



Modern Slavery Statement 2019

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 2018 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:

- included obligations on suppliers to comply with the Modern Slavery Act in our contractual agreements and terms of business;
- 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;
- reviewed, updated and communicated our Safeguarding Policy, Whistle Blowing Policy, Bullying & Harassment Policy and Equality and Diversity Policy;



- been committed to the development of programmes for ongoing training, awareness-raising events and activities aimed at promoting the eradication of discrimination within the Group and also within the region by using our elevated profile and status within the local community;
- proactively promote equal opportunities by treating people fairly and with respect; by recognising inequalities exist; by taking steps to address them; and by providing access and opportunities for all;
- 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 28 February 2019.