

MODERN DAY SLAVERY ACT 2015 POLICY/STATEMENT

POLICY STATEMENT

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to try and eliminate slavery and human-trafficking from our supply chains and any other part of the business.

We have an Anti-Slavery and Human Trafficking Policy, which sets out our zero-tolerance approach to modern slavery and our commitment to acting ethically in our business dealings and relationships.

Responsibility

Company Directors, HR Manager, Purchasing Manager, Production Managers and Supervisors have specific responsibilities for various aspects of the policy

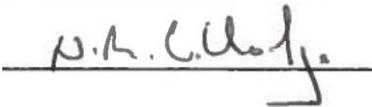
Policy Commitments

Vale Mill (Rochdale) Ltd shall:

1. Designate appropriate managers / supervisors to attend "Tackling Hidden Labour Exploitation" training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation, and know the signs to look for.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters & Labour Abuse Authority (GLAA) and police.
6. Provide information on tackling "Hidden Labour Exploitation" to our workforce through a variety of formats such as workplace posters, worker leaflets, induction, other training.
7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Name **Neil Colledge**

Position **Technical and Operations Director**

Signed  **Dated** **Dec 2017**