

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Modern Slavery and Human Trafficking Policy Statement

The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts to address the issues of modern slavery and human trafficking in their business and their supply chain. These disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support.

Global Associates will endeavor to ensure that slavery and human trafficking do not take place within our directly employed workforce, or within our supply chain.

Our recruitment processes are reviewed regularly and we communicate directly with candidates to discuss job opportunities and confirm the details of any offer made. We have robust procedures in place for vetting of new employees and ensuring they are able to confirm their identities and that they are paid directly into an appropriate personal bank account.

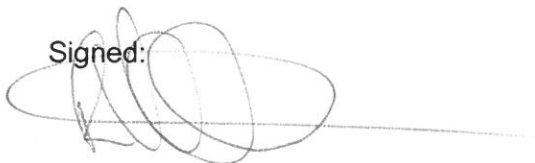
Global associates is committed to maintain and improve systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

We take steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. Our verification process involves an assessment of our suppliers, who are required to complete our pre-qualification process, including questions targeted at slavery and human trafficking risk. We use this questionnaire to determine the risk profile of suppliers for safety, environmental, quality, human rights (including slavery and human trafficking) and other supplier sustainability issues. We review supplier assessments and audits as part of our overall supply chain management process. These reviews help us identify compliance gaps and develop systemic solutions and improvements.

Our Chief Executive sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. This "top down" message approach enforces the importance of ethics and legal compliance with employees and senior managers and helps to create a compliant culture throughout our business. Compliance is monitored through management meetings, site visits and internal audits.

We seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. These principles are embodied in our policies related, but not limited to slavery, human trafficking, conflicts of interest, non-discrimination and anti-bribery and corruption and help to protect our company's reputation.

Signed:

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Chief Executive

Date: Dec 2016