

Policy Document

Modern Slavery and Human Trafficking Policy

Rev 2, September 2023

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



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Associated Group Policies:	Whistle Blowing Policy Colleague Handbook	IMS Reference:	IMSM07
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Rev 2	September 2023	Updated policy and procedure	Emma Thompson

	Author:	Owner:	Approver:
Name:	Emma Thompson	Sue Wishart	Gareth Kirkwood
Job Title:	HR BP	Chief People Officer	CEO

CEO Signature:

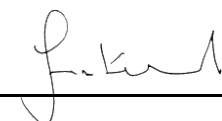


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Glossary of Terms

Term / Acronym	Definition / Meaning
Nurture	Nurture Group including Nurture Landscapes Limited, Gavin Jones Limited, Rokill Limited.
HSEQ Manager	Health, Safety & Quality Manager

1 Introduction

- 1.1. Anti-slavery policies were introduced by the government in the United Kingdom in 2015 under the Modern Slavery Act 2015. These policies were set out to ensure organisations supply chains are slavery free.
- 1.2. 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 to exploit them for personal or commercial gain.
- 1.3. Nurture is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015.
- 1.4. Nurture expects the same high standards from all its contractors, suppliers and other business partners, and as part of its contracting processes, Nurture includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and Nurture expect that its suppliers will hold their own suppliers to the same high standards.

2 Purpose

- 2.1. This policy reflects the organisations commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the organisations supply chains.

3 Scope

- 3.1. This policy applies to all colleagues, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, and interns.

4 Roles and Responsibilities

CPO

- 4.1. This policy applies to all colleagues, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, and interns.

Line Managers

- 4.2. Has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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Colleagues

- 4.3. All colleagues employed within the Nurture group are asked to familiarise themselves with the Modern Slavery policy at the start of their employment and are contractually obligated to adhere to the policy and attend training as and when required.

5 Communications

- 5.1. Nurture employs over 2,000 people, and as a company we ensure that our people are trained, supported, and safeguarded by the Nurture Group.
- 5.2. Policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training.
- 5.3. We have a Whistleblowing Policy, named Whistleblowing Officers and an independent Whistleblowing Helpline for whistleblowing concerns with Protect.
- 5.4. **Training and Awareness:**
 - Cross business training is led by a Learning and Development Team.
 - Modern Slavery and Whistleblowing are two of 10 mandatory courses completed within the first 90 days.
 - Modern Slavery is included in all new colleague inductions.
 - We deliver tailored business briefs for all frontline colleagues and subcontractors.
 - Full training needs analysis for all acquisitions with mandatory training completed during the transition.
 - All training and business briefs are reviewed annually, and refresher courses are issued for completion as necessary.
- 5.5. **Risk Assessment:**
 - Nurture's Operating Model (Direct Supply) means significantly less risk on Modern Slavery
 - Modern Slavery and RTW controls are well established within the Group with training and compliance embedded into our Operating Model
 - We have multiple points of scrutiny with any areas for improvement highlighted and supported by an improvement plan.
 - We always look to adopt best practice and will seek to develop partnerships with expert bodies in the fight against Modern Slavery

6 Supply Chain Compliance

- 6.1. All Nurture Group companies work to the same standards, framework and due diligence when choosing new suppliers.
- 6.2. Our suppliers complete a standardised "new supplier questionnaire" requesting documentation and evidence of their modern slavery policy.
- 6.3. We apply a risk-based approach to the onboarding of new subcontractors and suppliers.
- 6.4. We use reputable agencies for recruitment, any new agencies are approved by our central People Team.

7 Reporting a Modern Slavery Concern

- 7.1. Nurtures Modern Slavery and Human Trafficking Policy and Whistleblowing Policies are intended to provide guidance on how concerns can be communicated to the organisation.

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- 7.2. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 7.3. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

8 Monitoring and Auditing

- 8.1. The CPO has responsibility for ensuring this procedure is implemented accordingly and monitored appropriately.

9 Compliance

- 9.1. The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for Nurture or under our control. Colleagues are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 9.2. Adherence to this Policy 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.

10 Review and Improvement

- 10.1. The CPO is responsible for reviewing this procedure.
- 10.2. The Modern Slavery Statement and Policy will be reviewed annually in accordance with clause 6 of the Modern Slavery Act 2015 making any recommendations for improvement and presenting these to the ELT / CEO for further consideration.

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