



Modern Slavery Statement 2020

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 Rackliffe 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 2019 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 by:

- having a clear framework of rules and behaviours and encourage the reporting of any concerns or breaches so that they can be dealt with appropriately in accordance with our policies and procedures;
- having a Recruitment and Selection Policy and checking that staff can demonstrate their eligibility to work in the UK before commencing work with us. In addition, we use a preferred supplier list to source temporary workers.
- including obligations on suppliers to comply with the Modern Slavery Act in our contractual agreements and terms of business and refusing to work with suppliers who cannot commit to meeting the standards we expect;
- communicating 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;



- conducting annual reviews, updates and communication of our Equal Opportunities Policy, Safeguarding Policy, Whistle Blowing Policy, Bullying & Harassment Policy and Equality and Diversity Statement of Commitment;
- committing to ongoing training promoting the eradication of discrimination within the Group and also within the region by using our elevated profile and status within the local community via initiatives such as the MFC Foundation Club Together Programme for refugees and asylum seekers;
- proactively promoting 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;
- continuing 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 28th January 2020.