slavery Policy into the business including induction and training;



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- refused to work with suppliers who cannot commit to meeting the standards we expect; and
- we continue to consult and engage with key staff, best placed to advise on our supply chains, to conduct risk assessments to identify areas within our businesses most at risk, and to develop policies and procedures that are practical and effective in eliminating identified risks.

MONITORING EFFECTIVENESS

We continue as a Group to assess the effectiveness of our approach to Modern Slavery and to ensure ongoing improvement.

This statement is made pursuant to section 54 Modern Slavery Act 2015 and sets out the steps taken by the Group to prevent Modern Slavery and human trafficking in our businesses and supply chains.

This statement was approved by the Board of Directors of The Gibson O'Neill Company Limited on 4 January 2018.