Modern Slavery Statement

Albany Products Ltd

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending [DATE].

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Organisational Structure

We are a supplier of major branded grocery and general supermarket products throughout the UK, Ireland, Portugal and other export destinations. Albany Products Ltd employs less than 30 staff in Rochdale and Portugal.

Our Supply Chains

Albany purchases stock from large recognised EU wholesale and retail trading organisations in the UK and Ireland along with agents of manufacturers and brand owners. All products purchased are fully traceable to the manufacturer and brand owner.

Albany uses Archbold Logistics in Heywood for the majority of ambient storage and distribution. Archbold is a privately owned business established in 1918. XPO Logistics are used for frozen and chilled storage and distribution.

Our policies on slavery and human trafficking

Albany Products Ltd is aware of its responsibilities towards customers, employees and the local community and expect all suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As the products traded by Albany are largely owned and produced by major global manufacturers Albany Products Ltd considers

itself to be at low risk of modern slavery. As part of our initiative to identify and mitigate risk we have in place systems to:

Identify and assess potential risk areas in our supply chains.

Mitigate the risk of slavery and human trafficking occurring in our supply chains.

Monitor potential risk areas in our supply chains.

Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we ask our suppliers to acknowledge our terms and conditions of contract contain a provision around good industry practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a

manner that is consistent with Albany Products Ltd anti-slavery policy.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff. We will also require our suppliers to provide training to their staff and suppliers and

providers.

We are also looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding

of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Our effectiveness in combating slavery and human trafficking

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place

within our business or supply chain if:

No reports are received from our staff, customers, the public or law enforcement agencies to indicate that modern slavery practices

have been identified.

Approval for this Statement

This statement will be presented for approval at Management Meeting on January 8 2019 and signed by a Director of

the Company.

NAME OF DIRECTOR

NIGEL HUNTER

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SIGNATURE OF DIRECTOR

Date: 8 January 2019