

Policy Document

Supplier Code of Business Conduct

Rev 1 September 2024

Our purpose

To create a **healthier, safer, and more beautiful** world

Our mission

To be the market leader and trusted partner for clients.

Our values



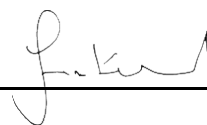
SUPPLIER CODE OF BUSINESS CONDUCT

Associated Group Policies:	<ul style="list-style-type: none"> • Anti Bribery • Competition Law • Data Protection • Privacy • Fraud • Business Ethics • Modern Slavery • Equality Diversity & Inclusion • Environmental Policy 	IMS Reference:	
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Introduction

At Nurture Group we pride ourselves on being a reputable and honest business and are committed to upholding high ethical and professional standards in everything we do, consistent with our company values.

We recognise the important relationship between Nurture Group and our suppliers in supporting our vision to be the UK's leading green service provider achieving Net Zero by 2035.

Our strategic suppliers are an extension of our own teams, allowing us to grow and succeed by supporting shared values, objectives, and goals.

As we work together on this journey, it is important that our suppliers also identify and are committed to meeting our expected standards & values, along with our 'pillars', which are to demonstrate Passion, Respect, Integrity, Diversity and Expertise (P.R.I.D.E).

These standards reflect the aspects of business conduct by which we would like to be treated, and so how we treat our supply partners.

This Supplier Code of Conduct covers third parties, consultants and contractors engaged to provide goods and services to or on behalf of Nurture Group and is a statement of our basic requirements rather than a maximum standard. We therefore ask our suppliers to adhere to our Supplier Code of Conduct and to promote our standards within the supply chain.

We expect our suppliers to have checks in place to support meeting these standards and to be able to provide supporting evidence if requested.

Nurture Group will seek appropriate assurance from suppliers that they comply with the Supplier Code of Conduct through our procurement tendering process, our sub-contractor onboarding process, and our supplier setup process.

We aim to periodically review (through audits and checks) the performance of our suppliers against this code, although the scope of review will be dependent on the nature and delivery of the service and may range from self-assessment through to independent audit.

For ease of reference, you can find the detailed policies referred to in this document by visiting our website at <https://www.nurture-group.co.uk/about/policies>.

1 Compliance with laws

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and provided to Nurture Group. This includes compliance with the International Labour Organisation (ILO) Core Conventions. It is the supplier's responsibility to maintain and enforce these standards within its own supply chain.

2 Human Rights

2.1 Child Labour

Suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services to Nurture Group. A child is any person under the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or in the absence of law under the minimum age for completed mandatory education.

Nurture Group does not tolerate slavery, servitude, human trafficking or any kind of forced, involuntary, bonded, indentured or child labour within our own business or in any of our supply chains.

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2.2 Modern Slavery

We expect our Suppliers to comply with the UK Modern Slavery Act 2015 and all other applicable anti-slavery laws, to ensure that they do not engage in any activity or behaviour that constitutes modern slavery, and to hold their own suppliers to the same standards.

Our Modern Slavery Statement can be found [here](#).

3 Employment Practices

3.1 Harassment and bullying

Nurture Group does not tolerate harassment, sexual harassment, bullying, discrimination or offensive behaviour of any kind, which includes the persistent demeaning of individuals through words or actions, and/or the display or distribution of offensive material, including online and social media. Nurture Group expects its suppliers to have relevant guidance and policies in place to prevent and deal with harassment and bullying in their own workplace(s).

3.2 Diversity and Inclusivity

Nurture Group recognise the benefits that diversity brings to our business and the wider world. We aim to promote diversity across race, gender, age and anything else that makes you who you are. We want to work with suppliers who also recognise the benefits of diversity, and we expect suppliers to provide working environments, practices and policies that are inclusive for everyone, adhering to the Equality Act 2010. This should include commitments to diversity and inclusion as well as equal opportunities across pay, working conditions, benefits, maternity/ paternity entitlement, pensions, recruitment, training and promotion. Inclusivity applies to all workers, whether migrant or otherwise.

4 Integrity

4.1 Competition law

Our business policy is to fully and unconditionally comply with the requirements of European and national competition law. We expect our suppliers to comply with applicable competition and antitrust laws. We also expect our suppliers to ensure that there is no exchange of competitively sensitive information between competitors, nor will they otherwise restrict competition in an illegal or unethical manner.

Suppliers must refrain from practices such as price-fixing, market sharing, bid-rigging, and other anti-competitive activities. We also expect our supply partners to implement appropriate training, checks, and balances to ensure colleagues understand and adhere to these laws. Suppliers should regularly review their compliance measures and conduct audits to ensure ongoing adherence to competition law.

4.2 Compliance with anti-corruption laws

Nurture Group takes a zero-tolerance approach to bribery and corruption. The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited.

Nurture complies with the UK Bribery Act 2010 and all other applicable anti-bribery and corruption law. Our Anti-Bribery & Corruption Policy sets out the expectations and responsibilities of our colleagues for the prevention, detection and reporting of bribery and corruption, and our procedures relating to offering and accepting gifts and hospitality where these are reasonable, proportionate and in the ordinary course of business.

A bribe is an inducement or reward offered, promised or provided to someone in business in order to gain a commercial, contractual, regulatory or personal advantage, usually to influence the recipient to act improperly. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.

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We expect our suppliers and their colleagues to comply with the UK Bribery Act 2010 and all other applicable anti-bribery and corruption laws. Suppliers should have procedures in place designed to prevent colleagues or persons associated with their business from committing offences of bribery or corruption. This includes conducting due diligence on third parties, maintaining accurate books and records, and providing regular anti-bribery training to colleagues.

4.3 Compliance with the Criminal Finances Act 2017

Nurture Group is committed to preventing tax evasion in all its forms. Under the Criminal Finances Act 2017, companies can be held criminally liable if they fail to prevent tax evasion by an associated person, including suppliers and contractors.

We expect our suppliers to comply with all applicable tax laws and to implement reasonable prevention procedures to ensure that their colleagues and associates do not engage in the facilitation of tax evasion. This includes conducting risk assessments, performing due diligence on business relationships, providing training on tax compliance, and monitoring adherence to these policies.

Suppliers must promptly report any suspected tax evasion or facilitation of tax evasion to Nurture Group and cooperate fully with any investigations. By adhering to these standards, our suppliers help us ensure a fair, transparent, and ethical business environment, reinforcing the trust and integrity that underpin our operations.

4.4 Fraud

Nurture Group is committed to preventing fraud in all its forms. Fraud is defined in the Fraud Act 2006 as wrongful or criminal deception intended to result in financial or personal gain. This includes, but is not limited to, false representation, failure to disclose information when there is a legal duty to do so, and abuse of position to gain an advantage or cause loss to another party.

We expect our suppliers to take a proactive stance against fraud, implementing robust internal controls to detect and prevent fraudulent activities. Suppliers should establish and maintain effective anti-fraud policies and procedures, conduct regular risk assessments, and ensure that their colleagues receive appropriate training on fraud detection and prevention.

Suppliers are required to promptly report any suspected fraud or fraudulent activity to Nurture Group and cooperate fully in any investigation of such matters. We encourage a culture of transparency and accountability, where colleagues feel empowered to report concerns without fear of retaliation.

4.5 Payments and gifts

Nurture Group recognises that exchanging gifts and hospitality are part of normal business, just as they are in ordinary life, and can build goodwill. However, diligence must be exercised in order for gifts not to be perceived as bribes.

We expect our supply partners to not provide any gift, meal, or entertainment to a company colleague in any situation in which it might influence or appear to influence any colleague decision in relation to themselves.

In the spirit of transparency, we also expect suppliers to tell us if they feel influenced or pressurised in turn through the acceptance of inappropriate gifts or hospitality.

Suppliers may offer modest gifts, meals, or entertainment to company colleagues providing they are not cash or cash equivalent, they are consistent with customary business practice and supplier company policy, they not frequent or expensive, and that they do not violate any law.

Nurture Group expects its supply partners to exercise similar judgment in their own supply chain.

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5 Health & Safety

5.1 Managing H&S and protecting colleagues, visitors & suppliers

Nurture Group are committed to protecting the health and safety of those that work for us and on our behalf wherever we do business. Suppliers must comply with all applicable health and safety laws and regulations in the countries in which they operate as well as those laws which apply in the locations where the relevant materials, goods and/or services are provided. Suppliers are expected to provide colleagues with a healthy and safe workplace, including access to clean, safe and reasonable working conditions. Suppliers must maintain records documenting workplace injury/illness, and safety training and implement procedures that encourage worker reporting.

Suppliers should regularly evaluate works machinery for damages and defects, use risk assessments when carrying out works, ensure adequate training is provided for their colleagues and sub-contractors, and generally foster a 'safety first' culture, in line with that of Nurture Group.

Suppliers are responsible for providing certificates to meet regulatory requirements.

With regard to a healthy working environment, suppliers' colleagues (in line with Nurture's colleagues), should have access to clean toilet facilities and drinking water. If suppliers provide a canteen, they must include sanitary food preparation, storage, and eating facilities in line with local laws and regulations. If Suppliers provide residential facilities for their workers, they must provide clean and safe accommodation equipped with fire alarms, hot water for bathing, adequate lighting, heat and ventilation, reasonable personal space and so on.

Suppliers of Nurture Group are also required to hold insurance cover set at a level appropriate to the goods / services they deliver.

5.2 Managing chemicals and disposal of waste

Nurture Group's aim is to become NET zero by 2030. One aspect of our emissions is waste.

Suppliers should make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.

Ideally, suppliers should provide waste reports in order to facilitate Nurture Group's scope 1,2 and 3 emissions monitoring. If suppliers cannot meet this standard, then they should explain what efforts they are making to reach it.

6 GDPR and sensitive information

6.1 Protecting sensitive information

The security of our intellectual property, data and systems is critical to our commercial success and we hold the Cyber Essentials Plus accreditation. We therefore need our suppliers to respect and safeguard our information by complying with applicable laws and regulations, having appropriate processes and governance in place and working with us to identify and mitigate risks.

Our expectations are that our supply partners will comply with local privacy and data protection laws to respect and protect the privacy and personal data of our viewers, customers, talent, contractors and colleagues.


Nurture conducts risk assessments on its suppliers, baselining using Cyber Essentials (in the case of data security) and using a DPA (Data Processing Agreement) for data privacy.

Nurture Group must be notified immediately if anything affects the confidentiality, integrity or availability of personal information (e.g. unlawful destruction, loss, alteration, unauthorised disclosure or access).

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Our suppliers also need to safeguard our confidential information, trade secrets and intellectual property from unauthorised access and misuse.

Where our suppliers have access to our data (including confidential information, trade secrets, and IP), they must safeguard it and have appropriate checks in place to ensure they maintain data due diligence. Ideally, suppliers will also have business continuity plans, to ensure that any business disruption because of a cyber-attack will not adversely affect the service to, or the data of, Nurture Group. 

7 ESG & Environmental criteria

Nurture Group places a significant emphasis on ensuring that its suppliers adhere to Environmental, Social, and Governance (ESG) and sustainable practices. Our supply chain should reflect our own commitment to achieve net zero by 2030.

As a supplier to the Nurture Group, you should be able to demonstrate your existing and planned strategies, policies and guidelines around your drive to carbon neutrality and ultimately net zero. In addition, you should be implementing policies around sustainable practice and biodiversity enhancement, protection and promotion

7.1 Environmental Management Systems

Suppliers should have an environmental policy that demonstrates a commitment to environmental responsibility.

They should demonstrate Continuous Improvement in their environmental performance through the implementation of an Environmental Management System (EMS) such as ISO 14001 or equivalent. Where this is not appropriate, suppliers should demonstrate that they are actively working towards reducing their carbon footprint as a minimum.

7.2 Resource efficiency

Suppliers should monitor and reduce energy consumption, utilising renewable energy sources where possible. They should also ensure the efficient use of water resources and the implementation of water-saving technologies where appropriate. Suppliers should actively reduce water pollution.

In addition, processes should be energy efficient, avoiding unnecessary waste, and waste itself should be correctly managed. For example, by using the 3 R principles of 'reuse, recycle, repurpose'.

7.3 Material usage

Suppliers should optimise material use and minimise waste through recycling and reusing materials. Best practice is to target recognised accreditations for sustainable materials such as FSC timber or recycled plastic.

Nurture Groups rigorous ESG and sustainability expectations for its suppliers reflect its dedication to creating a responsible and lasting ecosystem. By aligning our supply chain with these values, we not only enhance our sustainability performance but also contribute to broader environmental and sustainable goals, setting a benchmark for industry practices.

8 Monitoring and Auditing

The Procurement Director has responsibility for ensuring this procedure is implemented accordingly and monitored appropriately.

8.1 Compliance

Adherence to this Policy procedure is both an individual and a corporate responsibility. Wilful breach of this policy, or unauthorised departure from the Procedures derived from this Policy, may invoke the disciplinary procedure.

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9 Review and Improvement

The Procurement Director is responsible for reviewing this procedure, making any recommendations for improvement, and presenting these to the ELT for further consideration. Nurture reserves the right to amend or discontinue the Policy and any associated Procedures at any time.

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