

Modern Slavery Statement

About Us

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 steps taken by the Group during the year ending 30 June 2016 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

The Group understands and is alert to the risks of Modern Slavery and has a zero-tolerance approach to Modern Slavery of any kind in its business or supply chains. We are 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.

A pragmatic approach has been taken to address the issue of Modern Slavery during 2016. The Group has, and continues to:

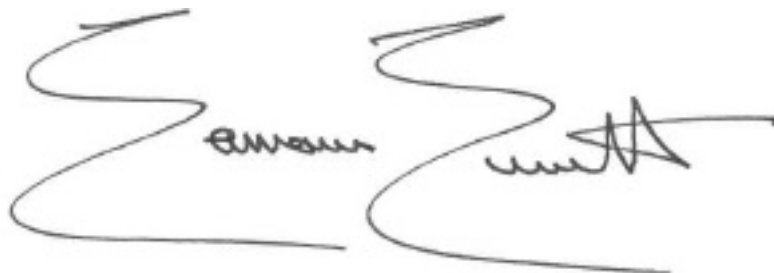
- conduct business in an ethical, socially and environmentally responsible manner. Our approach to Modern Slavery reflects this culture;
- consult and engage with key staff, best placed to advise on our supply chains, to conduct risk assessments to identify areas within our businesses most at risk, and to develop policies and procedures that are practical and effective in eliminating identified risks;
- prepared an Anti-Slavery Policy which will be communicated to new and existing suppliers and business partners. We expect our suppliers and business partners to comply at all times with our Anti-Slavery Policy and the Modern Slavery Act;
- insist on inclusion of contractual terms with suppliers and other partners obliging them to comply with the Modern Slavery Act and conduct due diligence on their own supply chain;
- train key staff throughout the Group to understand what Modern Slavery is and be vigilant to its existence and accountable for communicating the Anti-Slavery Policy within their department and reporting any concerns raised by their department;
- provide a reporting mechanism to raise concerns or questions and report any suspected breach of the Modern Slavery Act and enable employees to confidently and proactively support our zero-tolerance approach to Modern Slavery.

Monitoring Effectiveness

As a Group we understand the importance of assessing the effectiveness of our approach to Modern Slavery and to ensure ongoing improvement. We will continually review our policies and procedures and engage with and train employees across the Group to improve understanding and target areas within our businesses most at risk.

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 2017.

A handwritten signature in black ink, appearing to read 'Eamonn Elliott', with a stylized flourish at the end.

Eamonn Elliott, Rockliffe Hall's Chief Executive.